State of Georgia

CDBG-MIT Action Plan

Georgia® Department of Community Affairs

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Revision History

Substantial Action Plan Amendment #1

Comment Period:

Submitted to HUD for approval:

Below is a summary of the key changes for Amendment 1. Note, all changes are not listed in this summary, however, all changes are accentuated in the Action Plan using the following formatting:

Additions: Font color red, underline
Deletions: ~~Font color red, strike-through text~~

Section	Sub-Section	Page Number	Description
Section 1	Executive Summary	4	Addition of Summary of 2018 MIT Allocation
Section 5	MID Areas	95	Zip-code Correction
Section 5	Expenditure Schedule	110	Updated schedule
Section 5	5.5: Award Selection	113	Addition of section outlining the 2017 MIT awards
Section 6	2018 CDBG-MIT	114	2018 Mitigation Allocation
Appendix C	Staffing	162-163	Updated Organizational Chart

1. Introduction

Executive Summary

2017 Mitigation Allocation

On February 9, 2018, Congress appropriated $26,961,000 in Community Development Block Grant Mitigation Funds to the State of Georgia in response to two tornadoes occurring in January 2017 (DR-4294 and DR-4297) and Hurricane Irma (DR-4338). These funds will be used for mitigation projects within the fifteen counties declared eligible for FEMA's Individual and Public Assistance (IA and PA). Federal Register Notice 84 FR 45838 governs the use of these funds. The Notice states,

> *"HUD seeks to support data-informed investments in high-impact projects that will reduce risks attributable to natural disasters, build the capacity of States and local governments to comprehensively analyze disaster risks, support the adoption of policies that reflect local and regional priorities that will have long-lasting effects on community risk reduction, and maximize the impact of available funds by encouraging leverage, private-public partnerships, and coordination with other Federal programs."*

2018 Mitigation Allocation

Under the 2019 Additional Supplemental Appropriations for Disaster Relief Act, the State of Georgia was allocated $2,669,000 to address the mitigation needs of communities impacted by Hurricane Michael in 2018 (DR-4400). Guidance provided by the Department of Housing and Urban Development (HUD) in Federal Register Notice 86 FR 561, released January 6, 2021, required the State of Georgia to prepare a substantial amendment to the original CBDG-MIT Action Plan, detailing the proposed use of the funds, which can be found in **Section 6** of this document. The substantial amendment details the conditions of the impacted regions, the mitigation needs of the communities, and the method of distribution. Lastly, any public comment, as well as other significant records, that were collected in the process of developing the amendment will be included in the appendices of this document.

Purpose

This Action Plan seeks to outline the long-term strategy to mitigate disaster risks and reduce future losses. The Action Plan defines how DCA plans to effectively use the available CDBG-MIT funding to support a data-driven mitigation effort based upon the needs of Georgia communities affected by the 2017 declared disasters. The Plan describes DCA's proposed allocation by program and lays out the design for each area of assistance, in addition to identifying the thresholds for mitigation activities, and performance and expenditure schedules.

This Action Plan considers and addresses critical mitigation needs over a large geographical area while maintaining as much local control as possible through several programs designed to create more resilient communities through improved infrastructure, building and land use policies and practices, and hazard mitigation planning. These programs will protect against losses of life and property.

The Plan includes:

1. The amount of assistance expected to be received and the geographical restrictions of the funds
2. An analysis of national and local data
3. The Method of Distribution detailing how the funds will be spent
4. An anticipated time schedule for spending the funds

Overview of Disasters

In 2017, it seemed that the State of Georgia could not catch a break from severe weather. Dual catastrophic weather events harassed southern Georgia with destructive rain, wind, and cyclonic activity. On January 2, 2017 (DR-4294) severe storms, tornadoes, and straight-line winds struck Dougherty and the surrounding counties. Then, on January 21, 2017 and January 22, 2017 (DR-4297), forty-one tornados touched-down across the State of Georgia as part of a weather event that spawned the third-most tornados over a three-day event in recorded US history. Twenty-seven tornados struck on January 21st alone, but the most dreadful effects were witnessed in Berrien, Brooks, Cook, Dougherty, and Thomas Counties on January 22nd. In these counties, fourteen people perished in the storms, and, less importantly, millions of dollars of property damage was reported during the immediate recovery efforts.

As if the tornadic weather were not enough, September brought another spate of severe weather to South Georgia. Hurricane Irma made landfall in Florida on September 10th. Over the next two days, Irma worked its way up the Florida coast and into Georgia (DR-4338). Once stationed over southern Georgia, Irma caused levels of damage and devastation not seen in this part of the state since 1994. A storm surge of more than four feet inundated the coast, and widespread flooding and power outages became the norm, not exceptions. In addition, fallen trees and windswept debris the area caused further damage to homes, buildings, and other infrastructure. The widespread nature of the damage resulted in millions of dollars in cleanup costs alone.

Tornados

The January tornados were not the more expensive of the two disasters in terms of dollars and cents, but on a human scale, few natural disasters in Georgia's history compare. A report from the Atlanta Journal Constitution six months after the storms noted that, while residents and volunteers have worked "daily" since the storm on repairs to their properties, work still remained to be done.

Additional damage from the tornados was observed in Albany, about 50 miles northwest of Adel, where an EF3 tornado killed five people. The Albany Herald reported on the one-year anniversary of the storm that "more than $1 billion in local damages" resulted from the storm. Buildings that housed homes and businesses existed on a Friday, but by the time Monday came they were no more. Residents noted that it was the worst tornado to hit Albany in almost 80 years, since a February tornado in 1940 before the start of World War II, killed three and injured hundreds.

Hurricane Irma

While Hurricane Irma did not make a direct landfall on Georgia's coast, one could barely take solace in this fact based on the damage witnessed in the aftermath of the storm. Georgia's barrier islands, often referred to as the Golden Isles, saw massive amounts of erosion. Jekyll Island's famed "Driftwood Beach," so-called because of the beautiful collection of driftwood that collects each day and has inspired artists and poets alike for generations, saw all of the loose driftwood washed out to sea and many of the smaller trees obliterated. The scenic trees of Savannah and Saint Simons Island may be beautiful southern backdrops, but after their rain-soaked roots were pressured for hours by high winds, they became living nightmares for both residents and debris removal crews when their limbs and trunks littered the ground.

The short-term tasks of cleanup and the long-term damage to landscape aside, many communities experienced impacts from Irma that were not as easily foreseeable. The Georgia coast is as known for its mosquitos as it is for its beaches, and a number of communities were forced to conduct additional spraying rounds for the pestilent population. Under normal conditions, places like Glynn County are able to quickly and consistently keep standing water environments at a minimum. Irma changed the equation with the large rainfall totals and prioritization of other recovery activities over these regular patrols. They were forced to ramp-up operations in quick succession in order to meet FEMA's reimbursement deadlines. While some were able to do this effectively, many were unable to conduct all of the recovery operations needed in the few months immediately following the disaster.

All of the communities mentioned above experienced loss of life and major property damage; these places and their struggles were featured on local, state, and national news articles in the aftermath of the storms. The death and destruction, though, were not all that was wrought by the storms. Millions of dollars in damage were reported through the numerous FEMA funding announcements after the storms, but not everyone was in a position to submit the applications and required documentation to benefit from these opportunities. In fact, it took months for many people to truly understand the nature of their recovery needs. An analysis of these needs are discussed in Section 5: Unmet Needs.

Local governments also dealt with these same issues. Georgia has a high percentage of local governments with populations under 1000, this is especially true in South Georgia. Many of these cities are only staffed by part-time employees; the weeks and months following the storms were full of clearing roads, helping elderly citizens with their debris cleanup, flushing water lines, repairing lift stations, issuing boil-water advisories, patching potholes, shoring-up storm drains, and a myriad of other tasks that cities and counties with more robust budgets and staffs would be able to do in a matter of days. Those cities that do have

larger staffs and budgets are still experiencing outsized problems and costs to match. Chatham and Glynn Counties, home to the cities of Savannah and Brunswick, respectively, both saw the full impacts of the four foot storm surge. Roads were washed out, parks were flooded, homes were flooded, and commercial areas damaged, some buildings beyond repair.

Counties Eligible for CDBG-MIT Assistance

Counties that were declared eligible for FEMA's Individual Assistance (IA) and Public Assistance (PA) for the 2017 Presidentially Declared Disasters are eligible for Mitigation funds. These counties include: Berrien, Camden, Charlton, Chatham, Coffee, Cook, Crisp, Dougherty, Glynn, Liberty, McIntosh, Thomas, Turner, Wilcox, and Worth.

Outreach Efforts

Initial Meetings with State and Local Officials

DCA held two preliminary meetings with state and local agencies and representatives from the storm-impacted areas. Before holding these two meetings, DCA collaborated with GEMA through a conference call with all EMA Directors in the impacted counties. The EMA directors were made aware of the topics of discussion on the call prior to the in person meetings. DCA held one meeting along the Coast and the other in Southwest Georgia where regional planning commissions, the Georgia Department of Natural Resources, and the Georgia Emergency Management and Homeland Security Agency were in attendance.

- October 9, 2019 in Darien, GA (25 attendees representing 17 communities/ organizations)
- October 10, 2019 in Tifton, GA (37 attendees representing 22 communities/ organizations)

Coast – 10-9-19

Southern Georgia – 10-10-19

Southern Georgia – 10-10-19

Georgia Emergency Management and Homeland Security Agency (GEMA/HS) Consultation

DCA consulted with GEMA/HS on multiple occasions to discuss the state's vulnerabilities and mitigation needs. Additionally, during the CDBG-MIT Action Plan development phase, DCA continually conversed with GEMA/HS via email, in-person meetings, phone, and conference calls. Below summarizes some of these meetings:

1. (9/3/2019) Initial discussion with Alan Sloan, Hazard Mitigation Planning Program Manager, at Georgia Emergency Management and Homeland Security Agency (GEMHSA)
2. (9/3/2019) After the phone call, GEMA emailed a shared folder to DCA with GEMA's Hazard Mitigation Resources.
3. (9/4/2019) Mr. Sloan shared the updated Hazard Mitigation Plans for the 15 disaster impacted counties.
4. (9/5/2019) DCA was given access to the GIS database containing project information called GMIS.
5. (9/12/2019) DCA's Deputy Commissioner Rusty Haygood contacted Catherine Howden, Chief Of Staff at Georgia Emergency Management and Homeland Security Agency to discuss inter-agency collaboration.
6. (9/19/2019) Collaborative meeting with GEMA
    a. In attendance were:
        i. Joey Green, GEMA General Counsel
        ii. Joseph Sousa, DCA
        iii. Charlie Dawson, GEMA
        iv. Homer Brison, GEMA
        v. Crystal Gaillard, DCA
        vi. Terry Lunn, GEMA SHMO
        vii. Susan Miller, DCA
        viii. Stella Kim, DCA
7. (10/2/2019) Meeting with DCA's Technical Assistance provider, DCA, GEMA to discuss CDBG-MIT Pre-Applications.
8. (10/7/2019) Conference Call with GEMA and 15 Impacted County EMA Directors.
9. (10/9/2019) Public Outreach with Local communities and GEMA SHMO.
10. (10/10/2019) Public Outreach with Local communities and GEMA SHMO.
11. (10/23/2019) State Hazard Mitigation Plan 1st Annual Update Meeting
12. (10-24) – (11-15) Consultation on Mitigation Pre-Application

Public Hearings

The requirements for CDBG-MIT grantees mandate a specific number of public hearings in the HUD-identified Most Impacted and Distressed (MID) areas; Georgia's requirement is two (2) public hearings. One of these hearings must be held during action plan development, prior to publishing the draft action plan for public comment. Georgia held six (6) public hearings during the action plan development stage,

at two (2) different locations. All public hearing locations were held in facilities that are physically accessible to persons with disabilities and in compliance with civil rights requirements. Individuals requesting reasonable accommodation, hearing impairment assistance, or language access assistance were asked to contact DCA @ fairhousing@dca.ga.gov by January 22, 2020.

DCA held public hearings in two locations prior to the posting of the action plan in order to gain public input regarding the use of CDBG-MIT funds. As seen in the table below, the hearings occurred at different locations to ensure geographic balance and maximum accessibility. The meeting held on January 30, 2020 in Kingsland, GA (Zip Code 31548) satisfies the requirement of holding a hearing in a MID zip code. Documentation from the Public Hearings is located in Appendix A.

Table 1.1: Public Hearing Schedule

Date	Location	Time
January 29, 2020	Dougherty County Government Center 222 Pine Avenue Albany, GA 31701	4:00PM 5:15PM 6:30PM
January 30, 2020	College of Coastal Georgia 8001 Lakes Boulevard Kingsland, GA 31548	4:00PM 5:15PM 6:30PM

Additional public hearings will be held after publication of the Action Plan. Specifically, a hearing will be scheduled in the MID Zip Code 31705.

Public Hearings and Public Comment Period

The draft action plan will be posted to DCA's public website for a 45-day review period beginning February 20, 2020. In addition, DCA and/or MID area local governments will notify affected citizens through electronic mailings, press releases on websites, and/or social media. A summary of all comments received, and responses provided will be included in the appendices of the final action plan submitted to HUD for approval. The HUD-approved action plan will be posted to DCA's public website, in English and Spanish.

CDBG-MIT Pre-Application - Mitigation input from Local Governments

DCA seeks to understand the needs of the communities impacted by Hurricane Irma and the January 2017 tornadoes in order to best allocate CDBG-MIT funding. DCA created a Pre-Application and posted it to the DCA website on November 15, 2019. Each community in the fifteen eligible counties was invited to submit up to three pre-applications. The deadline for Pre-Applications was January 15, 2020. These pre-applications outlined which hazards would be mitigated by the projects and the type of proposed activity including the needs to be addressed as well as a description of the activities to be undertaken.

Pre-Application Informational Webinars

DCA hosted two Webinars outlining the Pre-application submission process for impacted communities. The webinars were open to the public and links were provided on the CDBG-MIT page of the DCA website.

The webinars were recorded and published on DCA's CDBG-MIT webpage. Table 1.2 details webinar attendance and participation.

Table 1.2: Pre-Application Webinar Attendance

Date	# of Registrants	# of Attendees	# of Questions Asked by Attendees
December 4, 2019 | 3:00PM	39	31	7
December 12, 2019 | 10:00AM	42	30	4

The webinars introduced the CDBG-MIT program and reviewed Frequently Asked Questions (FAQs) regarding the CDBG-MIT program. Participants were also provided the opportunity to ask questions related to the submission of Mitigation Pre-Applications.

2. Mitigation Needs Assessment: State Plan

The State of Georgia has unique geography and topography. With farmland across the south, a southeastern coastline, and mountains in the northern part of the state, Georgia experiences weather ranging from tornadoes to winter storms to hurricanes - sometimes in the same season. This section will show the top hazards affecting Georgia as a whole, patterns of weather and historical data, the counties that are most vulnerable, and why it is important for our state to mitigate against future disasters. The Georgia Emergency Management Agency (GEMA) created the Georgia Hazard Mitigation Strategy (GHMS), which is updated every five years. Every time the State of Georgia experiences a disaster, GEMA is the frontline of support. DCA works alongside GEMA to identify the damage immediately following the storm. DCA also consults with GEMA in determining unmet needs after FEMA, SBA, and insurance support have been provided. The information provided below comes primarily from GEMA, as they are the agency responsible for compiling each individual county's five year Hazard Mitigation Plan and creating the GHMS from the information contained within.

Local Hazards Identified in State Plan

Table 2.1: Hazards 2013 and 2017 Source: Page 21 of Chapter 2 of GHMS		
Hazard Type	**% of Counties Identifying in 2013**	**% of Counties Identifying in 2017**
Inland Flooding	98%	99%
Tornadoes	98%	99%
Drought	90%	90%
Severe Winter Storms	81%	79%
Wind	80%	73%
Wildfire	79%	82%
Tropical Cyclonic Events (Hurricane Wind)	60%	55%
Severe Weather	68%	73%
Hailstorm (Severe Weather)	64%	61%
Lightning (Severe Weather)	63%	58%
Dam Failure	32%	36%
Heat	22%	28%
Earthquake	21%	27%
Coastal Flooding	6%	6%
Sinkhole	3%	3%
Landslide	1%	4%

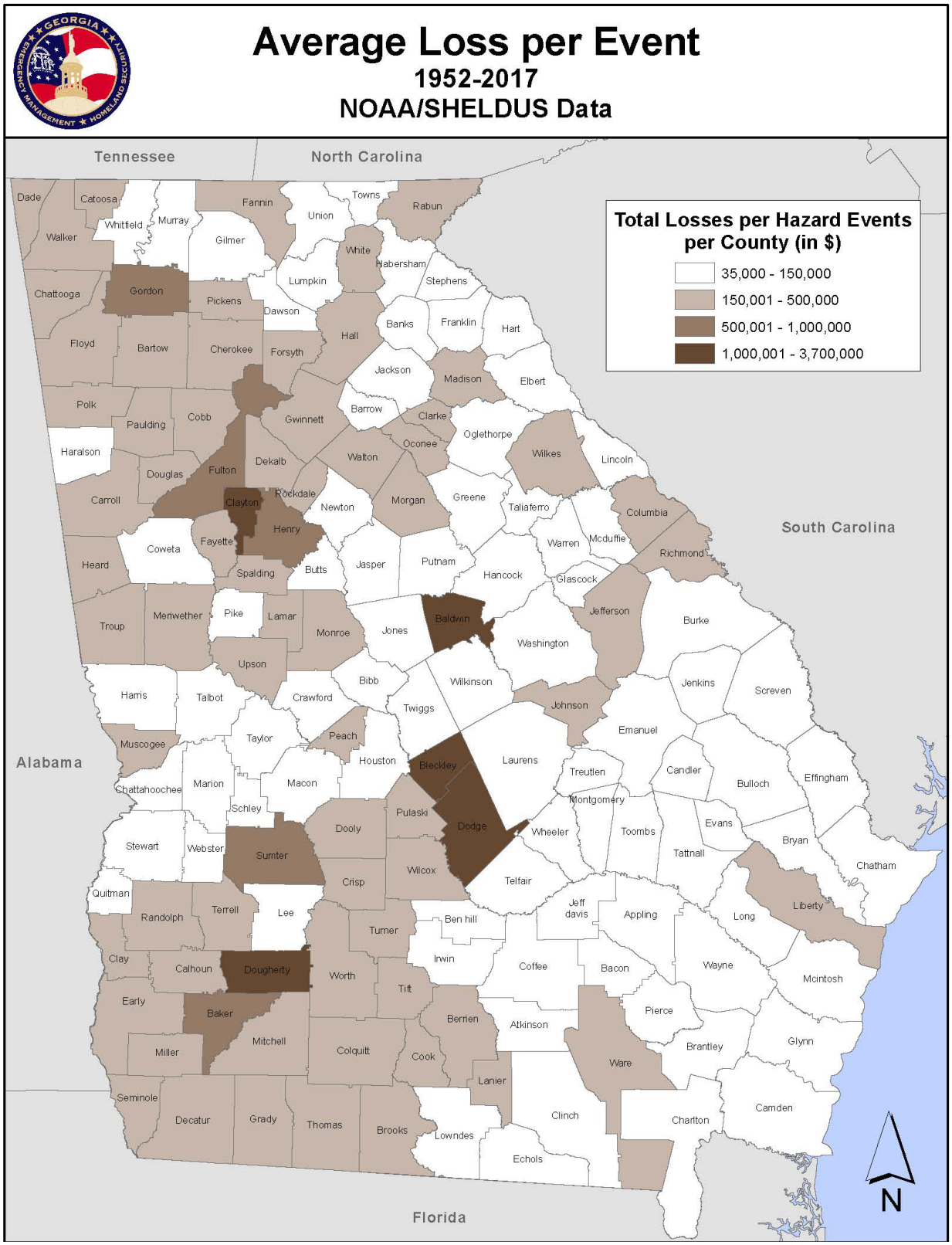
As seen in the table 2.1, five hazards were addressed in over 75% of local Hazard Mitigation Plans in 2017. The top five hazards Georgia counties are preparing for are Inland Flooding, Tornadoes, Drought, Wildfire and Severe Winter Storms. Ninety-nine percent of all counties addressed inland flooding and tornadoes. This data shows the counties are already considering plans on mitigating these hazards due to Georgia's unique geography and topography. Until recently, Georgia has not been impacted as much as the neighboring states by hurricanes. This is likely due to Georgia having a relatively small amount of coastline. Hurricanes and inland flooding may be underrepresented due to this reason as well as the small amount of counties that are directly on the coast.

Table 2.2 shows the lack of change in the hazards identified in the state plan between 2014 and 2019. This means the state is continuing to experience and prepare for the same types of hazards. Mitigating against these hazards will have long-term positive effects.

Table 2.2: Changes in Hazards from 2014 to 2019 State Plan

2014 Hazards	2019 Hazards
Hurricane Wind	Hurricane Wind
Coastal Hazards	Coastal Hazards
Wind	Wind
Severe Weather	Severe Weather
Tornadoes	Tornadoes
Inland Flooding	Inland Flooding
Severe Winter Weather	Severe Winter Weather
Drought	Drought
Wildfire	Wildfire
Earthquake	Earthquake
Geologic Hazards	Geologic Hazards
Dam Failures	Dam Failures
	Extreme Heat

Figure 2.3: Average Loss per Event



Within the impacted area, the following data shows the average losses per event. The losses for Camden, Charlton, Chatham, Coffee, Glynn, and McIntosh counties are between $35,000-150,000. The majority of counties within the impacted area averaged between $150,001 and $500,000. These include: Berrien, Cook, Crisp, Liberty, Thomas, Turner, Wilcox, and Worth. Finally, data shows Dougherty County sustained between $1,000,001 and $3,700,000 as the average loss per event.

Figure 2.4: Hazard Induced Losses

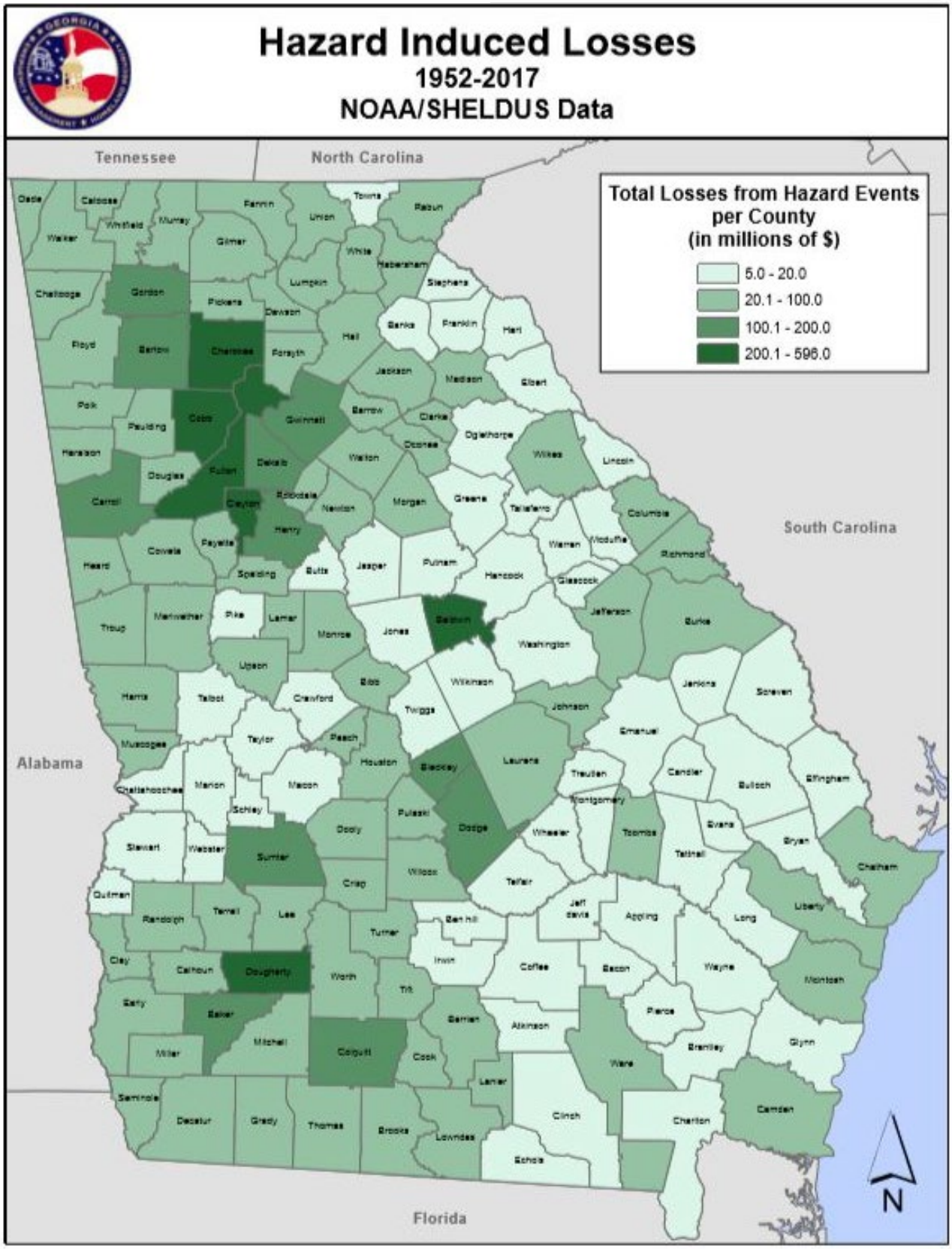


Figure 2.4 uses NOAA and SHELDUS data to display hazard induced losses. The losses for Charlton, Coffee, and Glynn County are between $5M-$20M. The majority of counties within the impacted area suffered losses between $20M and $100M. These include the following counties: Berrien, Camden, Chatham, Cook, Crisp, Liberty, McIntosh, Thomas, Turner, Wilcox, and Worth. Finally, data shows Dougherty County sustained between $200M and $596M of hazard induced losses.

Figure 2.5: Total Hazard Events From 1952-2017

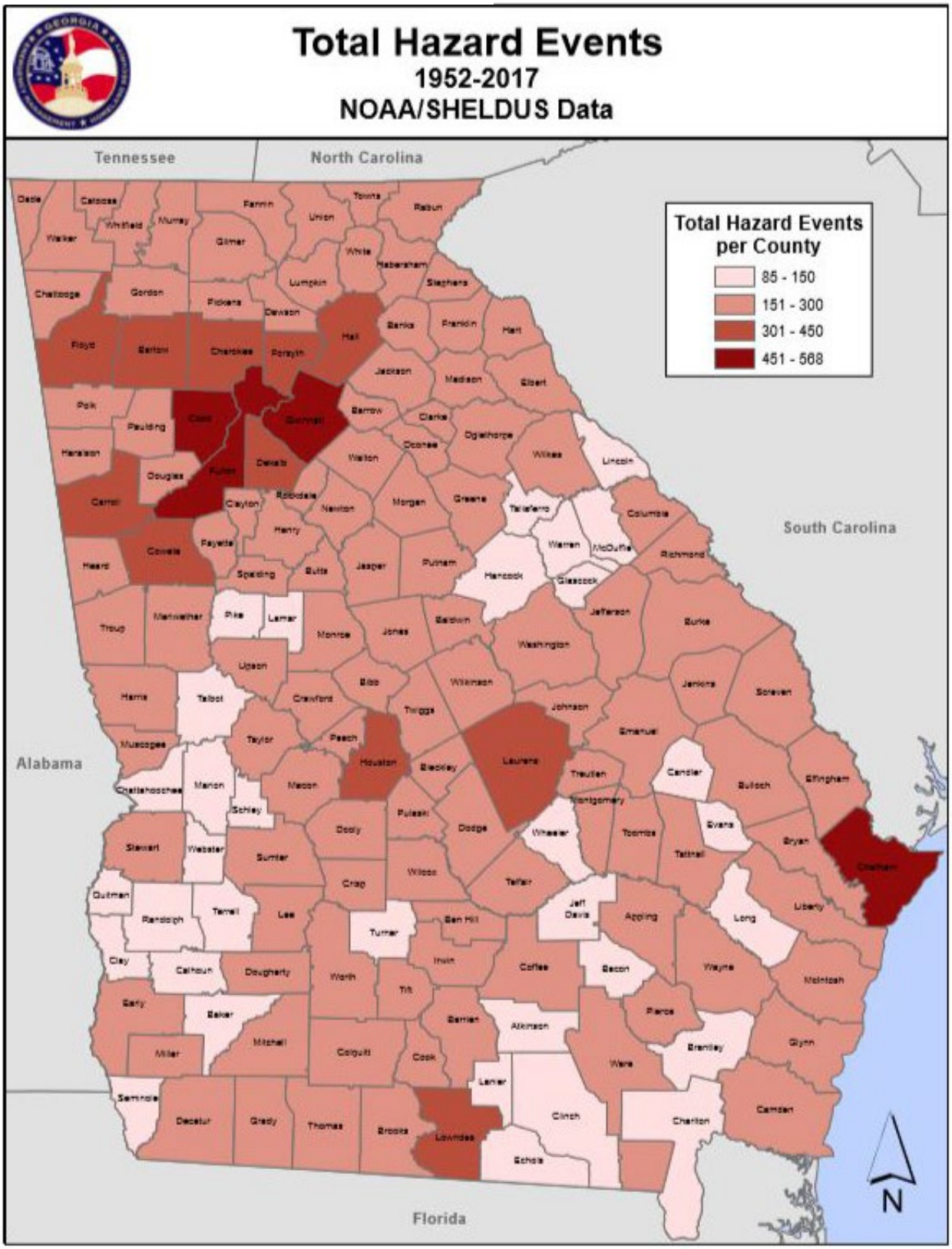


Figure 2.5 illustrates the total of all hazard events that occurred within the state from 1952 to 2017, based on SHELDUS data. Within the impacted area, the following data shows the total hazard events by county. The hazard events for Charlton and Turner counties are between 85 and 150. The majority of counties within the impacted area averaged between 151 and 300. These include: Berrien, Camden, Coffee, Cook, Crisp, Dougherty, Glynn, Liberty, McIntosh, Thomas, Wilcox, and Worth. Finally, data shows Chatham County sustained between 451 and 568 hazard events between 1952 and 2017.

Figure 2.6:

NOAA HAZARD EVENTS PERCENTAGE

1957–2016

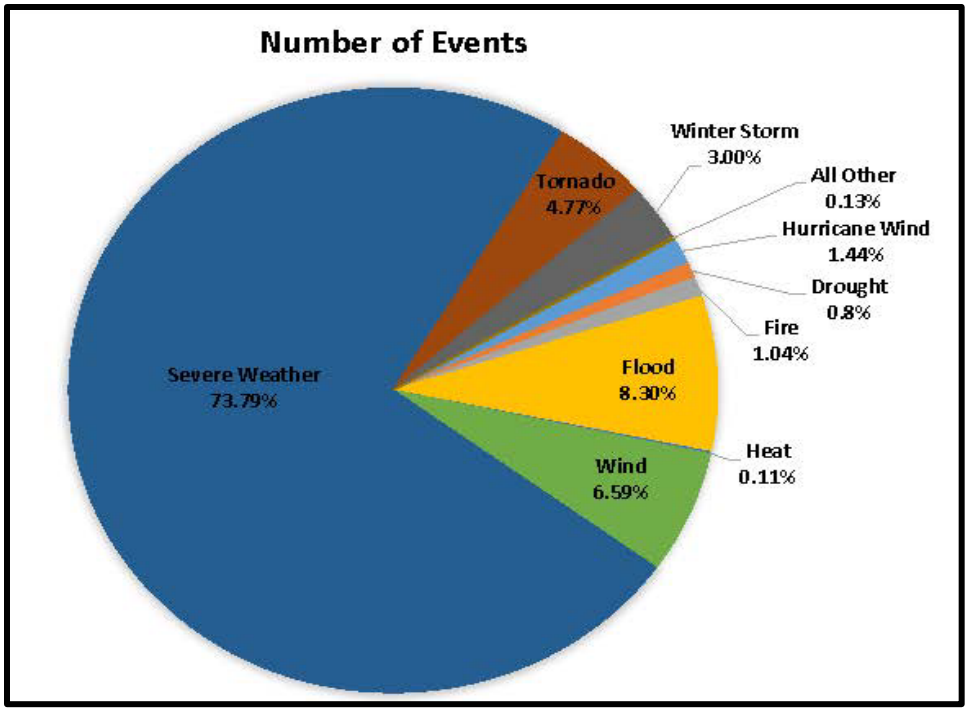
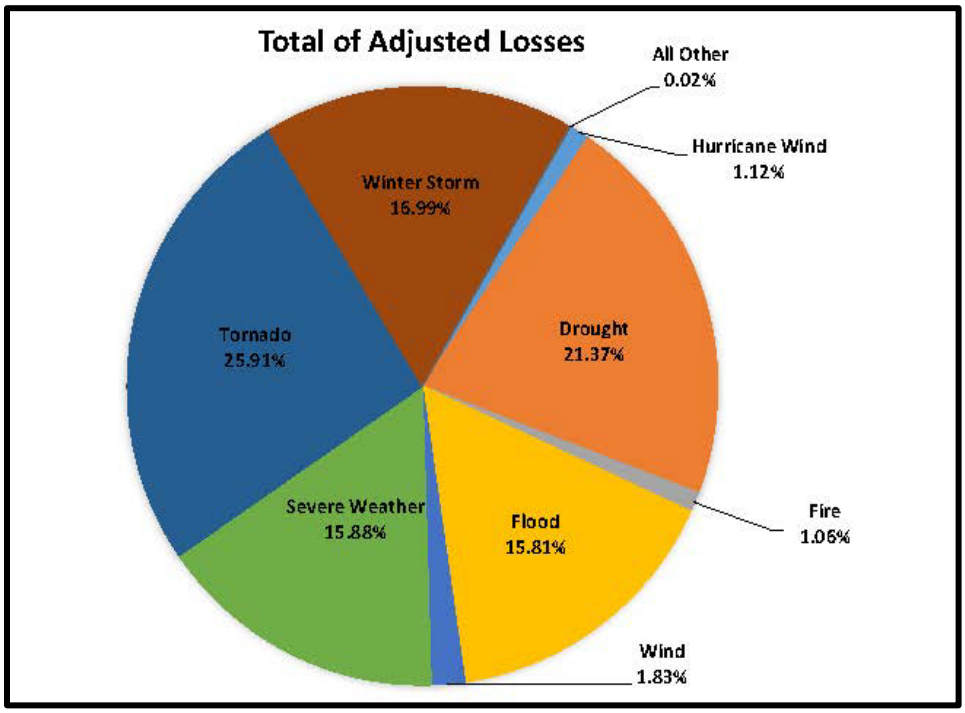


Figure 2.6 (above) illustrates the distributions and the number of events of each hazard type, based on data from NCEI between 1997 and 2016. By far, Severe Weather (thunderstorm, lightning, hail) is the most frequent hazard event that occurs in Georgia. Figure 2.7 (below) illustrates total losses by hazard. Tornadic and Drought events created the highest dollar losses in Georgia. These events made up 25.91% and 21.37% of total adjusted losses, respectively. Following closely behind, winter storms and severe weather made up 15.99% and 15.88% of the total adjusted losses.

Figure 2.7:

SHELDUS Adjusted Loss Percentage by Hazard

1992–2012



Social Vulnerability Index (SOVI)

SOVI data is used by a wide variety of professionals including: scientists, geographers, planners, and politicians. SOVI data is important to these groups, because it shows social vulnerability within every county of the state. It is vital for DCA's CDBG-MIT Program, because it highlights where in the fifteen declared counties mitigation efforts are most needed. Areas with higher social vulnerability are less likely to fully recover after a disaster, and most certainly do not have the resources to undertake mitigation measures.

TABLE 2.8: VARIABLES INCLUDED IN THE SOCIAL VULNERABILITY INDEX (SOVI) ANALYSIS SOURCE: PAGES 99-107, CHAPTER 2 OF GHMS	
Hospitals per capita	Per Capita Income
Median age	People per household
Service industry employment	Percent Households earning over $200,000
Percent Households on Social Security	Percent Poverty
Extractive industry employment	Median House Value
Percent Native American population	Percent Renters
Percent Asian population	Median Gross Rent
Percent Black population	Percent Female headed households
Percent Hispanic population	Percent Mobile Homes
Percent population under 5 or over 65	Percent population less than 12th grade education
Nursing Home Residents per capita	Female labor force participation
Percent population without health insurance	Population speaking English as a second language with limited proficiency
Percent female population	Population Households with no car
Percent civilians unemployed	Percent Unoccupied Housing units

SOVI data is compiled and processed by the Hazards and Vulnerability Research Institute at the University of South Carolina. The variables in Table 2.8 are grouped together into eight similar components. Each component is assigned a positive or negative cardinality, based on its anticipated impact on the social vulnerability of the area. The lower the SOVI score, the more capable the community is to recover from disasters. Therefore, the components that research suggests would improve a community's capability to recover are given a negative cardinality. For example, research suggests more affluent communities tend to be more resilient, or better able to recover. Therefore, the wealth component is given a negative cardinality because it would lower the SOVI score meaning the community is more resilient to disasters. The Figure 2.9 shows the components and their cardinality (i.e. whether they have a positive or negative effect on the SOVI score). The SOVI variables listed in the table explain 78% of the variance in the data.

Figure 2.9: Social Vulnerability Index by County

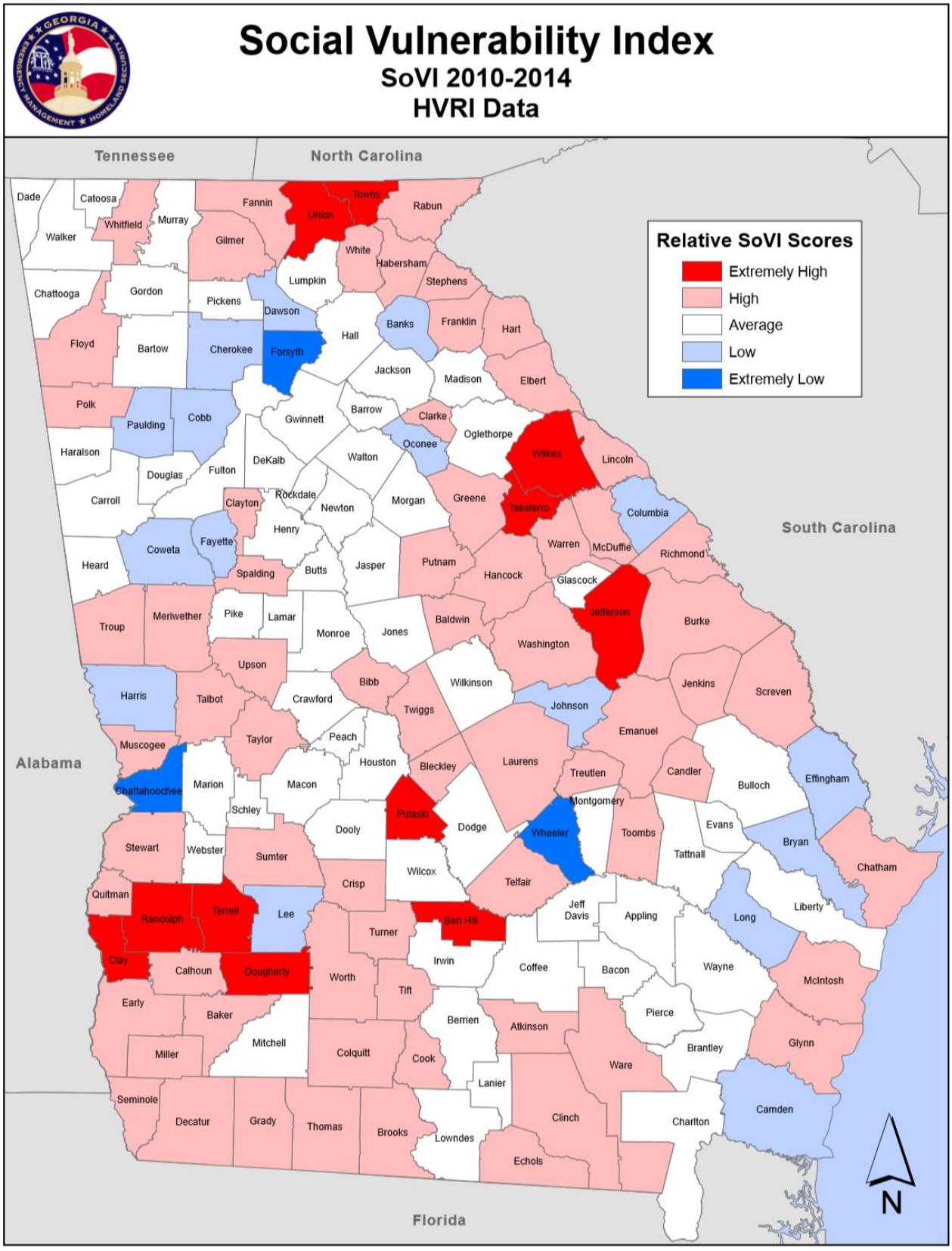


Figure 2.10: Average Hazard Score by County

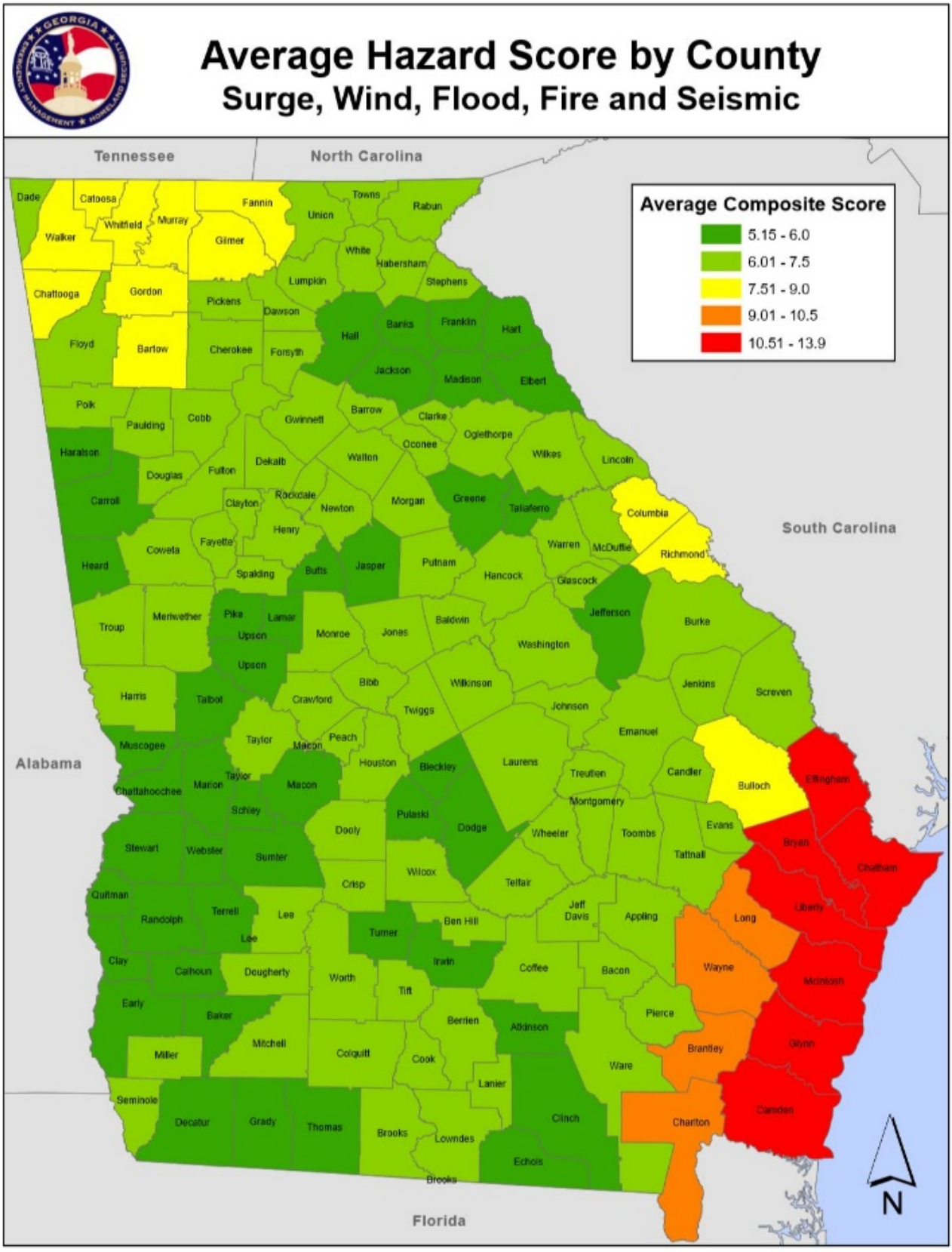


Figure 2.11: Composite Hazard Scores for Georgia

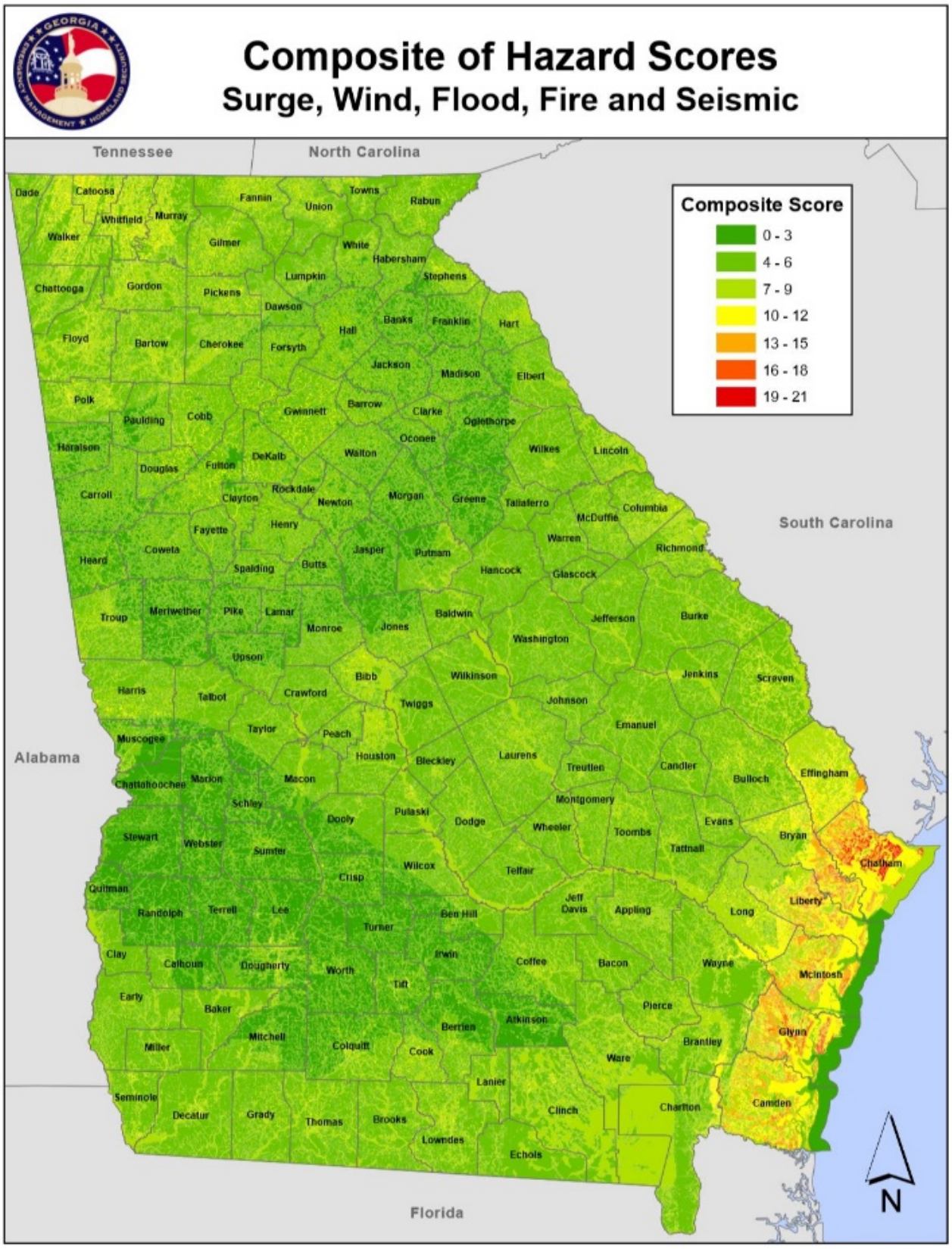
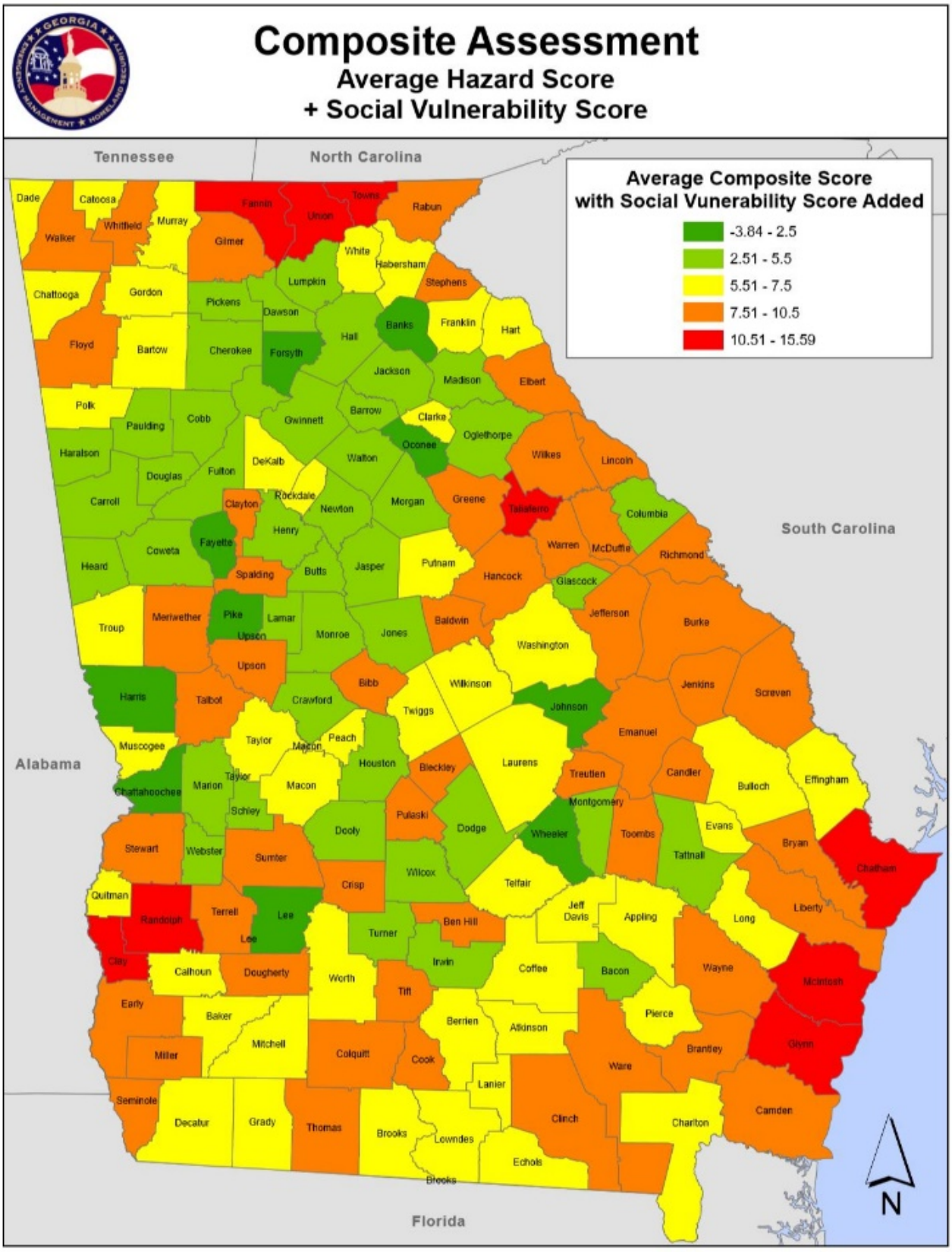


Figure 2.12: Combined Hazard Score and Social Vulnerability Index Scores



By combining the hazard scores with the vulnerability score, an estimate of total risk is calculated for each county. Figure 2.12 combines the average hazard score with the SOVI score for each county. These scores are categorized into five groups. The red and orange shading indicates the most at-risk and vulnerable counties within the State of Georgia, and the green counties are the least at-risk and vulnerable. **(Page 99-107 of GHMS, Chapter 2).**

Combined Hazard Risk and Social Vulnerability Index Score, Changes to Total Score

Adding social vulnerability to the hazard scores changes the risk for several counties, and Figure 2.13 highlights those counties with significant changes. Some counties with less risk have a higher combined score due to high SOVI scores.

Specifically, counties showing significant increases after Social Vulnerability is added in are many of the same counties with high or extremely high SOVI scores. Likewise, counties showing a significant reduction after SOVI is added in are many of the same counties with a low SOVI score. This leads to the conclusion that counties with lower social vulnerability are better able to recover from disasters than counties with higher social vulnerability, thereby reducing their overall vulnerability to the hazards. On the other hand, counties with higher social vulnerability are considered to be less capable of recovering, thereby increasing their overall vulnerability to disasters and lessening their ability to expend funds on mitigation efforts.

Additionally, the table below displays the top ten communities with the highest composite score. This score is the hazard score plus the SOVI score. Of the ten communities, three are located within the 15-county affected area. These are Glynn County, McIntosh County, and Chatham County. Further, Glynn County is a MID Area.

County	Composite Score (Hazard+SoVI)
Glynn County	15.6
McIntosh County	14.1
Chatham County	14.1
Taliaferro County	12.3
Towns County	12.2
Clay County	11.8
Union County	11.0
Randolph County	10.9
Fannin County	10.9
Wilkes County	10.5

Source: Pages 99-107 GHMS

Figure 2.13

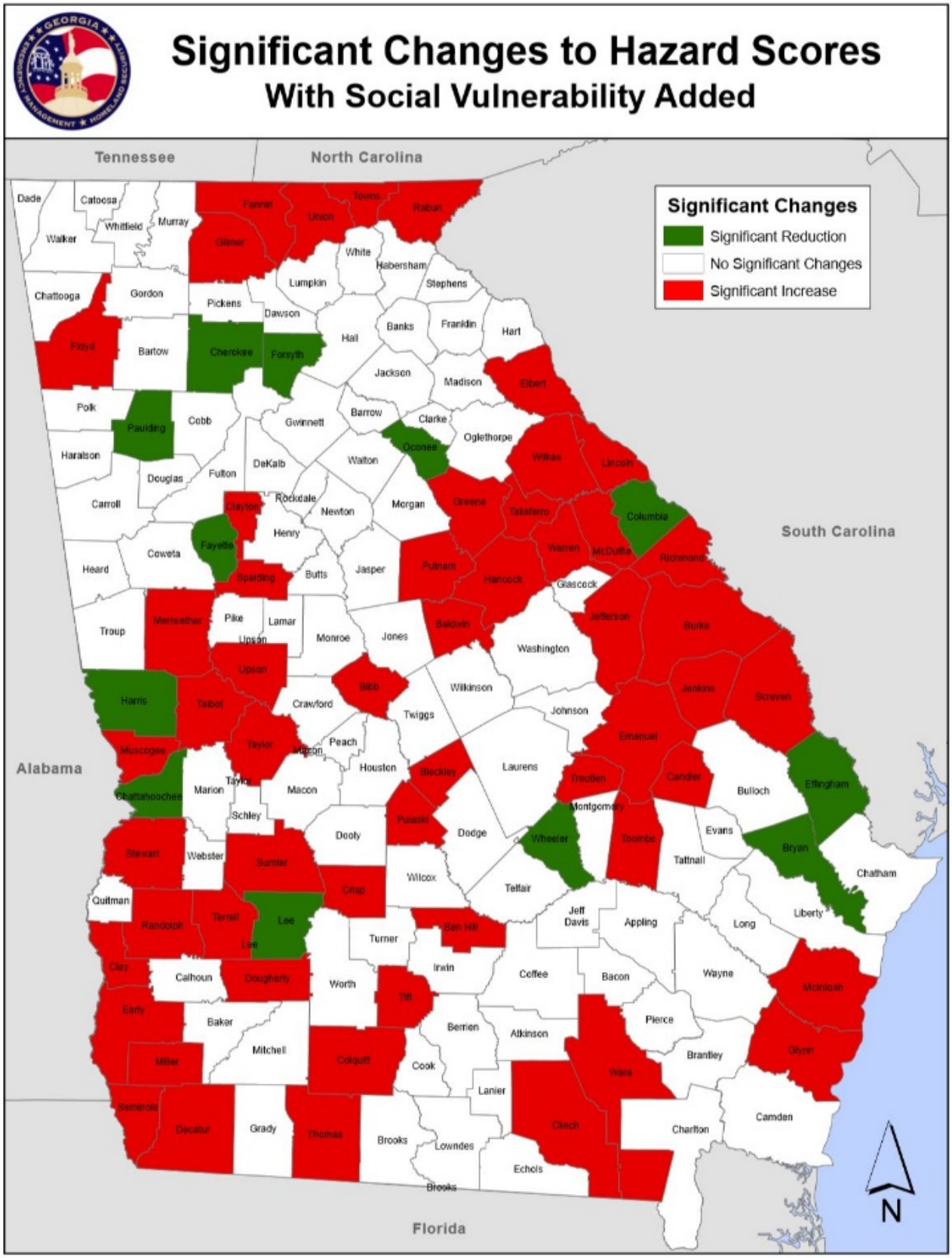
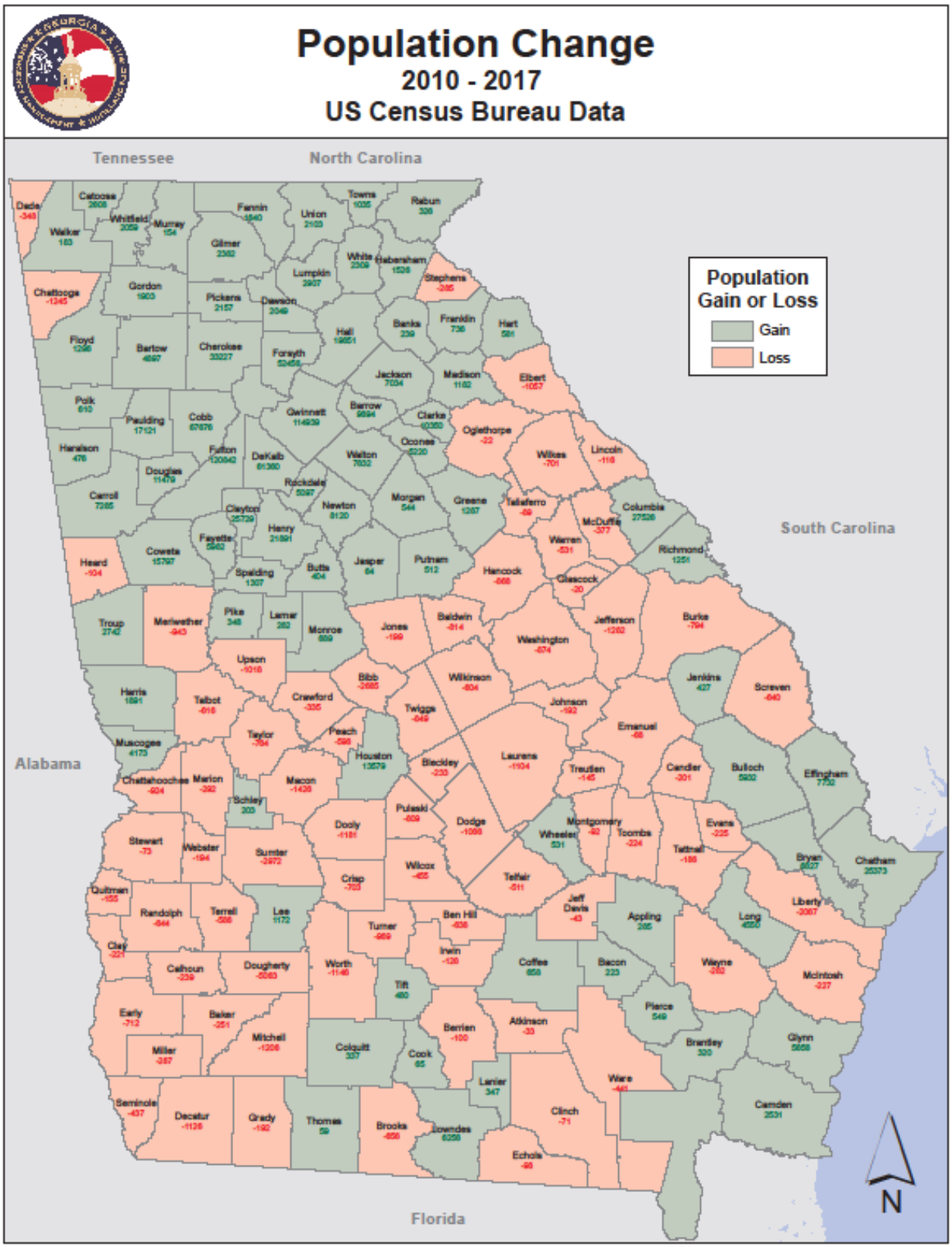

Significant Changes to Hazard Scores
With Social Vulnerability Added
Significant Changes
Significant Reduction
No Significant Changes
Significant Increase
Tennessee
North Carolina
South Carolina
Alabama
Florida
N

Figure 2.14: Population changes between 2010 and 2017



Increased Urbanization

The GMIS database is designed to include numerous attributes of each locally reported critical facility. FEMA defines critical facilities as those buildings and facilities that are essential for the delivery of vital services or protection of a community. The accuracy and completeness of the facility information depends on the local officials using the GMIS database. Therefore, as more and more local jurisdictions add to the database, the data continues to improve. For a record to be considered complete in the GMIS system, all of the attributes must be reported by the local officials. However, to produce the most comprehensive results possible, the analyses conducted for this report include incomplete records as well. The information presented below focuses on the two attributes in the GMIS system with the least missing data: estimated value and occupancy type.

Incorporating the locally provided GMIS data into the GIS hazard maps allows the spatial joining of the critical facility data with the composite hazard assessment. Also, the GMIS data is used to determine the percentages of critical facilities located in specific hazard categories (high to low composite hazard scores) and the estimated value of the critical facilities at varied risk to hazards. These results are found in tables 2.15 and 2.16 below.

Table 2.15: Local Critical Facilities by Hazard Category
Source: Page 110, Chapter 2, GHMS

Hazard Category	Hazard Score Range	2014 Total Facilities	2019 Total Facilities	2014 % Total Facilities	2019 % Total Facilities
High	18-25	59	206	0.3%	1.11%
Moderate	9-17	1,395	2,162	19.9%	11.68%
Low	0-8	16,681	16,150	80.1%	87.21%

Table 2.16: Local Critical Facility Value at Risk, by Hazard Category
Source: Page 111, Chapter 2, GHMS

Hazard Category	Hazard Score Range	2014 Estimated Value	2019 Estimated Value	2014 % Total Value	2019 % Total Value
High	18-25	$16,725,605	$258,446,191.48	0.02%	0.01%
Moderate	9-17	$16,469,725,013	$519,299,192,844.00	19.9%	17.33%
Low	0-8	$66,171,116,486	$2,476,568,618,040.00	80.1%	82.66%

As Tables 2.15 and 2.16 illustrate, the majority of critical facilities and the facilities facing the greatest amount of estimated value at risk are located in low hazard areas. In terms of the estimated value of critical facilities at risk, 99% of the facilities are represented.

Table 2.17: Rankings of Potential for Loss by Jurisdiction
Source: Page 113, Chapter 2, GHMS

Rank	High Avg. Value / Facility	High Avg. Risk / Facility	High Avg. Standardized
1	City of Warner Robins	City of Tybee Island	City of Warner Robins
2	Bryan County	Chatham County	Bryan County
3	Habersham County	Town of Thunderbolt	Habersham County
4	City of Marietta	City of Garden City	City of Marietta
5	Heard County	Glynn County	Heard County
6	Bulloch County	City of Brunswick	Columbus-Muscogee County
7	Cobb County	City of St. Marys	Cobb County
8	City of Canton	City of Midway	City of Austell
9	Effingham County	City of Port Wentworth	City of Perry
10	Cherokee County	City of Savannah	City of Fitzgerald

Table 2.18: State Facility Exposure to 100 year Flood and Wind Events by GEMA/HS Area
Source: Page 117, Chapter 2, GHMS

GEMA/HS Area	Description	Flooding		Wind	
		Facilities exposed	$ Losses	Facilities exposed	$ Losses
1	Northeast GA	91	$13,444,232	0	$0
2	Southwest GA	100	$103,579,808	0	$0
3	East Central GA	46	$9,070,368	1	$79,249
4	West Central GA	32	$4,516,386	0	$0
5	Coastal GA	491	$302,253,405	243	$9,673,788
6	Northwest GA	45	$20,552,609	0	$0
7	Metro Atlanta	12	$4,232,355	0	$0
8	South Central GA	34	$8,633,603	2	$21,238
Total		**851**	**$466,282,765**	**246**	**$9,774,275**

HAZUS-MH was used to estimate the buildings that could be damaged during a 100YR storm event with winds and a 1% annual chance flood, as well as the losses potentially seen from those events. Tables 2.17 and 2.18 show the results of the HAZUS analysis by agency and by GEMA/HS area.

REPETITIVE LOSS PROPERTIES

The State of Georgia utilizes several federal hazard mitigation programs to mitigate repetitive and severe repetitive loss properties. Repetitive Loss Properties are properties that have two or more claims greater than $1,000 each for flood losses paid by National Flood Insurance Program (NFIP). Severe Repetitive Loss Properties are properties that have at least 4 claims greater than $5,000 each paid through the NFIP or two or more claims where the cumulative total is greater than the current market value. These programs include the Hazard Mitigation Grant Program (HMGP), the Flood Mitigation Assistance (FMA), and the Pre-Disaster Mitigation Competitive (PDM-C) program. The various federal programs have the ability to provide funds to assist states and communities in reducing flood damages to insured properties that have multiple claims paid by the National Flood Insurance Fund. Eligible mitigation activities include property acquisition (includes either demolition or relocation, where the property is deed-restricted for open space in perpetuity), structural elevation, dry flood proofing of nonresidential structures, and minor localized flood control projects. In order for this strategy to target repetitive loss properties, including severe repetitive loss properties, those properties must be documented and mapped for further analysis. In 2012, the Federal Register was updated with new definitions for repetitive loss (RL) and severe repetitive loss (SRL) properties. For the purposes of comparison to 2014 data, the figures presented in this section are based on the definition used in the 2012 Federal Register.

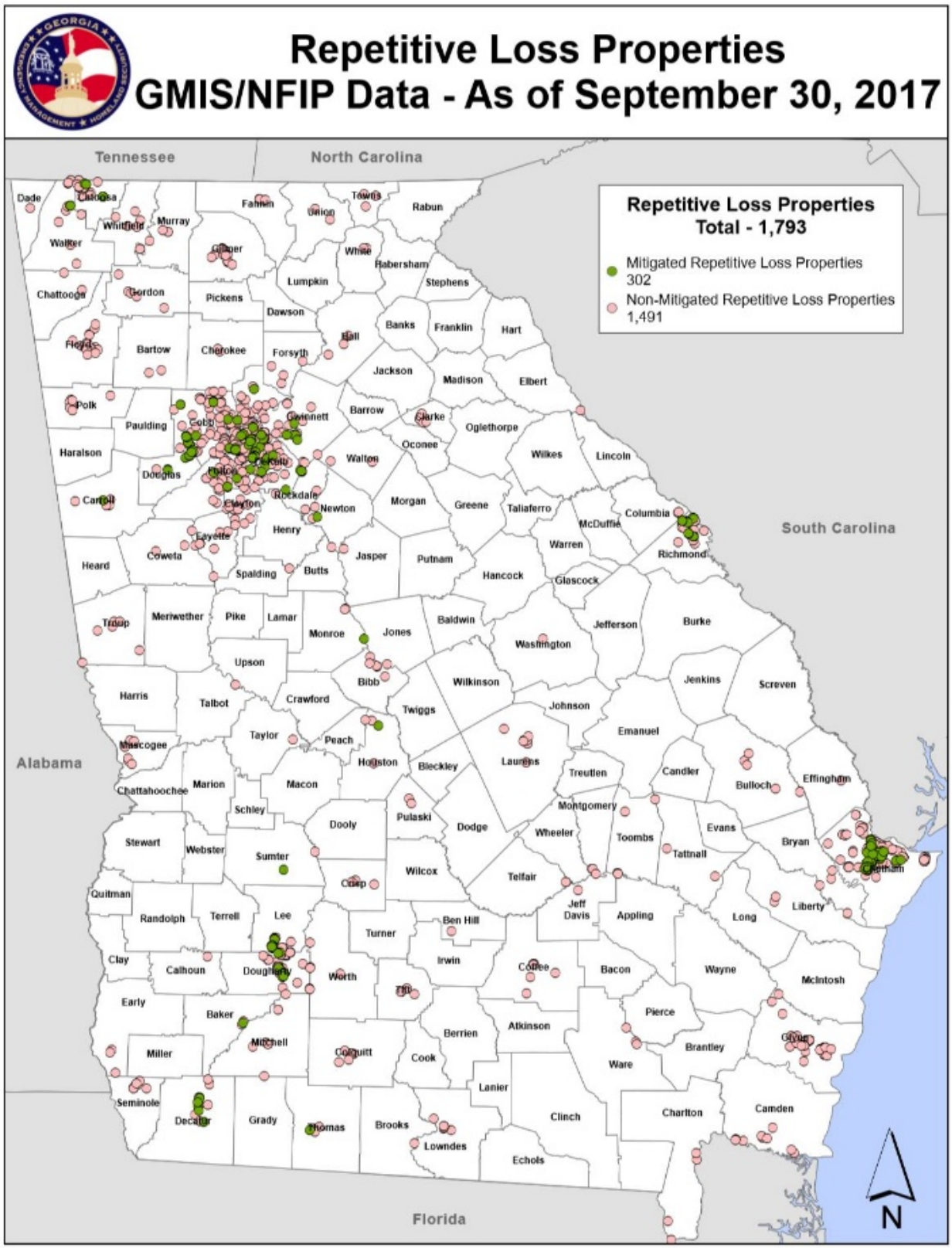
To assess the risk associated with repetitive loss properties, the point location of every property was aligned with the inland flood hazard score previously discussed above. The significant increases in RLPs between 2004 - 2007, 2007 – 2010, and 2013 - 2017 are a result of major flood events during those timeframes. Between 2010 and 2013, there were no major flood events in Georgia; therefore, the change in property totals was negligible. Analyzing location of RLPs in relation to special flood hazard areas did not begin until 2007; therefore, the 2004 data does not have the number of properties located within each flood hazard category.

Table 2.19: Total Repetitive Loss Properties in Flood Hazard Zones by Year of Data with Hazard Scores Source: Source: Page 118, Chapter 2, GHMS

Flood Hazard Category	Hazard Score	2004	2007	2010	2013	2017
Floodway / 1% Annual Chance of Flood with Velocity	4	N/A	168	135	157	155
1% Annual Chance of Flood	3	N/A	450	688	739	794
0.2% Annual Chance of Flood	2	N/A	82	106	126	160
Undetermined/Possible	1	N/A	518	701	604	684
Total		**811**	**1218**	**1610**	**1626**	**1793**

The first column of Table 2.19 corresponds with the flood hazard scores table. The Total Repetitive Loss Properties in Flood Hazards Zones by Year of Data with Hazard Scores table reveals that between 2013 and 2017 there was an increase in RLPs in identified flood hazard areas and an increase in RLPs whose location in relation to a flood hazard area was not known or is beyond the boundaries of the 500 year floodplain.

Figure 2.20: Number of Losses per Repetitive Loss Properties



Clusters of RLPs are located in Metro Atlanta, Augusta–Richmond County, Lee County, Dougherty County, and Chatham County. Properties with frequent flood claim losses are possible locations for mitigation actions.

Figure 2.21: Repetitive Loss Properties in Georgia

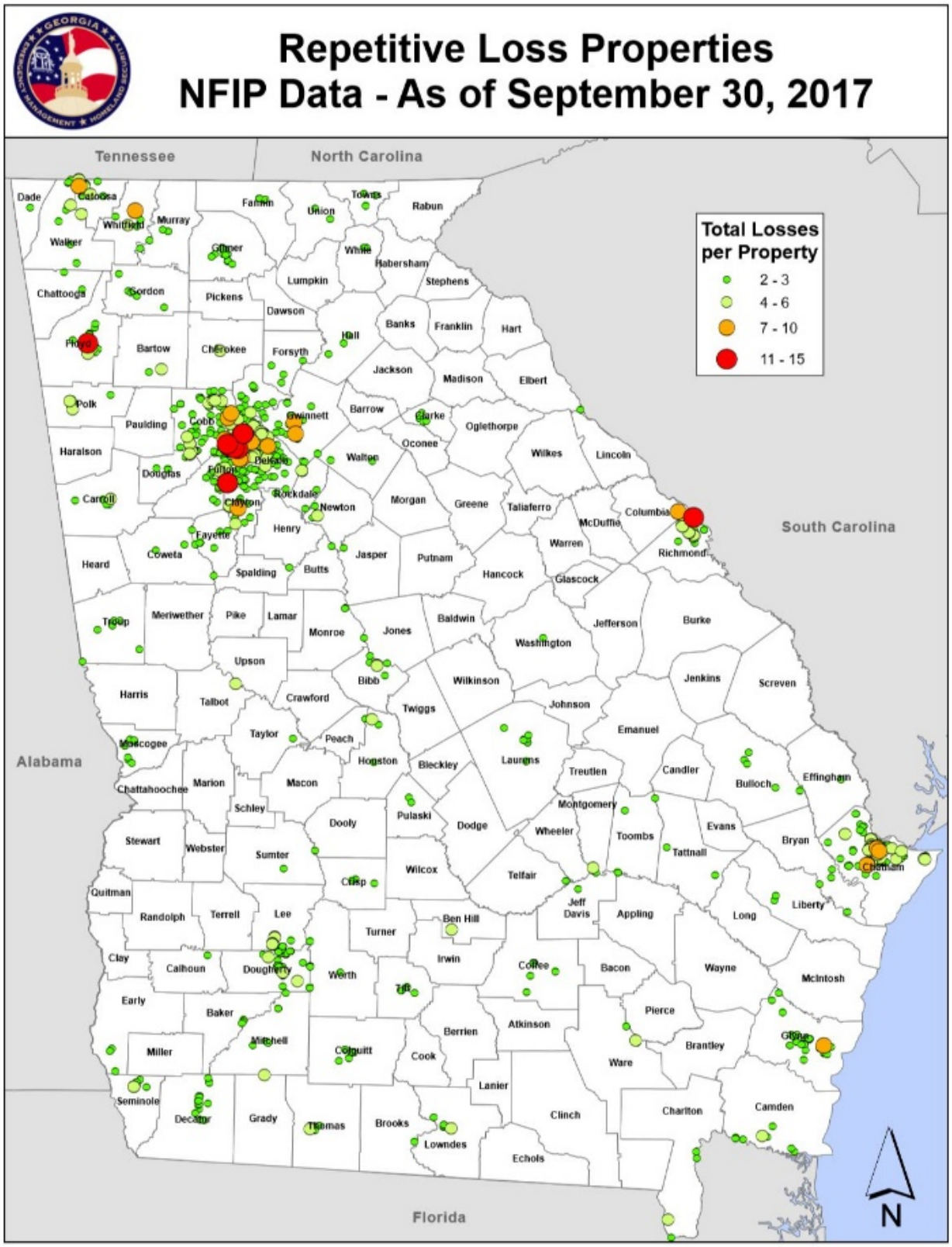


Figure 2.22: Top 10 Communities by Total RL Properties

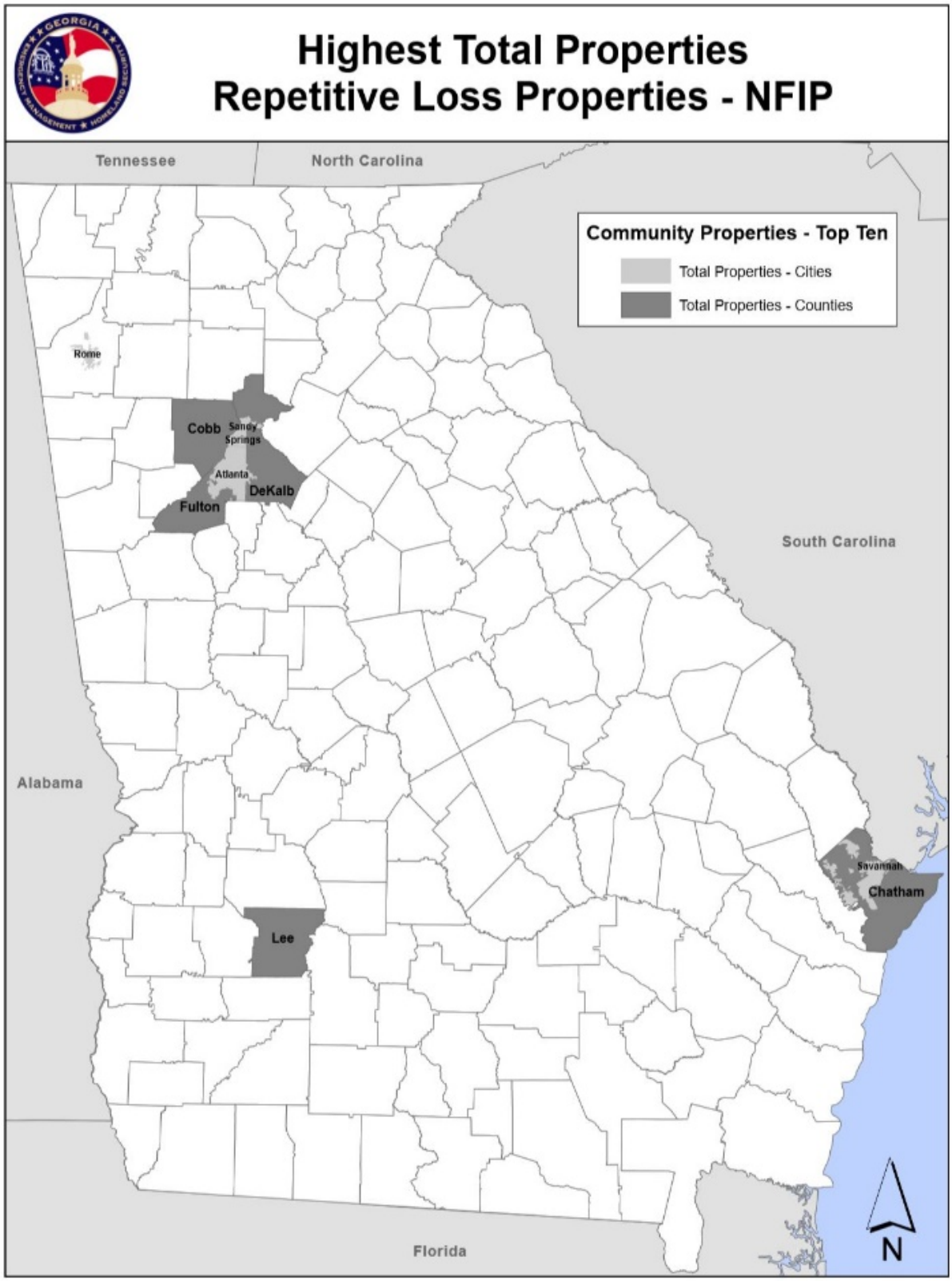


Figure 2.23: Top 10 Communities by Total RLP Losses

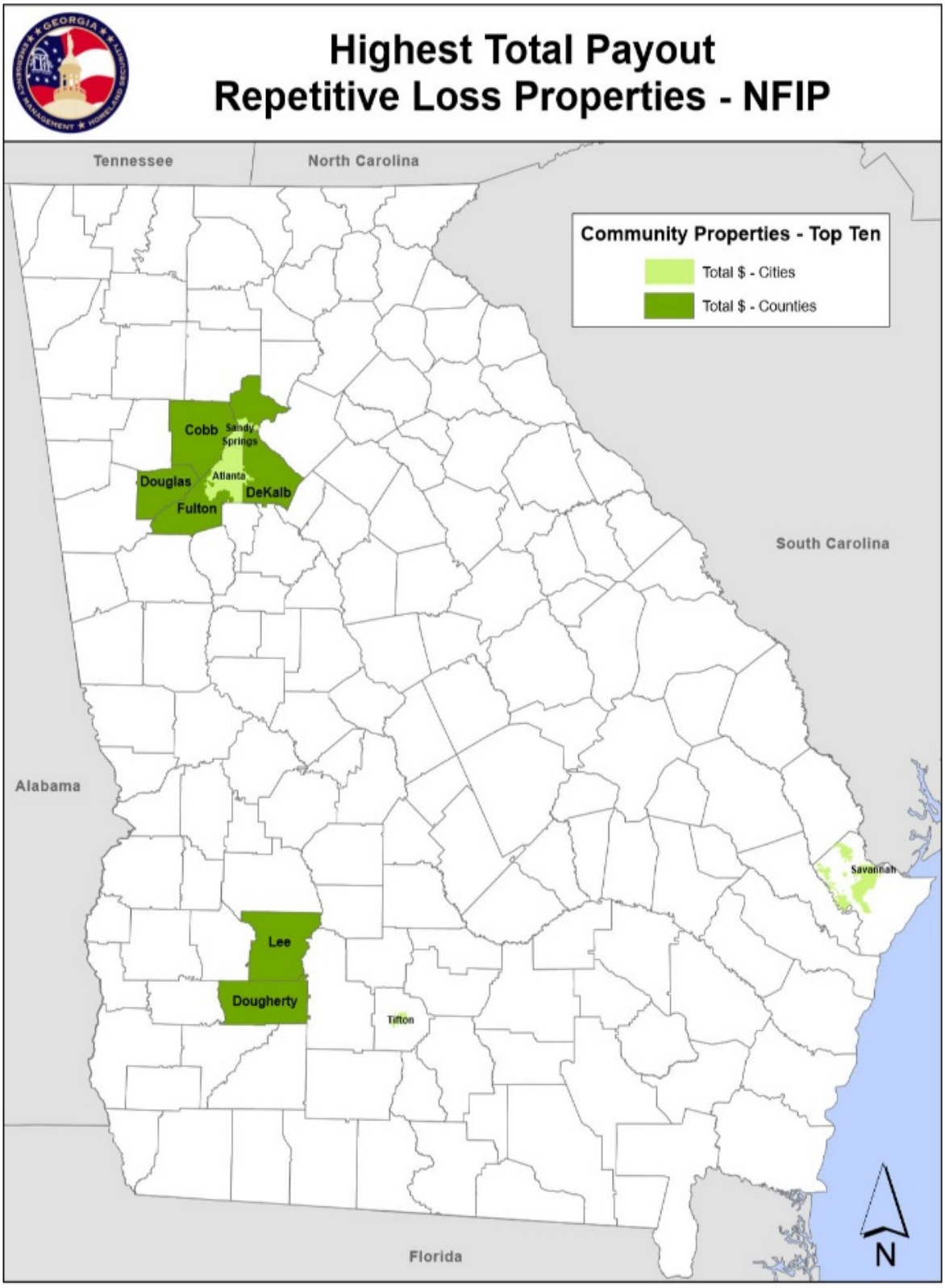
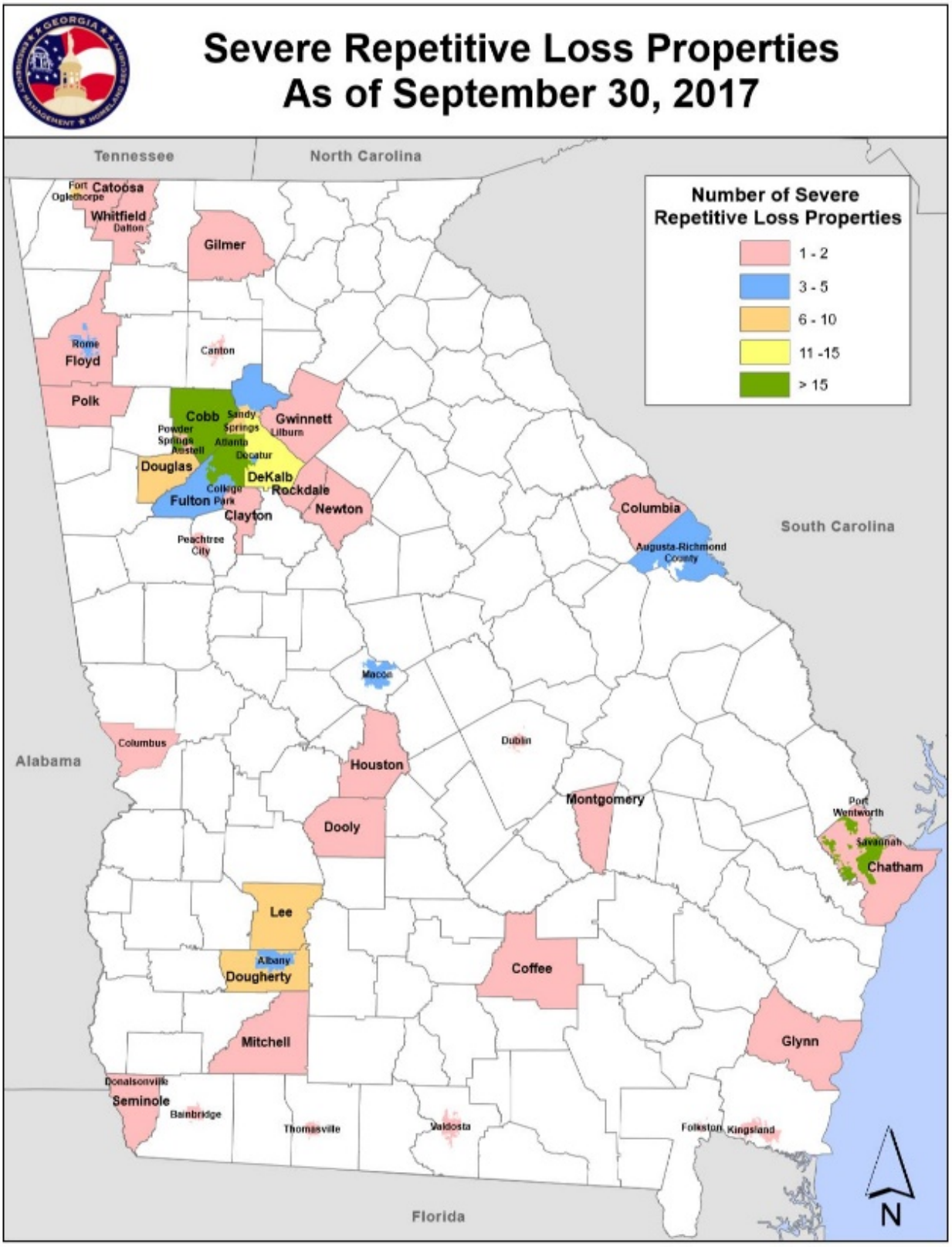


Figure 2.24: Communities with Severe Repetitive Loss Properties, as of September 30, 2017



GEMA created Table 2.25 to show the relationship between the hazards identified in the State Plan and the hazards gleaned from review of the local plans.

Table 2.25: Hazards Identified in Local Plans Source Page 196, Chapter 4, GHMS		
State Plan Hazard	Hazards in Local Plans	% of Counties identifying
Tornadoes	Tornadoes	99%
Inland Flooding	Inland Flooding	99%
Drought	Drought	90%
Wildfire	Wildfire	82%
Severe Winter Weather	Winter Storms	79%
Wind	Wind	73%
Severe Weather	Severe Weather	73%
	Hailstorm	61%
	Lightning	58%
Hurricane Wind	Hurricane/Tropical Storm	55%
Dam Failures	Dam Failure	36%
Earthquake	Earthquake	27%
Coastal Hazards	Coastal Flooding	6%
Geologic Hazards	Landslide	4%
	Sinkhole	3%
Heat	Heat	28%

Greater than 95% of all local plans include mitigation actions that fall into three of the four basic mitigation categories. Ninety-eight percent of plans include mitigation actions that fall within the “Planning and Regulation” and “Education and Awareness” categories while 100% of all plans include mitigation actions that fall under the “Structure and Infrastructure Projects” category. Twenty-two percent of local plans include mitigation actions in the “Natural Resources Protection” category. The State Hazard Mitigation Strategy includes mitigation actions representing all four categories and includes mitigation actions to support local communities in their efforts to reduce their vulnerability to their identified hazards.

Table 2.26: Hazard Ranking

	Historical Impact					Potential Hazard	
Hazard	Annualized Losses	Injuries and Deaths	Historical Frequency	Historical Score		Duration and Area Impacted Table Rankings	Total Hazard Score (H+P)
Dam Failure	1	1	1	3		3	6
Drought	4	1	1	6		8	14
Inland Flooding	4	1	2	7		6	13
Seismic Hazards				0		4	4
Severe Weather	5	2	3	10		6	16
Severe Winter Weather	5	1	3	9		7	16
Geologic Hazards				0		3	3
Coastal Hazards	1	1	1	3		5	8
Tornadoes	5	3	2	10		4	14
Hurricane Wind	2	1	1	4		6	10
Wildfire	1	1	1	3		6	9
Wind	2	1	3	6		4	10
Extreme Heat	2	1	1	4		8	12

Table 2.27: Vulnerability Ranking

	Potential Vulnerability Impact					
Hazard	Human	Property	Critical Facilities	Economy	Environment	Impact Score
Dam Failure	3	4	2	3	2	14
Drought	0	1	1	3	2	7
Inland Flooding	2	4	3	3	3	15
Seismic Hazards	1	2	1	1	1	6
Severe Weather	2	3	1	2	1	9
Severe Winter Weather	2	2	1	2	1	8
Geologic Hazards	0	1	1	1	0	3
Coastal Hazards	3	4	3	4	3	17
Tornadoes	3	4	3	3	2	15
Hurricane Wind	3	4	3	4	3	17
Wildfire	1	3	2	2	3	11
Wind	1	2	1	1	1	6
Extreme Heat	2	0	0	2	1	5

Total Risk Ranking

The top five hazards in which Georgia counties prepare for in their local Hazard Mitigation Plans are: Inland Flooding, Tornadoes, Drought, Wildfire and Severe Winter Storms.

Table 2.28 (below) comes from the Georgia Hazard Mitigation Strategy and lists the vulnerability rankings of the top hazards in Georgia. The chart was created by GEMA staff and uses the formula RISK = HAZARD + VULNERABILITY with data from 1996-2017. Data from Tables 2.26 and 2.27 was used in determining the scores. According to the chart, GEMA identified five hazards that have the highest priority across the state based on their vulnerability rankings. These are tornadoes, inland flooding, hurricane wind, severe weather, and coastal hazards. Tornadoes and inland flood overlap with the top priorities in local hazard mitigation plans. Few counties are located along Georgia's coastline, reducing the number of counties that are vulnerable for and mitigate against coastal hazards and hurricane winds. This causes the two categories to be ranked lower statewide, but it does not diminish their importance when looking at the number of coastal hazards (including hurricanes) that impact Georgia.

Due to the location of the fifteen declared counties eligible to receive the 2017 CDBG-MIT dollars, the State of Georgia's priority for mitigation projects will be based on the five high priority hazards in Table 2.28 (below).

Table 2.28: Vulnerability Ranking
Source: GHMS Page 19

Rank	Hazard	Score	Priority
1	Tornado	34	High
2	Inland Flooding	32	High
3	Hurricane Wind	30	High
4	Severe Weather	28	High
5	Coastal Hazards	27	High
6	Drought	26	Medium
7	Severe Winter Weather	26	Medium
8	Wildfire	24	Medium
9	Wind	17	Medium
10	Extreme Heat	17	Medium
11	Dam Failure	17	Medium
12	Seismic Hazards	10	Low
13	Geologic Hazards	6	Low

Priority Level
High = >26
Medium = 16–26
Low = <16

3. Mitigation Needs Assessment: Local Analysis

15-County Hazard Analysis

As seen in Table 3.5, all fifteen declared counties identify tornadoes, inland flooding and severe weather within their local Hazard Mitigation Plans. These are identified based on weather patterns and historical data. In addition, Camden County and Glynn County (two of three HUD-Identified MID areas) identify hurricane winds. This shows the impacted counties all had the hazards at the forefront of their preparedness and planning before the 2017 tornadoes and Hurricane Irma took place. Mitigating against these types of disasters in the future is necessary to reduce losses of life and property.

Table 3.5: Hazards Identified in Local Plans
Source: Local Hazard Mitigation Plans and GHMS

County	Tornado	Inland Flooding	Hurricane Wind	Severe Weather	Coastal Hazards	Drought	Severe Winter Weather	Wildfire	Wind	Extreme Heat	Dam Failure	Seismic Hazards	Geologic Hazards	Other
Berrien	X	X	X	X		X	X	X	X					
Camden	X	X	X	X	X	X		X						X
Charlton	X	X	X	X		X	X	X		X				
Chatham	X	X	X	X	X	X	X	X	X	X	X	X		X
Coffee	X	X	X	X		X	X	X	X					
Cook	X	X	X	X		X		X	X	X				
Crisp	X	X	X	X		X	X		X	X	X			X
Dougherty	X	X		X		X			X					
Glynn	X	X	X	X	X		X	X		X		X		X
Liberty	X	X	X	X	X	X		X	X					
McIntosh	X	X	X	X	X	X		X	X	X				X
Thomas	X	X	X	X		X			X					
Turner	X	X	X	X		X		X	X	X				
Wilcox	X	X		X		X	X	X	X					
Worth	X	X	X	X		X			X	X	X			

Historical Data by Top Eight Hazards

Disclaimer: only tornado events were recorded between 1950 and 1954, tornado, thunderstorm wind, and hail data was collected from 1955-1995, and all event type data was collected from 1996- present. **The data contained in the tables below is from storms between 1996 and October 2019.** Between 1996 and October 2019, NOAA reported 121 tornadoes, 242 instances of inland flooding and 24 instances of hurricane force winds impacting the 15 declared counties. Housing, infrastructure, and critical facilities are at risk each time there is an occurrence. Georgia's unique geography and topography make many of the declared areas at risk for multiple types of hazards. Severe weather includes: thunderstorms, hail, and lightning. Source: NOAA Storm Events Database, data collected from 1996 until October 2019.

Table 3.6: Historical Hazard Data (NOAA)

County	Tornado	Inland Flooding	Hurricane Wind	Severe Weather	Coastal Hazards	Drought	Severe Winter Weather	Wildfire
Berrien	1	10	1	98	9	27	3	
Camden	14	12		313	21	2	1	4
Charlton	8	13		152	6	1	1	4
Chatham	14	69	14	555	155	77	37	
Coffee	13	11		234	4		3	1
Cook	5	5	1	55	8	26	3	
Crisp	6	22	4	97	18	25	18	
Dougherty	6	28	2	170	9	31	4	
Glynn	9	10		166	29		1	
Liberty	9	13	4	288	28	46	6	2
McIntosh	4	6	4	157	43	46	7	
Thomas	6	13	1	155	10	31	3	
Turner	3	2	1	79	6	29	5	
Wilcox	6	6	2	64	16	23	18	
Worth	17	22	1	200	8	30	5	
TOTAL	121	242	24	2783	370	394	115	11

Injuries Caused by the Top Hazards from 1996- October 2019

As seen in tables 3.6 and 3.7, tornadoes caused the majority of the injuries and deaths related to weather hazards within the 15 declared counties between 1996 and October 2019. Hardening infrastructure, increasing communications and increasing the number of shelters and critical facilities will reduce injuries and loss of life. Source: NOAA Storm Events Database, data collected from 1996 until October 2019.

Table 3.7: Injuries by Hazard Type

County	Tornado	Inland Flooding	Hurricane Wind	Severe Weather	Coastal Hazards	Drought	Severe Winter Weather	Wildfire
Berrien	0	0	0	0	0	0	0	
Camden	5	0		1	0	0	0	0
Charlton	0	0		2	0	0	0	0
Chatham	6	2	2	18	14	0	0	
Coffee	2	0		8	0		0	0
Cook	45	0	0	2	0	0	0	
Crisp	2	0	0	2	0	0	0	
Dougherty	32	0	0	2	0	0	0	
Glynn	0	0		0	0		0	
Liberty	7	0	0	13	0	0	0	0
McIntosh	9	0	0	6	0	0	0	
Thomas	3	1	0	1	0	0	0	
Turner	25	0	0	3	0	0	0	
Wilcox	0	0	0	2	0	0	0	
Worth	35	0	0	0	0	0	0	
TOTAL	171	3	2	60	14	0	0	0

Table 3.8: Deaths by Hazard Type								
County	Tornado	Inland Flooding	Hurricane Wind	Severe Weather	Coastal Hazards	Drought	Severe Winter Weather	Wildfire
Berrien	2	0	0	0	0	0	0	
Camden	0	0		0	0	0	0	0
Charlton	0	0		0	0	0	0	0
Chatham	0	0	1	2	6	0	0	
Coffee	0	0		0	0		0	0
Cook	7	0	0	0	0	0	0	
Crisp	0	0	0	1	0	0	0	
Dougherty	5	0	0	0	0	0	0	
Glynn	0	0		0	2		0	
Liberty	1	0	0	1	0	0	0	0
McIntosh	0	0	0	0	0	0	0	
Thomas	0	0	0	1	0	0	0	
Turner	1	0	0	1	0	0	0	
Wilcox	0	0	0	0	0	0	0	
Worth	2	0	0	0	0	0	0	
TOTAL	18	0	1	6	8	0	0	0

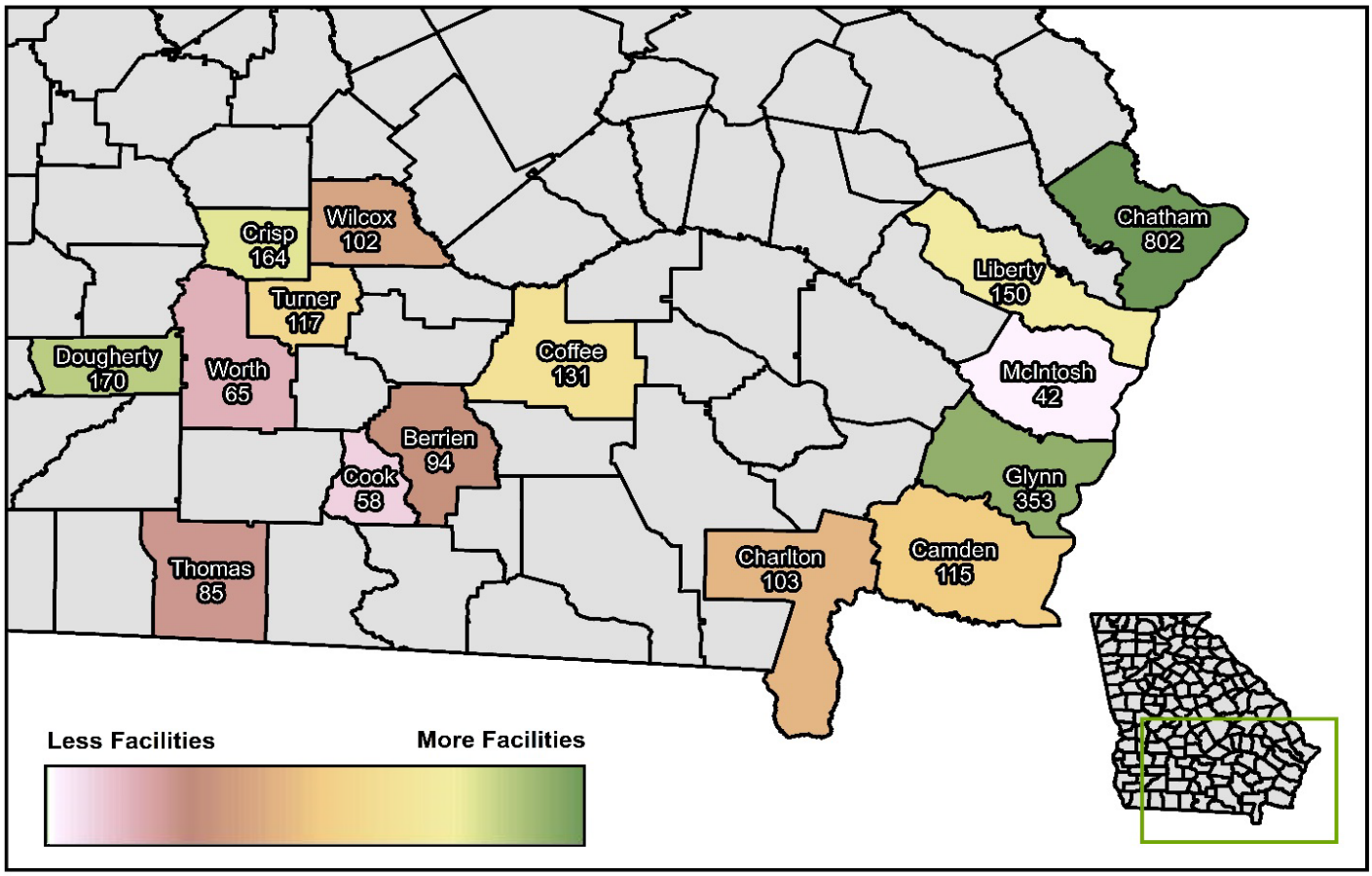
Source: NOAA Storm Events Database, data collected from 1996 until October 2019

Table 3.9: Property Damage by Hazard Type 1996-2019								
County	Tornado	Inland Flooding	Hurricane Wind	Severe Weather	Coastal Hazards	Drought	Severe Winter Weather	Wildfire
Berrien	$500,000	$75,000	$100,000	$876,250	$1,370,000	$0	$0	
Camden	$289,500	$869,000		$480,500	$2,300,000	$0	$0	$0
Charlton	$167,500	$225,000		$181,000	$0	$0	$0	$0
Chatham	$3,600,000	$8,432,000	$0	$4,424,300	$20,173,000	$0	$1,168,790	
Coffee	$604,500	$1,540,000		$397,900	$0		$0	$0
Cook	$1,535,000	$305,000	$100,000	$731,920	$1,480,000	$0	$0	
Crisp	$710,000	$1,531,000	$0	$1,549,950	$210,000	$0	$25,000	
Dougherty	$301,135,000	$116,301,000	$300,500,000	$18,200,500	$305,690,000	$0	$51,000	
Glynn	$551,000	$42,000		$286,800	$0		$0	
Liberty	$43,082,000	$35,000	$0	$10,727,700	$2,934,000	$0	$0	$0
McIntosh	$12,535,000	$25,000	$0	$277,050	$2,945,250	$0	$0	
Thomas	$11,310,000	$2,852,000	$1,000,000	$1,162,450	$6,030,000	$0	$0	
Turner	$7,000,000	$0	$100,000	$1,139,500	$2,665,000	$0	$30,000	
Wilcox	$1,155,000	$195,000	$0	$1,279,200	$105,000	$0	$0	
Worth	$15,102,000	$3,540,000	$6,750,000	$2,459,500	$9,050,000	$0	$75,000	
TOTAL	$399,276,500	$135,967,000	$308,550,000	$44,174,520	$354,952,250	$0	$1,349,790	$0

Critical Facilities

Figure 3.4 below displays the number of critical facilities within the counties declared eligible for FEMA's Individual and Public Assistance. Chatham County listed 802 critical facilities, the highest of the counties declared eligible for FEMA's Individual and Public Assistance. Glynn County, another coastal community, listed 353 critical facilities. Source: GHMS

Figure 3.4: Amount of Critical Facilities in IA and PA Counties



Repetitive Loss Data

Table 3.10: Repetitive and Severe Repetitive Loss Properties by NFIP Community (Georgia IA and PA Counties)								
County	2017 Data Losses ($)	RL	GEMA/HS Analysis		SRL Best Cand.	FMA/RL Best Cand.	# Mitigated RLPs (GMS)	# Mitigated SRLPs
			SRL	FMA/RL				
Camden County	$140,626	3		1		1		
Charlton County	$142,456	3	1					
Chatham County	$1,508,904	44	1	1	1	1	3	
Coffee County	$483,042	6	4	1	3			
Crisp County	$29,555	3	1					
Dougherty County	$3,790,638	42	12	10	7	6	7	
Glynn County	$1,765,861	33	5	5	2	1		
Worth County	$99,678	2	1					

Source: GHMP (counties included are NFIP communities)

The Georgia Hazard Mitigation Plan (GHMP) notes repetitive loss properties (RLPs) generally consist of older, less safe properties that were "grandfathered" into the National Flood Insurance Program (NFIP) during its creation. RLPs have been repaired multiple times to pre-flood conditions with subsidized flood insurance claim payments. According to FEMA, a relatively small number of RLPs account for a relatively large share of paid flood claims. Therefore, identifying and mitigating RLPs and severe repetitive loss properties (SRLPs) leads to a reduction in actual flood insurance claims.

The totals in the table above have been updated to show the total losses and total RLPs, the GEMA/HS analysis to determine the total number of SRLPs, and the total number of mitigated RLPs and total mitigated SRLPs. The table also includes additional information and a summary of FMA/RL properties and best SRL and FMA/RL candidates for the FMA program.

The repetitive loss information was obtained from DataXchange and the mitigated property information was obtained from GEMA/HS's mitigated properties database. To be considered an RLP by FEMA, the property must have two or more losses (at least $1,000 per loss) paid within a 10-year period. To be considered an SRLP by FEMA, the property must have four or more losses (at least $5,000 per loss) paid or have two or more losses in which the payments to repair the structure exceed the structure value. To be considered an FMA/RL by FEMA, the property must have two or more losses in which, on the average, the payments to repair the structure equaled or exceed 25% of the structure value. As of September 30, 2017, Georgia had 1,786 RLPs totaling more than $149 million in paid claims. Also, Georgia had 191 SRLPs and 187 FMA/RL properties. Of these, 69 SRL and 62 FMA/RL properties are best candidates for the FMA program. The number of repetitive loss properties has also increased over the past few years due to flood claims from Hurricanes Matthew and Irma.

Community Rating System (CRS)

GEMA lists the Community Rating System (CRS) as a voluntary program through which NFIP communities are rewarded for beneficial floodplain management that exceeds minimum NFIP requirements, including higher regulatory standards. Under the CRS, flood insurance premium rates are adjusted to reflect the reduced flood risk resulting from community activities that meet the three goals of CRS: reducing flood losses, facilitating accurate insurance ratings, and promoting the awareness of flood insurance. The CRS classifies communities based on a point system, with the first class (Class 1) receiving the largest premium reduction and the last class (Class 10) receiving no reduction. CRS recognizes 18 credible flood mitigation activities that fall under four broad categories: public information, mapping and regulations, flood damage reduction, and flood preparedness

Table 3.11: Community Rating System (CRS) County Scores within IA & PA Counties Source: GHMP Chapter 3, page 179.

County	2004	2007	2010	2013	2017
Camden				8	6
Chatham	7	7	6	6	5
Crisp		9	9	9	9
Dougherty	7	7	6	6	6
Glynn	8	8	8	7	7
Worth	9	9	9	9	9

*Scores as of October 1, 2017

Demographic Background – MID Zip Code Analysis

The table below provides a demographic data of the three zip codes which make up the MID Area. The total population within each of the MID zip codes are very similar. Zip Code 31520 has a total population of 23,531, Zip Code 31548 has 22,146, and Zip Code 31705 has 33,579. There is an African American population of 74% within Zip Code 31705, 52% in Zip Code 31520, and 20% in Zip Code 31548. The Hispanic populations in Zip Codes 31520, 31548, and 31705 are 13%, 7%, and 4%, respectively. This data shows that Zip Codes 31520 and 31705 have higher minority concentrations. The percentage of households with individuals with person older than 65 years of age for Zip Codes 31520, 31548, and 31750 are 15.3%, 10.7%, and 12.6%, respectively. As will be further detailed in the Method of Distribution, an Infrastructure Program as well as Planning and Administration activities will be undertaken with CDBG-MIT funds. Local Government applicants will submit infrastructure applications for consideration of funding. A higher score will be given for projects located in areas with greater concentrations of minority, Hispanic, low-to-moderate income, persons with disabilities, or those greater than 65 years of age. Additionally analysis of the MID Areas, including low-to-moderate income populations and those with Limited English Proficiency are located in the overall analysis for the 15-county impacted area.

MID Zip Codes: Demographic Profile								
Community	Zip Code	Total Population	# White	# African American	# All Other	# 2 or more races	# Hispanic	% Households w/ individuals 65+
Glynn County	31520	23,531	8,564	12,291	2,105	571	2,965	15.3
Camden County	31548	22,146	15,833	4,463	926	924	1,560	10.7
Dougherty County	31705	33,579	7,227	24,759	1,025	568	1,404	12.6

MID Zip Codes: Demographic Profile (Percentages)								
Community	Zip Code	Total Population	# White	# African American	# All Other	# 2 or more races	# Hispanic	% Households w/ individuals 65+
Glynn County	31520	23,531	36.39%	52.23%	8.95%	2.43%	12.60%	15.30
Camden County	31548	22,146	71.49%	20.15%	4.18%	4.17%	7.04%	10.70
Dougherty County	31705	33,579	21.52%	73.73%	3.05%	1.69%	4.18%	12.60

Demographic Background – 15-County Analysis

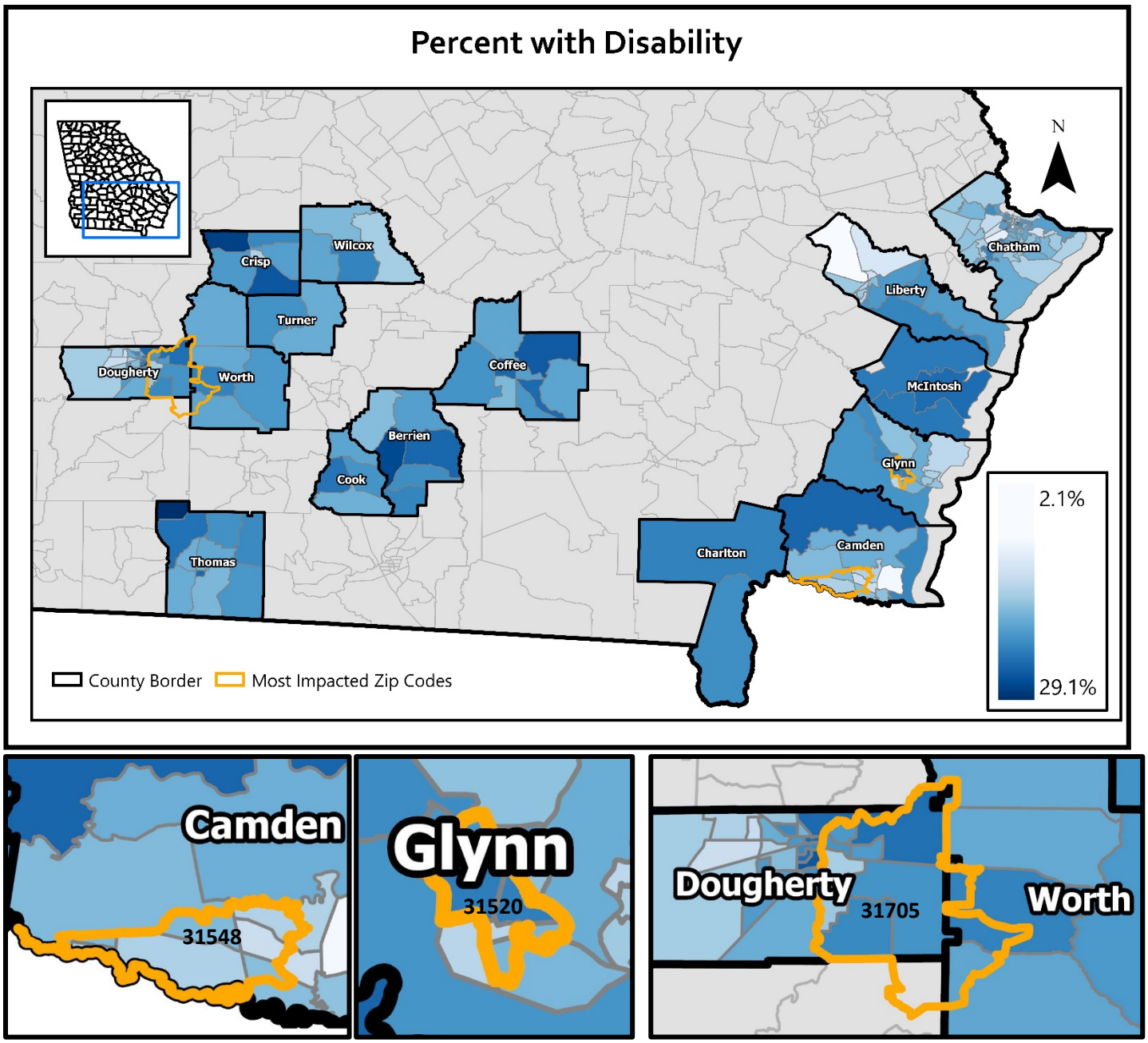
Table 3.1 details the demographic background of the counties declared eligible for FEMA Individual and Public Assistance. The highlighted counties are those determined by HUD to be Most Impacted and Distressed (MID) Areas. Camden County and Glynn County have increased in population since 2010. A higher population leads to an increased number of businesses as well as additional use of roadways, bridges, and critical infrastructure. Higher populations also increase the need for critical facilities and communications, especially during times of disasters.

Table 3.1: Demographic Data | Source: ACS/CHIP 2019 Data from ARCGIS

County	2018 Population	2010-2018 Pop. Change	Median Household Income	Poverty Rate	Employment Rate	Median Age	% Minority	% High School +	Total Establishments
Berrien	19,025	-1.40%	$37,163	26.3%	47.4%	39.7	15.5%	78.1%	248
Camden	52,714	4.40%	$56,397	12.9%	52.0%	32.3	27.1%	91.8%	803
Charlton	12,983	6.70%	$40,283	24.4%	39.4%	41.7	33.1%	73.3%	149
Chatham	287,049	8.30%	$54,911	15.8%	58.7%	35.2	47.3%	89.6%	7,728
Coffee	42,961	1.40%	$38,266	22.3%	49.5%	36.2	32.0%	77.4%	833
Cook	17,184	-0.10%	$38,408	24.0%	53.3%	37.4	31.0%	79.9%	315
Crisp	22,846	-2.50%	$35,096	30.8%	49.5%	38.8	47.0%	80.1%	510
Dougherty	91,049	-3.70%	$37,633	29.4%	49.3%	35.1	73.0%	82.5%	2,276
Glynn	83,974	5.50%	$50,672	18.3%	57.5%	41	32.1%	87.9%	2,533
Liberty	62,108	-2.20%	$45,959	16.8%	49.2%	28.1	53.5%	90.9%	824
McIntosh	8,484	-40.80%	$44,309	19.9%	49.3%	49.7	37.5%	86.3%	179
Thomas	44,730	0.00%	$40,112	20.8%	53.1%	40.3	39.9%	82.6%	1,113
Turner	7,962	-10.80%	$38,341	35.3%	50.1%	38.8	45.1%	82.4%	151
Wilcox	8,846	-4.40%	$36,077	22.0%	33.0%	39.5	37.2%	82.3%	84
Worth	20,656	-4.70%	$46,076	20.8%	53.6%	41.1	31.7%	81.3%	255

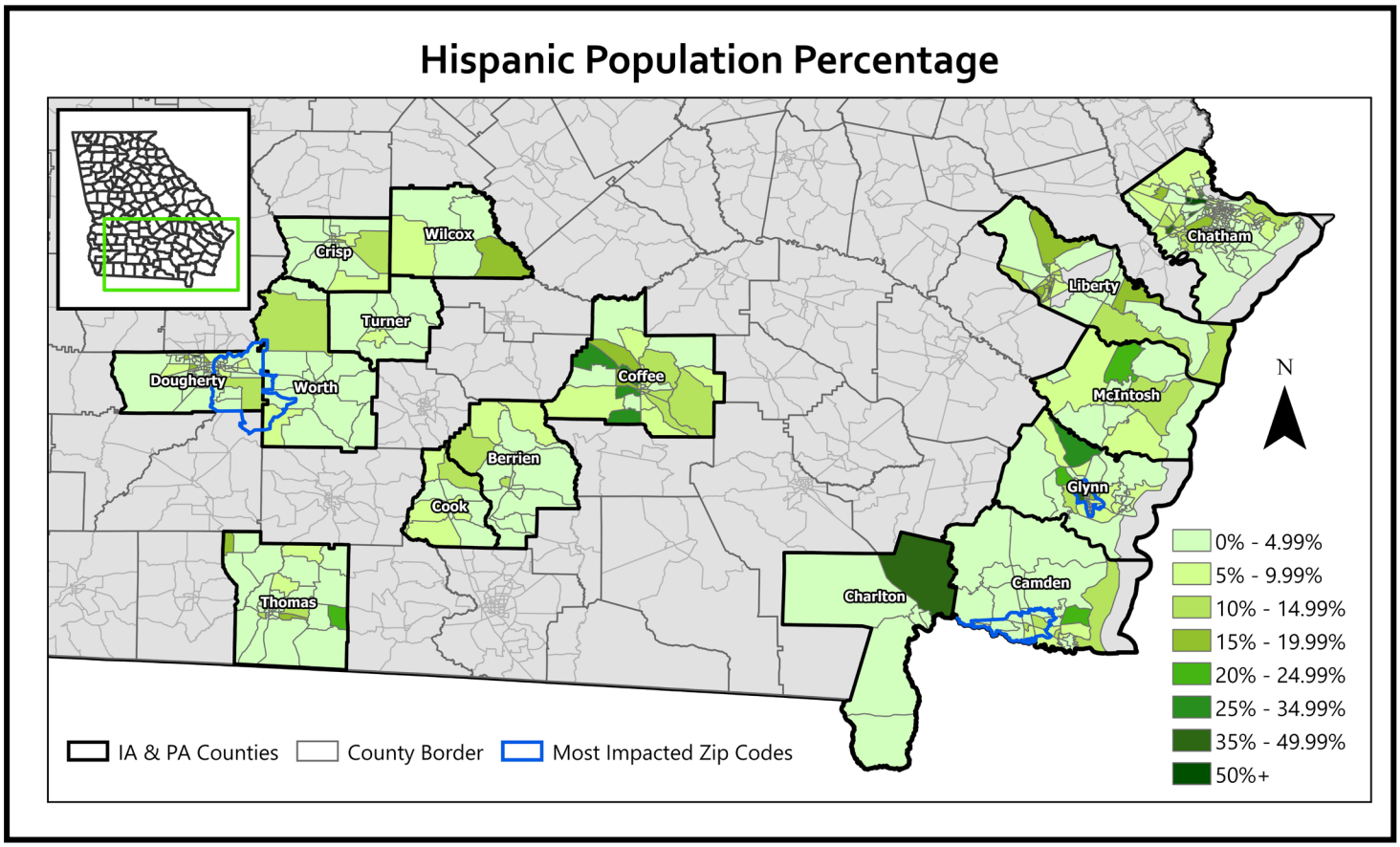
Population with Disabilities

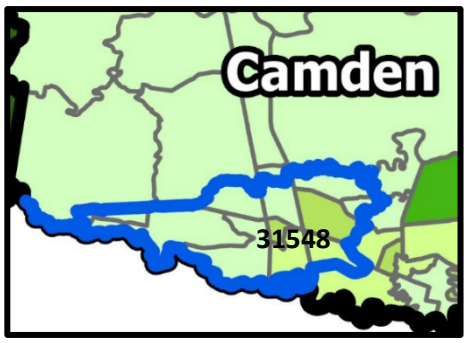
As analyzed on a Census Tract level, the entire jurisdictions of Charlton County and McIntosh County have population with a higher percentage of disabilities. As seen in the map below, the other 13 presidentially declared counties have varying levels of percentages of persons with a disability. Crisp County and Thomas County have tracts with the highest percentage of disabilities, while Camden County, Chatham County and Liberty County have tracts with the lowest percentage of disabilities. The census tracts within the HUD identified MID zip codes vary between higher and lower percentages of disabilities. Although there is a higher presence of persons with a disability, the MID area portions of Camden county seem to have lower percentages of persons with a disability. Conversely, in the Glynn County MID zip code, 31520, there are higher concentrations of persons with a disability. Similarly, the Dougherty County MID zip code, 31705, has high concentrations of persons with a disability compared to the western part of the county.

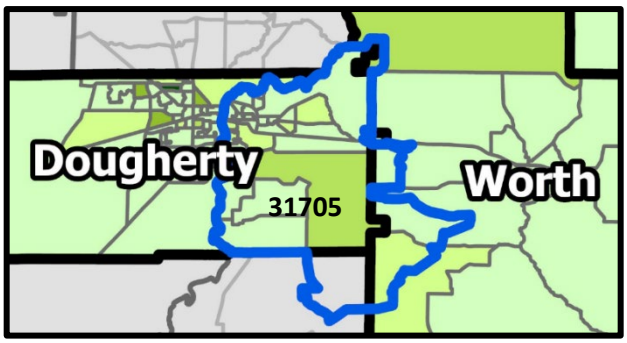


Hispanic Population

As seen in the maps below, there are concentrations of Hispanic persons within the 15-county area as well as the MID Zip Codes. The United States Census Bureau defines "Hispanic or Latino" as "a person of Cuban, Mexican, Puerto Rican, South or Central American or other Spanish culture or origin regardless of race." Within the 15-county impacted area, Charlton County and Coffee County have populations that fall into the bottom half of the scale provided below. Within the MID Zip Codes, Camden County and Dougherty County do not have high concentrations, while Glynn County has a couple of areas where Hispanic persons are located. In order to ensure Hispanic populations that only speak Spanish have access to information related to these funds, vital documents will be translated to Spanish. Further information related to documents translated into Spanish can be found in the Citizen Participation Plan located in the Appendix.

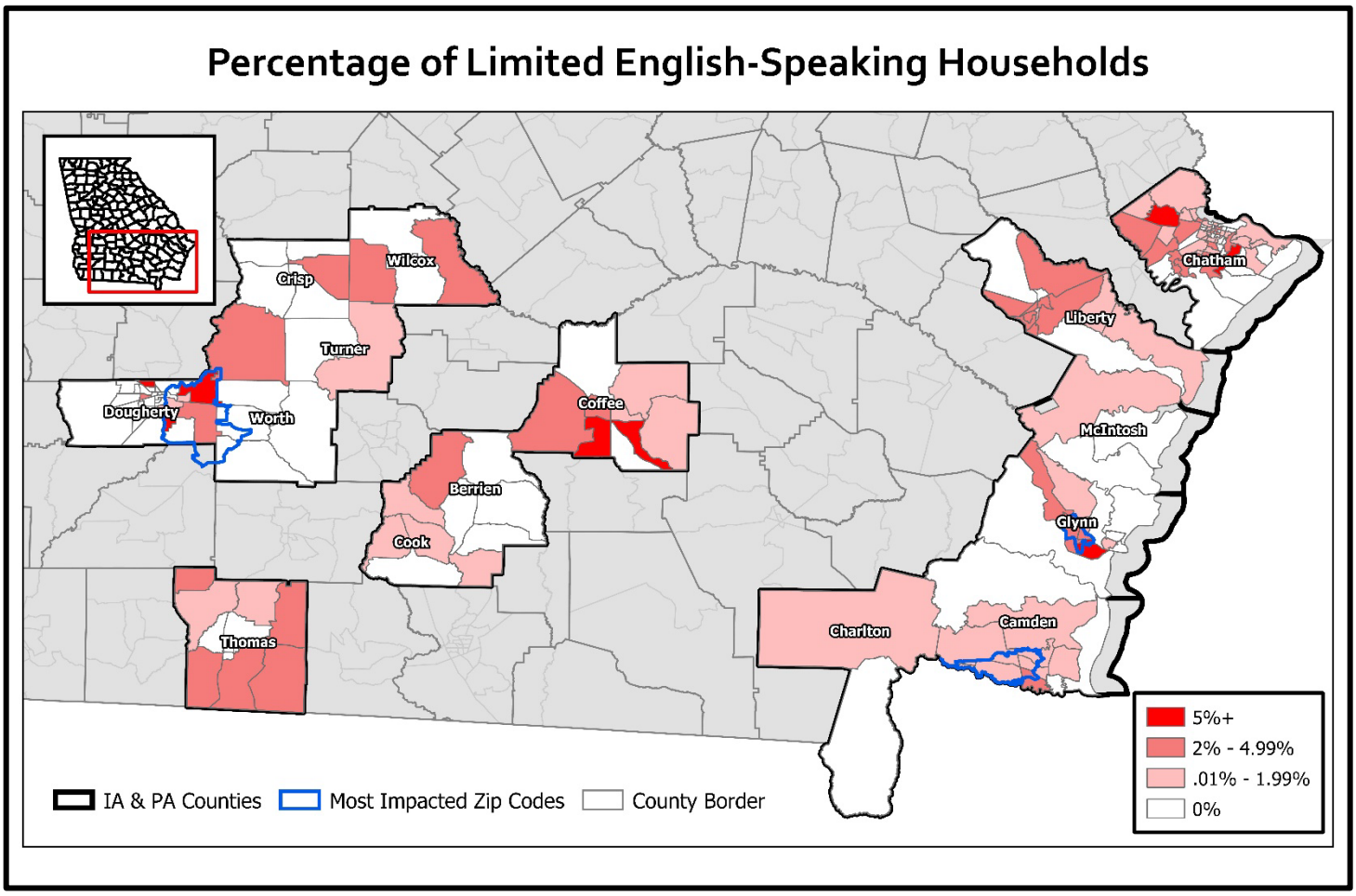


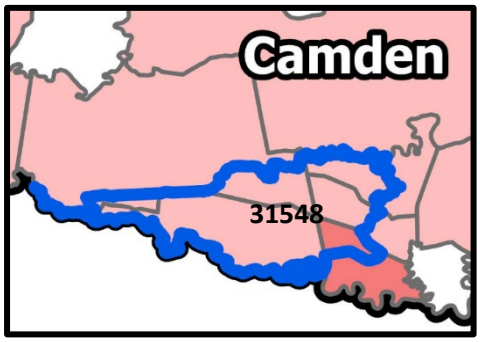


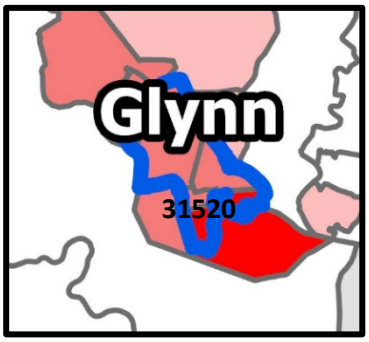


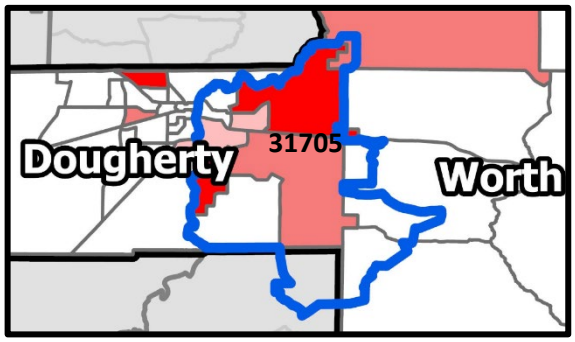
Limited English Proficiency

As seen in the maps below, several communities within the 15-county impacted area have high concentrations of limited English-speaking households. Specifically, Coffee County, Dougherty County, Glynn County, and Chatham County have populations that fall within the highest category of limited English-Speaking households. Also, MID area Zip Codes 31705 and 31520 have populations within the highest category. In order for these residents have access to information related to these funds, vital documents will be translated to Spanish. Further information related to documents translated into Spanish can be found in the Citizen Participation Plan located in the Appendix.



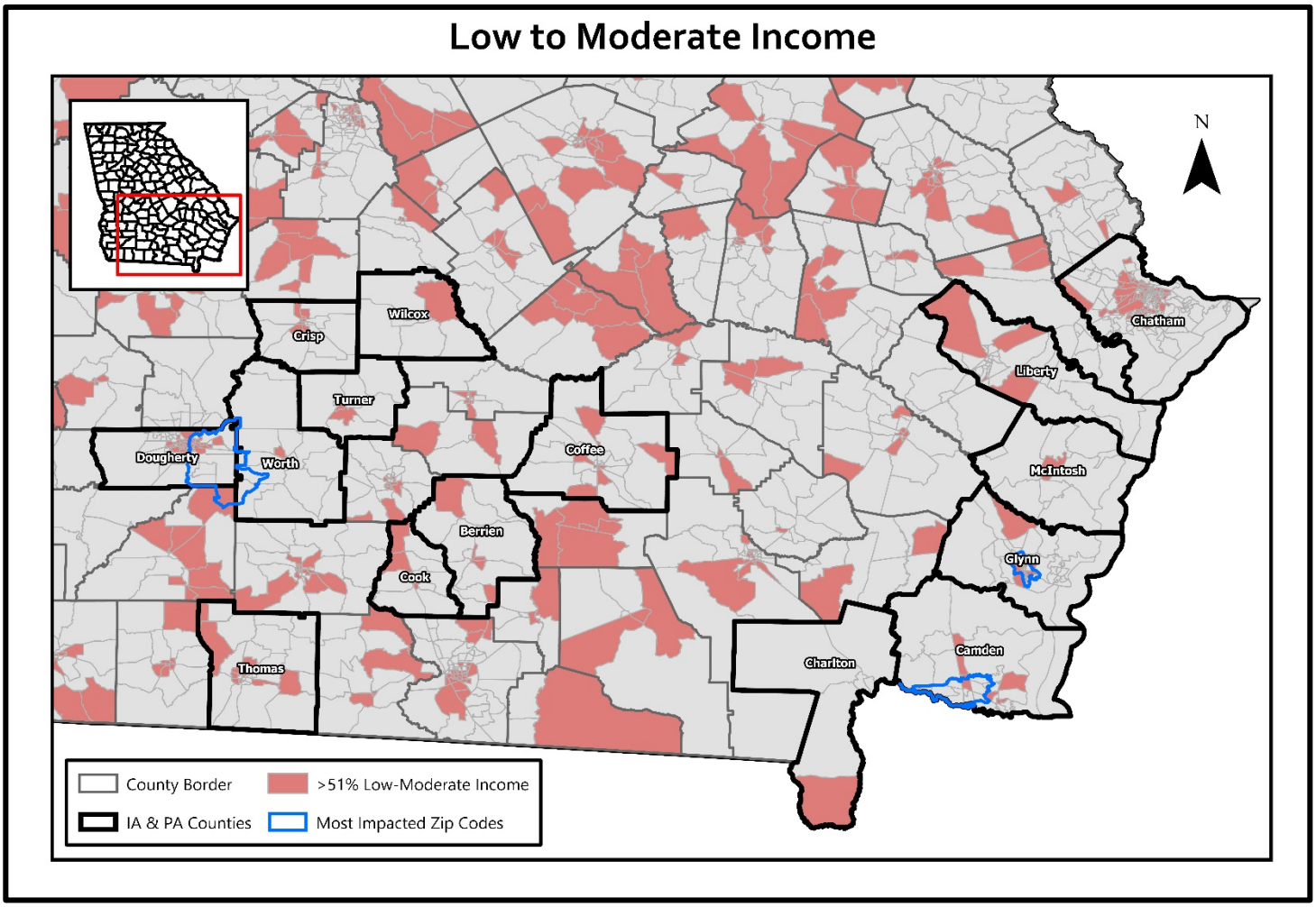


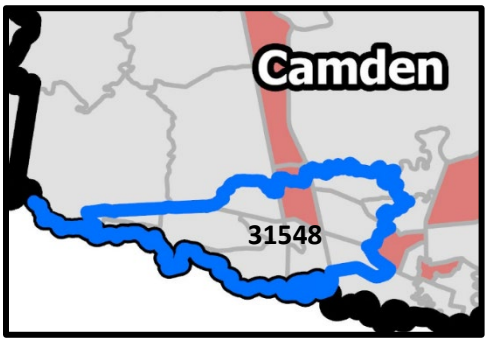


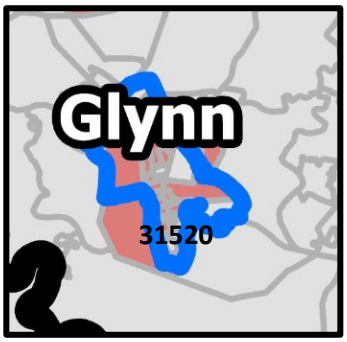


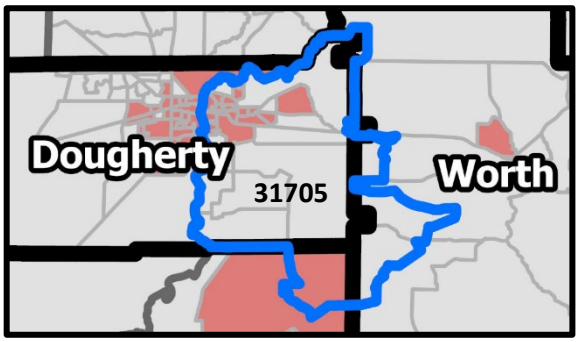
Low-to-Moderate Income

The maps below provide a census-tract level comparison of the communities where greater than 51% of the population is considered to have low-to-moderate income. Within the 15-county impacted area there is a least one community that has greater than 51% low-to-moderate income concentrations within each of counties. Within the MID areas, Zip Code 31548 has concentrations on the northern end, while 31520 and 31705 have concentrations on the north and eastern sides of the zip codes. Since the concentrations are wide-spread throughout the impacted areas, CDBG-DR funds will be made available to all 15 counties and the three zip codes. Further information related to the distribution of funds is located in the Method of Distribution section.









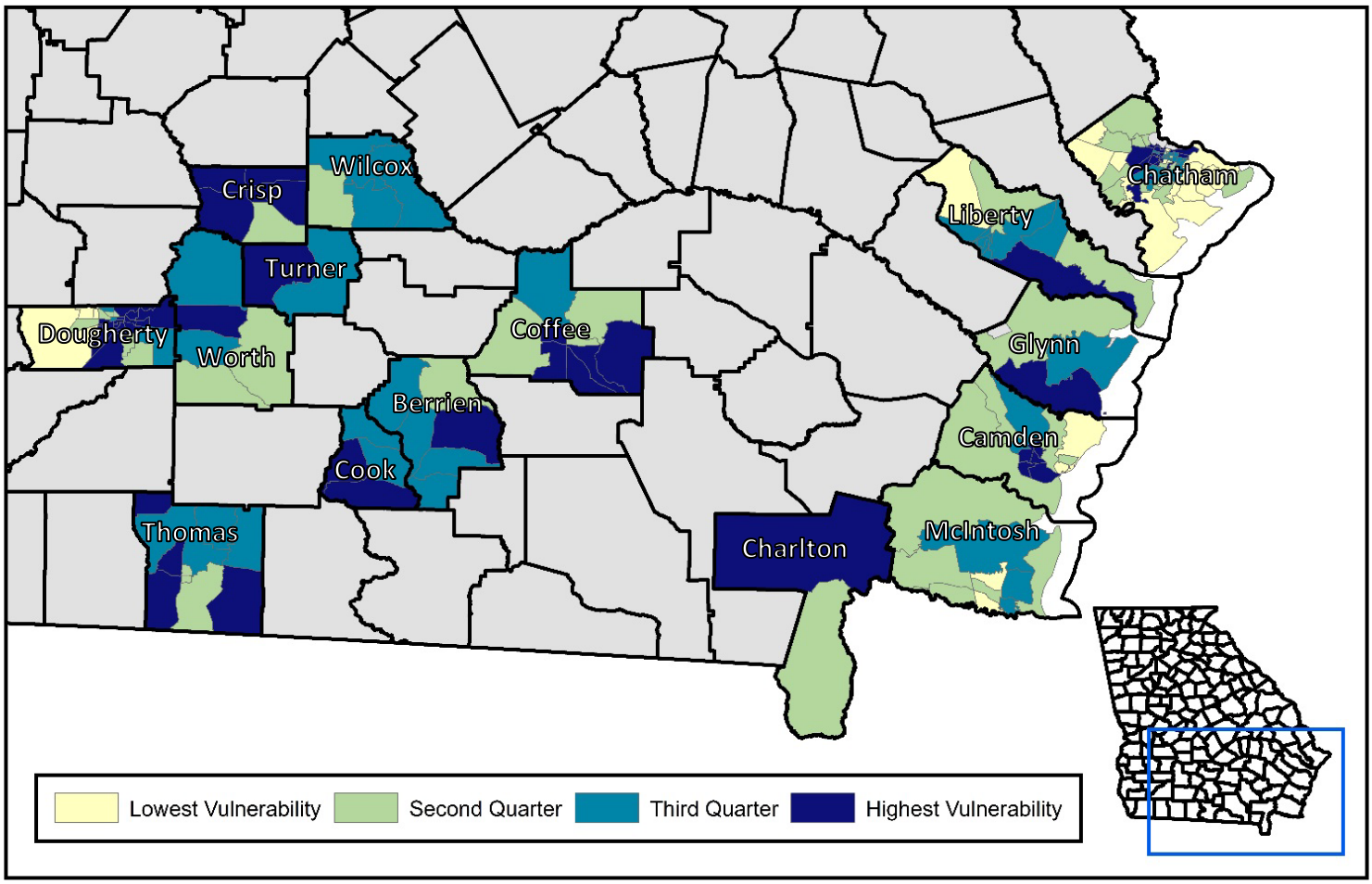
Social Vulnerability

SOVI data is compiled and processed by the Hazards and Vulnerability Research Institute at the University of South Carolina. For a complete list of variables that influence SOVI scores, see the Hazards by State overview, table 2.8 (page 17). As seen in Figure 3.3 below, each of the communities within the 15-county affected area have populations that are within the third quarter or the highest vulnerabilities categories. The three MID Zip Codes are located in Dougherty, Camden, and Glynn Counties. Within those counties, there are areas classified within the highest vulnerability category. Many communities within Southwest and Southeast Georgia have a similar makeup in terms of social vulnerability. Most counties have some presence of persons that are within the highest vulnerability category, and very few counties have populations of persons within the lowest vulnerability category.

Every county and MID Zip Code are in need of access to CDBG-DR funding. Because of this, the three MID zip codes will have access to 50% of the CDBG-DR funding and the remaining 15 counties will have access to the remaining 50%. Local governments wishing to receive infrastructure funds will submit applications to DCA detailing their proposed projects. DCA will take into account proposed infrastructure projects effects on socially vulnerable areas when scoring applications. Further information regarding the distribution of funds can be found in the Method of Distribution Section.

Source: CDC/ATSDR/GRASP, U.S. Census

Figure 3.3: Social Vulnerability for 15 FEMA IA and PA Declared Counties



Housing Characteristics

Table 3.2 is comprised of housing data for each of the communities declared eligible for FEMA's Individual and Public Assistance. Dougherty County and Glynn County have a large percentage of homes built before 1990. With homes greater than 30 years old, storms are more likely to have a detrimental effect. Even though Camden County has a greater percentage of newer homes, due to the flood risk associated with the location of the county, Camden County, like Glynn County, is more likely to have an increased need to undertake infrastructure, elevation and drainage projects. The HUD Identified Most Impacted and Distressed counties are highlighted for emphasis.

Table 3.2: Housing Data | Source: 2018 American Community Survey (ACS) 5- Year Estimates/ CHIP 2019 Data from ARCGIS

County	Median Home Value	Total Housing Units	% Occupied Housing Units	% Owner Occupied	% Renter Occupied	% Houses Built Before 1990	% Houses Built After 1990
Berrien	$85,300	8,767	83.5%	67%	33%	58.3%	41.7%
Camden	$159,800	21,837	88.5%	62%	38%	43.2%	56.8%
Charlton	$82,600	4,492	79.2%	73%	27%	64.0%	36.0%
Chatham	$184,900	124,300	87.0%	54%	46%	60.7%	39.3%
Coffee	$92,600	17,219	83.0%	66%	34%	53.8%	46.2%
Cook	$88,100	7,386	84.4%	67%	33%	55.2%	44.8%
Crisp	$85,200	10,777	77.3%	58%	42%	72.3%	27.7%
Dougherty	$103,900	40,637	85.6%	45%	55%	74.6%	25.4%
Glynn	$168,700	42,682	79.1%	62%	38%	57.5%	42.5%
Liberty	$121,500	27,997	83.0%	44%	56%	44.9%	55.1%
McIntosh	$89,500	4,189	79.5%	74%	26%	54.0%	46.0%
Thomas	$133,800	20,615	84.2%	63%	37%	60.4%	39.6%
Turner	$74,000	3,914	77.2%	68%	32%	74.3%	25.7%
Wilcox	$68,200	3,507	74.3%	76%	24%	70.4%	29.6%
Worth	$85,600	9,329	86.2%	66%	34%	63.1%	36.9%

Berrien County

Berrien County is located in rural Southwest Georgia. It was impacted by a tornado (DR-4297) in mid-January 2017. Since 1996 Berrien County has experienced 98 severe weather incidents. According to NOAA, severe weather events include thunderstorms, hail, and lightning. Berrien County identifies floods, hurricanes/ tropical storms, drought, hail, and tornadoes as high priorities in their local Hazard Mitigation Plan. In Berrien County, 26.3% of the population live below the poverty line, and greater than 58% of the houses are more than 30 years old. These two components make recovery after a disaster more difficult. Mitigating against severe weather and tornadoes will increase the resiliency of the county to lessen the impact from future disasters. *Demographic Profile Source: ACS. Historical Hazard Profile: NOAA's Historical Storm Events Database (1996-2019). High priority hazard project data source: Pages 56-91 of Berrien County's HMP, interpreted by DCA.*

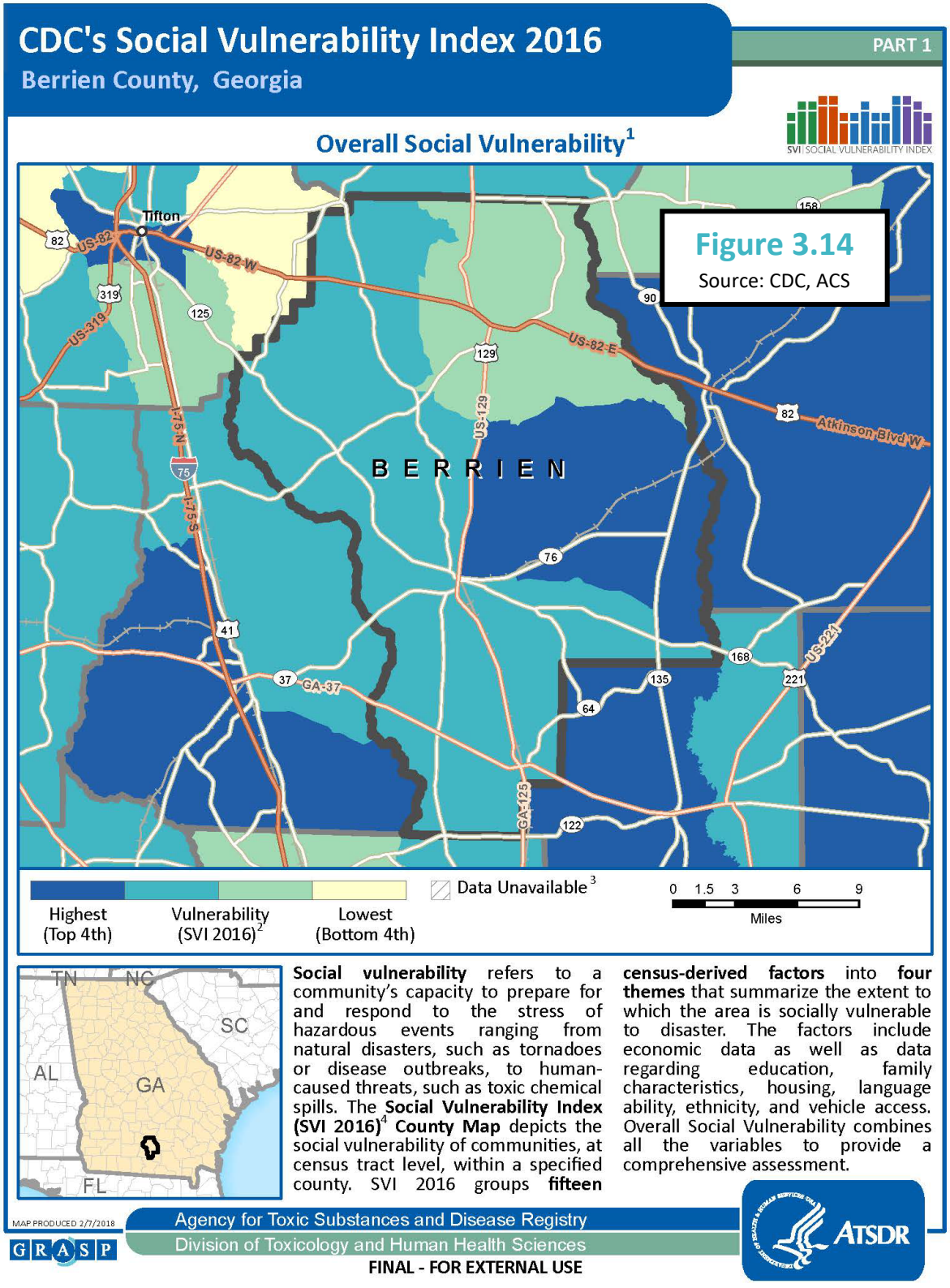
Table 3.12: Berrien County Demographics

2018 Population	19,025	Total Businesses	248
2010-2018 Pop. Change	-1.4%	Median Home Value	$85,300
Median Household Income	$37,163	Total Housing Units	8,767
Poverty Rate	26.3%	% Occupied Housing Units	83.5%
Employment Rate	47.4%	% Owner Occupied	67%
Median Age	39.7	% Renter Occupied	33%
% Minority	15.5%	% Houses Built Before 1990	58.3%
% High school + education	78.1%	% Houses Built After 1990	41.7%

Table 3.13: Berrien County Historical Hazard Profile

Hazard	Number of Events	Injuries	Deaths	Crop Damage	Property Damage
Tornado	1	0	2	$0	$500,000
Inland Flooding	10	0	0	$0	$75,000
Hurricane Wind	1	0	0	$0	$100,000
Severe Weather	98	0	0	$0	$876,250
Coastal Hazards	9	0	0	$0	$1,370,000
Drought	27	0	0	$0	$0
Severe Winter Weather	3	0	0	$7,850,000	$0
Wildfire	0	0	0	$0	$0

Berrien County is a rural area with large census tracts. Because of this, there are large areas of social vulnerability. As seen in Figure 3.14 approximately 75% of the county is ranked in the top 50% for vulnerability. The east-central section of the county has the highest vulnerability overall.



Camden County

Camden County is located along Georgia's coast and was impacted by Hurricane Irma (DR-4338) in September 2017. Historically, Camden County has experienced 313 severe weather incidents and 21 coastal hazards since 1996. According to NOAA, severe weather events are localized and include thunderstorms, hail, and lightning, while coastal hazards astronomical low tide, coastal flood, high surf, hurricane, hurricane typhoon, rip current, storm surge tide, tropical depression, tropical storm and waterspout. Camden County identifies wildfire, tornado/storm/hailstorm and flooding as very high priorities in their local Hazard Mitigation Plan. Mitigating against severe weather and coastal hazards (including hurricanes) will increase the resiliency of the county against future disasters. *Demographic Profile Source: ACS. Historical Hazard Profile: NOAA's Historical Storm Events Database (1996-2019). High priority hazard project data source: Pages 74-153 of Camden County's HMP, interpreted by DCA.*

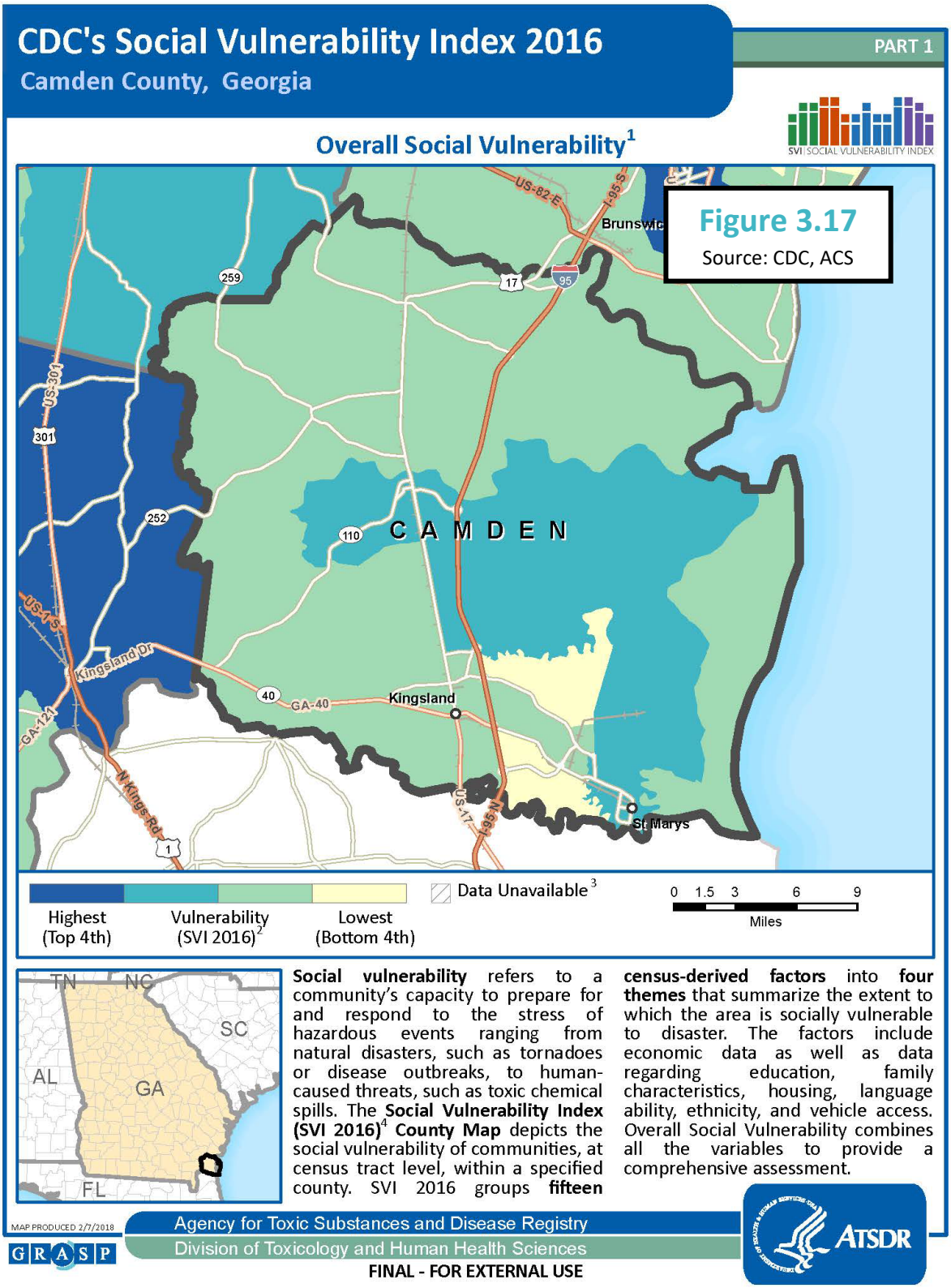
Table 3.15: Camden County Demographics

2018 Population	52,714	**Total Businesses**	803
2010-2018 Pop. Change	4.40%	**Median Home Value**	$159,800
Median Household Income	$56,397	**Total Housing Units**	21,837
Poverty Rate	12.9%	**% Occupied Housing Units**	88.5%
Employment Rate	52.0%	**% Owner Occupied**	62%
Median Age	32.3	**% Renter Occupied**	38%
% Minority	27.1%	**% Houses Built Before 1990**	43.2%
% High school + education	91.8%	**% Houses Built After 1990**	56.8%

Table 3.16: Camden County Historical Hazard Profile

Hazard	Number of Events	Injuries	Deaths	Crop Damage	Property Damage
Tornado	14	5	0	$0	$289,500
Inland Flooding	12	0	0	$0	$869,000
Hurricane Wind	0	0	0	$0	$0
Severe Weather	313	1	0	$1,500	$480,500
Coastal Hazards	21	0	0	$0	$2,300,000
Drought	2	0	0	$22,000	$0
Severe Winter Weather	1	0	0	$0	$0
Wildfire	4	0	0	$0	$0

Overall, Camden County's census tracts rank in the bottom fourth and middle fifty percent for vulnerability. The middle section of the county has the highest vulnerability overall and the highest vulnerability for housing and transportation.



Charlton County

Charlton County is located in southeast Georgia and was severely impacted by Hurricane Irma (DR-4338) in September 2017. Since 1996 Charlton County has experienced 152 severe weather incidents and 13 inland flooding incidents. According to NOAA, severe weather events are localized and include thunderstorms, hail, and lightning. Charlton County identifies hurricane/ tropical storm, flood/ SLOSH, wildfire, and tornado as high priorities in their local Hazard Mitigation Plan. The county has a 24.4% poverty rate and 64% of the houses are over 30 years old. These two demographics make recovery after a disaster more difficult. Mitigating against severe weather will increase the resiliency of the county against future disasters. *Demographic Profile Source: ACS. Historical Hazard Profile: NOAA's Historical Storm Events Database (1996-2019). High priority hazard project data source: Pages 88-147 of Charlton County's HMP, interpreted by DCA.*

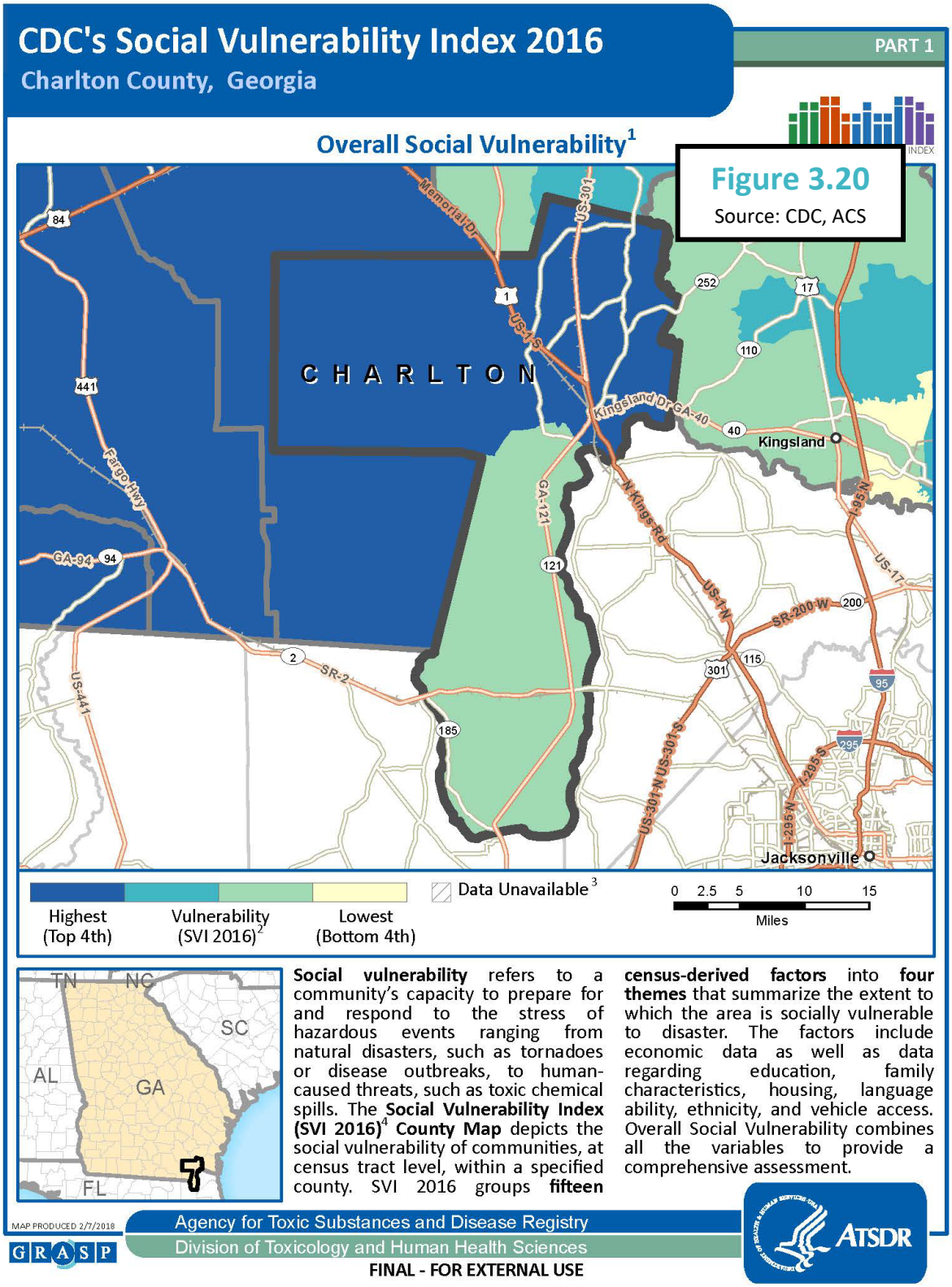
Table 3.18: Charlton County Demographics

2018 Population	12,983	**Total Businesses**	149
2010-2018 Pop. Change	6.70%	**Median Home Value**	$82,600
Median Household Income	$40,283	**Total Housing Units**	4,492
Poverty Rate	24.4%	**% Occupied Housing Units**	79.2%
Employment Rate	39.4%	**% Owner Occupied**	73%
Median Age	41.7	**% Renter Occupied**	27%
% Minority	33.1%	**% Houses Built Before 1990**	64.0%
% High school + education	73.3%	**% Houses Built After 1990**	36.0%

Table 3.19: Historical Hazard Profile

Hazard	Number of Events	Injuries	Deaths	Crop Damage	Property Damage
Tornado	8	0	0	$0	$167,500
Inland Flooding	13	0	0	$0	$225,000
Hurricane Wind	0	0	0	$0	$0
Severe Weather	152	2	0	$1,000	$181,000
Coastal Hazards	6	0	0	$0	$0
Drought	1	0	0	$0	$0
Severe Winter Weather	1	0	0	$0	$0
Wildfire	4	0	0	$0	$0

Approximately 50% of Charlton County ranks in the highest vulnerability category. The same section also ranks in the highest vulnerability category for socioeconomic status, race/ ethnicity/language, and housing/transportation.



Chatham County

Chatham County is located along Georgia's coast and was heavily impacted by Hurricane Irma (DR-4338) in September 2017. Historically, Chatham County has experienced 555 severe weather incidents, 155 coastal hazards, and 69 inland flooding incidents since 1996. According to NOAA, severe weather events are localized and include thunderstorms, hail, and lightning, coastal hazards astronomical low tide, coastal flood, high surf, hurricane, hurricane typhoon, rip current, storm surge tide, tropical depression, tropical storm and waterspout. Chatham County identifies hurricane/tropical storms, thunderstorm/ high wind, tornado, storm surge, hazardous materials incident, and terror threat as high priorities in their local Hazard Mitigation Plan. Within the county, 61% of homes are greater than 30 years old. *Demographic Profile Source: ACS. Historical Hazard Profile: NOAA's Historical Storm Events Database (1996-2019). High priority hazard project data source: Pages 209-210 of Chatham County's HMP, interpreted by DCA.*

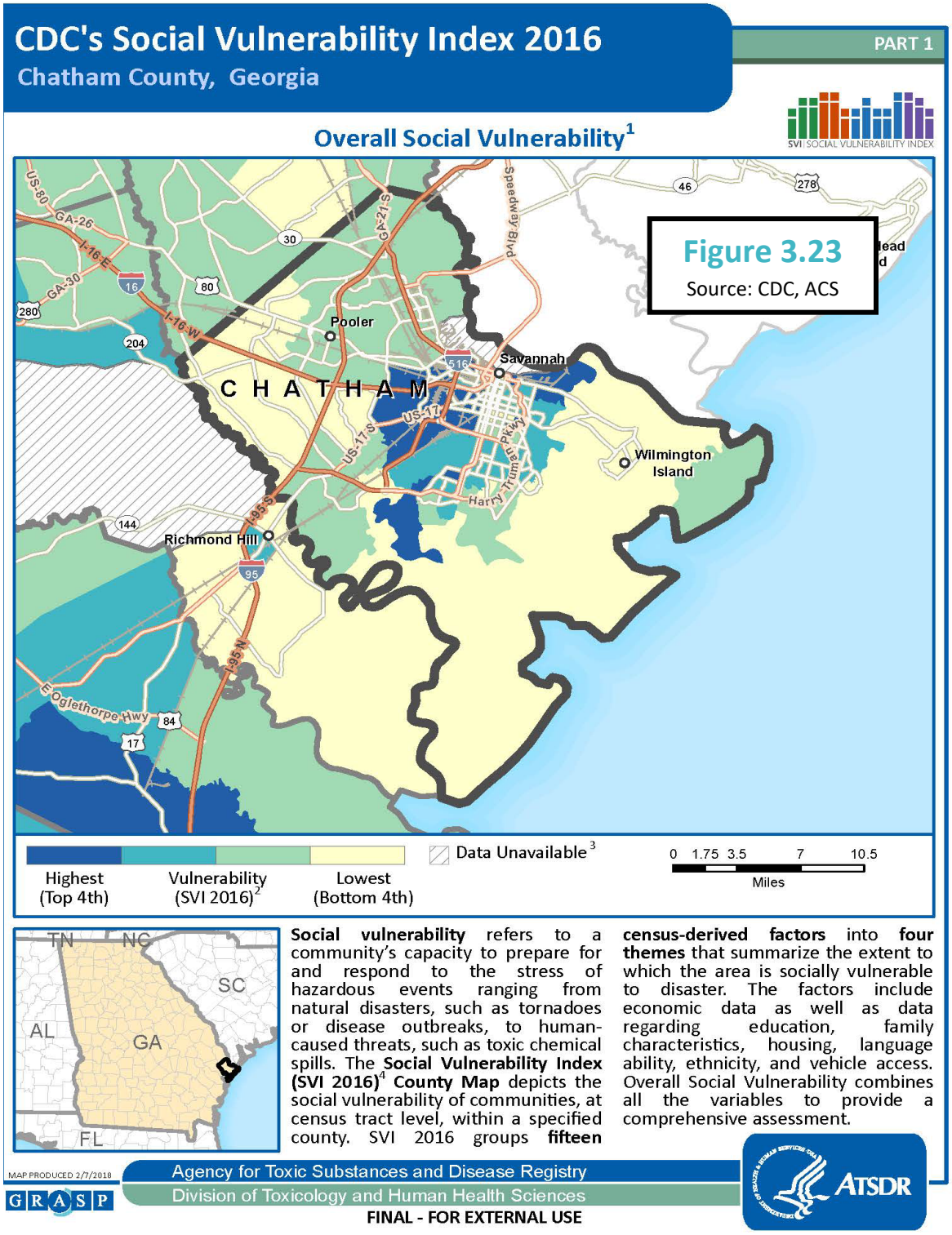
Figure 3.21: Chatham County Demographics

2018 Population	287,049	**Total Businesses**	7,728
2010-2018 Pop. Change	8.30%	**Median Home Value**	$184,900
Median Household Income	$54,911	**Total Housing Units**	124,300
Poverty Rate	15.8%	**% Occupied Housing Units**	87.0%
Employment Rate	58.7%	**% Owner Occupied**	54%
Median Age	35.2	**% Renter Occupied**	46%
% Minority	47.3%	**% Houses Built Before 1990**	60.7%
% High school + education	89.6%	**% Houses Built After 1990**	39.3%

Table 3.22: Chatham County Historical Hazard Profile

Hazard	Number of Events	Injuries	Deaths	Crop Damage	Property Damage
Tornado	14	6	0	$0	$3,600,000
Inland Flooding	69	2	0	$0	$8,432,000
Hurricane Wind	14	2	1	$0	$0
Severe Weather	555	18	2	$1,000	$4,424,300
Coastal Hazards	155	14	6	$0	$20,173,000
Drought	77	0	0	$6,030,000	$0
Severe Winter Weather	37	0	0	$0	$1,168,790
Wildfire	0	0	0	$0	$0

Most of the outer borders of Chatham County have low social vulnerability. The highest vulnerability ranked sections of the county are in the middle. This is also true for socioeconomic status, household composition/ disability, and race/ ethnicity/language. In terms of housing and transportation, the most vulnerable areas include the northern end of the county as well as the eastern section on the coast.



Coffee County

Coffee County is located in South Georgia and was impacted by Hurricane Irma (DR-4338) in September 2017. Historically, Coffee County has experienced 234 severe weather incidents, 13 tornadoes and 11 inland flooding incidents since 1996. According to NOAA, severe weather events are localized and include thunderstorms, hail, and lightning. Coffee County identifies tornadoes, flood, hail, and hurricane/tropical storms as high priorities in their local Hazard Mitigation Plan. The county has a 22.3% poverty rate and 54% of the houses are over 30 years old. These two demographics make recovery after a disaster more difficult. Mitigating against severe weather and inland flooding will increase the resiliency of the county against future disasters. *Demographic Profile Source: ACS. Historical Hazard Profile: NOAA's Historical Storm Events Database (1996-2019). High priority hazard project data source: Pages 56-85 of Coffee County's HMP, interpreted by DCA.*

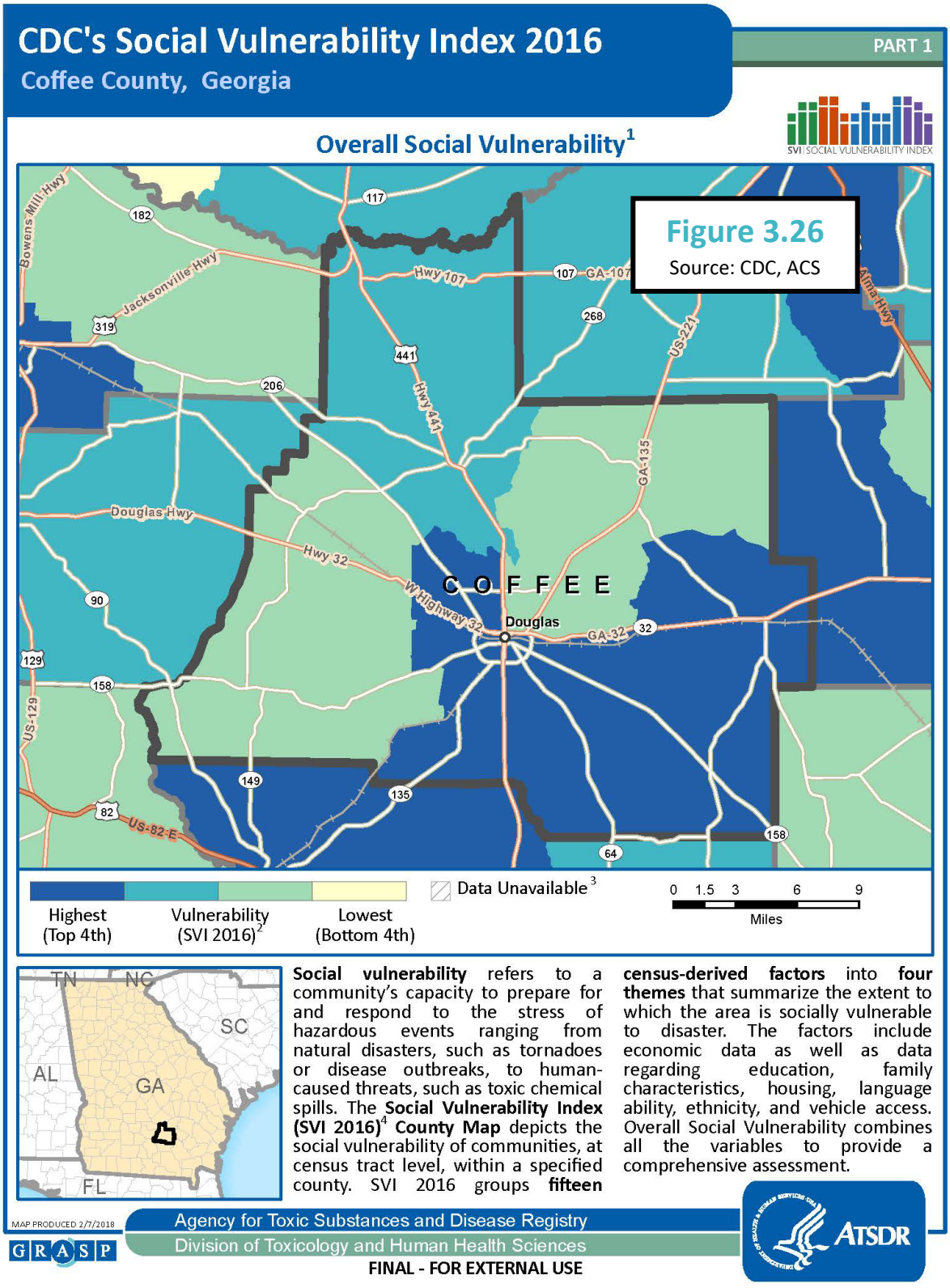
Table 3.24: Coffee County Demographics

2018 Population	42,961	**Total Businesses**	833
2010-2018 Pop. Change	1.40%	**Median Home Value**	$92,600
Median Household Income	$38,266	**Total Housing Units**	17,219
Poverty Rate	22.3%	**% Occupied Housing Units**	83.0%
Employment Rate	49.5%	**% Owner Occupied**	66%
Median Age	36.2	**% Renter Occupied**	34%
% Minority	32.0%	**% Houses Built Before 1990**	53.8%
% High school + education	77.4%	**% Houses Built After 1990**	46.2%

Table 3.25: Coffee County Historical Hazard Profile

Hazard	Number of Events	Injuries	Deaths	Crop Damage	Property Damage
Tornado	13	2	0	$50,000	$604,500
Inland Flooding	11	0	0	$0	$1,540,000
Hurricane Wind	0	0	0	$0	$0
Severe Weather	234	8	0	$3,200	$397,900
Coastal Hazards	4	0	0	$0	$0
Drought	0	0	0	$0	$0
Severe Winter Weather	3	0	0	$0	$0
Wildfire	1	0	0	$0	$0

The southeastern census tract of Coffee County ranks in the highest vulnerability category. The same southeastern quadrant of the county has the highest vulnerability for housing and transportation as well as socioeconomic status.



Cook County

Cook County is located in rural Middle-South Georgia and was impacted by a tornado (DR-4297) in mid-January 2017. Historically, Cook County has experienced 55 severe weather incidents since 1996. According to NOAA, severe weather events are localized and include thunderstorms, hail, and lightning. Cook identifies tornadoes, flood, windstorms/hailstorms/lightning and hurricane/tropical storms as medium to high priorities in their local Hazard Mitigation Plan. Cook County has a 24% poverty rate and 55% of the houses are over 30 years old. These two demographics make recovery after a disaster more difficult, and mitigating against severe weather should increase the resiliency of the county against future disasters. *Demographic Profile Source: 2018 American Community Survey (ACS) 5-Year Estimates. Historical Hazard Profile: NOAA's Historical Storm Events Database (1996-2019). High priority hazard project data taken from pages 58-96 of Cook's HMP and interpreted by DCA.*

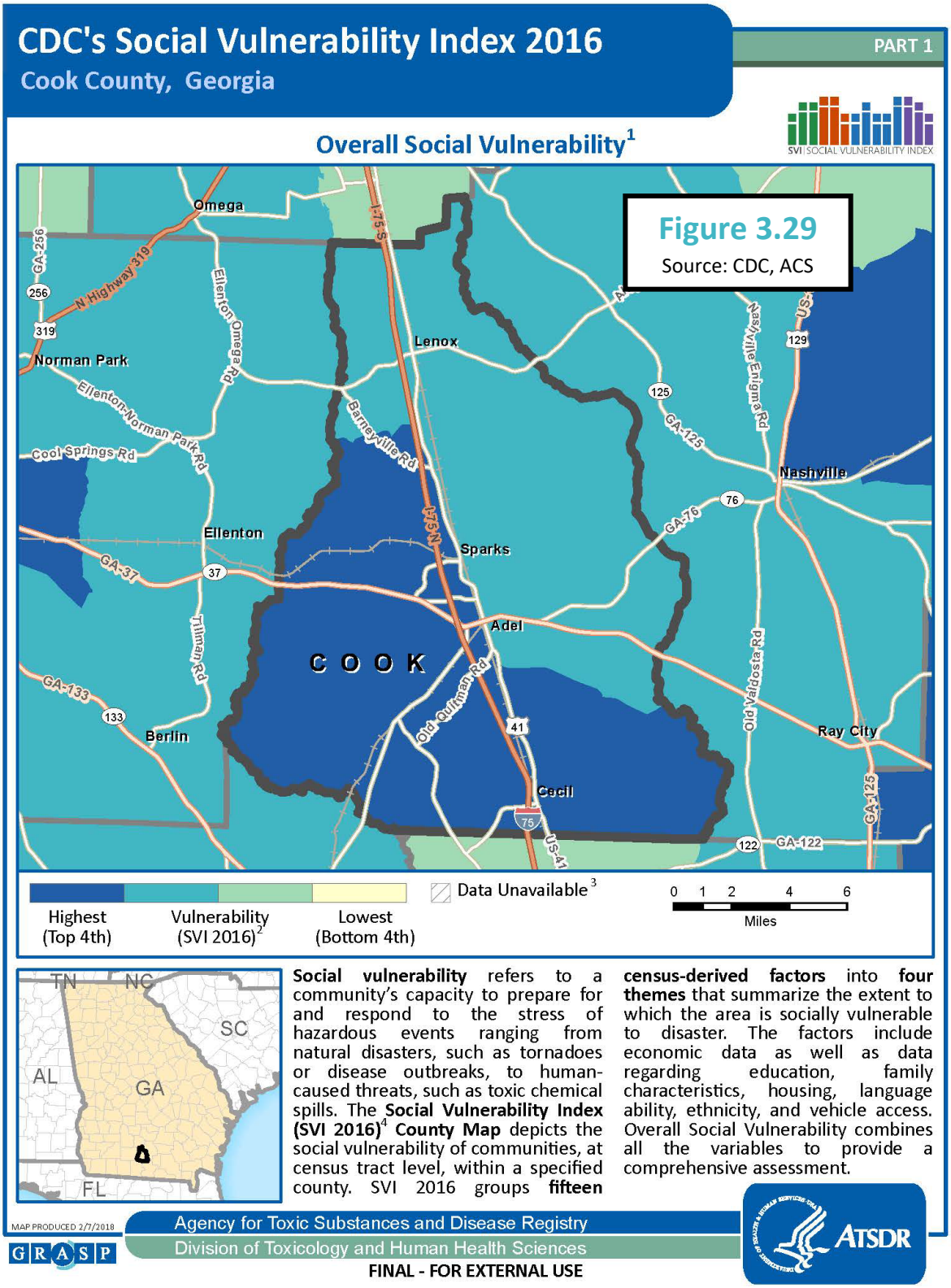
Table 3.27: Cook County Demographics

2018 Population	17,184	**Total Businesses**	315
2010-2018 Pop. Change	-0.10%	**Median Home Value**	$88,100
Median Household Income	$38,408	**Total Housing Units**	7,386
Poverty Rate	24.0%	**% Occupied Housing Units**	84.4%
Employment Rate	53.3%	**% Owner Occupied**	67%
Median Age	37.4	**% Renter Occupied**	33%
% Minority	31.0%	**% Houses Built Before 1990**	55.2%
% High school + education	79.9%	**% Houses Built After 1990**	44.8%

Table 3.28: Cook County Historical Hazard Profile

Hazard	Number of Events	Injuries	Deaths	Crop Damage	Property Damage
Tornado	5	45	7	$0	$1,535,000
Inland Flooding	5	0	0	$0	$305,000
Hurricane Wind	1	0	0	$0	$100,000
Severe Weather	55	2	0	$0	$731,920
Coastal Hazards	8	0	0	$0	$1,480,000
Drought	26	0	0	$0	$0
Severe Winter Weather	3	0	0	$7,850,000	$0
Wildfire	0	0	0	$0	$0

Although all parts of the county rank high on the social vulnerability index, the western and southern parts of Cook County (approximately 50%) have the greatest social vulnerability ranking. This is also true for housing/ transportation vulnerability.



Crisp County

Crisp County is located in rural Middle-South Georgia and was impacted by a tornado (DR-4297) in mid-January 2017. Historically, Crisp County has experienced 97 severe weather incidents and 22 inland flooding incidents since 1996. According to NOAA, severe weather events are localized and include thunderstorms, hail, and lightning. Crisp County did not rank priorities in their local Hazard Mitigation Plan, but mentioned tornado, windstorm/thunderstorm winds, excess heat, flood, drought, dam failure, winter storm, hurricane/ tropical storm, hailstorm and expansive soils. Crisp County has a 31% poverty rate and 72% of the houses are over 30 years old. These two demographics make recovery after a disaster more difficult. *Demographic Profile Source: 2018 American Community Survey (ACS) 5-Year Estimates. Historical Hazard Profile: NOAA's Historical Storm Events Database (1996-2019). Hazard project data taken from pages 105 & 115 of Crisp's Pre-Disaster Mitigation Plan and interpreted by DCA.*

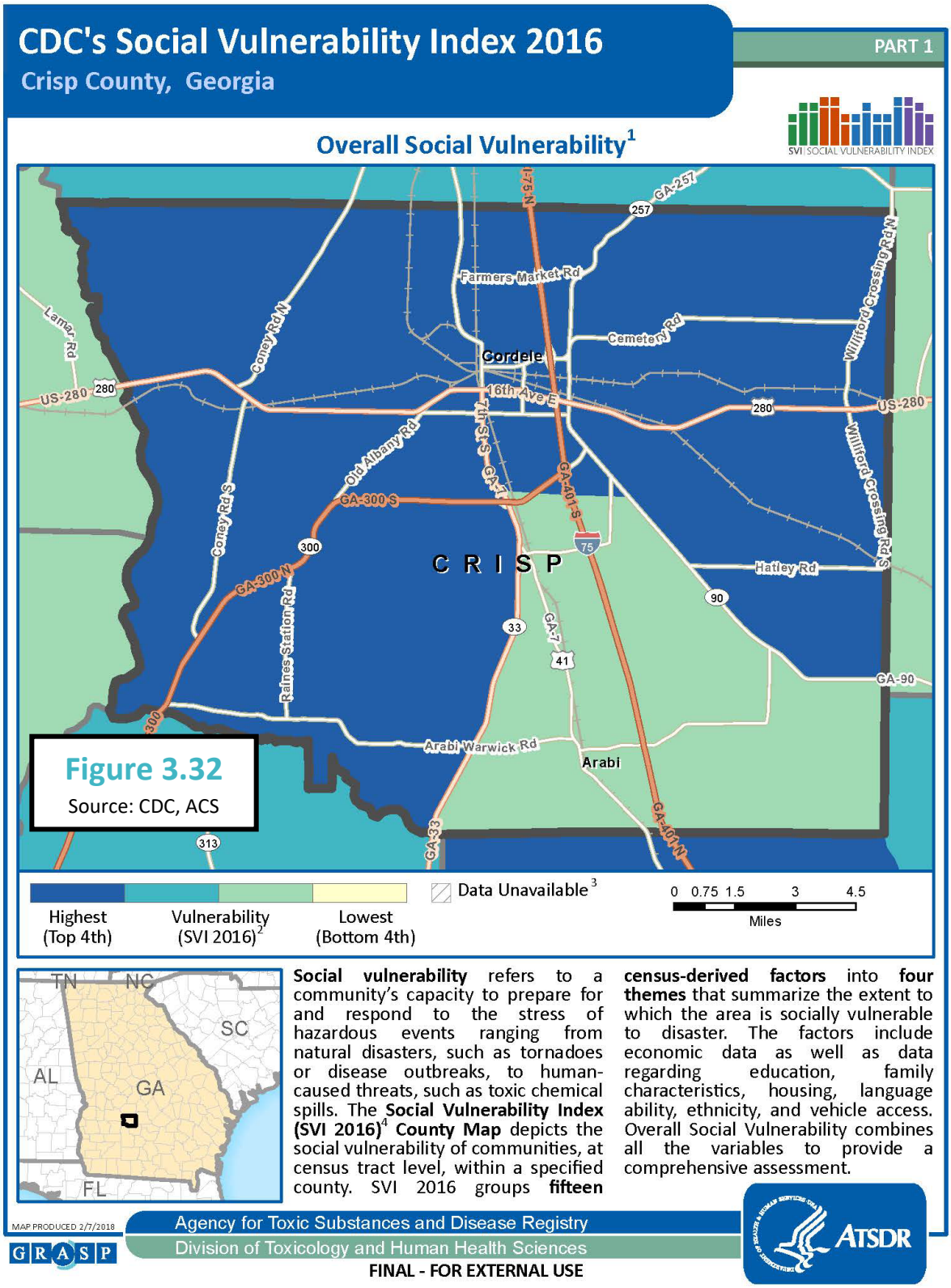
Table 3.30: Crisp County Demographics

2018 Population	22,846	**Total Businesses**	510
2010-2018 Pop. Change	-2.50%	**Median Home Value**	$85,200
Median Household Income	$35,096	**Total Housing Units**	10,777
Poverty Rate	30.8%	**% Occupied Housing Units**	77.3%
Employment Rate	49.5%	**% Owner Occupied**	58%
Median Age	38.8	**% Renter Occupied**	42%
% Minority	47.0%	**% Houses Built Before 1990**	72.3%
% High school + education	80.1%	**% Houses Built After 1990**	27.7%

Table 3.31: Crisp County Historical Hazard Profile

Hazard	Number of Events	Injuries	Deaths	Crop Damage	Property Damage
Tornado	6	2	0	$0	$710,000
Inland Flooding	22	0	0	$0	$1,531,000
Hurricane Wind	4	0	0	$0	$0
Severe Weather	97	2	1	$0	$1,549,950
Coastal Hazards	18	0	0	$0	$210,000
Drought	25	0	0	$10,400,000	$0
Severe Winter Weather	18	0	0	$0	$25,000
Wildfire	0	0	0	$0	$0

Approximately 75% of Crisp County ranks in the highest category for social vulnerability overall as well as for household composition/disability vulnerability. These areas include the north, west, and east. Socioeconomic vulnerability is highest in the north and west parts of the county.



Dougherty County

Dougherty County is located in rural Southwest Georgia and was impacted by two tornadic events (DR-4294 & DR-4297) both occurring in mid-January 2017. Historically, Dougherty County has experienced 170 severe weather incidents, 6 tornadoes and 28 inland flooding incidents since 1996. According to NOAA, severe weather events are localized and include thunderstorms, hail, and lightning. Dougherty County identifies tornadoes, drought, severe weather (thunderstorm winds) and floods as priorities in their local Hazard Mitigation Plan. The county has a 29% poverty rate and 75% of the houses are over 30 years old. Having a high poverty rate and such a large portion of aging housing stock makes recovery after a disaster more difficult. Mitigating against severe weather, tornadoes, and inland flooding should increase the resiliency of the county against future disasters. *(Hazard project data taken from page 38 of Albany/ Dougherty Flood Hazard Mitigation Plan and interpreted by DCA)*

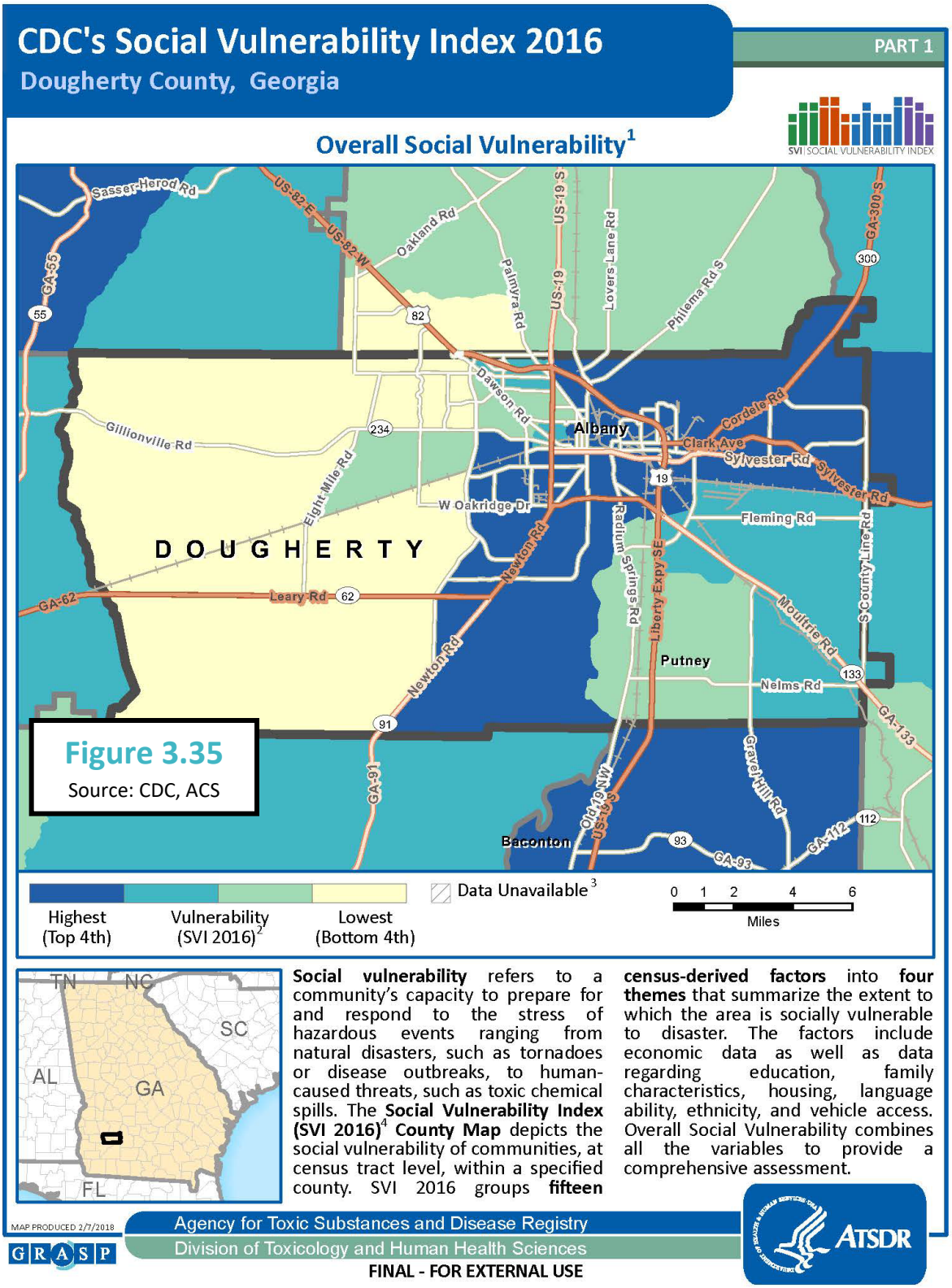
Table 3.33: Dougherty County Demographics

2018 Population	91,049	**Total Businesses**	2,276
2010-2018 Pop. Change	-3.70%	**Median Home Value**	$103,900
Median Household Income	$37,633	**Total Housing Units**	40,637
Poverty Rate	29.4%	**% Occupied Housing Units**	85.6%
Employment Rate	49.3%	**% Owner Occupied**	45%
Median Age	35.1	**% Renter Occupied**	55%
% Minority	73.0%	**% Houses Built Before 1990**	74.6%
% High school + education	82.5%	**% Houses Built After 1990**	25.4%

Table 3.34: Dougherty County Historical Hazard Profile

Hazard	Number of Events	Injuries	Deaths	Crop Damage	Property Damage
Tornado	6	32	5	$0	$301,135,000
Inland Flooding	28	0	0	$0	$116,301,000
Hurricane Wind	2	0	0	$111,000,000	$300,500,000
Severe Weather	170	2	0	$0	$18,200,500
Coastal Hazards	9	0	0	$111,000,000	$305,690,000
Drought	31	0	0	$0	$0
Severe Winter Weather	4	0	0	$7,850,000	$51,000
Wildfire	0	0	0	$0	$0

In Dougherty County, the south-central to northeastern parts of the county are the most socially vulnerable overall. This section includes the City of Albany. The socioeconomic vulnerability and housing/ transportation vulnerability follow the same pattern and are highest in these areas as well.



Glynn County

Glynn County is located along Georgia's coast and was impacted by Hurricane Irma (DR-4338) in September 2017. Historically, Glynn County has experienced 166 severe weather incidents, 29 coastal hazards, 10 inland flooding incidents and 9 tornadoes since 1996. According to NOAA, severe weather events are localized and include thunderstorms, hail, and lightning, coastal hazards astronomical low tide, coastal flood, high surf, hurricane, hurricane typhoon, rip current, storm surge tide, tropical depression, tropical storm and waterspout. The county identifies coastal storms/ hurricanes, floods, hailstorms, and severe thunderstorms as high priorities in their local Hazard Mitigation Plan. Mitigating against severe weather and coastal hazards (including hurricanes) will increase the resiliency of the county against future disasters. *Demographic Profile Source: ACS. Historical Hazard Profile: NOAA's Historical Storm Events Database (1996-2019). High priority hazard project data taken from pages 89-107 of Glynn's HMP and interpreted by DCA.*

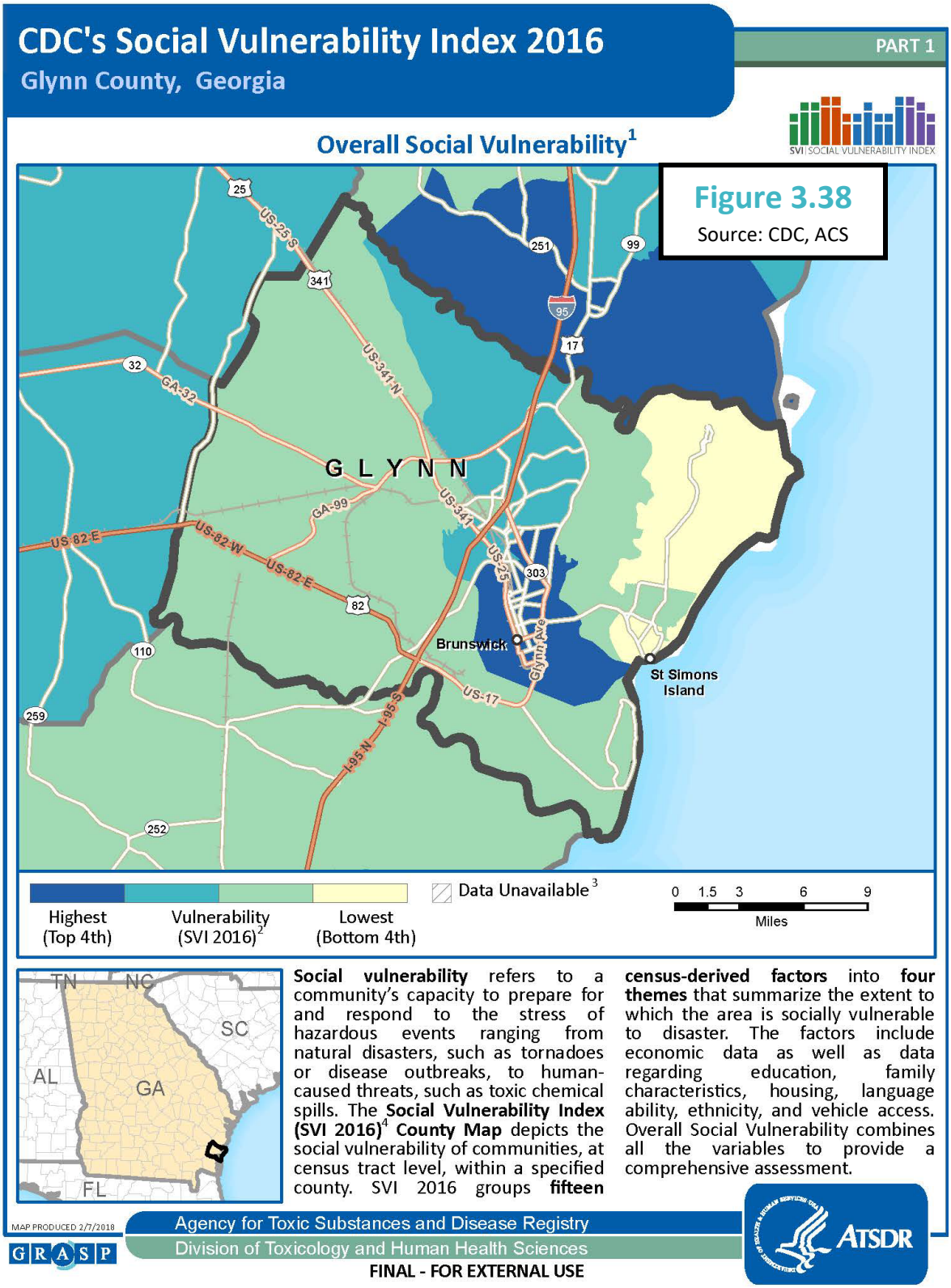
Table 3.36: Glynn County Demographics

2018 Population	83,974	**Total Businesses**	2,533
2010-2018 Pop. Change	5.50%	**Median Home Value**	$168,700
Median Household Income	$50,672	**Total Housing Units**	42,682
Poverty Rate	18.3%	**% Occupied Housing Units**	79.1%
Employment Rate	57.5%	**% Owner Occupied**	62%
Median Age	41	**% Renter Occupied**	38%
% Minority	32.1%	**% Houses Built Before 1990**	57.5%
% High school + education	87.9%	**% Houses Built After 1990**	42.5%

Table 3.37: Glynn County Historical Hazard Profile

Hazard	Number of Events	Injuries	Deaths	Crop Damage	Property Damage
Tornado	9	0	0	$0	$551,000
Inland Flooding	10	0	0	$0	$42,000
Hurricane Wind	0	0	0	$0	$0
Severe Weather	166	0	0	$0	$286,800
Coastal Hazards	29	0	2	$0	$0
Drought	0	0	0	$0	$0
Severe Winter Weather	1	0	0	$0	$0
Wildfire	0	0	0	$0	$0

A large portion of Glynn County ranks low overall for social vulnerability. The highest section encompasses the City of Brunswick in the middle part of Glynn County and stretching to the coast to the east. Household composition/ disability and housing/transportation vulnerabilities follow the same pattern.



Liberty County

Liberty County is located on the coast of Georgia and was impacted by Hurricane Irma (DR-4338) in September 2017. Historically, Liberty County has experienced 288 severe weather incidents, 28 coastal hazards, 13 inland flooding incidents and 9 tornadoes since 1996. These figures make Liberty County one of the most often impacted counties out of the 15 declared counties for the 2017 disasters. Liberty County identifies coastal hazards, hurricane wind, wind, tornadoes, severe weather (thunder, lightning, and hail), inland flooding, drought and wildfire as priorities in their local Hazard Mitigation Plan. The county does not list a priority ranking for hazards, but it does list projects in order of priority with corresponding hazards addressed, and projects addressing coastal hazards and inland flooding are at the top of the action list. *Demographic Profile Source: ACS. Historical Hazard Profile: NOAA's Historical Storm Events Database (1996-2019). Hazard project data taken from chapter 2 and page 152 of Liberty's HMP and interpreted by DCA.*

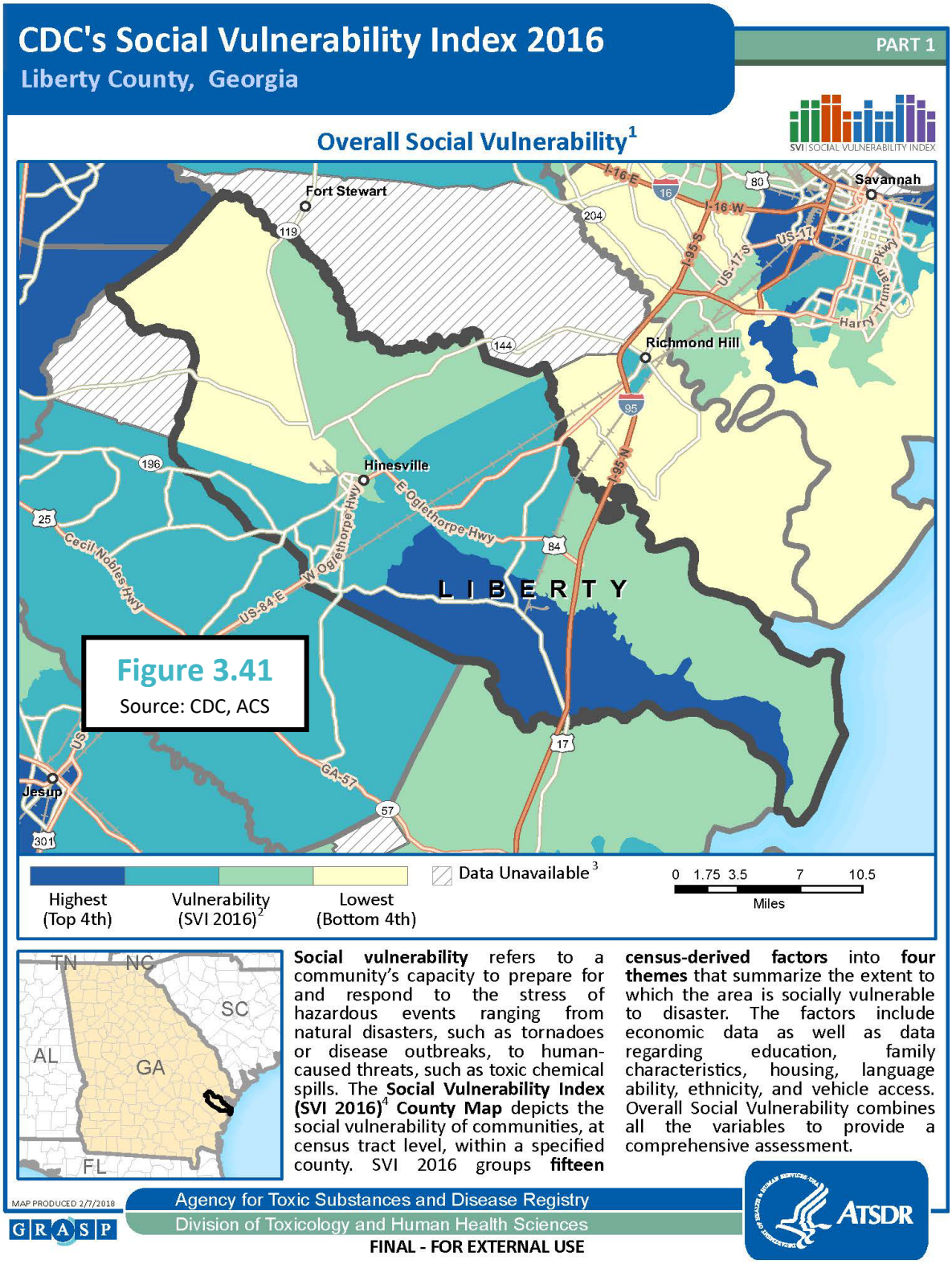
Table 3.39: Liberty County Demographics

2018 Population	62,108	**Total Businesses**	824
2010-2018 Pop. Change	-2.20%	**Median Home Value**	$121,500
Median Household Income	$45,959	**Total Housing Units**	27,997
Poverty Rate	16.8%	**% Occupied Housing Units**	83.0%
Employment Rate	49.2%	**% Owner Occupied**	44%
Median Age	28.1	**% Renter Occupied**	56%
% Minority	53.5%	**% Houses Built Before 1990**	44.9%
% High school + education	90.9%	**% Houses Built After 1990**	55.1%

Table 3.40: Liberty County Historical Hazard Profile

Hazard	Number of Events	Injuries	Deaths	Crop Damage	Property Damage
Tornado	9	7	1	$425,000	$43,082,000
Inland Flooding	13	0	0	$0	$35,000
Hurricane Wind	4	0	0	$0	$0
Severe Weather	288	13	1	$20,000	$10,727,700
Coastal Hazards	28	0	0	$0	$2,934,000
Drought	46	0	0	$0	$0
Severe Winter Weather	6	0	0	$0	$0
Wildfire	2	0	0	$0	$0

The middle-southern portion of Liberty County is the most socially vulnerable. This same area also corresponds to the most vulnerable parts of the county in terms of socioeconomic status and household composition/ disability. The actual coastline is less vulnerable in all categories.



McIntosh County

McIntosh County is located on the coast of Georgia and was impacted by Hurricane Irma (DR-4338) in September 2017. Historically, McIntosh County experienced 157 severe weather incidents and 43 coastal hazards since 1996. According to NOAA, severe weather events are localized and include thunderstorms, hail, and lightning. Coastal hazards include astronomical low tide, coastal flood, high surf, hurricane, hurricane typhoon, rip current, storm surge tide, tropical depression, tropical storm and waterspout. McIntosh County identifies coastal storms/ hurricanes, extreme heat, and wildfire as high priorities in the county's local Hazard Mitigation Plan. McIntosh County has a poverty rate of 20% and 54% of the houses were built 30 or more years ago. *Demographic Profile Source: ACS. Historical Hazard Profile: NOAA's Historical Storm Events Database (1996-2019). High priority hazard project data taken from page 106, Section III of McIntosh's HMP and interpreted by DCA.*

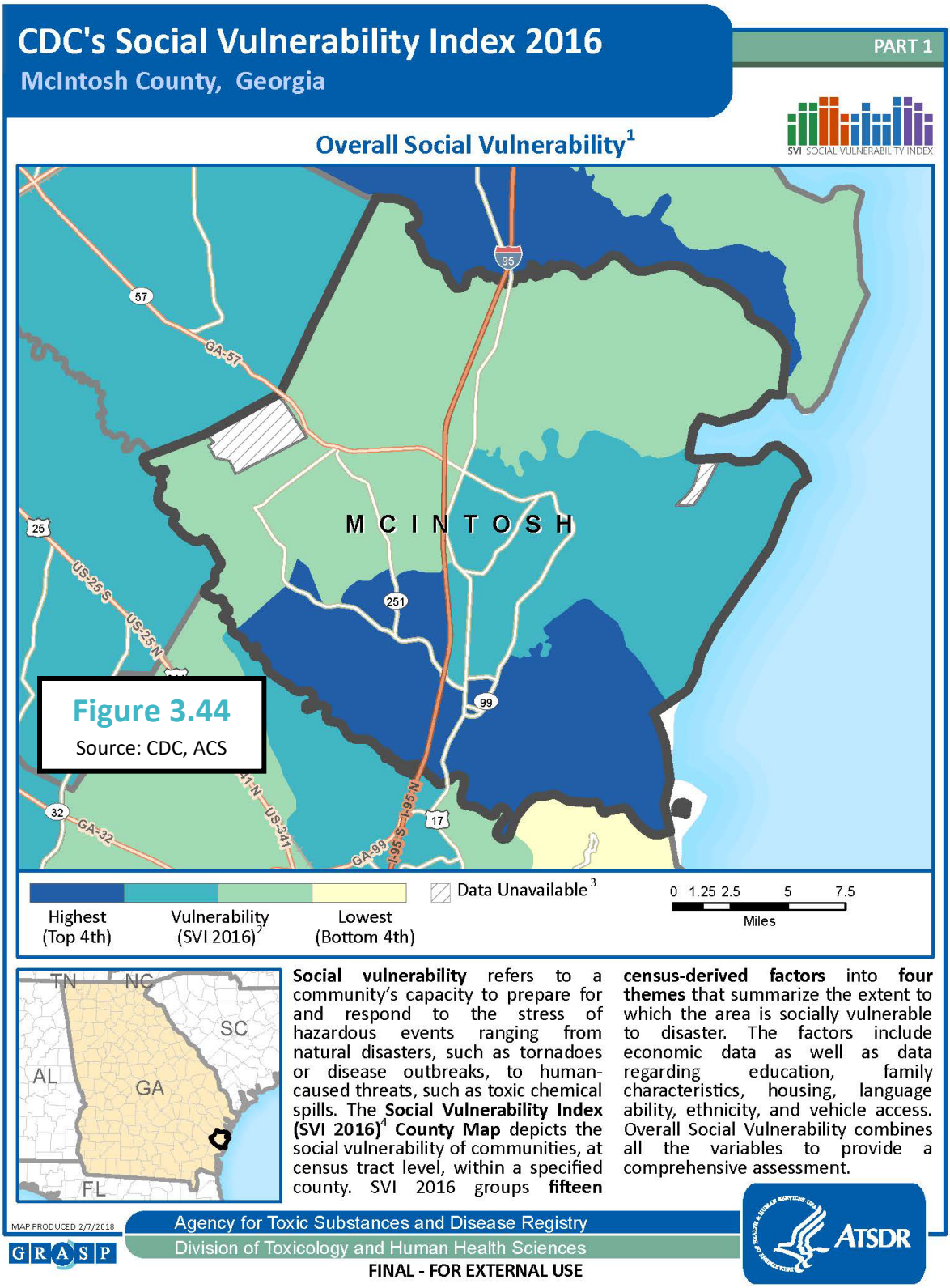
Table 3.42: McIntosh County Demographics

2018 Population	8,484	**Total Businesses**	179
2010-2018 Pop. Change	-40.80%	**Median Home Value**	$89,500
Median Household Income	$44,309	**Total Housing Units**	4,189
Poverty Rate	19.9%	**% Occupied Housing Units**	79.5%
Employment Rate	49.3%	**% Owner Occupied**	74%
Median Age	49.7	**% Renter Occupied**	26%
% Minority	37.5%	**% Houses Built Before 1990**	54.0%
% High school + education	86.3%	**% Houses Built After 1990**	46.0%

Table3.43: McIntosh County Historical Hazard Profile

Hazard	Number of Events	Injuries	Deaths	Crop Damage	Property Damage
Tornado	4	9	0	$0	$12,535,000
Inland Flooding	6	0	0	$0	$25,000
Hurricane Wind	4	0	0	$0	$0
Severe Weather	157	6	0	$30,000	$277,050
Coastal Hazards	43	0	0	$0	$2,945,250
Drought	46	0	0	$0	$0
Severe Winter Weather	7	0	0	$0	$0
Wildfire	0	0	0	$0	$0

The southern part of McIntosh County is the most socially vulnerable overall. This corresponds as well to the area of most socioeconomic status and housing/transportation vulnerability. For the most part, the coast is not where the highest vulnerability rankings are- the rankings trend inward within the county.



Thomas County

Thomas County is located in rural South Georgia and was impacted by a tornado (DR-4297) in mid-January 2017. Historically, Thomas County has experienced 155 severe weather incidents, 6 tornadoes, 10 coastal hazards and 13 inland flooding incidents since 1996. According to NOAA, severe weather events are localized and include thunderstorms, hail, and lightning. Coastal hazards include astronomical low tide, coastal flood, high surf, hurricane, hurricane typhoon, rip current, storm surge tide, tropical depression, tropical storm and waterspout. Thomas County is in the process of updating their local Hazard Mitigation Plan, as their plan has expired. The county has a 21% poverty rate and 60% of the houses are over 30 years old. Mitigating against severe weather, tornadoes, coastal hazards and inland flooding. These efforts will increase the resiliency of the county against future disasters.

Table 3.45: Thomas County Demographics

2018 Population	44,730	**Total Businesses**	1,113
2010-2018 Pop. Change	0.00%	**Median Home Value**	$133,800
Median Household Income	$40,112	**Total Housing Units**	20,615
Poverty Rate	20.8%	**% Occupied Housing Units**	84.2%
Employment Rate	53.1%	**% Owner Occupied**	63%
Median Age	40.3	**% Renter Occupied**	37%
% Minority	39.9%	**% Houses Built Before 1990**	60.4%
% High school + education	82.6%	**% Houses Built After 1990**	39.6%

Table 3.46: Thomas County Historical Hazard Profile

Hazard	Number of Events	Injuries	Deaths	Crop Damage	Property Damage
Tornado	6	3	0	$0	$11,310,000
Inland Flooding	13	1	0	$0	$2,852,000
Hurricane Wind	1	0	0	$0	$1,000,000
Severe Weather	155	1	1	$0	$1,162,450
Coastal Hazards	10	0	0	$0	$6,030,000
Drought	31	0	0	$0	$0
Severe Winter Weather	3	0	0	$7,850,000	$0
Wildfire	0	0	0	$0	$0

Within Thomas County, 75% of the population ranks within the top 50% for social vulnerability. The City of Thomasville is located with the most vulnerable area overall as well as for housing/transportation and household composition/ disability vulnerability.

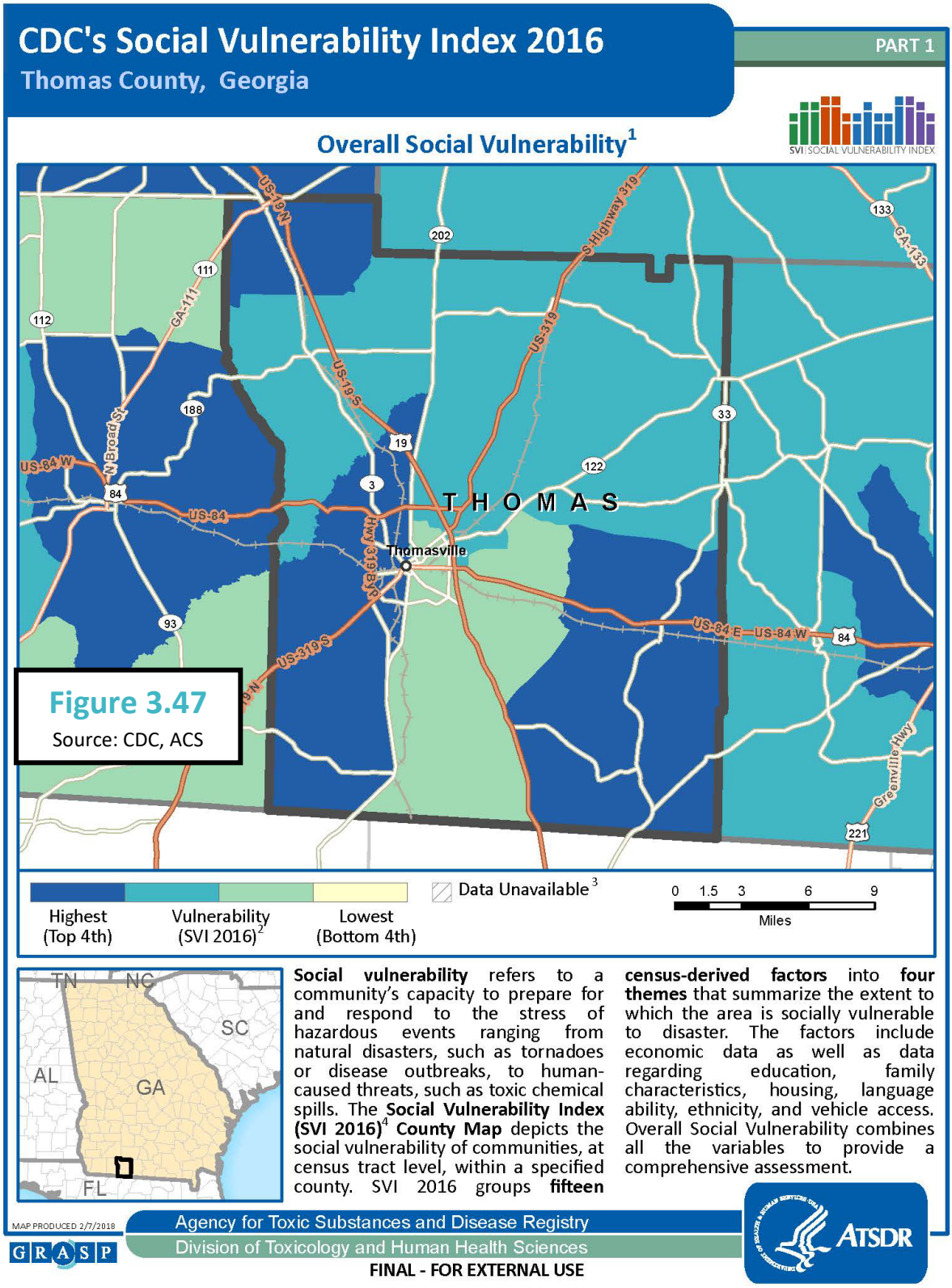


Figure 3.47
Source: CDC, ACS

Turner County

Turner County is located in rural Southwest Georgia and was impacted by two tornados (DR-4294 and DR-4297) both occurring in mid-January 2017. Historically, Turner County has experienced 79 severe weather incidents and three tornadoes since 1996. According to NOAA, severe weather events are localized and include thunderstorms, hail, and lightning. Turner County identifies hurricanes/tropical storms, tornadoes, floods, wildfires and extreme heat as high priorities in their local Hazard Mitigation Plan. The county has a 35% poverty rate and 74% of the houses are over 30 years old. These figures are some of the highest within the 15 county impacted area. Turner County also lost 11% of the population from 2010-2018. These figures may indicate distress. *Demographic Profile Source: ACS. Historical Hazard Profile: NOAA's Historical Storm Events Database (1996-2019). High priority project data taken from pages 63-101 of Turner's HMP and interpreted by DCA.*

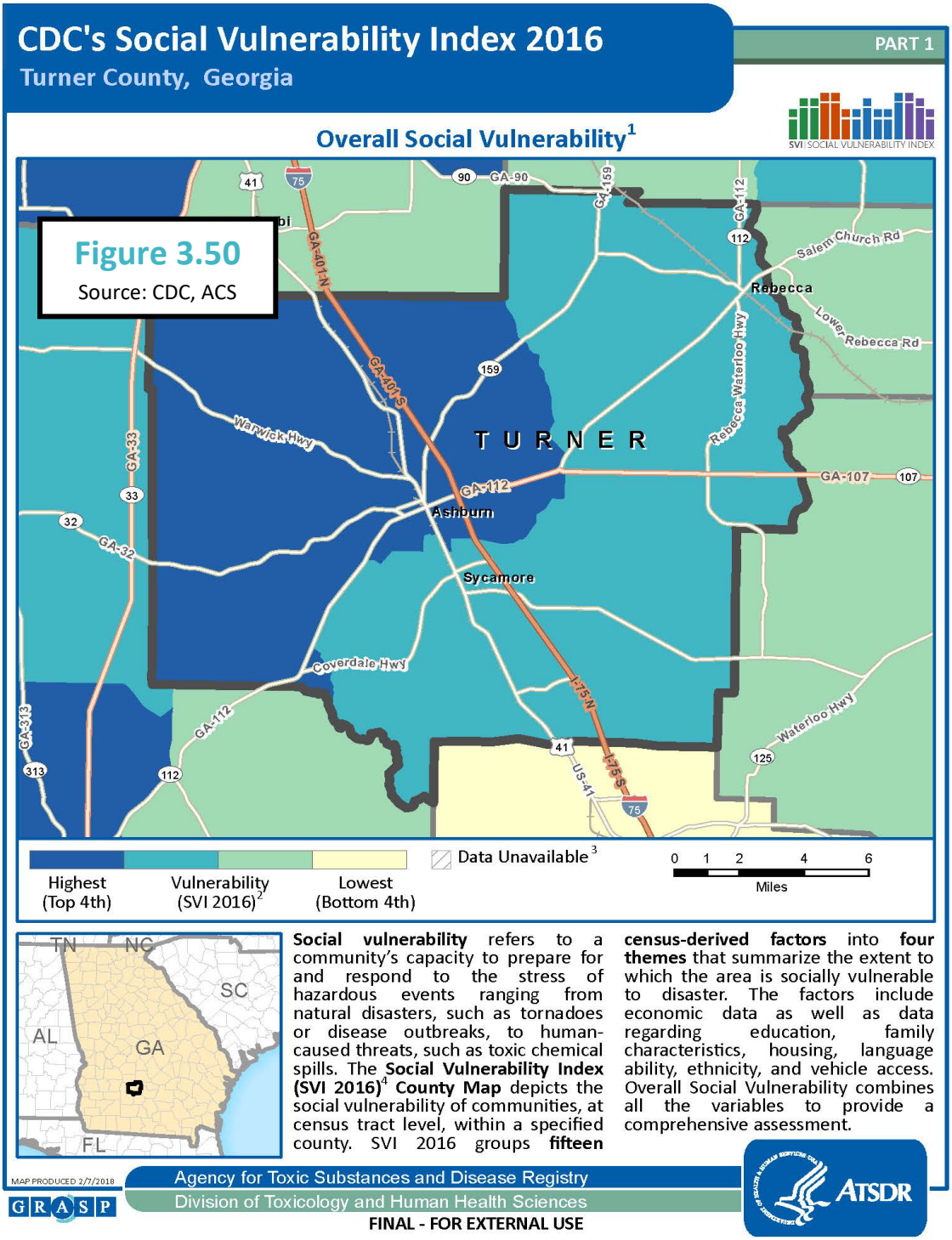
Table 3.48: Turner County Demographics

2018 Population	7,962	**Total Businesses**	151
2010-2018 Pop. Change	-10.80%	**Median Home Value**	$74,000
Median Household Income	$38,341	**Total Housing Units**	3,914
Poverty Rate	35.3%	**% Occupied Housing Units**	77.2%
Employment Rate	50.1%	**% Owner Occupied**	68%
Median Age	38.8	**% Renter Occupied**	32%
% Minority	45.1%	**% Houses Built Before 1990**	74.3%
% High school + education	82.4%	**% Houses Built After 1990**	25.7%

Table 3.49: Turner County Historical Hazard Profile

Hazard	Number of Events	Injuries	Deaths	Crop Damage	Property Damage
Tornado	3	25	1	$0	$7,000,000
Inland Flooding	2	0	0	$0	$0
Hurricane Wind	1	0	0	$0	$100,000
Severe Weather	79	3	1	$0	$1,139,500
Coastal Hazards	6	0	0	$0	$2,665,000
Drought	29	0	0	$0	$0
Severe Winter Weather	5	0	0	$7,850,000	$30,000
Wildfire	0	0	0	$0	$0

The left third of the county is ranked in the highest social vulnerability category overall and for the four themes shown in the maps above which include socioeconomic status, household composition/disability, race/ethnicity/language and housing/ transportation.



Wilcox County

Wilcox County is located in rural Southwest Georgia and was impacted by a tornado (DR-4297) in mid-January 2017. Historically, Wilcox County has experienced 64 severe weather incidents, 6 tornadoes and 16 coastal hazards since 1996. According to NOAA, severe weather events are localized and include thunderstorms, hail, and lightning. The county identifies flood, tornado, winter storm, thunderstorms/windstorms and drought as high priorities in their local Hazard Mitigation Plan. Wilcox County has a 22% poverty rate and 70% of the houses are over 30 years old. Mitigating against severe weather, tornadoes, and coastal hazards will increase the resiliency of the county against future disasters. *Demographic Profile Source: ACS. Historical Hazard Profile: NOAA's Historical Storm Events Database (1996-2019). High priority project data taken from pages 50-70 of Wilcox's HMP and interpreted by DCA.*

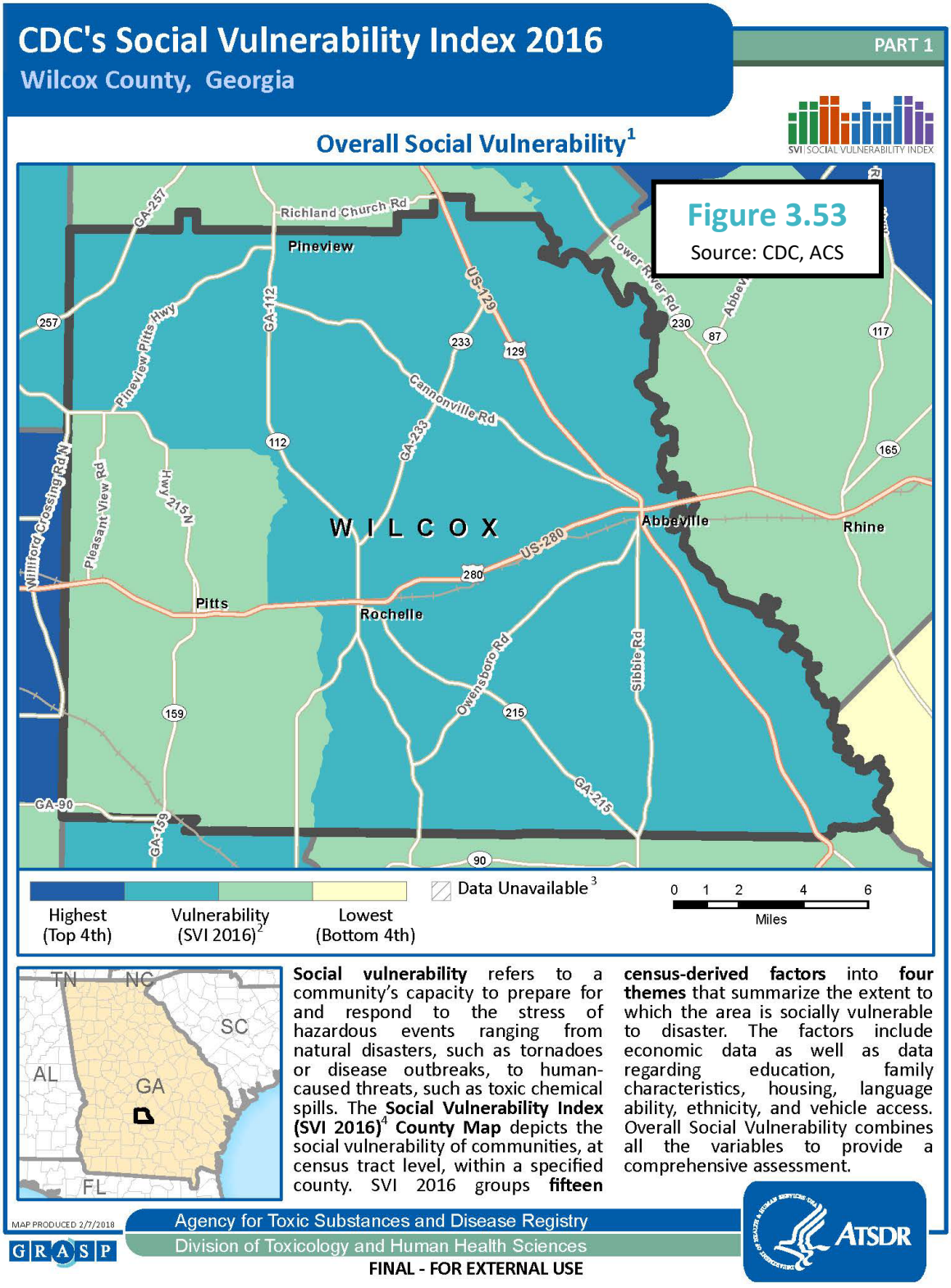
Table 3.51: Wilcox County Demographics

2018 Population	8,846	**Total Businesses**	84
2010-2018 Pop. Change	-4.40%	**Median Home Value**	$68,200
Median Household Income	$36,077	**Total Housing Units**	3,507
Poverty Rate	22.0%	**% Occupied Housing Units**	74.3%
Employment Rate	33.0%	**% Owner Occupied**	76%
Median Age	39.5	**% Renter Occupied**	24%
% Minority	37.2%	**% Houses Built Before 1990**	70.4%
% High school + education	82.3%	**% Houses Built After 1990**	29.6%

Table 3.52: Wilcox County Historical Hazard Profile

Hazard	Number of Events	Injuries	Deaths	Crop Damage	Property Damage
Tornado	6	0	0	$500,000	$1,155,000
Inland Flooding	6	0	0	$0	$195,000
Hurricane Wind	2	0	0	$0	$0
Severe Weather	64	2	0	$10,000	$1,279,200
Coastal Hazards	16	0	0	$0	$105,000
Drought	23	0	0	$10,840,000	$0
Severe Winter Weather	18	0	0	$0	$0
Wildfire	0	0	0	$0	$0

Overall, the entire county is within the mid-50% range for social vulnerability. When broken into the four separate categories in the SOVI chart above, the highest vulnerability tends to be on the eastern border from north to south, with the exception of the household composition/ disability vulnerability.



Worth County

Worth County is located in rural Southwest Georgia and was impacted by two tornados (DR-4294 & DR-4297) both occurring in mid-January 2017. Historically, Worth County has experienced 200 severe weather incidents, 17 tornadoes and 22 inland flooding incidents since 1996. According to NOAA, severe weather events are localized and include thunderstorms, hail, and lightning. Worth County identifies tornadoes, thunderstorm winds and extreme heat as their top priorities in their local Hazard Mitigation Plan. The county has a 21% poverty rate and 63% of the houses are over 30 years old. *Demographic Profile Source: ACS. Historical Hazard Profile: NOAA's Historical Storm Events Database (1996-2019). Hazard project data taken from pages 58-80 of Worth's HMP and interpreted by DCA.*

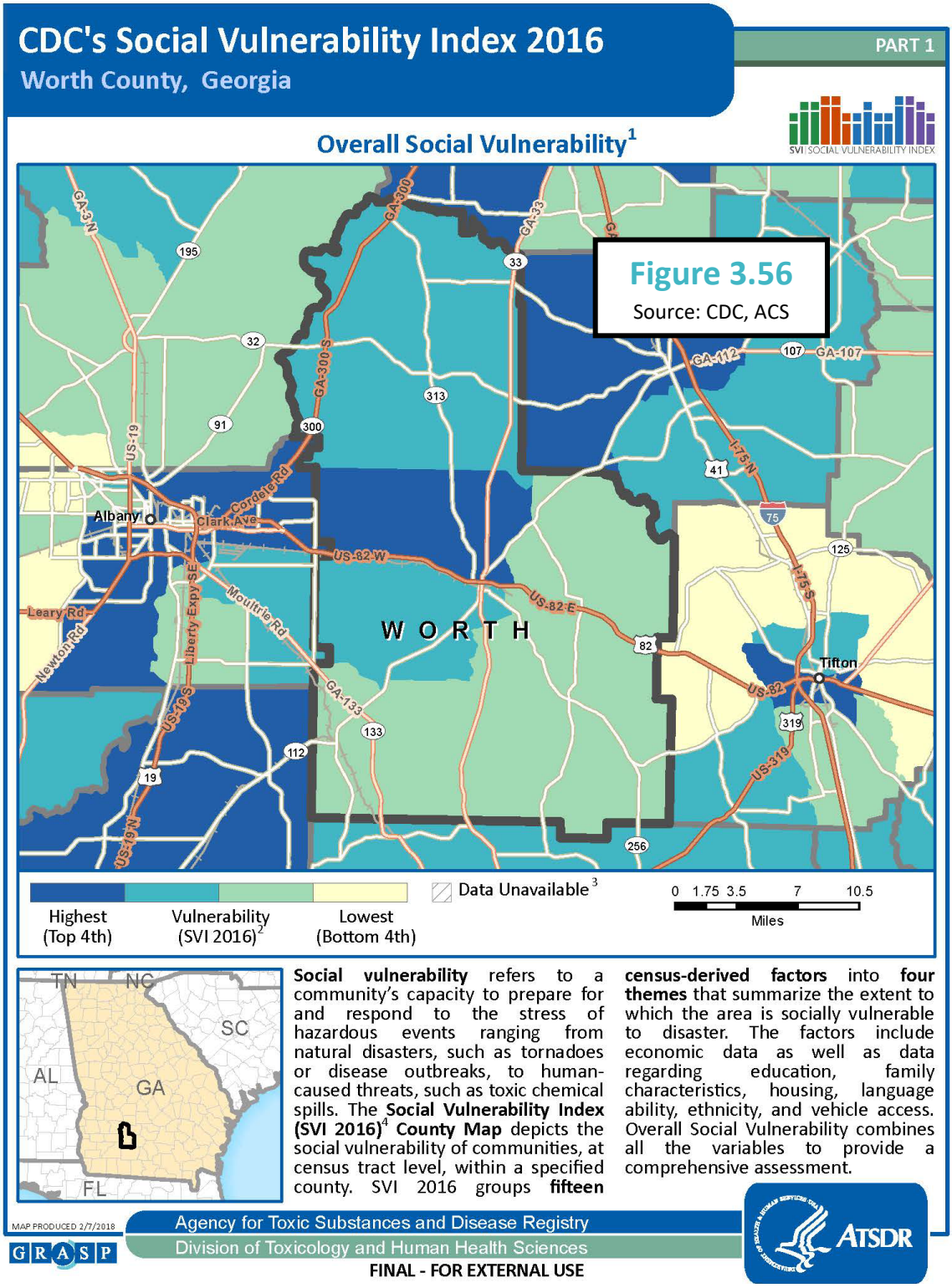
Table 3.54: Worth County Demographics

2018 Population	20,656	**Total Businesses**	255
2010-2018 Pop. Change	-4.70%	**Median Home Value**	$85,600
Median Household Income	$46,076	**Total Housing Units**	9,329
Poverty Rate	20.8%	**% Occupied Housing Units**	86.2%
Employment Rate	53.6%	**% Owner Occupied**	66%
Median Age	41.1	**% Renter Occupied**	34%
% Minority	31.7%	**% Houses Built Before 1990**	63.1%
% High school + education	81.3%	**% Houses Built After 1990**	36.9%

Table 3.55: Worth County Historical Hazard Profile

Hazard	Number of Events	Injuries	Deaths	Crop Damage	Property Damage
Tornado	17	35	2	$2,000,000	$15,102,000
Inland Flooding	22	0	0	$0	$3,540,000
Hurricane Wind	1	0	0	$111,000,000	$6,750,000
Severe Weather	200	0	0	$10,000	$2,459,500
Coastal Hazards	8	0	0	$111,000,000	$9,050,000
Drought	30	0	0	$0	$0
Severe Winter Weather	5	0	0	$7,850,000	$75,000
Wildfire	0	0	0	$0	$0

The north and northwestern portions of Worth County have the highest social vulnerability overall. These trends extend over county lines to the west through Dougherty County to the City of Albany. The highest vulnerability for housing/transportation and household composition/ disability also extend to the west into Dougherty County.



4. Mitigation Needs Assessment: Pre-Application Solicitation

Local Government Pre-Applications

In order to determine mitigation needs, DCA developed a pre-application to gather project specifics. The pre-applications serve as a tool, similar to a survey, for local governments to communicate their mitigation needs to DCA. All local governments located within the 15 eligible counties were invited to participate. DCA placed the pre-application on the official CDBG-MIT webpage and held two webinars to discuss questions related to the CDBG-MIT funding, the pre-application process, and to gather feedback. DCA staff explained topics such as eligibility, maximum application submission, leverage, the new Urgent Need Mitigation national objective, and other requirements of 84 FR 45838. Each local government could submit up to three (3) pre-applications.

The pre-application was broken into the following sections:

- Hazards to be Mitigated
- Activity Type
- Activity Useful Life
- Priority Level
- Narrative
- Budget
- FEMA Lifelines
- National Objective

Summary of Pre-Applications Received

A total of 54 Pre-Applications were received from the local governments within the 15 county area. These applications came from 23 local governments, with six (6) joint applications. The following table breaks down the financial section of the Pre-Applications. The total CDBG-MIT funds requested is $149,242,775. Leverage was committed in 33 of the 54 Pre-Applications and totaled $24,024,368. Of the Pre-Applications submitted, the average amount of leverage was 14% of the total project cost.

Table 4.1 : Financial Breakdown of Pre-Applications	
Total CDBG-MIT Funds Requested	$ 149,242,775
Total Leverage	$ 24,024,368
Total Project Cost	$ 173,267,143

DCA staff categorized the Pre-Applications into the following types: Infrastructure-Communications, Infrastructure-Facilities, Infrastructure-Stormwater, Infrastructure-Water/Sewer, Infrastructure Flood Prevention, Infrastructure-Roads, Relief Efforts, Home Hardening Program, Demolition, Acquisition and Elevation Program, Planning, Infrastructure-Utilities, and Equipment. Table 4.2 shows the most Pre-Applications were infrastructure projects which involved facilities. Some of these projects include the construction or modification of disaster shelter recovery centers, hardening of fire stations, safe room retrofits, and additions to public safety buildings. The second most requested category was infrastructure-communications. This category included infrastructure related improvements to communication systems, broadband communication programs, and developing a regional inter-operable communications system. As a note, during the Pre-Application phase, it was not the intention of DCA to determine if all aspects of the

projects were CDBG eligible. For example, in table 4.2, the project categorized as "Relief Efforts" will not be considered eligible. **The Pre-Application phase was intended only to inform the Action Plan of the mitigation needs of the CDBG-MIT eligible communities.**

Table 4.2: Pre-Application Budget Summary

Activity Type	# Count of Pre-Applications	Leverage	Total CDBG-MIT Funds requested	Total Project Cost
Infrastructure-Facilities	16	$7,969,629	$40,829,706	$48,799,335
Infrastructure-Communications	10	$8,433,895	$45,430,491	$53,864,386
Infrastructure-Stormwater	5	$497,000	$19,730,000	$20,227,000
Infrastructure-Water/Sewer	6	$1,166,103	$13,473,229	$14,639,332
Infrastructure-Flood Prevention	5	$2,943,741	$11,611,555	$14,555,296
Infrastructure-Roads	3	$1,740,000	$5,060,344	$6,800,344
Relief Efforts	1	$0	$4,172,000	$4,172,000
Program-Home Hardening	1	$275,000	$2,725,000	$3,000,000
Program-Demolition, Acq. Elevation	1	$500,000	$2,000,000	$2,500,000
Planning	2	$200,000	$1,798,900	$1,998,900
Infrastructure-Utilities	2	$237,500	$1,750,000	$1,987,500
Equipment	2	$61,500	$661,550	$723,050
Total	54	$24,024,368	$149,242,775	$173,267,143

Pre-Application Priorities

Since each local government was allowed up to three submissions, DCA asked each applicant to rank their activities. Each community selected either "one", "two", or "three", when submitting Pre-Applications. Tables 4.3 and 4.4 show characteristics related to these priorities.

Of the 54 submissions, 23 ranked as the first priority, 19 as the second, and 12 as the third. Projects categorized as priority one requested a total of $84,696,405 in CDBG-MIT funds. However, projects considered priority two and three requested only $38,755,109 and $25,791,261, respectively.

Table 4.3: Pre-Applications by Priority

Priority Number	Count	CDBG-MIT Funds Requested
1	23	$84,696,405
2	19	$38,755,109
3	12	$25,791,261
Total	54	**$149,242,775**

Table 4.4 displays the activities first by priority, then by type. Of the 23 projects making up the first priority, the majority of projects fall into the infrastructure-communications category. Two communities selected programs as their first priority. The first is a demolition, acquisition, and elevation program and the second involves home hardening.

Interestingly, the only two infrastructure-utilities activities are ranked as first priorities. Likewise, the only infrastructure-roads activity is ranked as priority three.

DCA staff asked the local governments to rank their activities by priority because they have a greater understanding of the local needs.

Useful Life

DCA also asked the local governments to determine the useful life of each activity submitted. Each applicant was asked to use FEMA guidance when making a determination. This guidance can be seen in the tables below.

Table 4.4: Activities by Priority and Type	
1	**Count**
Infrastructure-Communications	7
Infrastructure-Facilities	5
Infrastructure-Flood Prevention	1
Infrastructure-Stormwater	3
Infrastructure-Utilities	2
Infrastructure-Water/Sewer	3
Program-Demolition, Acq., Elevation	1
Program-Home Hardening	1
2	**Count**
Equipment	1
Infrastructure-Communications	3
Infrastructure-Facilities	4
Infrastructure-Flood Prevention	2
Infrastructure-Roads	2
Infrastructure-Stormwater	2
Infrastructure-Water/Sewer	2
Planning	2
Relief Efforts	1
3	**Count**
Equipment	1
Infrastructure-Facilities	7
Infrastructure-Flood Prevention	2
Infrastructure-Roads	1
Infrastructure-Water/Sewer	1
Total	**54**

Structural/Non-Structural Building Project (Source: FEMA)

Project Type	Useful Life (Years): Standard Value	Useful Life (Years): Acceptable Limits (documentation required)
Residential Building Retrofit	30	30
Non-Residential Building Retrofit	25	25-50
Public Building Retrofit	50	50-100
Historic Building Retrofit	50	50-100
Roof Diaphragm Retrofit	50	50-100
Tornado Safe Room - Residential	30	30

Tornado Safe Room - Community	30	30-50
Non-Structural Building Elements	30	30
Non-Structural Major Equipment	15	15-30
Non-Structural Minor Equipment	5	5-20

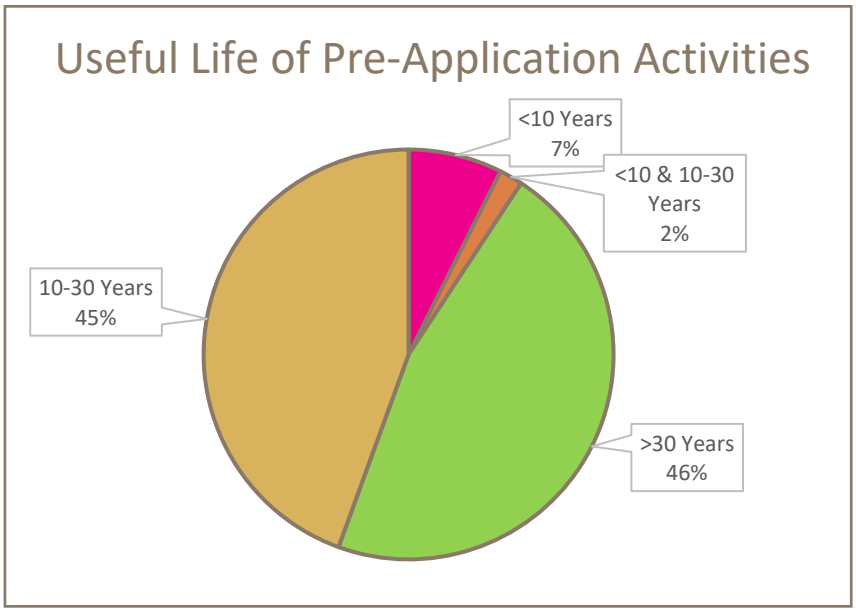
Infrastructure Projects (Source: FEMA)

Project Type	Useful Life (Years): Standard Value	Useful Life (Years): Acceptable Limits (documentation required)
Major Infrastructure (dams, levees)	50	35-100
Concrete infrastructure, flood walls, roads, bridges, major drainage system	50	35-50
Culverts (concrete, PVC, CMP, HDPE, etc.) **with** end treatment (i.e., wing walls, end sections, head walls, etc.)	30	25-50
Culverts (concrete, PVC, CMP, HDPE, etc.) **without** end treatment (i.e., wing walls, end sections, head walls, etc.)	10	5-20
Pump stations, substations, wastewater systems, or equipment such as generators - Structures	50	50
Pump stations, substations, wastewater systems, or equipment such as generators - Equipment	5	5-30
Hurricane Storm Shutters	15	15-30
Major Utility Mitigation Projects (power lines, cable, hardening gas, water, sewer lines, etc.)	50	50-100
Minor Utility Mitigation Projects (backflow values, downspout disconnect, etc.)	5	5-30

Miscellaneous Equipment Projects (Source: FEMA)

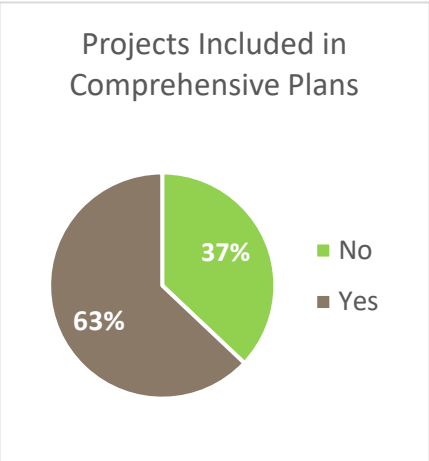
Project Type	Useful Life (Years): Standard Value	Useful Life (Years): Acceptable Limits (documentation required)
Equipment purchases: Small, portable equipment (e.g., computer)	2	2-10
Equipment purchases: Heavy equipment	5	5-30

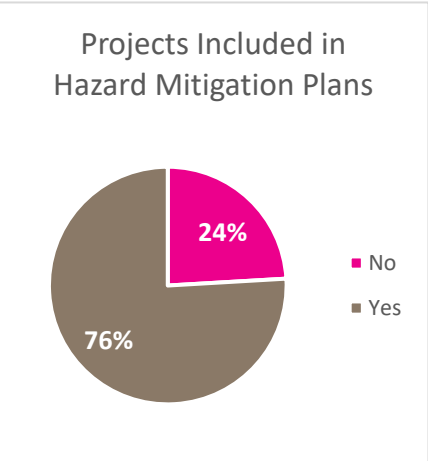
The activities that fall into the greater than 30 year category make up 46% of the overall projects. These are projects related to infrastructure and facilities. Falling only one percent behind the >30 years is the 10-30 year category with 45%. Next, items such as portable radios and portable generators make up the less than 10 year category with 7%. One project requesting funds for fixed generators and portable generators makes up the category of <10 and 10-30 years.

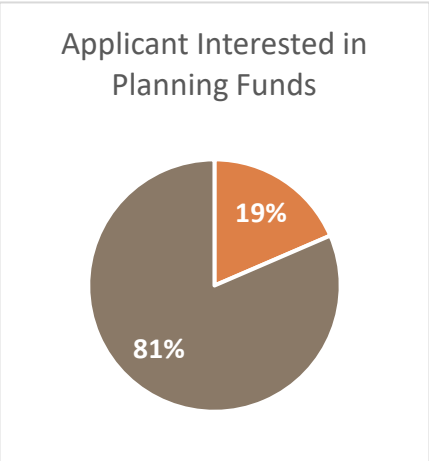


Planning

Planning is the one of the most important aspects of any project. Planning makes a community more prepared and ensures the benefit of projects are well-calculated before they are undertaken. Out of the 54 Pre-Applications received, 76% of the proposed projects are already included in the fifteen declared counties' individual local hazard mitigation plans. Sixty three percent of the proposed projects are already included in the community's local comprehensive plan. These statistics indicate the community has recognized the need for the project by incorporating it into their long-term planning documents. The same can be said for including a project in the community's Hazard Mitigation Plan. The community has already identified the importance of the project and realizes completion of the project would lead to an increased resiliency against future disasters. Eighty-one percent of the applicants indicated an interest in receiving planning funds. In working with the State Hazard Mitigation Officer, DCA will require that projects must be incorporated into the local "approved" Hazard Mitigation Plan to be considered for CDBG- MIT funding.







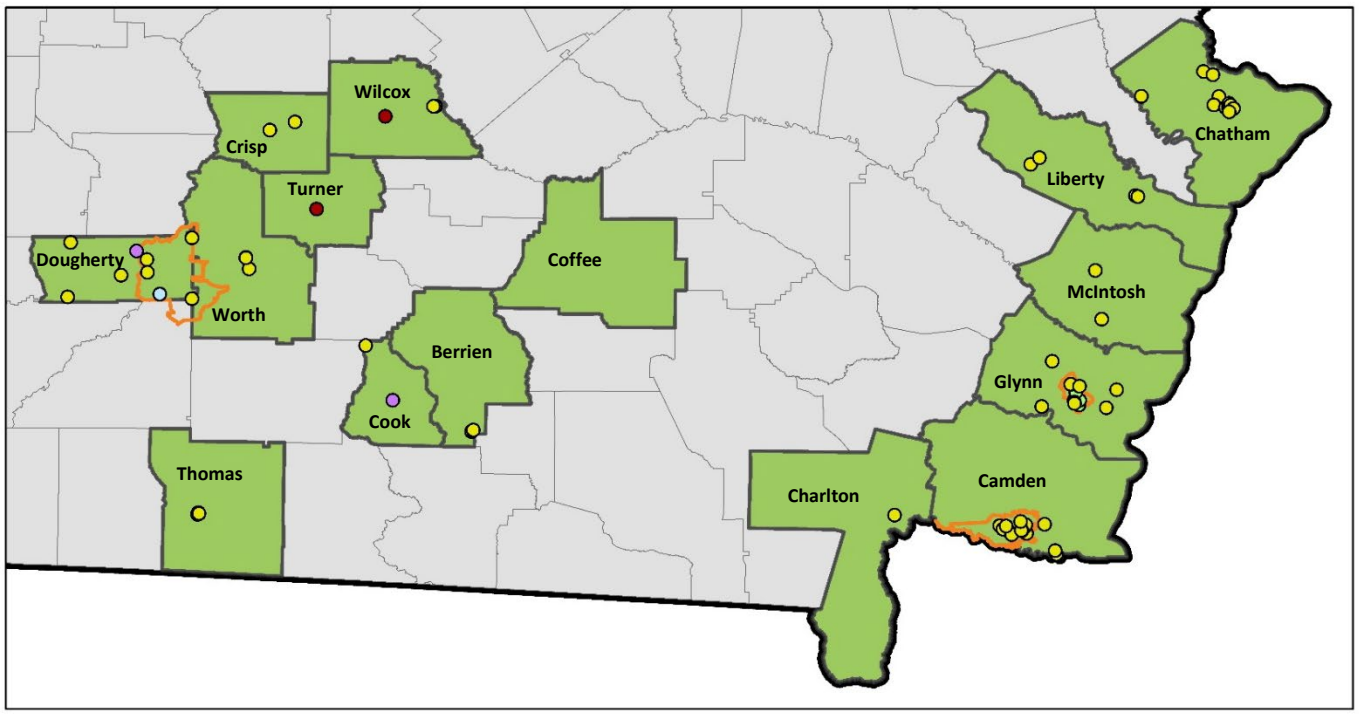
Location

Pre-Applications were submitted from 23 local governments. Some of these communities are located along the coast and are seeking to mitigate against coastal hazards, other are located on the Southwestern end of the state and are mitigating against tornadoes and inland flooding. In the map below, the location of the project sites is mapped to illustrate the types of projects based on location. Although there were 54 Pre-Applications, there are a total of 85 site locations. This is due to the nature of some of the Pre-Applications. For instance, there is a need in one community to install multiple lift stations. The location of each of the stations has been mapped below. Out of the 85 project sites, 28 or (33%) of the sites are located within the HUD-Identified MID zip codes. In addition, nearly every county below is requesting funds for infrastructure-based projects.

*Although only two communities below formally requested funds for a planning activity, many others indicated an interest in planning.

**Projects considered to have a county-wide or city-wide benefit were not mapped.

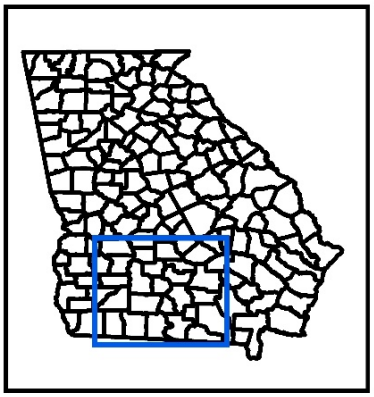
Pre-Application Project Site Locations

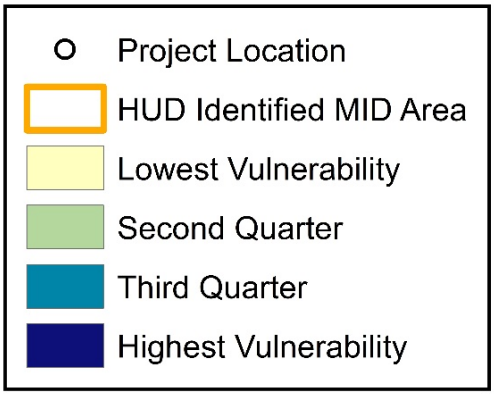


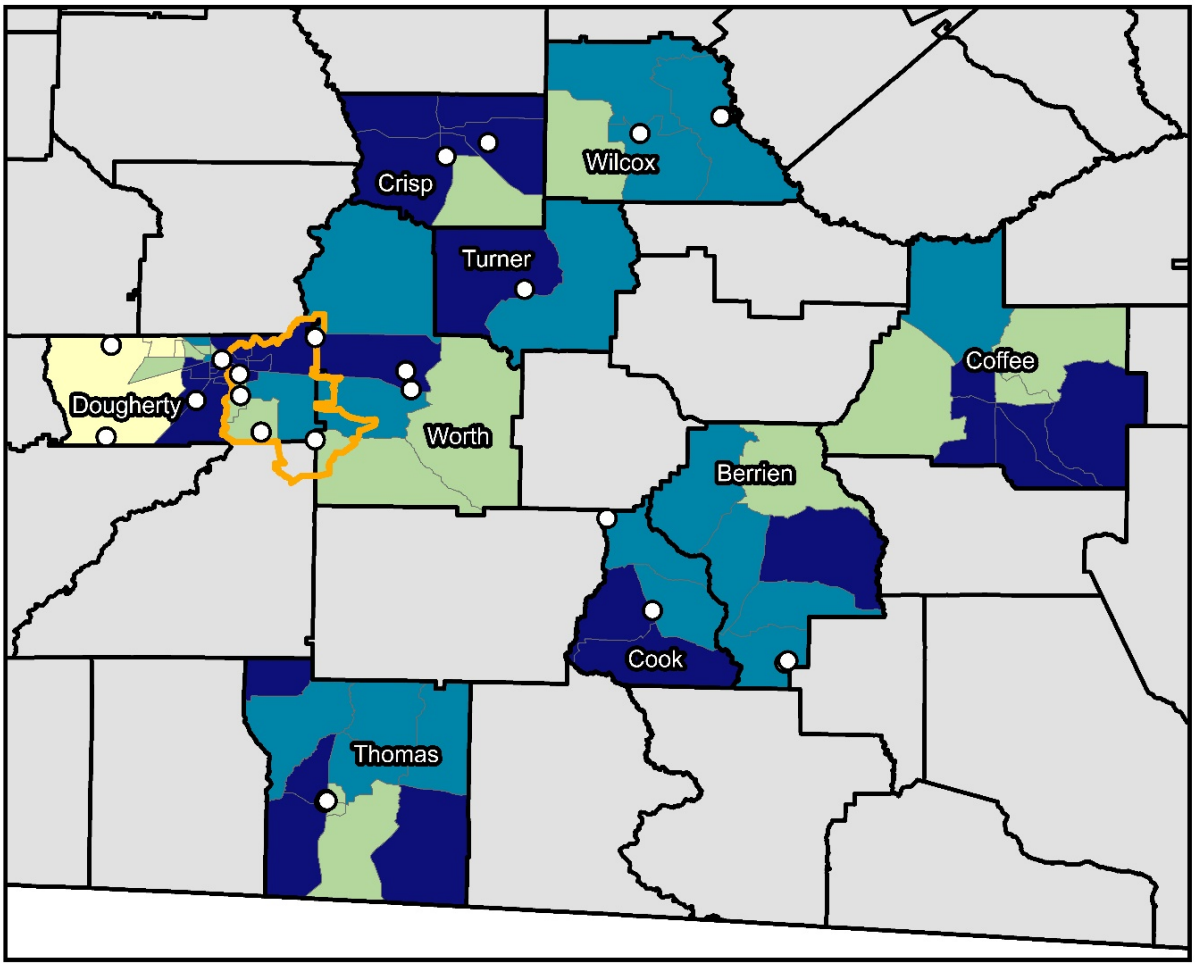
HUD Identified MID Area
Grantee Identified MID Area
Equipment
Infrastructure
Planning
Program - Demolition, Acq, Elevation
Program - Home Hardening

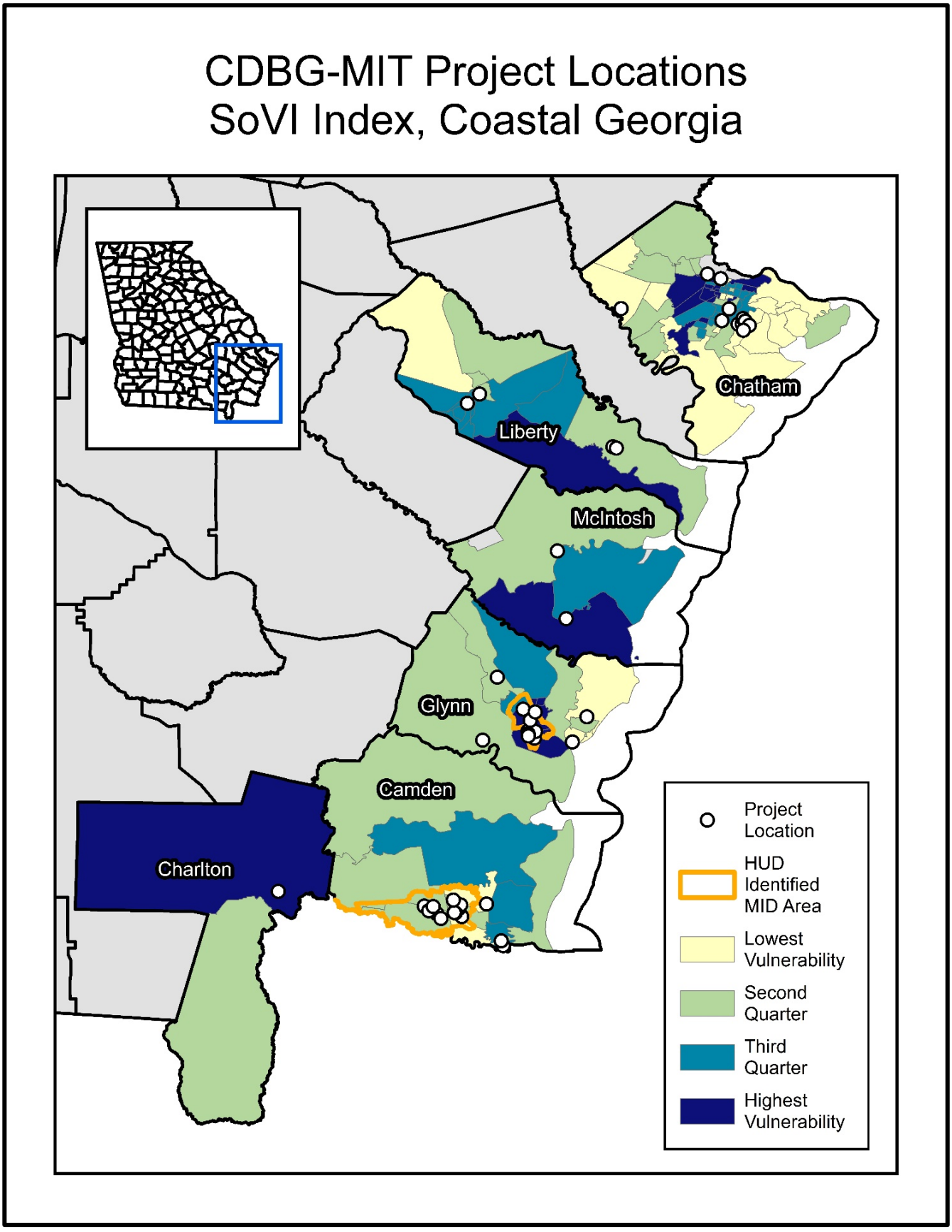
Project Counts	
Infrastructure	**75 (90%)**
Program-Home Hardening	**4 (5%)**
Equipment	**2 (2%)**
Planning	**2 (2%)**
Program- Demo, Ac, Elevation	**1 (1%)**

CDBG-MIT Project Locations
SoVI Index, Southwest Georgia








CDBG-MIT Project Locations
SoVI Index, Coastal Georgia
Chatham
Liberty
McIntosh
Glynn
Camden
Charlton
Project Location
HUD Identified MID Area
Lowest Vulnerability
Second Quarter
Third Quarter
Highest Vulnerability

FEMA Community Lifelines

Lifelines enable the continuous operation of critical government and business functions and are essential to human health and safety or economic security. FEMA developed the Community Lifelines construct to increase effectiveness in disaster operations and to better position agencies to respond to catastrophic incidents. The Lifelines provide an outcome-based, survivor-centric frame of reference that assists responders with the following:

- Rapidly determining the scale and complexity of a disaster;
- Identifying the severity, root causes, and interdependencies of impacts to basic, critical lifesaving and life-sustaining services within impacted areas;
- Developing operational priorities and objectives that focus response efforts on the delivery of these services by the most effective means available;
- Communicating disaster-related information across all levels of public, private, and non-profit sectors using a commonly understood, plain language lexicon; and
- Guiding response operations to support and facilitate integration across mission areas.

Each Pre-Applicant was instructed to identify the Community Lifeline each activity would address. The applicants could select multiple Lifelines. Table 4.5 summarizes the responses from applicants. The vast majority of Pre-Applications enhanced the Safety and Security lifeline. Safety and Security includes the following types of activities: Law Enforcement/Security, Fire Service, Search and Rescue, Government Service, and Community Safety.

Next, 27 activities would enhance the Food, Water, Sheltering Lifeline. Twenty-five activities related to the Health and Medical Lifeline. This includes the follow types of activities: medical care, public health, patient movement, medical supply chain, and fatality management.

Twenty-three Pre-applications involved the Communications Lifeline. The following are subcategories of the Communications Lifeline: infrastructure, responder communications, alerts, warnings, and messages, finance, and 911 and dispatch. The remainder of the projects satisfied the Transportation, Hazardous Materials, and Energy Lifelines.

Table: 4.5: Pre-Applications and FEMA Community Lifelines

FEMA Lifeline	Count
Safety and Security	47
Food, Water, Sheltering	27
Health and Medical	25
Communications	23
Transportation	21
Hazardous Materials	16
Energy	15

Pre-Application Project List

Table 4.6 lists each local government name, the priority of the project, project title, leverage, CDBG-MIT funds requested, and the total project cost.

Table 4.6: Pre-Application Summary					
Local Government(s)	**Project Priority**	**Title**	**Leverage**	**Total CDBG-MIT Funds Requested**	**Total Project Cost**
Abbeville	**2**	Sewer System and Treatment Upgrades	$37,500	$750,000	$787,500
Abbeville	**3**	Fire Station Improvements	$100,000	$1,500,000	$1,600,000
Adel/Berrien/Cook Turner/Wilcox/Worth	**1**	SCARRS APSCO P25 Communications Network	$0	$9,500,000	$9,500,000
Adel/Berrien/Cook Turner/Wilcox/Worth	**2**	SCARRS Planning Funds	$0	$48,900	$48,900
Albany	**2**	Stormwater Lift Station 50 Upgrade	$250,000	$2,500,000	$2,750,000
Albany	**3**	Perimeter Security for EOC, 911 Backup Center, Fire Training Campus	$20,000	$100,000	$120,000
Albany	**1**	Resilient Utility Infrastructure	$3,000,000	$12,000,000	$15,000,000
Albany/Dougherty	**3**	Storm Shelters	$500,000	$5,079,706	$5,579,706
Albany/Dougherty	**2**	Community-wide Building Assessment	$200,000	$1,750,000	$1,950,000
Albany/Dougherty	**1**	Storm Recovery Equipment (Fixed and Portable Generators, Sandbagging Equipment)	$500,000	$3,260,000	$3,760,000
Brunswick	**2**	Lifeline Broadband Communication Program	$125,000	$4,375,000	$4,500,000
Brunswick	**1**	Home Hardening and Storm Mitigation	$275,000	$2,725,000	$3,000,000
Camden County	**2**	Joint Continuity of Government Operations Center	$825,000	$1,750,000	$2,575,000
Camden County	**1**	Communication Resiliency Enhancement	$3,743,895	$2,548,322	$6,292,217
Camden County	**3**	Disaster Shelter Recovery Center	$4,924,629	$730,000	$5,654,629
Charlton County	**1**	Charlton County Communications Infrastructure Improvements	$315,000	$4,425,850	$4,740,850

Chatham County	**1**	Purchase and Install Emergency Bypass Pumps at 6 lift stations	$245,000	$633,750	$878,750
Crisp County	**1**	Emergency Operations Center Enhancement - Communications	$0	$250,000	$250,000
Crisp County	**2**	Emergency Operations Center - Equipment	$0	$90,000	$90,000
Dougherty County	**1**	County Demolition, Elevation, Acquisition and Flood Mitigation Project	$500,000	$2,000,000	$2,500,000
Glynn County	**1**	IT Relocation	$0	$4,500,000	$4,500,000
Glynn County	**3**	Fixed Generators for Critical Infrastructure	$0	$500,000	$500,000
Glynn County	**2**	Johnson Rocks Repair - Elevation	$90,000	$3,700,000	$3,790,000
Glynn County/Brunswick	**1**	Joint - College Park - Stormwater Drainage Improvement	$77,000	$8,200,000	$8,277,000
Hinesville	**1**	Storm Drainage Infrastructure Improvement	$170,000	$1,530,000	$1,700,000
Kingsland	**3**	Public Safety Improvements	$0	$6,250,000	$6,250,000
Kingsland	**2**	Flood Plain Management	$0	$6,000,000	$6,000,000
Kingsland	**1**	Drainage System Upgrade	$808,603	$7,794,904	$8,603,507
Liberty County	**3**	Addition to Public Safety Building	$0	$2,070,000	$2,070,000
Liberty County	**2**	Islands Highway Headwall	$50,000	$850,344	$900,344
Liberty County	**1**	SEGARRN Expansion	$1,250,000	$2,250,000	$3,500,000
McIntosh County	**2**	Coast-wide SEGARRN Emergency Radio System Expansion	$0	$1,685,240	$1,685,240
McIntosh County	**1**	Blounts Crossing/ Canal Street Drainage Improvements	$0	$1,500,000	$1,500,000
Ray City	**1**	Water Plant Oxidation Pond Capacity Restoration Dredge	$75,000	$250,000	$325,000
Ray City	**2**	Bettye Lane Road Paving	$90,000	$210,000	$300,000
Savannah	**1**	Critical Workforce Shelter Construction	$0	$10,000,000	$10,000,000
Savannah	**3**	Safe Room Retrofits at Water/ Wastewater Pump Stations	$100,000	$300,000	$400,000

Savannah	**2**	Fire Station Hardening-Station 4	$1,000,000	$2,800,000	$3,800,000
St. Marys	**2**	Neighborhood Flood Mitigation Project: Crooked River Plantation	$144,150	$2,250,000	$2,394,150
St. Marys	**1**	Historic Downtown Waterfront Flood Mitigation Project	$1,549,591	$4,200,000	$5,749,591
St. Marys	**3**	Historic Downtown SPINE Flooding Mitigation	$1,160,000	$961,555	$2,121,555
Sylvester	**2**	Broadband E-Connectivity	$0	$4,217,500	$4,217,500
Sylvester	**3**	Waste Water Treatment Facility	$0	$4,000,000	$4,000,000
Sylvester	**1**	Power Security	$37,500	$750,000	$787,500
Thomas County	**1**	Jail Justice Generator	$0	$450,000	$450,000
Thomasville	**2**	Upgrade Water Mains to Downtown Economic Center	$0	$44,575	$44,575
Thomasville	**1**	Installation of 11 Gas Shut-off Valves	$200,000	$1,000,000	$1,200,000
Turner County	**2**	Public Safety Facility for First Responders	$0	$1,200,000	$1,200,000
Turner County	**1**	Permanent Water Treatment Generators	$0	$750,000	$750,000
Turner County	**3**	Fire Safety Equipment	$0	$300,000	$300,000
Wilcox County	**2**	Pre-Disaster Equipment	$61,500	$361,550	$423,050
Worth County	**1**	Replacement of E911 System	$0	$4,178,579	$4,178,579
Worth County	**2**	Improved Fire Services	$0	$4,172,000	$4,172,000
Worth County	**3**	Unpaved Roads Paving Project	$1,600,000	$4,000,000	$5,600,000
Total:			$24,024,368	$149,242,775	$173,267,143

Excerpts from Pre-Applications submitted by Local Governments

> *If the activity is not implemented, critical infrastructure will fail to withstand extreme rain events. Sludge will continue to accumulate at the water plant and displace capacity for wastewater. Effluent discharge violations will increase, leading to costly penalties for the predominately low-income area. Efforts to improve housing and economic development will be stalled by permit compliance.*
>
> *- Ray City, Georgia*
> *Water Plant Oxidation Pond Capacity Restoration Dredge Project*

> *During Hurricanes Matthew, Irma, and Dorian, Camden County had no approved shelter facility to meet the needs of our population. Additionally, where individuals and families did not have transportation to evacuate, Camden County was unable to transport them to assembly points for out of county transportation. Due to lack of an approved shelter, as well as no inter-county transportation, a significant part of our at risk population did not evacuate and remained in harm's way.*
>
> *- Camden County, Georgia*
> *Disaster Shelter Recovery Center*

> *Along the county's shoreline, the only line of defense between the violent waves caused during a tropical storm and Saint Simons Island's shore are the Johnson Rocks. …. The Johnson Rocks are massive granite stones placed along the Island's high-water mark to help guard the shoreline. … The Intent of the Johnson Rocks Rehabilitation Project is to bring the rocks back to their original height. … The OneGeorgia grant allowed for additional rocks to be placed along higher priority section of the public beach access. However, it did not address the 2700-lft. of shoreline adjacent to private properties. Not rehabilitating the shoreline along private property would expose the community's natural resources and increase the likelihood of job displacement of existing low to moderate job generating businesses due to severe storm surge damages and or flooding.*
>
> *- Glynn County, Georgia*
> *Johnson Rocks Project*

5. Method of Distribution

DCA is utilizing the subrecipient model to carry out the activities of this award. As defined in 2 CFR 200.93, a Subrecipient is a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program. Local governments within the affected area will serve as the Subrecipients for DCA's CDBG-MIT Program. As seen in the previous sections, nearly all of the affected areas have extensive mitigation needs. Eligible local governments submitted Pre-Applications in January 2020 requesting $149,242,775 in CDBG-MIT funds. With a total CBDG-MIT allocation of $26,961,000, the actual need is 5.53 times greater than the allocation. As a result, multiple layers of need and prioritization will be utilized and analyzed when allocating these scarce resources. The funds will first be prioritized by geography, then allocated into programs. Next, funds will be provided on a competitive basis as eligible communities submit applications. The following sections provides further detail on all prioritizations.

Based on SOVI and Census poverty, race and ethnicity, disability, and LEP data, DCA has determined that all 15 counties including the MID Zip Codes, have concentrations of each of these categories. All areas exhibit a need for access to CDBG-MIT funds. With the submission of CDBG-MIT Applications, DCA will require the Subrecipients to consider and document the impacts of the proposed infrastructure activities effect on members of protected classes under fair housing and civil rights laws, racially and ethnically concentrated areas, as well as concentrated areas of poverty, and vulnerable communities. DCA will take into account the proposed project's effect on protected classes when scoring applications.

1. MID Areas

HUD-Identified MID Area

In Public Law 115-123, HUD identified the following zip codes as Most Impacted and Distressed as a result of the 2017 disasters: 31520, 312548, and 31705. HUD limits CDBG-MIT formula allocations to jurisdictions with major disasters that meet three standards:

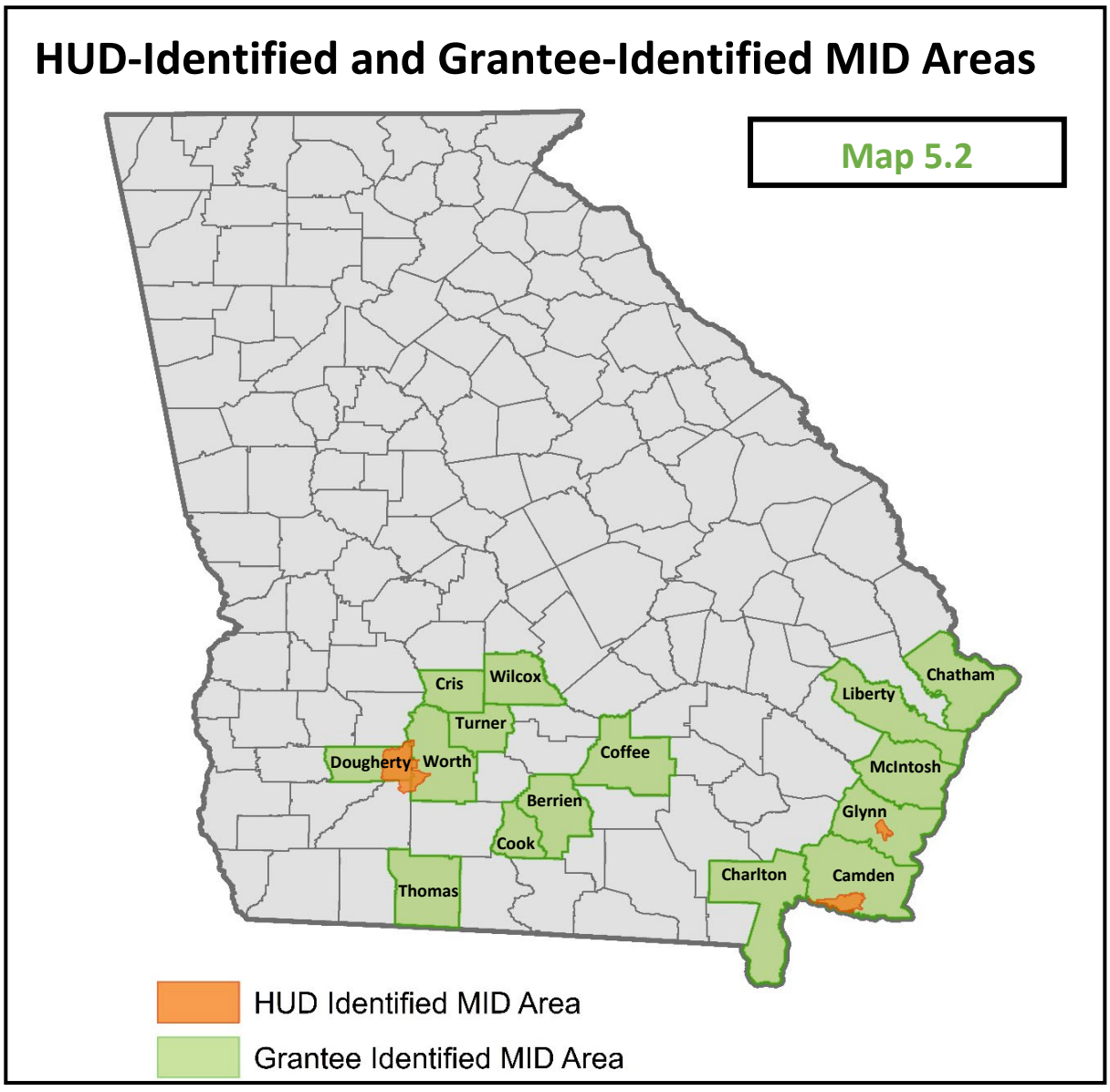
1. Individual Assistance/IHP designation: HUD has limited allocations to those disasters where FEMA had determined the damage was sufficient to declare the disaster as eligible to receive Individual and Households Program (IHP) funding.
2. Concentrated damage: HUD has limited its estimate of serious unmet housing need to counties and zip codes with high levels of damage, collectively referred to as "most impacted areas". For this allocation, HUD is defining most impacted areas as either most impacted counties - counties exceeding $10 million in serious unmet housing needs - and most impacted Zip Codes – Zip Codes with $2 million or more of serious unmet housing needs.
3. Disasters meeting the most impacted threshold: Only 2017 disasters that meet this requirement for most impacted damage are funded:
    a. One or more most impacted county; or
    b. An aggregate of most impacted zip codes of $10 million or greater.

On February 13, 2020 DCA submitted a MID Expansion Request hoping to include zip codes 31701 and 31707. These zip codes sustained considerable damage from the January 2017 tornadoes and are in need of assistance. These zip codes are located within Dougherty County and are adjacent to 31705, an existing MID area. This request is included in Appendix F.

Grantee-Identified MID Area

After reviewing local, SBA, and FEMA data, as well as the geographic locations of the Pre-Application Activities, DCA has determined all 15 local governments that were deemed eligible for FEMA's Individual and Public Assistance are indeed the Most Impacted and Distressed. These counties used local funds to expedite the recovery from the disasters and they greatly need CDBG-MIT funds to undertake projects to lessen their vulnerability to disasters. The counties listed in table 5.1 make up the Grantee-Identified MID Area.

Table 5.1: Grantee-Identified MID Area				
Berrien	Chatham	Crisp	Liberty	Turner
Camden	Coffee	Dougherty	McIntosh	Wilcox
Charlton	Cook	Glynn	Thomas	Worth



As seen in Map 5.2, the counties that make up the Grantee-Identified MID Area are located in Southwest Georgia and on the coast. These communities are all unique and have varying mitigation needs and resources. However, all of the communities still have the same goal, to protect against losses of life and property.

2. Budget

According to the Federal Register notice governing these funds, a minimum of 50% of the allocation must be spent within HUD-Identified zip codes. Therefore, at a minimum, $13,480,500 will be spent within the HUD-Identified Most Impacted and Distressed Areas. The remaining 50%, or $13,480,500, can be spent within the 15-county Grantee-Identified MID Area. Table below shows the breakdown of the budget for the both MID areas.

Table 5.3: MID Areas Budget Summary

Area	Allocation	% of Allocation
HUD-Identified MID Zip Codes: 31520, 31548, 31705	$13,480,500	50%
Grantee-Identified MID Area: Berrien, Camden, Charlton, Chatham, Coffee, Cook, Crisp, Dougherty, Glynn, Liberty, McIntosh, Thomas, Turner, Wilcox, Worth	$13,480,500	50%
Total	$26,961,000	100%

Table 5.3 displays the budget as broken down between the various activities. Administrative activities make up 5% of the budget, planning activities are budgeted at 15%, and infrastructure activities make up the majority of the budget with 80%.

As mentioned above, there is a requirement to expend at least 50% of the allocation within the HUD-Identified MID Area. Table 5.4 demonstrates how these funds are apportioned. As directed by Notice 84 FR 45838, DCA will include 50 percent of expenditures for grant administration as DCA has determined that 50 percent of the total award will been expended in the HUD-Identified MID areas. Therefore, in the HUD-Identified MID Area, $667,275 will be utilized for administrative activities, $2,022,075 for planning activities, and $10,791,150 will be allowed for infrastructure projects. The budget is then mirrored and will be applied in the same manner for the 15-county Grantee-Identified MID Area.

Also, as directed by the Federal Register Notice governing these funds (84 FR 45838), a minimum of 50% of the program funds will be used to serve low to moderate income individuals. To comply with this requirement, DCA will ensure $10,791,150 are used to benefit low to moderate income individuals. This figure was calculated using 50% of the funds for activities (infrastructure program) and excludes planning and administrative funds.

Table 5.4: CDBG-MIT Budget

Activity	Allocation	% of Allocation	HUD MID Allocation (at minimum)	DCA MID Allocation (at maximum)	Amount serving LMI	LMI %	National Objective
Administration	**$1,334,550**	**5%**	**$667,275**	**$667,275**	**N/A**	**N/A**	**N/A**
Planning	**$4,044,150**	**15%**	**$2,022,075**	**$2,022,075**	**N/A**	**N/A**	**N/A**
Infrastructure	**$21,582,300**	**80%**	**$10,791,150**	**$10,791,150**	**$10,791,150**	***50%**	**LMI UNM**
Total	**$26,961,000**	**100%**	**$13,480,500**	**$13, 480,500**	**$10,791,150**		

*at a minimum, 50% of the activities funded will benefit Low to Moderate income individuals

3. Proposed Activities

Using CDBG-MIT funds, DCA seeks to assist communities with undertaking activities that will reduce their risks posed by disasters. Many communities relied on local funds to recover from the storms of 2017, reducing their ability to spare the funds to prepare for the inevitable next disaster event. DCA is proposing infrastructure, planning, and administration activities in order to meet the mitigation needs within the HUD-Identified MID and Grantee-Identified MID Areas.

Promoting Affordable Housing and Residential Assistance

With the 2017 Unmet Needs CDBG-DR Allocation, DCA created three programs designed to assist with residential needs. DCA's Homeowner Rehabilitation and Reconstruction Program seeks to assist the hardest hit, low and moderate income, vulnerable, and historically hard-to-reach families and individuals. Mitigation measures are being taken on properties assisted with these funds (where appropriate). The Affordable Multi-Family Rental Program will facilitate the creation of quality, affordable housing units to help build resiliency and alleviate the rental stock shortage caused by disasters. Additionally, DCA created a Buyout Program to help residents that have been subject to repetitive losses due to flooding. With the housing meets being met with these three programs and mitigation measures being incorporated where possible, DCA seeks to provide an Infrastructure Program with CDBG-MIT funds. Planning and Administration activities will also be undertaken.

Elevation Requirement

DCA is not planning any residential rehabilitation activities and therefore will not be undertaking any elevation activities for residential structures. However, infrastructure projects will incorporate appropriate flood resilience measures. More information on the elevation measure can be found in the elevation standards section on page 100.

Infrastructure

Allocation	$21,582,300
Amount budgeted to be spent in HUD-Identified MID Area	$10,791,150
Amount budgeted to be spent in Grantee-Identified MID Area	$10,791,150
National Objectives	Benefit to low and moderate income (LMI) persons Urgent Need Mitigation (UNM)
Maximum Award	$10,000,000 – HUD-Identified MID Area $3,000,000 – Grantee-Identified MID Area $5,000,000 – Joint Application within Grantee-Identified MID Area
Exceptions	DCA will consider increasing maximums only when a quantifiable need and measurable benefit warrant is demonstrated.

Based on the data contained within the Mitigation Needs Assessment, a vast majority of the counties within the Grantee-Identified MID Area and the zip codes located within the HUD-Identified MID Areas need a Mitigation Infrastructure Program. Local governments communicated the need for the following types of infrastructure activities: facilities, communications, stormwater, water, sewer, flood prevention, utilities, and roads. These activities will be eligible under DCA's CBDG-MIT infrastructure program. As a note, these activities are also listed as eligible activities in the 1974 HCDA.

The DCA CDBG-MIT Program will operate similar to the State CDBG Annual Competition, and DCA will use a competitive model and solicit applications for funding. The Georgia CDBG-MIT program is designed to do the following: address community priorities, ensure fairness in the treatment of all applications, and assist communities in preserving and developing basic infrastructure and public facilities for increased resiliency to better recover from disasters. The HUD-Identified MID Areas will compete amongst themselves for funding. Likewise, the Grantee-Identified MID Areas will also compete amongst themselves for funds. Details of these competitions are listed below.

HUD-Identified MID Area Competition

Participants from the zip codes 31520, 31548, and 31705 are eligible to submit applications to DCA for consideration of funding. The maximum amount each local government can apply for is $10,000,000. Due to limited funds, there is no guarantee every zip code will receive funding. Applicants will be required to detail how the proposed project will: meet the definition for mitigation activities, CDBG eligibility criteria, and associated national objective(s), including additional criteria.

Grantee-Identified MID Area Competition

Participants from the Berrien, Camden, Charlton, Chatham, Coffee, Cook, Crisp, Dougherty, Glynn, Liberty, McIntosh, Thomas, Turner Wilcox, and Worth counties (and local governments contained within) are eligible to submit applications to DCA for consideration of funding. The maximum amount each local government can apply for is $3,000,000 and $5,000,000 if submitting a joint application with other eligible local governments. Due to limited funds, only the highest ranking applications will be funded. Applicants will be required to detail how the proposed project will: meet the definition for mitigation activities, CDBG eligibility criteria, and associated national objective(s), including additional criteria.

Operations and Maintenance

In the application for infrastructure funding, communities will be required to communicate how they intend to fund, with local dollars, the long-term operations and maintenance of the infrastructure projects. Applications that do not fulfill this requirement will not be considered for funding. If the local government is reliant on proposed changes to existing taxation policies or tax collection practices to fund operations and maintenance costs, DCA must be notified. DCA will include all reported modifications in the Action Plan. DCA will inform local governments if DCA becomes aware of any state-level funding that can assist with local operations and maintenance costs.

Cost Verification

All applications, regardless of requested amount, will undergo cost verification during the application review phase.

Resiliency Benefits

Local government applicants will be required to detail how the proposed activities will build resiliency to disasters.

Displacement of Persons and/or Entities

DCA will seek to minimize the displacement of persons and/or entities. However, should any proposed projects cause the displacement of people, DCA will ensure the requirements set forth under the Uniform Relocation Assistance (URA) and Real Property Acquisition Policies Act, as amended, are met.

Ranking Criteria

Table 5.5: Ranking Criteria	
Item	**Rank**
Cost to implement vs calculated benefit	High
Demographic Need (LMI, Minority,	Medium
Leverage of Additional Resources	Medium
Readiness to Proceed	Low

Applications will be rated and scored against each of the following factors listed in Table 5.5. Supplemental information, data, analyses, documentation, commitments, assurances, etc. as may be required or requested by DCA for purposes of evaluating, rating, and selecting applicants under this program.

The full scoring rubric, including points assigned to each category, is under development. This scoring rubric will be included in the application provided to local government.

Application Status

DCA will accept applications from local governments for infrastructure projects. Under this allocation, DCA will not make awards to residents. Local governments can inquire about the status of their application through emailing the CDBG-DR@dca.ga.gov email address, calling field representatives (404-638-8351), and accessing the CDBG-MIT public website:

https://www.dca.ga.gov/community-economic-development/funding-programs/community-development-block-grant-disaster-3

DCA will use a competitive application process for CDBG-MIT subrecipient grants. All CDBG-MIT applicants will be notified via email and letter of the status of their application on or immediately following the date of selection. This email and letter will be sent to the applicants by the DCA CDBG-DR Director, or designee. DCA will maintain documentation that supports each application decision, both funded and unfunded.

Flood Mitigation Infrastructure Projects

Local governments undertaking flood mitigation infrastructure projects must consider high wind and continued sea level rise and ensure responsible floodplain and wetland management based on the history of flood mitigation efforts and the frequency and intensity of precipitation events. Flood Mitigation Infrastructure Projects shall be prioritized for those projects that show the highest protection elevation not to below the 50-year event (or higher, 75 year+).

Tornado Mitigation Infrastructure Projects

DCA encourages the construction and use of safe rooms or storm shelters and also encourages local governments to incorporate wind engineering measures and construction techniques into the local building codes. Shelters must be built to *FEMA 361 Safe Rooms for Tornadoes and Hurricanes Guidance for Community and Residential Safe Rooms*.

Accessibility Standards

Subrecipients will be required to meet accessibility standards including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, and Titles II and III of the Americans with Disabilities Act.

Construction Standards

DCA will require both quality inspections and code compliance inspections on all projects. All facilities (otherwise known as “building”) projects shall be built to 2018 I-Codes and ASCE 24 standards when in a

flood zone, as applicable unless other infrastructure codes and standards apply. Site inspections will be required on all projects to ensure quality and compliance with building codes. CDBG-MIT applicants will seek activities that reduce the risk of loss of life and property from future disasters and yield community development benefits. DCA will encourage, to the extent practicable, implementation of green building practices while emphasizing quality, durability, energy efficiency, sustainability, and mold resistance, as applicable. DCA will also comply, to the extent applicable, with guidelines specified in the HUD CPD Green Building Retrofit Checklist. DCA will also consider the application of Green Building Standards and the advanced elevation requirements, when applicable. Subrecipients are encouraged to incorporate recommendations from *FEMA P-798 Natural Hazards and Sustainability for Residential Buildings* into infrastructure projects, when possible. Subrecipients will also be encouraged to incorporate recommendations from *FEMA P-2077, Mitigation Assessment Team (MAT) Report: Hurricane Michael in Florida,* https://www.fema.gov/media-library/assets/documents/186057. Specific recommendations from this report include:

- Recommendation #FL-8c. Building owners outside the WBDR but within the hurricane-prone region should consider protecting the glazed openings on their buildings.
- Recommendation #FL-9. Communities should consider more stringent building requirements for development or reconstruction in the unshaded Zone X (area of minimal flood hazard) and shaded Zone X (area of moderate flood hazard).
- Recommendation #FL-12. Local floodplain administrators, design professionals, and building owners should incorporate more freeboard than the minimum required in ASCE 24 based on Flood Design Class whenever possible.
- Recommendation #FL-18a. Designers and building owners should conduct a comprehensive vulnerability assessment as described in Hurricane Michael in Florida Recovery Advisory 1 before beginning a wind retrofit project.
- Recommendation #FL-18c. Designers, building owners, and operators of critical facilities should refer to FEMA 543, FEMA 577, and FEMA P-424 for additional guidance and best practices for protecting critical facilities from flooding and high winds.
- Recommendation #FL-19b. Owners and authorities having jurisdiction with facilities that present a life-safety threat to occupants during a high-wind event or that need “near absolute protection” or life safety protection should consider designing and constructing a FEMA P-361–compliant safe room or ICC 500–compliant storm shelter for people to take shelter in during a storm.
- Recommendation #FL-23a. Designers should properly design rooftop equipment anchorage per the recommendations in Hurricanes Irma and Maria in the U.S. Virgin Islands Recovery Advisory 2 and contractors should properly implement the anchorage design to prevent blow-off.
- Recommendation #FL-23b. Copings and edge flashings should comply with ANSI/ SPRI/FM 4435/ES-1 to prevent blow-off.
- Recommendation #FL-23c. In high-wind regions, designers should provide an enhanced closure detail for hip and ridge closures on metal panel roofs, and contractors should take special care in properly installing them.
- Recommendation #FL-23d. Designers, contractors, and inspectors should place more emphasis on proper soffit installation to limit wind-driven rain.
- Recommendation #FL-24b. Existing glazing assemblies that have inadequate wind pressure or wind-driven rain resistance should be replaced with new assemblies rather than being retrofitted with shutters.

- Recommendation #FL-25a. Designers should specify, and contractors should properly install, standing seam metal panel systems that have been tested in accordance with ASTM E1592.
- Recommendation #FL-25b. Designers should specify, and contractors should install, a roof deck with a secondary roof membrane for critical facilities designed with structural standing seam metal roof panels.
- Recommendation #FL-28b. Design professionals and contractors should improve installation of brick veneer in high-wind regions for new construction by ensuring it is properly attached.
- Recommendation #FL-29. Designers should consider specifying a more robust wall assembly than EIFS for new critical facilities.

Elevation Standards

Infrastructure projects will incorporate appropriate flood resilience approaches and DCA and its' Subrecipients will follow applicable state/local codes and standards for floodplain management.

Nonresidential structures must be elevated to the standards described in this paragraph or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above the 100-year (or 1 percent annual chance) floodplain. All Critical Actions, as defined at 24 CFR 55.2(b)(3), within the 500-year (or 0.2 percent annual chance) floodplain must be elevated or floodproofed (in accordance with the FEMA standards) to the higher of the 500-year floodplain elevation or 3 feet above the 100-year floodplain elevation. If the 500-year floodplain or elevation is unavailable, and the Critical Action is in the 100-year floodplain, then the structure must be elevated or floodproofed at least 3 feet above the 100-year floodplain elevation. Critical Actions are defined as an ''activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons or damage to property.'' For example, Critical Actions include hospitals, nursing homes, police stations, fire stations and principal utility lines.

Dam and Levee Requirements:

As stated in the Federal Register notice, 84 FR 45838 (August 30, 2019), CDBG-MIT funds are prohibited from being used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. DCA will ensure that if subrecipients use CDBG-MIT funds for levees and dams, the subrecipients will (1) register and maintain entries regarding such structures with the U.S. Army Corps of Engineers (USACE) National Levee Database or National Inventory of Dams, (2) ensure that the structure is admitted in the USACE PL 84–99 Program (Levee Rehabilitation and Improvement Program), and (3) ensure the structure is accredited under the FEMA NFIP.

High Hazard and Significant Hazard Dam inundation areas shall be taken into account for all projects funded with CDBG-DR monies.

Public Service Activities

It is anticipated that public service activities may need to be utilized to complement the mitigation activities proposed in the Method of Distribution. Public service activities may include but are not limited to: implementing and enforcing the most recent modern, resilient, building codes and training, post disaster damage assessment training, and education for construction tradespeople, supervisors, and inspectors.

Civil Rights Obligations

Each subrecipient will be required to comply with all Civil Rights Related Requirements. These requirements are listed in each Subrecipient Agreement that must be executed by the Subrecipient and DCA before any activities are undertaken.

Administration

Allocation	$1,334,550
Amount budgeted to be spent in HUD-Identified MID Area *At a minimum	$667,275
Amount budgeted to be spent in DCA-Identified MID Area *At a maximum	$667,275

As stated in Federal Register Notice 84 FR 45838, grantees can use up to 5% of the total grant award for grant administration. This allocation will cover administrative costs to run the program and is designated for the local government Subrecipients and DCA.

As allowed under the Notice governing these funds, DCA is authorized to use administrative funds appropriated by any of the acts listed below without regard to the particular disaster appropriation from which such funds originated. These acts include: Public Laws 114–113, 114–223, 114–254, 115–31, 115–56, 115–123, and 115–254. DCA will ensure that the amount of grant administration expenditures for each of the aforementioned grants will not exceed 5 percent of the total grant award for each grant (plus 5 percent of program income), review and modify its financial management policies and procedures regarding the tracking and accounting of administration costs, as necessary, and address the adoption of this treatment of administrative costs in the applicable portions of its Financial Management and Grant Compliance submissions.

Planning

Allocation	$4,044,150
Amount budgeted to be spent in HUD-Identified MID Area *At a minimum	$2,022,075
Amount budgeted to be spent in DCA-Identified MID Area *At a maximum	$2,022,075

DCA is allocating $4,044,150 or 15% of the overall CDBG-MIT allocation for planning activities. This includes planning at the state and local level, all of which will impact the HUD-Identified MID and Grantee- Identified MID areas. DCA seeks to collaborate with other state agencies and will also work with local governments to build on-going resiliency strategies for a more targeted investment. All planning activities with both state and local partners will fit within the guidelines proposed in Federal Register Notice 84 FR 45838. The proposed activities will incorporate, where applicable, appropriate mitigation measures and floodplain management. The activities will also promote sound, sustainable long-term recovery planning informed by a pre and post-disaster evaluation of hazard risk. In addition, planning activities will include construction standards and land-use decisions that reflect responsible floodplain and wetland management and consider continued sea level rise. The following sections detail proposed planning activities and DCA's collaboration with other state agencies, local governments, and non-profit organizations.

Georgia Department of Community Affairs (DCA)

A portion of the planning funds will be utilized by DCA for the costs associated with, but not limited to, developing the Action Plan, subsequent amendments, and program guidelines.

Local Governments

Proactive mitigation policies and actions help reduce risk and create safer, more disaster-resilient communities. When a community is more resilient, it has the ability to adapt to changing conditions and prepare, withstand, and rapidly recovery from a disaster. To this end, CDBG-MIT planning activities will create a framework for risk-based decision making to reduce damages to lives, property, and the economy from future disasters. DCA inquired with local governments to determine if the need existed for mitigation planning assistance. Of the local governments that submitted Pre-Applications, **81%** were interested in receiving assistance for mitigation planning. To assist these local governments, DCA will fund the following types of planning activities:

- Development and implementation of modern and resilient building codes consistent with an identified model or standard, such as ASCE 24 and ASCE 7
- Development or revisions of land use plans, zoning policies, and/or flood elevation protections
- Planning and implementation actions that promote and increase hazard insurance coverage
- vertical flood elevation protection

DCA will encourage and support Subrecipients' efforts to update and strengthen local compliance codes to mitigate hazard risks due to sea level rise, high winds, storm surge, and flooding where applicable. In the project application, Subrecipients will submit an explanation of both current and future planned codes to mitigate hazard risks. DCA will provide technical guidance on hazard mitigation code examples when needed.

Currently, 14 of the 15 eligible counties have adopted a FEMA-approved Hazard Mitigation Plan. Thomas County, the remaining local government, is in the process of completing their Hazard Mitigation Plan. Hazard Mitigation Plans are required to be updated every five years. The Georgia Emergency Management and Homeland Security Agency (GEMA/HS) helps local governments secure grant funding to develop or update the multi-jurisdictional hazard mitigation plan in each county. ***Therefore CDBG-MIT planning monies will not be spent on the development of Hazard Mitigation Plans.***

Georgia Emergency Management and Homeland Security Agency (GEMA/HS)

DCA will work with GEMA/HS, the agency administers FEMA-funded mitigation activities, throughout the process of administering this CDBG-MIT allocation. DCA would like to explore a collaboration with GEMA/HS to create Debris Removal Plans and Strategies with the local communities. Planning for debris removal will help the communities expedite the post- disaster recovery process and ensure the safe recovery, recycling, and disposal of disaster debris.

Additionally, DCA would like to collaborate with GEMA/HS on improving mitigation planning and data resources. Better planning will help focus mitigation efforts toward the most needed and beneficial activities, making communities more resilient to disasters and reducing the time, cost and overall toll of recovery.

Georgia Department of Natural Resources (DNR)

DCA seeks to collaborate with DNR on their on-going disaster recovery and hazard mitigation planning efforts. DNR has created the guide *Post-Disaster Recovery and Redevelopment Planning: A Guide for Georgia Communities*, to assist local governments in creating Disaster Recovery and Redevelopment Plans. These plans intend to adapt to and reduce vulnerabilities to inevitable natural disasters. Camden County, Chatham County, Glynn County, Liberty County, and McIntosh County have created Disaster Recovery and Redevelopment Plans. A potential collaboration for CDBG-MIT planning monies is to create these plans for the remaining HUD-Identified and Grantee-Identified MID Areas.

Georgia Heir Property Law Center – Heir Property Mitigation

Heir property refers to a home or land that passes from generation to generation without a legally designated owner resulting in ownership divided among all living descendants in a family. In 2017, the USDA Forest Service analyzed five counties in the State of Georgia that are thought to have a high percentage of heir property. Dougherty County is one of the five counties studied by USDA and is also considered Most Impacted and Distressed by the 2017 disasters. The report estimates the percentage of parcels indicating potential heir properties was 25 percent in Dougherty County.

A lack of clear title creates delays when recovering from a disaster as those who reside in the heir property may have trouble accessing grants, loans, and insurance monies. Additionally, clarifying property ownership for residents is a critical component of every community's resiliency planning process. Whether a local government would like to upgrade infrastructure like wells and septic tanks, expand roads or utilities across right-of-ways, or help residents mitigate the impacts of Natural Disaster through infrastructure improvement and buyout programs, clear title is required.

Considering the prevalence of heir property within the 15-county affected area, a portion of the planning funds will be allocated to the mitigation of heir properties. DCA will enter into a Subrecipient Agreement with The Georgia Heirs Property Law Center, a non-profit organization, which has practical experience with landowners, nonprofits, and municipalities in addressing these real property issues. The Center's efforts will include heir property clearance as well as working with local stakeholders to design and implement resiliency strategies that address the fundamental components of real property ownership.

Georgia Department of Transportation (GDOT) - Interstate Broadband

The Georgia Department of Transportation is currently working to equip major interstates within the state with broadband. Using planning monies, since all of the Grantee-Identified areas are located along I-95 and I-75, DCA would like to explore a possible partnership with this endeavor. Figure 5.6 (right) displays the interstates and the counties along them. As shown, Camden, Glynn, McIntosh, Liberty, and Chatham

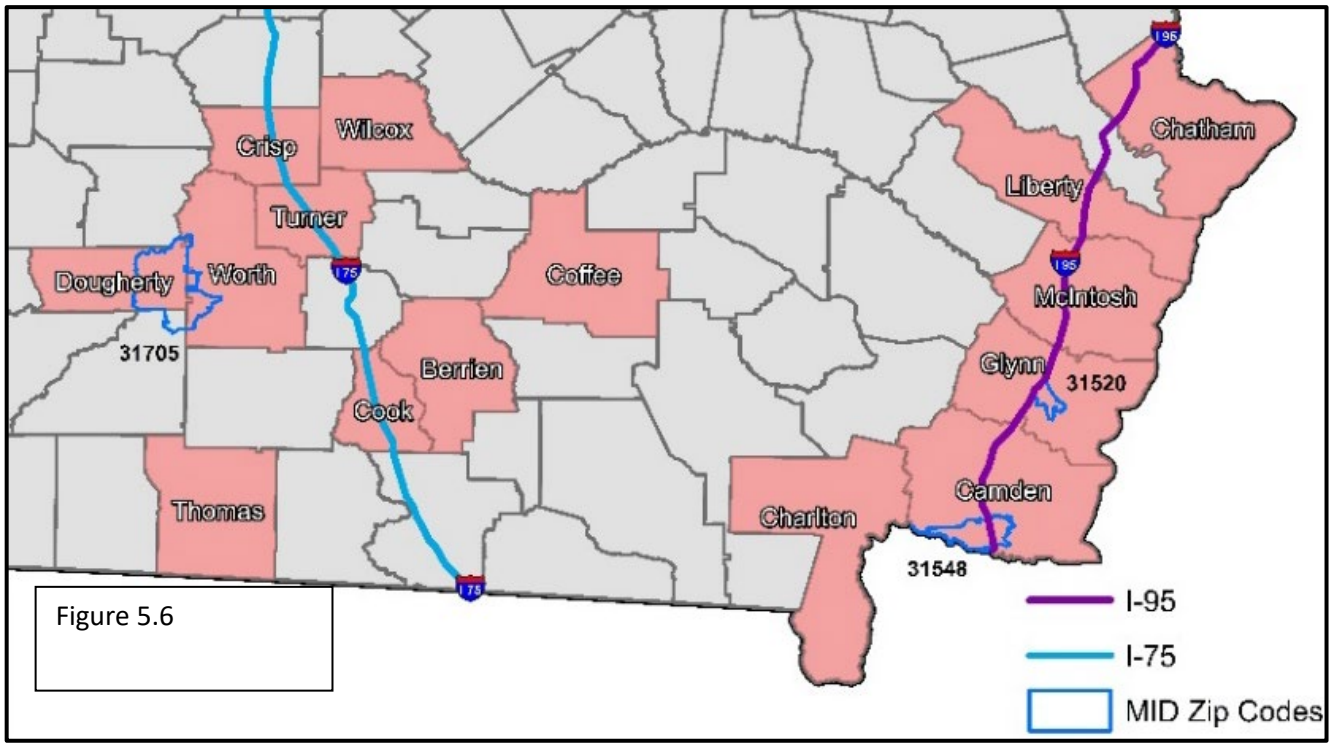


Figure 5.6

counties are located along I-95. Additionally, the following Grantee-Identified MID areas are affected by the efforts along Interstate 75: Coffee, Cook, Crisp, Dougherty, Thomas, Turner, Wilcox, and Worth.

As shown by the figure 5.7 (right), portions of the interstates around the Atlanta area and Middle Georgia area have fiber installed; however, the interstates along the coast and South Georgia do not.

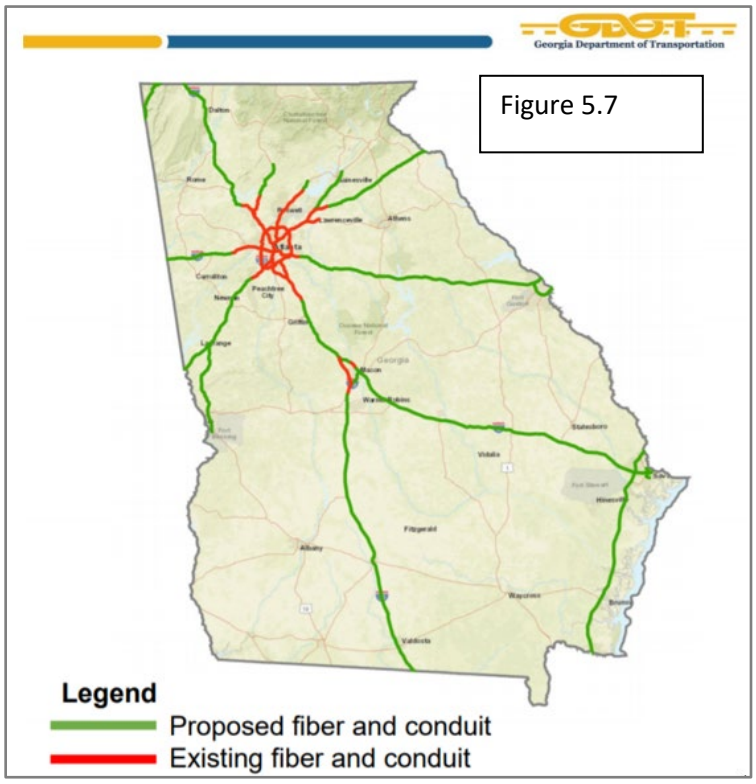


Figure 5.7

Providing Broadband along these routes would improve safety by enhancing internal GDOT communications and communications with citizens by using technology to feed information to signs from cameras on interstate highways. This is especially important during inclement weather and natural disasters when the more roadway information GDOT can provide about incidents, power outages and debris, the safer it is for drivers.

A statewide Broadband network on interstates would also prepare the State of Georgia for a future of connected and automated vehicles. These emerging technologies benefit from a connected roadside by providing the ability for low latency point to point communication and the enabling of safety driven applications utilizing information from the infrastructure itself.

Georgia Broadband Deployment Initiative (GBDI) – DCA and the Georgia Technology Authority (GTA)

DCA seeks to leverage planning dollars to fill in the existing broadband planning gaps to help communities be more resilient in the face of disaster and improve community preparedness and connectivity. A great deal has been done at the state level to document the need for greater connectivity across Georgia. With the 2018 passage of state Senate Bill 402, the Achieving Connectivity Everywhere (ACE) Act, the framework for the Georgia Broadband Deployment Initiative (GBDI) was created. Housed within the Georgia Department of Community Affairs (DCA), GBDI aims to provide planning and incentives for the promotion of broadband deployment to unserved areas throughout the state. The Department of Community of Affairs, in partnership with Georgia Technology Authority, is responsible for carrying out the mission of GBDI. The current efforts of GBDI are focused around completing the Georgia Broadband Availability Map. GBDI is working in partnership with the Carl Vinson Institute of Government (CVIOG) to gather data from over 40 internet service providers in order to precisely map the availability of broadband services to every home and business in the State, which includes all 159 counties. The map is created by overlaying the locations of all homes and businesses in the State of Georgia with broadband provider service availability/footprints for those locations within the State. There are over 5 million locations used in the mapping process. The results of the map will be used to direct the state's investment into unserved areas of the State. DCA seeks to use CDBG-MIT planning funds, where applicable, to assist in these efforts.

Many rural communities continue to rely on older, antiquated forms of communication technology despite the fact that broadband has become critical infrastructure in the 21st century. Traditional forms of communication infrastructure (i.e. copper and coaxial networks) typically lack the bandwidth requirements

to support modern technologies.[1] Moreover, traditional communications infrastructure is highly susceptible to damage from hazardous events such as high winds and inland flooding and the highly chaotic nature of disaster response renders some technologies unreliable. Amidst disaster response, any delay in communications can be significant.

In order to combat overreliance on legacy networks and increase community preparedness, it is advantageous to further explore, and potentially implement, resilient communications networks in high-risk areas. A resilient network is made up of multiple communication technologies that help to prevent total loss during and after disaster events.[2] These networks can manage the real-time information exchange in a disaster as well as provide a platform that enables early warning, mitigation, and forecasting of disaster events.[3] Once established, resilient networks carry great promise for mitigating the effects of disastrous events. Advanced communications carry great promise for ameliorating the pitfalls of traditional communications technologies. For example, Voice over Internet Protocol (VoIP) and cloud computing are technologies enabled by high-speed internet. These services enhance the capabilities of cities and governments by protecting against total loss during disaster events. For example, while cellular networks often become inundated during times of crisis, VoIP-enabled services help ensure that no coverage gaps occur during these critical periods. Similarly, cloud computing protects against total loss during hazardous events by geographically dispersing data centers away from home sites.[4] These added layers of protection allow communities to effectively restore the critical functions of businesses and governments.

DCA is fully aware of the barriers to deployment. It is important to realize that low population densities and rugged terrain present massive entry costs for internet service providers in some rural areas. While it widely acknowledged that a robust, reliable broadband network is a public good, there are many impediments to bringing such services into the unserved areas of the state. As such, this emphasizes the importance of researching, planning, and possibly implementing advanced communications networks in high-risk areas. It does not appear that this issue will be solved through market forces alone; therefore, there exists a need to assist communities with their connectivity goals.

One possible strategy to ameliorate the prevalence of unconnected communities in the State is to connect community anchor institutions. Community anchor institutions are facilities that provide services to the public; they include schools, libraries, hospitals, community health centers, police and fire stations, and town halls.[5] The Federal Communications Commission (FCC) set the goal that every community in the United States should have affordable access to at least a 1 gigabit per second connection through its anchor institutions.[6] While certain federal programs have focused on connecting a subset of community anchor institutions, a swath of these institutions remain reliant on older forms of communication technology.[7] This is troubling because these institutions lie at the heart of disaster relief efforts; therefore, bolstering the preparedness and resiliency of community anchor institutions should be made a priority within the realm of disaster mitigation.

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[1] CTC Technology & Energy, (2017) "Preliminary Policy Considerations: New Mexico Broadband for Business Study."
[2] Fajardo, Carlos, (2019) "Emergency Communications Network for Disaster Management" in Natural Hazards – Risk, Exposure, Response, and Resilience. IntechOpen, number 5751.
[3] Ibid.
[4] Wood, Timothy., Cecchet, Emmanuel., Ramakrishnan, K.K., Shenoy, P., Merwe, J., Venkataramani, A., (2010) "Disaster Recovery as a Cloud Service: Economic Benefits & Deployment Challenges."
[5] Massachusetts Broadband Institute., "Community Anchor Institution (CAI). Massachusetts Technology Collaborative.
[6] Federal Communications Commission., "Connecting America: The National Broadband Plan"
[7] Alemanne, Nicole., Mandel, Lauren., McClure, C., (2011) "The Rural Public Library as Leader in Community Broadband Services." Library Technology Reports.

Georgia Emergency Communications Authority (GECA) and Next Generation 911

DCA will use planning funds to engage our partners at the Georgia Emergency Communication Authority as they advance the Next Generation 911 project across the State. The Georgia Emergency Communications Authority (GECA) was created in 2018, under HB 751, to facilitate the effective and efficient operation of 911 and emergency communications across the state. GECA understands the importance of continuing the advancement of 911 service and is keenly focused on leading Georgia forward to statewide adoption of Next Generation 911 (NG911) technology.

NG911 refers to the upgrade of systems that were built using analog rather than digital technologies, public safety answering points (PSAPs) to a digital or Internet Protocol (IP)-based 911 system. NG911 will enhance emergency number services by creating a faster, more resilient system that allows digital information (e.g., voice, photos, videos, text messages) to flow seamlessly from the public, through the 911 network and eventually, directly to first responders. It will also enable 911 call centers to transfer 911 calls to other call centers, and help them deal with call overload, disasters, and day-to-day transfer of 911 calls to other jurisdictions.

4. CDBG-MIT Expenditure Schedule

Disclaimer: these are projections for planning purposes. Actual expenditure rates may vary.

Quarter	Admin	Planning	Infrastructure	Total	%
Q1				$0.00	0.00%
Q2				$0.00	0.00%
Q3		$200,000.00		$200,000.00	0.74%
Q4	$26,000.00	$200,000.00		$226,000.00	0.84%
Q5	$36,000.00	$209,245.24	$698,700.00	$943,945.24	3.50%
Q6	$46,000.00	$209,245.24	$798,700.00	$1,053,945.24	3.91%
Q7	$56,000.00	$164,433.93	$898,700.00	$1,119,133.93	4.15%
Q8	$56,000.00	$164,433.93	$998,700.00	$1,219,133.93	4.52%
Q9	$61,000.00	$169,245.24	$998,700.00	$1,228,945.24	4.56%
Q10	$51,000.00	$169,245.24	$998,700.00	$1,218,945.24	4.52%
Q11	$50,050.00	$149,433.93	$1,098,700.00	$1,298,183.93	4.82%
Q12	$46,000.00	$149,433.93	$1,098,700.00	$1,294,133.93	4.80%
Q13	$46,000.00	$164,245.24	$998,700.00	$1,208,945.24	4.48%
Q14	$46,000.00	$164,245.24	$898,700.00	$1,108,945.24	4.11%
Q15	$46,000.00	$164,245.24	$898,700.00	$1,108,945.24	4.11%
Q16	$46,000.00	$144,433.93	$898,700.00	$1,089,133.93	4.04%
Q17	$46,000.00	$144,433.93	$898,700.00	$1,089,133.93	4.04%
Q18	$46,000.00	$144,433.93	$898,700.00	$1,089,133.93	4.04%
Q19	$46,000.00	$144,433.93	$898,700.00	$1,089,133.93	4.04%
Q20	$46,000.00	$144,433.93	$898,700.00	$1,089,133.93	4.04%
Q21	$46,000.00	$164,245.24	$898,700.00	$1,108,945.24	4.11%
Q22	$46,000.00	$164,245.24	$898,700.00	$1,108,945.24	4.11%
Q23	$46,000.00	$144,433.93	$898,700.00	$1,089,133.93	4.04%
Q24	$46,000.00	$144,433.93	$998,700.00	$1,189,133.93	4.41%
Q25	$46,000.00	$134,433.93	$898,700.00	$1,079,133.93	4.00%
Q26	$46,000.00	$124,433.93	$798,700.00	$969,133.93	3.59%
Q27	$46,000.00	$104,433.93	$698,700.00	$849,133.93	3.15%
Q28	$66,000.00	$63,867.82	$598,700.00	$728,567.82	2.70%
Q29	$56,000.00			$56,000.00	0.21%
Q30	$46,000.00			$46,000.00	0.17%
Q31	$36,000.00			$36,000.00	0.13%
Q32	$26,000.00			$26,000.00	0.10%
Total	**$1,348,050.00**	**$4,044,150.00**	**$21,568,800.00**	$26,961,000.00	100.00%

As required by 84 FR 45838, DCA is required to expend 50% of the CDBG-MIT allocation within six years and 100% in twelve years. After soliciting Pre-Applications and gaining and better understanding of the mitigation needs, DCA anticipates to expend all funds within eight years. Table 5.8 details the timeframe in which the funds will be expended. In the first year of signing a grant agreement with HUD, DCA anticipates spending planning and administration dollars. This is due to the preparation work involved with creating the CDBG-MIT programs. Infrastructure allocations are expected to commence spending in Quarter 5.

5. National Objectives

The Georgia Department of Community Affairs has designed this CDBG-MIT program in compliance with the National Program objectives, and will ensure that assistance is prioritized toward the most disadvantaged populations. DCA will ensure, as is required in Federal Register Notice 84 FR 45838, that no less than 50 percent of the aggregate of CDBG-MIT program funds be used to support activities benefitting low- and moderate-income persons. This equates to the total allocation minus planning and administrative dollars. LMI status will be determined by evaluating income as a percentage of the Area Median Income (AMI). The AMI limits for each county is provided by HUD on the Income Limits Documentation System webpage.

As stewards of federal CDBG funds, the State of Georgia complies with the Department of Housing and Urban Development's (HUD) mission to develop viable communities by the provision of decent housing, a suitable living environment and expanding economic opportunities. To this end, all funded activities administered by the State of Georgia will meet one of three named HUD national objectives listed below.

1. Providing Benefit to Low- and Moderate-Income Individuals:
    - LMA Area Benefit Activities - The area benefit category is the most commonly used national objective for activities that benefit a residential neighborhood. An area benefit activity is one that benefits all residents in a particular area, where at least 51 percent of the residents are LMI persons.
2. Urgent Need Mitigation (UNM) - Activities funded with the UNM national objective must result in measurable and verifiable reductions and address current and future risks. For infrastructure activities using the Urgent Need Mitigation national objective, local governments must reference the current and future risks as identified in the Mitigation Needs Assessment, as well as the impact. Additionally, applicants using this national objective must demonstrate how it will result in a measurable and verifiable reduction in the risk of loss of life and property.
3. Preventing or eliminating slum and blighting conditions – (Only by pre-approval from HUD) - Grantees shall not rely on the national objective criteria for elimination of slum and blighting conditions without approval from HUD, because this national objective generally is not appropriate in the context of mitigation activities.

6. Affirmatively Furthering Fair Housing

The State of Georgia's resilience planning will incorporate measures to strategically align resources in a way that promotes protecting people from discrimination when they are renting, buying, or securing financing for housing, consistent with HUD's direction to Affirmatively Further Fair Housing. The State of Georgia

conducted an Analysis of Impediments to Fair Housing Choice (AI) in 2016 in order to research, analyze, and identify prospective impediments to fair housing choice throughout non-entitlement areas of the state. Identified impediments and recommended actions can be seen in the table below.

Public Sector Impediments and Suggested Actions		
#	**Impediment**	**Action**
1	Limited presence of fair housing enforcement entities in rural Georgia.	1.1: Compile a statewide database of local private organizations that provide fair housing complaint referral or other fair housing services. Include information on these entities and fair housing laws and updates in DCA's current communications through newsletters to promote the dissemination of information concerning developments in fair housing policy and trends in fair housing enforcement and complaints.
2	Need for additional outreach and education.	2.1: Conduct outreach and education pertaining to fair housing, targeting local government agencies, sub recipients or grantees of DCA funding and PHAs, with the goal of keeping public officials throughout the state apprised of ongoing changes to fair housing law and policy. 2.2: Design and implement an outreach campaign to publicize fair housing law and policy during fair housing month (April) of every year.
3	NIMBYism and public policies used to limit access to affordable housing. T	3.1: Share existing data and information on the impact of NIMBYism with sub recipients, local grantees and public housing agencies (PHAs) outlining the implications of the recent Supreme Court decision in Texas Department of Housing and Community Development v. Inclusive Communities Project for the development and placement of affordable housing units.
4	Individuals with Housing Choice Vouchers (HCVs) predominately reside in high minority concentrated areas.	4.1: Conduct outreach to landlords and property owners on making units throughout the state available to persons with HCV while developing and implementing policies in the Low Income Housing Tax Credit (LIHTC) program that encourage the development of affordable housing units in communities of opportunity.
5	Limited knowledge of fair housing law in rural areas of the state.	5.1: Conduct ongoing fair housing outreach and education sessions, in partnership with the entities identified in fulfilment of Public Sector Action 2.1, targeting housing providers and consumers.

The CDBG-DR program will require subrecipients to affirmatively further fair housing in an effort to increase outreach efforts (Action 2.1). The following actions are suggested to achieve greater participation and a higher awareness of Fair Housing. Note, this is not an exhaustive list and all actions below are not required. Subrecipients shall select and implement the actions that best fit the needs of their communities.

- Analyze any impediments to fair housing choice which may exist in your community. Contact HUD or DCA for an analysis of any fair housing complaints from the area.
- Review local zoning laws and procedures to determine whether they contribute to, or detract from, progress in fair housing. Establish a collection of zoning and land use planning material to have available for the use of local fair housing groups as well as subrecipient staff.

- Provide funding for local fair housing groups (eligible under the CDBG-DR Program) or provide financial or technical assistance to citizens wishing to organize such a group.
- Adopt a local Fair Housing Ordinance or a resolution supporting the state and/or federal law.
- Distribute brochures outlining fair housing law to persons attending community meetings or CDBG-DR Public Meetings.
- Post a fair housing poster at City Hall or Courthouse.
- Require owners of rental property receiving CDBG-DR assisted rehabilitation loans to sign fair housing agreements as a condition of receiving assistance.
- Develop an active public information and educational campaign to promote fair housing awareness in the community.
- Include a discussion of fair housing in public meeting agendas.
- Provide persons relocated to new housing with fair housing information and referrals.

7. Award Selection

Upon closure of the application period for the 2017 CDBG-MIT infrastructure Program, DCA received a total of 15 applications, including two city and county joint applications. Of the total funding amount available to subrecipients, $21,497,447 was recommended to be awarded. **Table 5.9** details the selected communities and their award amounts.

Table 5.9: 2017 CDBG-MIT Award Subrecipients

Local Government(s)	Award Amount
Camden County	$5,542,894.00
City of Abbeville	1,160,207.00
City of Adel & Cook County	$1,918,507.00
City of Albany	$3,921,402.00
City of Douglas	$1,788,761.00
City of Homeland	$1,864,369.00
City of Kingsland	$1,909,997.00
City of Sylvester	$1,065,672.00
Coffee County	$1,978,164.00
Crisp County	$347,474.00
Total	$21,497,447

6. 2018 Mitigation Award

Overview of the Disaster

On Wednesday, October 10, 2018, Hurricane Michael became the strongest hurricane on record to make landfall along the Florida panhandle and the first major hurricane (Category 3+) to directly impact the state of Georgia since the 1890s. Along with the damage caused by this hurricane's 115 mph winds, a few, brief tornadoes in the outer bands of the storm caused sporadic damage in portions of the area and heavy rainfall resulted in localized flooding. **Figure 6.1**, below, shows the path of Hurricane Michael. Within Georgia, the Southwest region of the state experienced the greatest impact from the storm.

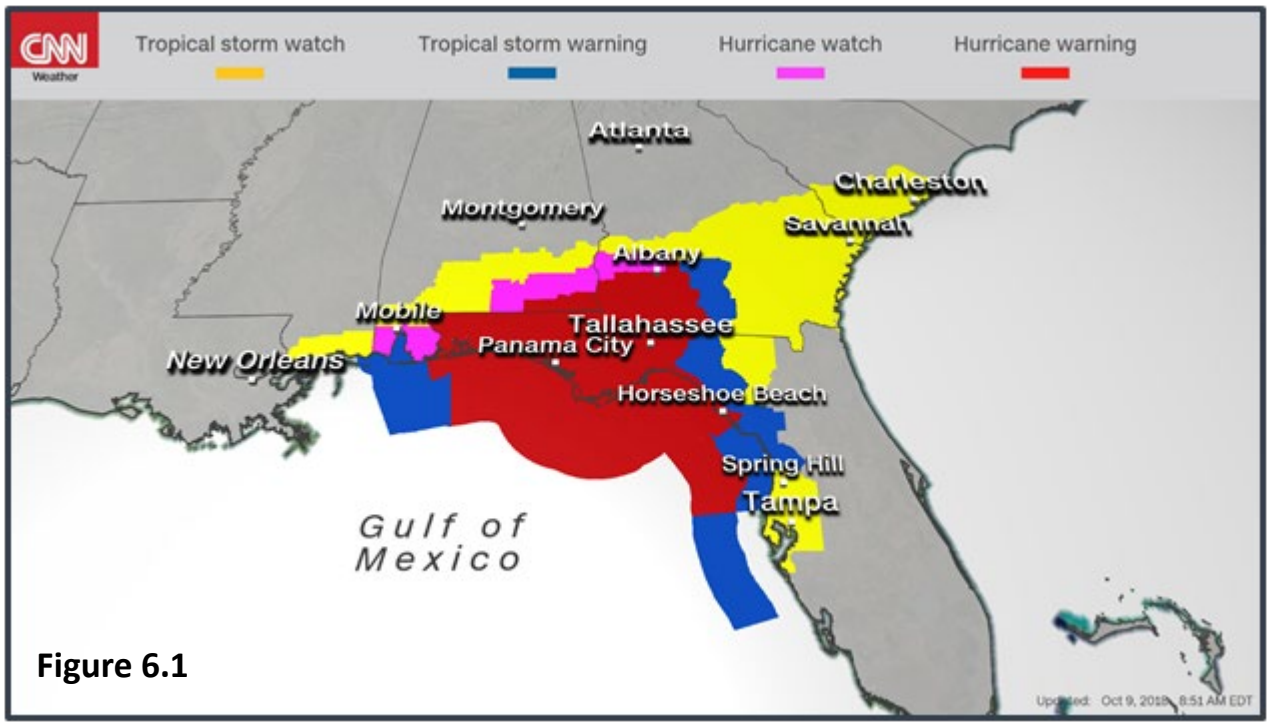
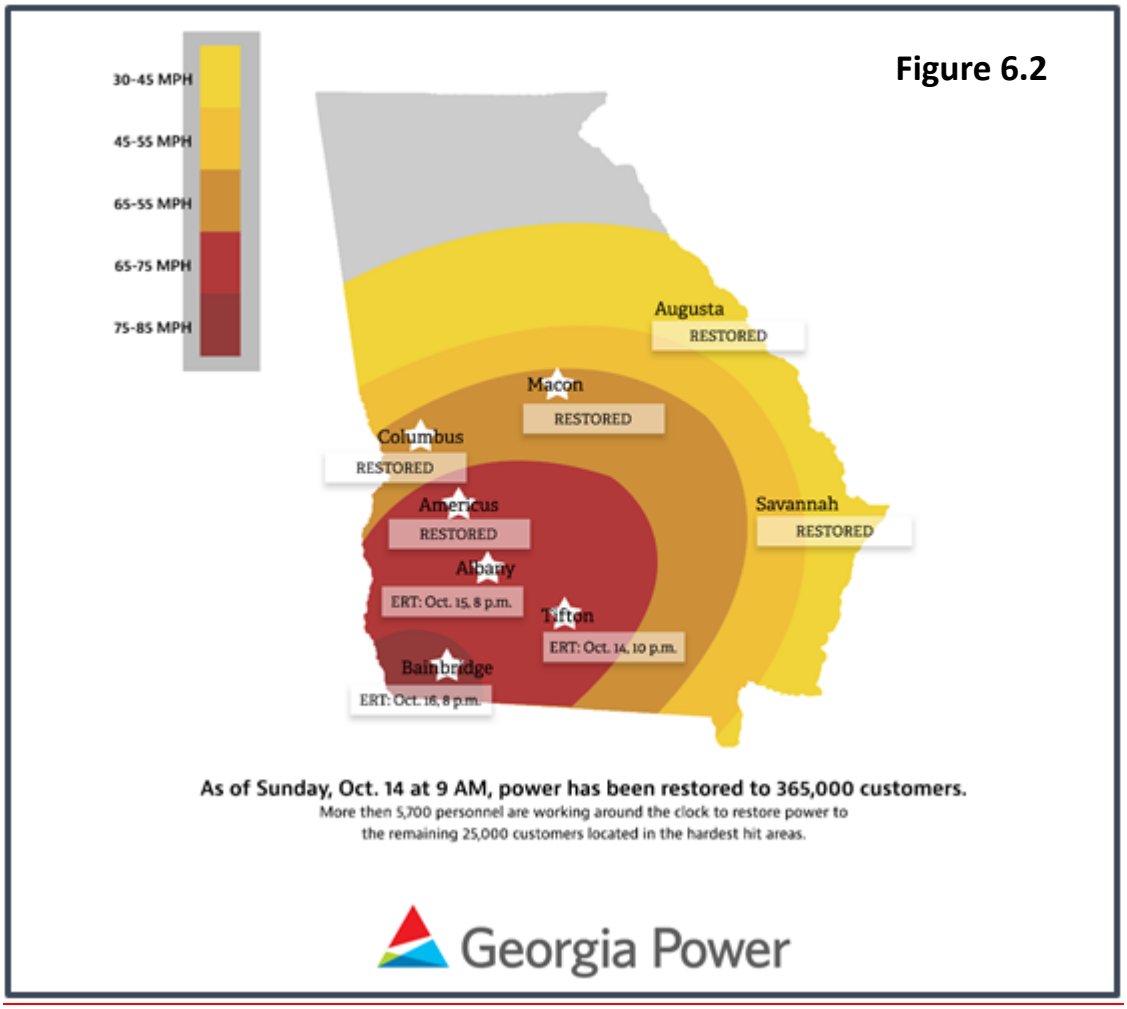


Figure 6.1

Although the hurricane moved swiftly through Georgia, exiting the state as a tropical storm, it left behind a vast amount of damage and debris. According to the National Hurricane Tropical Cyclone Report prepared by the National Oceanic and Atmospheric Association (NOAA), major wind damage occurred to various infrastructure along the track of Michael. The town of Donalsonville in Seminole County reported damage to 99 percent of the homes, along with severe destruction to timber and agriculture. According to the *Donalsonville News*, the morning after the Hurricane, 100 percent of Seminole County residents were without electrical power because of snapped poles and thousands of trees blown into lines. These power outages lasted up to a week and even longer, throughout the impacted region (**Figure 6.2**).



Most Impacted and Distressed Areas

MID Expansion and Concentration of Operations

In Federal Register Notice 85 FR 4681, HUD designated zip code 39845 (Seminole County) as a Most Impacted and Distressed (MID) area. However, the Department of Community Affairs (DCA) analyzed disaster data and determined zip codes 31705 (Dougherty County) and 39819 (Decatur County) suffered tremendous damage and had considerable remaining unmet needs as well. On April 14, 2020, DCA submitted a formal request to HUD, asking the agency to designate the aforementioned areas as MID areas. On April 24, 2020, HUD responded with a letter of approval, citing that, based on the data provided by DCA, the Department found good cause to grant the request. Both the request and the approval letters can be found in the appendices of this document. HUD has also authorized grantees of both the 2018 CDBG-DR and CDBG-MIT awards to expand operations to the entirety of the MID areas, an option that has been selected by DCA to pursue.

While the expansion of the MID designation to two more counties better serves the implementation of DCA's 2018 CDBG-DR programs, the agency has determined that solely concentrating the CDBG-MIT award in Seminole County would allow for a more efficient use of the mitigation funding. Like with previous

allocations, HUD also requires that, "At least 50 percent of CDBG-MIT funds be used for mitigation that addresses identified risks within the HUD-Identified MID areas." Because of this requirement, the increasing cost of compliance with HUD mitigation standards, and the limited amount of operational costs that $2,669,000 would offer for MIT activities, limiting operations to Seminole County better serves the Hurricane Michael-impacted communities and will significantly reduce the time it takes for the subrecipients to receive an award from DCA, bringing the county's residents much closer to being prepared for future disasters.

CDBG-MIT grants also have a statutory focus on benefitting vulnerable, lower income people and their communities. Through concentrating the MIT funding in Seminole County, the activities are more likely to benefit low- and moderate-income (LMI) individuals, as shown in **Figure 6.3** below, allowing the program to meet the national objective of Benefit to LMI and satisfy HUD's requirement of spending at least 50 percent of funding to benefit such persons and communities.

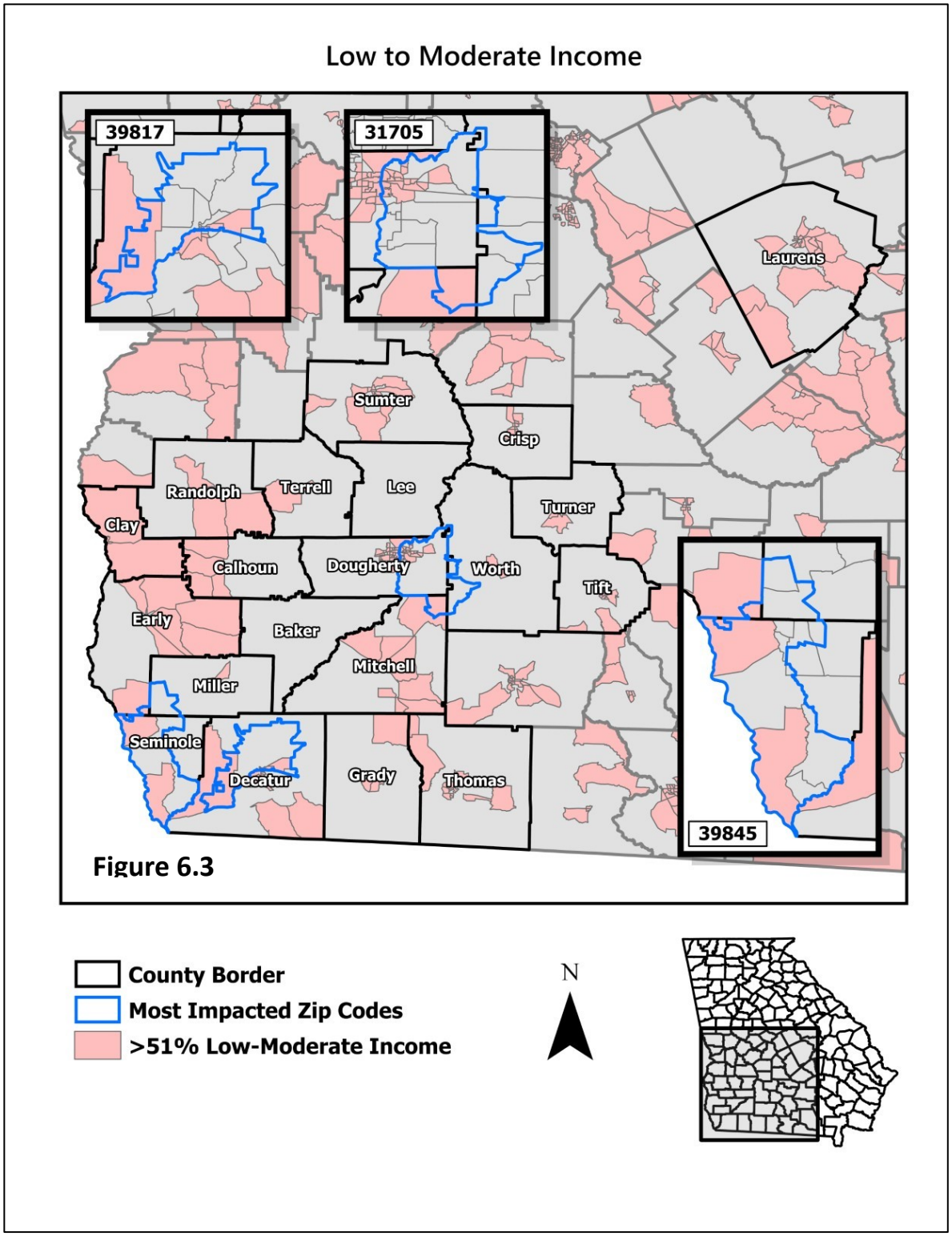


Figure 6.3

Impact of Hurricane Michael

This section details the overall impact of Hurricane Michael on the MID counties, which were declared eligible for FEMA's Individual and Public Assistance grants. While Individual Assistance eligibility may seem unrelated to the enhancement of public infrastructure, which DCA has chosen to direct mitigation funding towards, it is important to note that the success of public infrastructure can play a significant role in the

protection of residential areas and homeowners during natural disasters. The data provided in this section will inform the chosen direction for the program funded by this allocation, which will function to ensure the security of life and property in the wake of future natural disasters.

During the development of DCA's 2018 CDBG-DR Action Plan, several sets of data were analyzed by the agency to gauge the housing impact caused by Hurricane Michael. These sets include data from FEMA, which details the total amount of residents applying for Individual Assistance. Figure **6.4** below shows that between the three MID counties, there were 4,007 FEMA Verified Losses (FVL) and a total of $8,783,490 in FVL dollars. As evidenced by the table, Seminole County, the chosen area for 2018 MIT activities, experienced $3,442,112 in FVL, the highest amount of loss in all of the 20 presidentially-declared counties, not just among the MID areas. The average FVL amounts were derived by dividing the number of applicants with FVL and the FVL dollars for each county. Also shown in **Figure 6.5** below, despite having the smallest population, Seminole County experienced the largest amount of FVL per application, per resident, and a larger percentage of its population applied for FEMA assistance.

Figure 6.4: FEMA Assistance

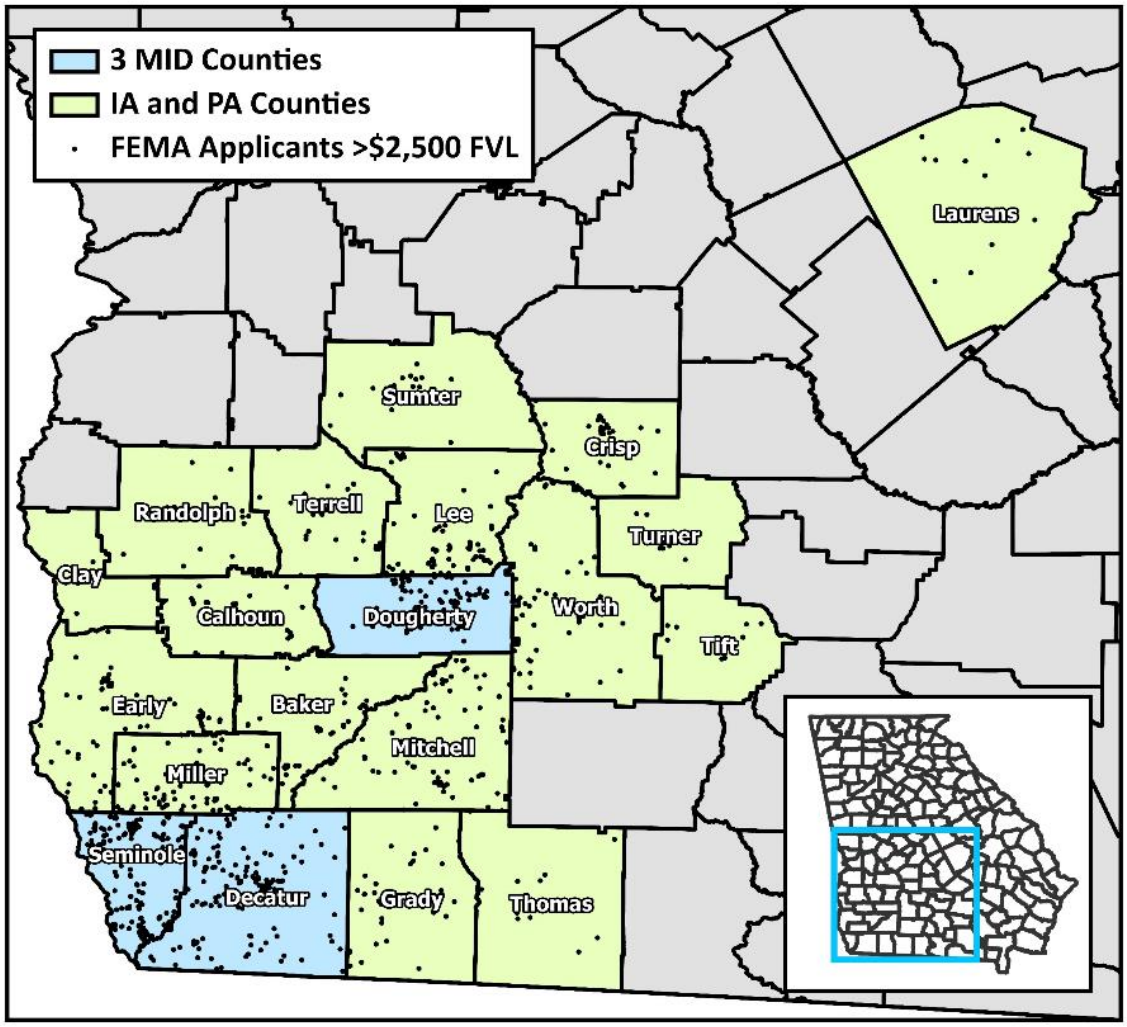
County	# of Applicants	Applicants with FVL	FVL Dollars	Average FVL Dollars
Decatur	5,128	1,469	$2,627,371.25	$1,788.54
Dougherty	10,016	1,447	$2,714,006.16	$1,875.61
Seminole	2,764	1,091	$3,442,112.39	$3,155.01

Figure 6.5: FVL for MID Counties (Source: GEMA)

County	Total Population	Total FVL	# of Applications	FVL per Application ($)	FVL per Resident ($)	Population with FVL (%)
Decatur	26,575	$2,627,371	5,128	$512	$99	19.30%
Dougherty	91,243	$2,714,006	10,016	$271	$30	10.98%
Seminole	8,315	$3,442,112	2,764	$1,245	$414	33.24%
Total	126,133	$8,783,490	17,908	$2,029	$543	63.52%

Figures 6.6 shows the density of applicants with FEMA Verified Losses, which shows losses above $2,500. In **Figure 6.6**, there is a high density of applicants and the larger concentrations, especially those with losses above $2,500, are found in the MID counties. Seminole County, specifically, has one of the most pronounced densities.

Figure 6.6: FEMA Applicants with >$2,500 FEMA Verified Loss (FVL), MID Counties, Hurricane Michael, DR-4400



Public Assistance is FEMA's largest grant program. The purpose of the program is to support communities' recovery from major disasters by providing them with grant assistance for debris removal, life-saving emergency protective measures, and restoring public infrastructure. Local governments, states, tribes, territories, and certain nonprofit organizations are eligible for these funds. The Georgia Emergency Management and Homeland Security Agency (GEMA) oversees the Public Assistance program and assists counties and local municipalities with the applications for Public Assistance.

Figure 6.7 details the assistance received by the MID counties in each of the public infrastructure categories. There was a total of $43,418,102 in public assistance costs, with Seminole accounting for the largest portion at $29,146,747.. Proper mitigation efforts and infrastructure enhancements, which would be funded by the 2018 MIT allocation, could lessen these costs in the wake of future disasters by increasing the resiliency of these various types of infrastructure.

Figure 6.7: FEMA Public Assistance							
County	Category A: Debris Removal	Category B: Emergency Protective Measures	Category C: Roads and Bridges	Category D: Water Control Facilities	Category E: Public Buildings and Contents	Category F: Public Utilities	Category G: Parks, Rec and Other Facilities
Decatur	$77,000.81	$332,804.22	$73,796.86	0	$143,098.71	$135,788.90	$38,823.35
Dougherty	$12,526,644.57	$893,397.97	0	0	$50,000.00	0	0
Seminole	$170,089.00	$255,986.61	$19,874.88	0	0	$28,700,796.58	0

Demographic Overview and Analysis of MID Communities

As reflected in the previous section, the MID counties, Decatur, Dougherty, and Seminole, were declared eligible to receive Individual and Public Assistance from FEMA. These counties are far less populated and exhibit higher poverty rates than the State of Georgia. This section seeks to provide a detailed analysis of these MID communities to examine their ability to mitigate against future natural disasters and hazards and perhaps clarify why FEMA assistance was so necessary in the aftermath of Hurricane Michael. It is important to note, however, that while these demographics play a role in determining how both CDBG-DR and CDBG-MIT funding should be used, they are not the only factors to be considered. DCA's decision to solely allocate 2018 mitigation funding to Seminole County and its local governments was based on additional components, such as significant mitigation and financial needs, which are evidenced throughout Section 6.

The populations of the MID counties vary greatly, as evidenced in **Figure 6.8**. However, Dougherty County, which has the largest population of the three MIDs at just over 91,000, does not make up even 1% of the State of Georgia's population. While these counties are somewhat larger geographically, the number of people per square mile is significantly smaller than counties such as those of Fulton, Richmond, Muscogee, and Chatham. The MID counties also have a significantly less median household income than that of Georgia's statewide average of $55,821, with Seminole County having the lowest, as well as higher rates of poverty compared to the state's overall rate of 14.3%. Low-income households, as well as smaller populations, result in a modest tax base, significantly limiting the mitigation efforts the local governments can pursue to mitigate against further storm damage in the future.

Figure 6.8: Median Household Income and Poverty by County (ACS 5 Year 2015-2019)			
County	Population	Median Household Income	Poverty Rate %
Decatur	26,682	$41,481	24.30%
Dougherty	89,703	$39,584	28.40%
Seminole	8,321	$33,357	23.70%

According to the U.S. Census Bureau's 2015-2019 American Community Survey 5-Year Estimates, there is also a vast difference in the percentage of minority residents among the HUD-designated MID counties. As evidenced by **Figure 6.9**, it is noted these areas have higher concentrations of minority residents, and therefore, may have a great need for mitigation enhancements to address any disparities in critical infrastructure needs throughout the region. **Figure 6.10** below provides demographic data (%) of the three zip codes which make up the MID areas. There is an African American population of 74.34% in Dougherty County, 48.68% in Decatur County, and 33.04% in Seminole County. The Hispanic populations are 4.22%, 5.13%, and 4.06% respectively. The percentage of households with individuals with persons over 55 years of age are 44.0%, 46.6%, and 56.1% respectively.

An infrastructure program will be undertaken with the 2018 CDBG-MIT funds, which will be explained in further detail in the following sections. The funds will be directly allocated to Seminole County and its local governments. The county will be responsible for submitting mitigation project proposals to DCA. A higher score will be given to projects located in areas within the county with higher minority, Hispanic, and LMI concentrations.

Figure 6.9 : MID Zip Codes, Demographic Profile (ACS 2014 -2018)

County	Zip Code	Total Population	# White	# African American	# All Other	# 2 or more races	# Hispanic	% Households w/ individuals 55+
Decatur	39817	10,624	4,959	5,163	502	209	545	46.6%
Dougherty	31705	35,470	7,389	26,370	1,711	594	1,498	44.0%
Seminole	39845	7,949	4,937	2,626	386	164	323	56.1%

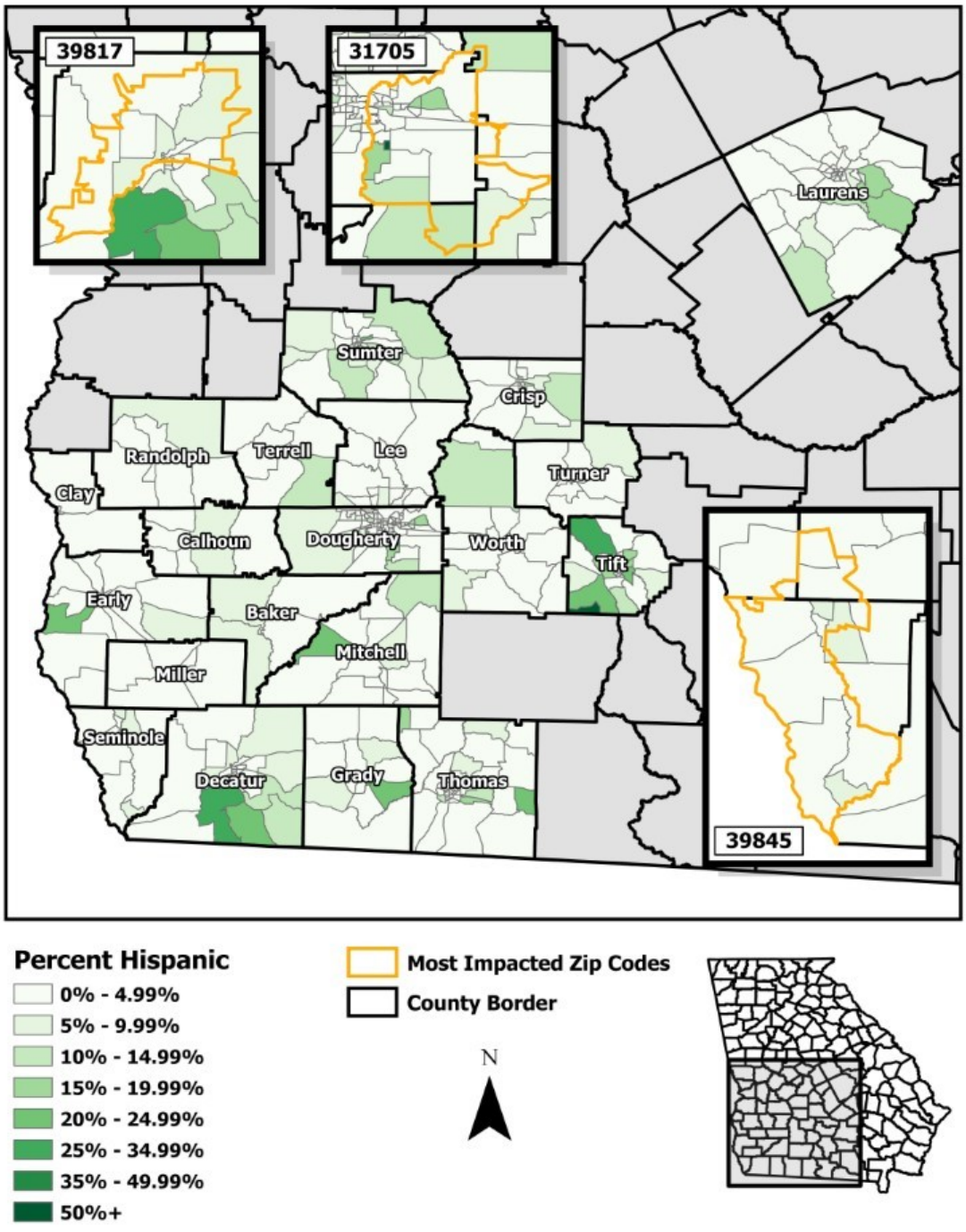
Figure 6.10 : MID Zip Codes, Demographic Profile (Percentages, ACS 2014 - 2018)

County	Zip Code	Total Population	# White	# African American	# All Other	# 2 or more races	# Hispanic	% Households w/ individuals 55+
Decatur	39817	10,624	46.68%	48.60%	4.73%	1.97%	5.13%	46.6%
Dougherty	31705	35,470	20.83%	74.34%	4.82%	1.67%	4.22%	44.0%
Seminole	39845	7,949	62.11%	33.04%	4.86%	2.06%	4.06%	56.1%

Hispanic Population

As seen in **Figure 6.11**, Decatur County, one of the MID designated counties, has a census tract with a Hispanic population of 25 percent or greater. The United States Census Bureau defines "Hispanic or Latino" as "A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race." In order to ensure Hispanic populations that only speak Spanish have access to information related to these funds, vital documents with be translated to Spanish when necessary. Further information related to documents translated into Spanish can be found in the Citizen Participation Plan located in the Appendices of this document.

Figure 6.11: Hispanic Population Percentage

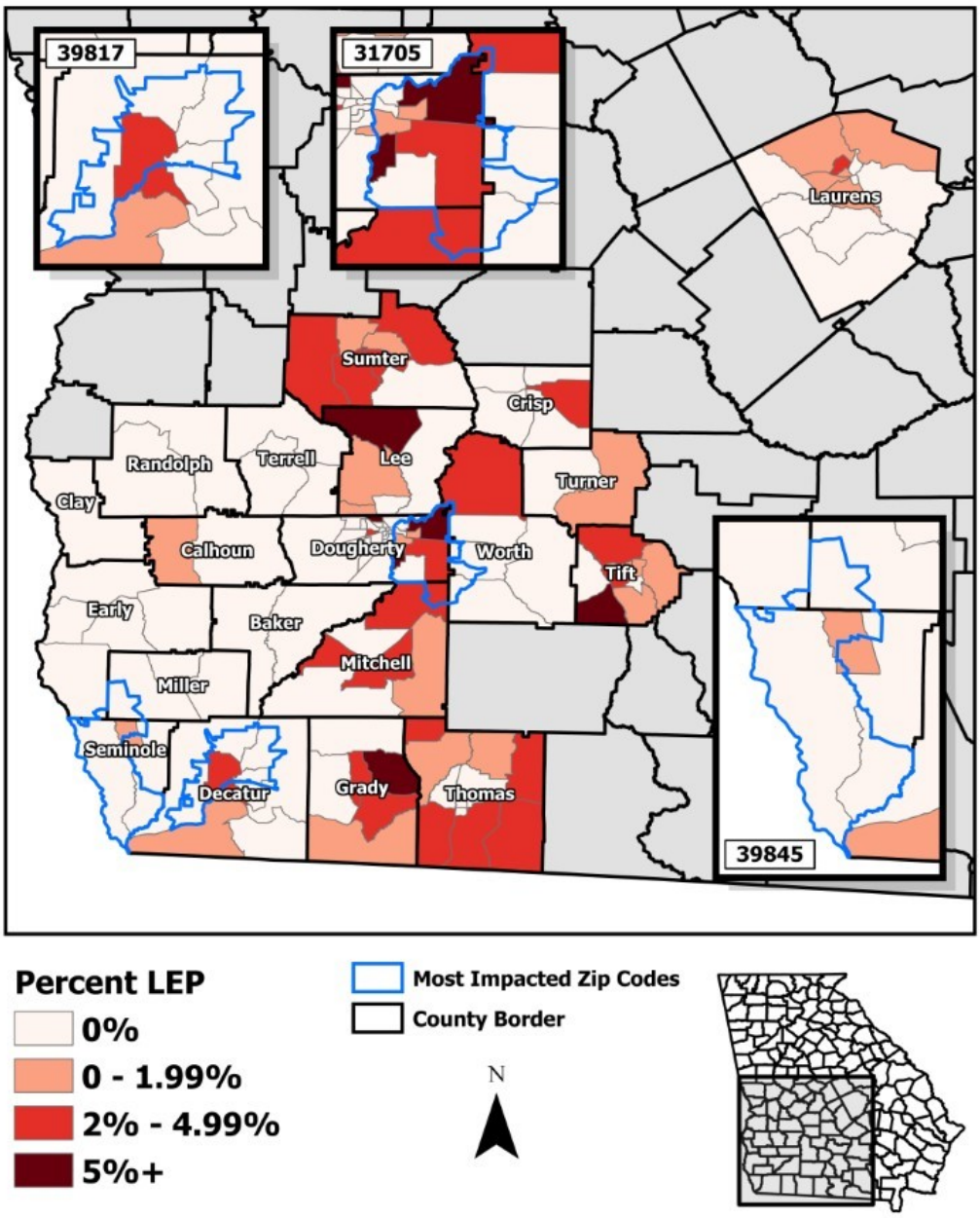


Limited English Proficiency (LEP)

As shown in **Figure 6.12** below, the Most Impacted and Distressed counties, Decatur, Dougherty, and

Seminole, have relatively high concentrations of limited English-speaking households. In order for these communities to have access to information related to these funds, vital documents will be translated to Spanish or other languages, when necessary. Further information related to translation of documents can be found in the Citizen Participation Plan located in the Appendices of this document.

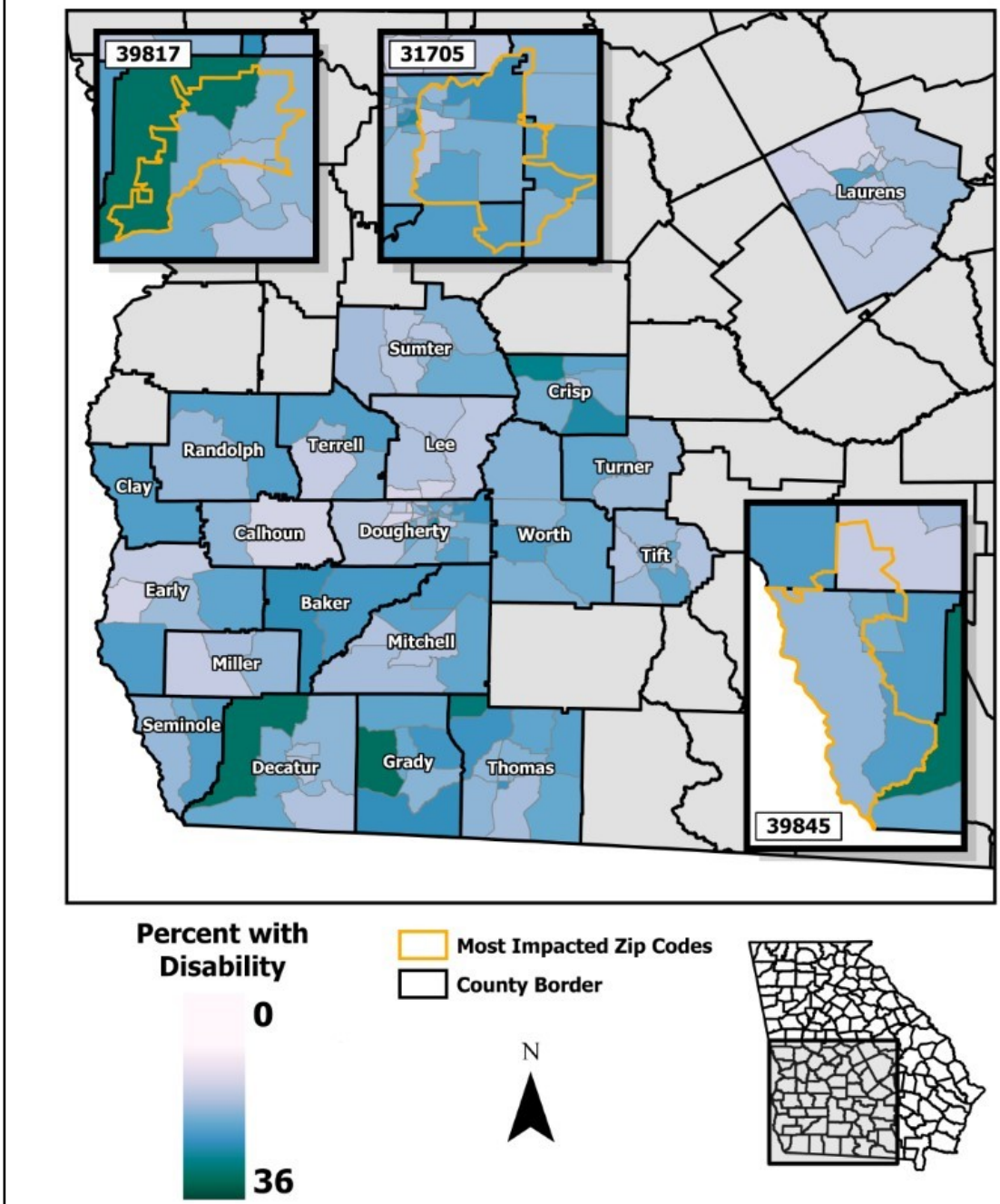
Figure 6.12: Percentage of Limited English-Speaking Households



Populations with Disabilities

As seen in **Figure 6.13**, the MID-designated counties have varying levels of percentages of persons with disabilities. Decatur has the tract with the highest percentage of disabilities out of the three counties. While Seminole and Dougherty have lower concentrations of persons with disabilities, the rural nature of all the MID counties makes it increasingly difficult for disabled persons to access emergency services and be involved with planning for disasters. For this reason, these persons are considered vulnerable populations.

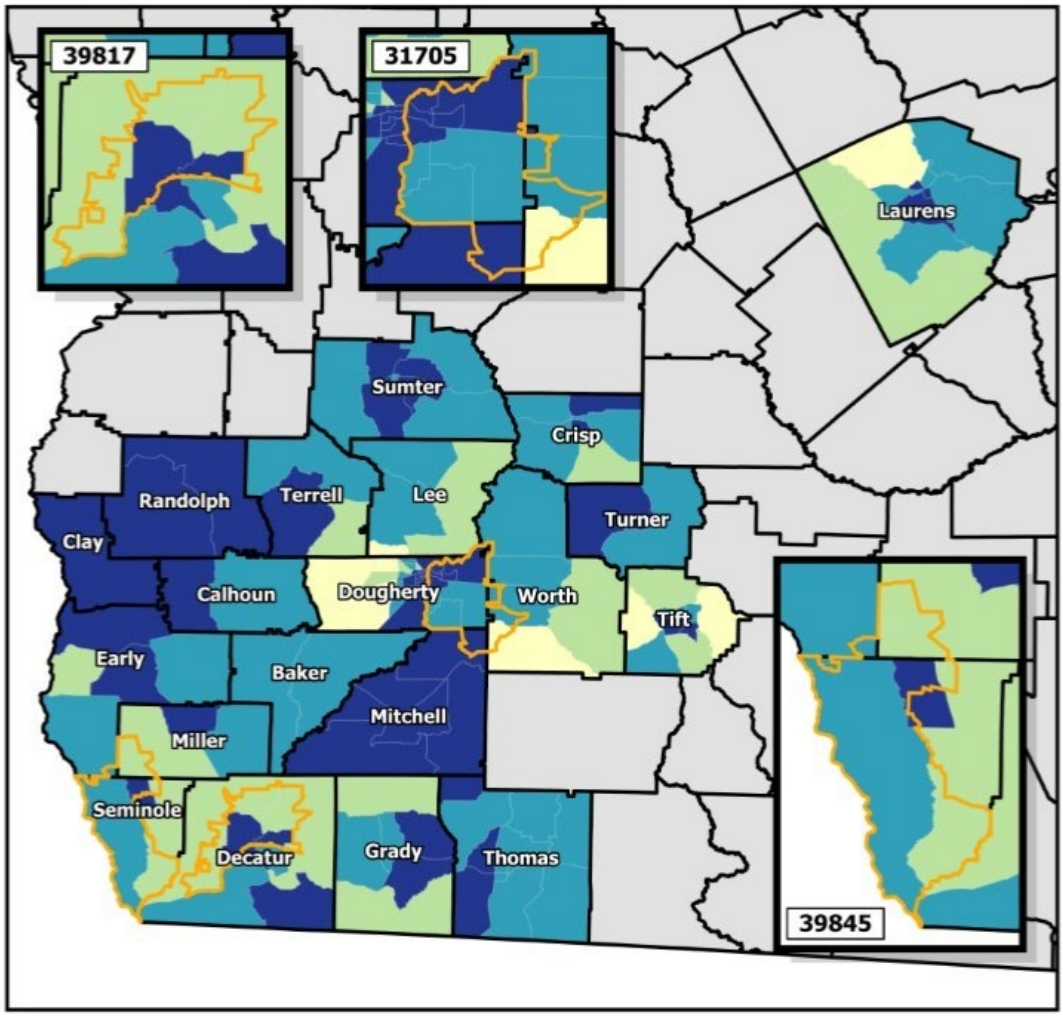
Figure 6.13: Percentage of Individuals with Disabilities



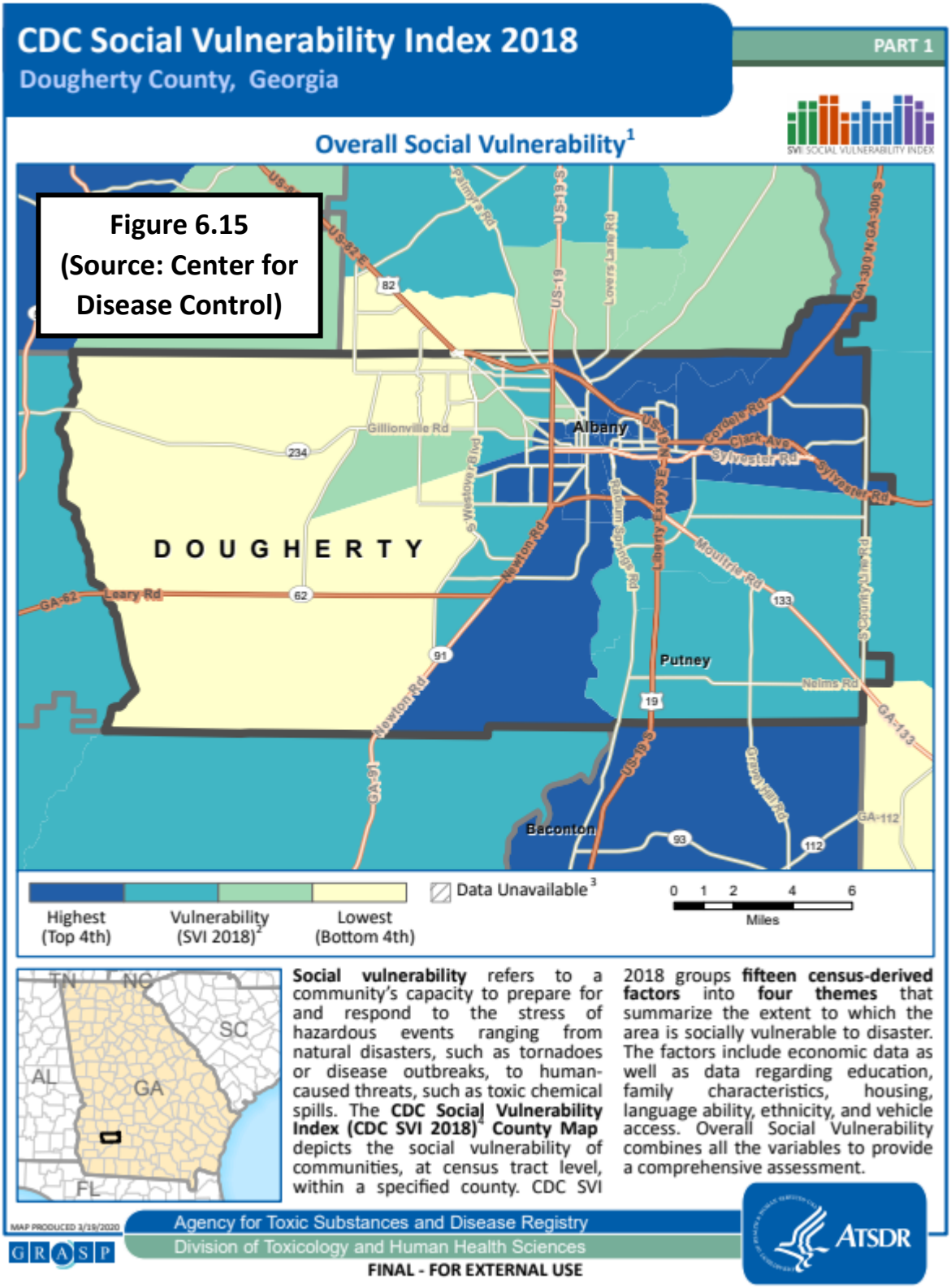
Social Vulnerability

The Social Vulnerability Index (SVI), created by the Centers for Disease Control (CDC), is a visual tool used to compare the resiliency of communities. The SVI uses U.S. Census Data to determine social vulnerability by individual census tracts. Each tract is ranked on 15 social factors, including poverty, lack of vehicle access, and percent of population without access to a hospital. According to the CDC, social vulnerabilities may weaken communities' ability to prevent human suffering and financial loss during disaster. The higher the score, the more socially vulnerable a community is. As seen in **Figure 6.14**, the MIDs, which sustained the most damage in the 2018 storm, all have moderate to high social vulnerability scores.

Figure 6.14: Social Vulnerability Scores



In Dougherty County, the south-central to northeastern parts of the county are the most socially vulnerable overall, which is reflected in **Figure 6.15** below. This section includes the City of Albany. The socioeconomic vulnerability and housing/ transportation vulnerability follow the same pattern and are highest in these areas as well.



Community Profile: Seminole County

Seminole County is located in the farthest Southwestern corner of Georgia and experienced substantial devastation from Hurricane Michael (DR-4400) in 2018. Historically, Seminole County has experienced 58

severe weather incidents since 1996 **(Figure 6.16)**. Currently, the county lists tornados, hurricane winds, winds, inland flooding, and wildfire in their most current Hazard Mitigation Plan.

As seen in **Figure 6.17,** Seminole County also has a 23.7% poverty rate and 67.1% of its houses were built prior to 1990, making them over 30 years old. Mitigating against severe weather, tornados, hurricane winds, and flooding will increase the resiliency of the housing units and infrastructure throughout the county in future disasters.

Figure 6.16: Seminole County Historical Hazard Profile (Source: NOAA)

Hazard	Number of Events	Injuries	Deaths	Crop Damage	Property Damage
Tornado	3	9	1	$50,000	$1,850,000
Inland Flooding	7	0	0	$2,000,000	$5,375,000
Hurricane Wind	2	0	1	$500,000,000	$300,250,000
Severe Weather	58	0	0	$5,000	$1,806,750
Coastal Hazards	7	0	0	$2,000,000	$5,605,000
Drought	33	0	0	$0	$0
Severe Winter Weather	3	0	0	$7,850,000	$0
Wildfire	0	0	0	$0	$0

Figure 6.17: Seminole County Demographics (Source: ACS 5-year Survey)

2019 Population	8,090	Total Businesses	178
2010-2018 Pop. Change	-7.32%	Median Home Value	$81,100
Median Household Income	$33,357	Total Housing Units	4,832
Poverty Rate	23.70%	% Occupied Housing Units	69.60%
Employment Rate	36.13%	% Owner Occupied	65.3%
Median Age	36.5	% Renter Occupied	34.7%
% Minority	37.90%	% Houses Built Before 1990	67.1%
% High school+ education	61.97%	% Houses Built After 1990	32.9%

Hazard Risk of MID Areas

Historical Data by Top Eight Hazards

In Georgia's history, only tornadic events were recorded between 1950 and 1954. Collection of tornado, thunderstorm wind, and hail data began in 1955. Starting in 1996, all event type data was collected, and continues to the present. The data contained in the table below (**Figure 6.18**) is from storm events between 1996 and December 2020. Between these periods, the NOAA reported 18 tornadoes, 48 instances of inland flooding, and 6 instances of hurricane force winds impacting the three MID counties. Housing, infrastructure, and critical facilities are at risk each time there is an occurrence. Georgia's unique geography and topography make many of the declared areas at risk for multiple types of hazards. Severe weather includes thunderstorms, hail, and lightning.

Figure 6.18 Historical Hazard Data (NOAA, 1/1/1996 - 12/31/2020)

County	Tornado	Inland Flooding	Hurricane Wind	Severe Weather	Coastal Hazards	Drought	Severe Winter Weather	Wildfire
Decatur	9	12	2	163	9	32	2	0
Dougherty	6	29	2	178	9	32	4	0
Seminole	3	7	2	58	7	33	3	0

As seen in **Figure 6.19**, all three MID counties identify tornadoes, inland flooding, and wind within their local Hazard Mitigation Plans. These are identified based on weather patterns and historical data. In addition, Decatur and Seminole counties identify hurricane winds. This shows the MIDs all had hazards at the forefront of their preparedness and planning, including Seminole County, before Hurricane Michael occurred in 2018. Mitigating against these types of disasters in the future is necessary to reduce losses of life and property.

Figure 6.19: Hazards Identified in Local Plans (Source: Local Hazard Mitigation Plans and GHMS)

County	Tornado	Inland Flooding	Hurricane Wind	Severe Weather	Coastal Hazards	Drought	Severe Winter Weather	Wildfire	Wind	Extreme Heat	Dam Failure	Seismic Hazards	Geologic Hazards	Other
Decatur	X	X	X						X					
Dougherty	X	X		X		X			X					
Seminole	X	X	X					X	X					

Critical Facilities

Figure 6.20 below displays the number of critical facilities that can be found within Seminole County. FEMA defines critical facilities as, "Buildings essential for the delivery of vital services or protection of

community." Without proper enhancement and mitigation against natural disasters, these buildings, along with their service areas and corresponding populations, are at risk.

Figure 6.20: Critical Facilities in MID Areas (Source: GEMA)

County	Number of Critical Facilities
Seminole	38

Mitigation Needs Assessment

Consultation with Georgia Emergency Management Agency (GEMA)

DCA consulted with the Georgia Emergency Management and Homeland Security Agency (GEMA/HS) to discuss the state's vulnerabilities and mitigation needs. Additionally, DCA requested GEMA's assistance and review in developing a mitigation needs assessment survey for municipalities within the MID Counties. GEMA reviewed and approved the survey on February 24, 2021 with no suggested deletions or additions.

Mitigation Needs Survey

To determine mitigation needs in the MID areas, DCA staff created a Mitigation Needs Assessment Survey to collect data on priority mitigation activities within the communities. All MID county governments, as well local governments within the counties, were notified of this survey and received the link to the form via email. The recipients were given two weeks to complete the assessment.

The survey form was prefaced with a notice describing the intent of the assessment, as well as a disclaimer stating that completion of the form would not result in funding. The survey itself was broken up into four sections, which included a contact information sheet and three sections dedicated to one mitigation activity per section. The eligible governments were encouraged to use the latter three sections to highlight priority mitigation activities.

The following details were requested for each activity:

- Activity Title
- Estimated Cost of Activity
- Hazard to Be Mitigated Against (i.e., Flood, Wind, Tornado, Seismic, or Other)
- Critical Facility Status
- Activity Description
- 'Mitigation' Definition Compliance
- National Objective of the Activity (Benefit to LMI or Urgent Need)

Summary of Survey Results

A total of five completed survey forms were received following the two week-period, two of these forms being from Seminole County and its county seat, the City of Donalsonville. **Figure 6.21** summarizes the estimated costs of the mitigation activities suggested by the municipalities. It is important to note that some respondents submitted activities that did not meet the requirements to be considered a mitigation activity. These were notated in the table as "Ineligible Activities." Nevertheless, DCA opted to include the

estimated costs for such activities in the table to demonstrate the overall need in the most impacted and distressed areas. **Figure 6.22** illustrates the estimated costs submitted in the survey by each MID county. While Dougherty County has the highest estimate, this county is eligible for infrastructure funding through both the 2017 and 2018 CDBG-DR allocations. These funds, though not specifically designated for mitigation activities, may be used for such. As a result, Seminole County, which has the second highest total of $4,075,000, was selected as the sole recipient of 2018 mitigation funding from DCA.

Figure 6.21: Estimated Costs of Mitigation Needs Assessment Survey

Activity	Estimated Cost
Eligible Activities	$5,250,000
Ineligible Activities	$500,000
Total	$5,750,000

Figure 6.22: Total Cost of Mitigation Needs

County	Total Estimated Project(s) Cost
Decatur	$2,200,000
Dougherty*	$5,437,620
Seminole	4,075,000

DCA staff categorized the suggested activities into the following categories: Infrastructure-Communications, Infrastructure-Facilities, Infrastructure-Stormwater, Infrastructure-Water/Sewer, Infrastructure Flood Prevention, Infrastructure-Roads, Relief Efforts, Home Hardening Program, Demolition, Acquisition and Elevation Program, Planning, Infrastructure-Utilities, and Equipment. **Figure 6.23** reflects the number of activity suggestions received for each category, indicating that a majority of the projects were Infrastructure-related.

Figure 6.23: Summary of Suggested Activities

Activity Type	Number of Submissions
Infrastructure-Stormwater	3
Infrastructure-Water/Sewer	1
Infrastructure-Communications	2
Infrastructure-Roads	1
Equipment	3

Planning	2
Infrastructure-Facilities	2
Total	14

Proposed Activities

Budget

According to the Federal Register notice governing these funds, a minimum of 50% of the allocation must be spent within HUD-Identified MID zip codes, though such designation may be expanded to the entirety of the counties. As stated in previous sections of this document, however, DCA has decided to allocate 100% of the MIT Infrastructure Program funds to Seminole County. Therefore, at a minimum, $2,535,550 will be spent in the area. . 5% will be directed toward the administration of the program. **Figure 6.24** below shows the breakdown of the 2018 CDBG-MIT budget among the various activities.

Figure 6.24: CDBG-MIT Budget

Activity	Allocation	% of Allocation	Amount Serving LMI	LMI %	National Objective
Administration	$133,450	5%	N/A	N/A	N/A
Infrastructure	$2,535,550	80%	$1,267,775	50%	LMI, UNM
Total	**$2,669,000**	**100%**	**$1,267,775**		

As directed in the federal register notice and therefore reflected in the table above, there is a requirement to expend at least 50% of the funding serving low- and moderate-income (LMI) individuals. To comply with this requirement, DCA will ensure $1,267,775 is used to do so.

Programming

Using CDBG-MIT funds, DCA seeks to assist Seminole County in the undertaking of activities that will reduce their risks posed by disasters. Despite FEMA's public assistance and the match offered by the state, the county has relied on a significant amount of local funds to repair infrastructure and recover from the aftermath of Hurricane Michael, reducing its ability to spare the funds to prepare for the inevitable next disaster event. Based on the mitigation needs assessed within Seminole and its fellow MID counties, DCA is proposing infrastructure activities to meet the mitigation needs within Seminole County.

Exclusion of Housing and Elevation Activities

DCA is amid developing and implementing a Homeowner Rehabilitation and Reconstruction Program under the 2018 CDBG-DR (Unmet Need) allocation from HUD. This program will assist the hardest hit, low and moderate income, vulnerable, and historically hard-to-reach families and individuals across the 20 presidentially declared counties. Per HUD's encouragement to do so, mitigation measures, such as

elevation, will be incorporated, where possible. Because this specific program will address the housing needs in the affected communities, DCA has chosen not to fund residential mitigation activities with the 2018 Mitigation allocation. However, the MIT Infrastructure activities will be used to the highest and best use to prevent the loss of life and property primarily in low-income areas.

2018 CDBG-MIT Infrastructure Program

As demonstrated by the data collected through the Mitigation Needs Assessment Survey, a majority of the MID counties and the local governments within them, specifically Seminole County, have various mitigation needs for public infrastructure, including facilities, communications, roads and bridges, stormwater, and water and sewer. These activities will be eligible under DCA's 2018 CDBG-MIT Infrastructure Program. As a note, these activities are also listed as eligible activities in the 1974 Housing and Community Development Act (HCDA).

Due to the limited amount of funding available and the high concentration of damage, DCA will directly allocate the 2018 CDBG-MIT Infrastructure funding to Seminole County. However, the county must still submit its mitigation project proposals to DCA through GrAAM, DCA's official grants management system and portal. Further requirements of the application are outlined in the following sections below.

Infrastructure Program: Application Requirements

As detailed previously, HUD has allowed for the HUD-designated MID status to be expanded to the entirety of the counties encompassed within the initial designated zip codes. As a result, mitigation activities throughout Seminole County may be approved, not just those within the zip code of 39845. Seminole County has far more mitigation needs than funds available. DCA will prioritize the funds to best serve their intended by HUD as outlined in the MIT FR Notice through the application process, Seminole County and its municipalities will be required to detail how the proposed project will: meet the definition of 'Mitigation Activities,' be in compliance with CDBG eligibility criteria, and meet one of the two eligible national objectives (Urgent Need or Benefit to LMI) with, at a minimum, at least 50% of the funds benefiting LMI individuals. Applicants will also be expected to explain how the proposed activities will create or increase resiliency for the community in the wake of future disasters.

Within applications, the subrecipient(s) will be required to communicate how they intend to fund, with local dollars, the long-term operations and maintenance of the infrastructure activities. Proposals that do not fulfill this requirement will not be considered for funding. All proposed activities, regardless of amount requested, will also undergo a cost verification during the application review phase. Projects that prove to not be cost-effective will not be funded.

Note: DCA will seek to minimize the displacement of persons and/or entities. However, should any proposed projects cause the displacement of people, DCA will ensure the requirements set forth under the Uniform Relocation Assistance (URA) and Real Property Acquisition Policies Act, as amended, are met.

Infrastructure Program: Ranking Criteria

Figure 6.25: Ranking Criteria

Item	Rank
Program Strategy	High
Program Feasibility	Medium

Cost to Implement	High
Readiness to Proceed	Low

Seminole County's project proposals for the 2018 CDBG-MIT Infrastructure Program will be rated and scored against the criteria listed in **Figure 6.25.** Supplemental information, data, analyses, documentation, commitments, assurances, etc. may be required or requested by DCA for purposes of evaluating, rating, and selecting an activity under this program.

Infrastructure Program: Application Status

Under this allocation, DCA will not make awards to residents. Seminole County and its local governments within may inquire about the status of their proposals through emailing the CDBG-DR@dca.ga.gov email address or by accessing their accounts on the eCivis application portal. DCA will directly allocate the 2018 CDBG-MIT to Seminole County and the local governments contained therein. The county will be notified via email and letter of the status of each project proposal following the date of selection. Both will be sent by the DCA CDBG-DR Manager or a designee. DCA will maintain documentation that supports its selections and rejections.

Infrastructure Program: Flood Mitigation Infrastructure Projects

Flood mitigation infrastructure projects must consider high wind and continued sea level rise and ensure responsible floodplain and wetland management based on the history of flood mitigation efforts and the frequency and intensity of precipitation events. Flood Mitigation Infrastructure Projects shall be prioritized for those projects that show the highest protection elevation, below the 50-year event (or higher, 75 year+).

Infrastructure Program: Tornado Mitigation Infrastructure Projects

DCA encourages the construction and use of safe rooms or storm shelters and encourages local governments to incorporate wind engineering measures and construction techniques into the local building codes. Shelters must be built to FEMA 361 Safe Rooms for Tornadoes and Hurricanes Guidance for Community and Residential Safe Rooms.

Infrastructure Program: Accessibility Standards

Subrecipients will be required to meet accessibility standards including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, and Titles II and III of the Americans with Disabilities Act (ADA).

Infrastructure Program: Construction Standards

DCA will require both quality inspections and code compliance inspections on all projects. All facility (otherwise known as "building") projects shall be built to 2018 I-Codes and ASCE 24 standards when in a flood zone, as applicable, unless other infrastructure codes and standards apply. Site inspections will be required on all projects to ensure quality and compliance with building codes. CDBG-MIT applicants will seek activities that reduce the risk of loss of life and property from future disasters and yield community development benefits. DCA will encourage, to the extent practicable, implementation of green building practices while emphasizing quality, durability, energy efficiency, sustainability, and mold resistance, as applicable. DCA will also comply, to the extent applicable, with guidelines specified in the HUD CPD Green Building Retrofit Checklist. DCA will also consider the application of Green Building Standards and the

advanced elevation requirements, when applicable. Subrecipients are encouraged to incorporate recommendations from FEMA P-798 Natural Hazards and Sustainability for Residential Buildings into infrastructure projects, when possible. Subrecipients will also be encouraged to incorporate recommendations from FEMA P-2077, Mitigation Assessment Team (MAT) Report: Hurricane Michael in Florida, https://www.fema.gov/media-library/assets/documents/186057. Specific recommendations from this report include:

- Recommendation #FL-8c. Building owners outside the WBDR but within the hurricane-prone region should consider protecting the glazed openings on their buildings.
- Recommendation #FL-9. Communities should consider more stringent building requirements for development or reconstruction in the unshaded Zone X (area of minimal flood hazard) and shaded Zone X (area of moderate flood hazard).
- Recommendation #FL-12. Local floodplain administrators, design professionals, and building owners should incorporate more freeboard than the minimum required in ASCE 24 based on Flood Design Class whenever possible.
- Recommendation #FL-18a. Designers and building owners should conduct a comprehensive vulnerability assessment as described in Hurricane Michael in Florida Recovery Advisory 1 before beginning a wind retrofit project.
- Recommendation #FL-18c. Designers, building owners, and operators of critical facilities should refer to FEMA 543, FEMA 577, and FEMA P-424 for additional guidance and best practices for protecting critical facilities from flooding and high winds.
- Recommendation #FL-19b. Owners and authorities having jurisdiction with facilities that present a life-safety threat to occupants during a high-wind event or that need “near absolute protection” or life safety protection should consider designing and constructing a FEMA P-361–compliant safe room or ICC 500–compliant storm shelter for people to take shelter in during a storm.
- Recommendation #FL-23a. Designers should properly design rooftop equipment anchorage per the recommendations in Hurricanes Irma and Maria in the U.S. Virgin Islands Recovery Advisory 2 and contractors should properly implement the anchorage design to prevent blow-off.
- Recommendation #FL-23b. Copings and edge flashings should comply with ANSI/ SPRI/FM 4435/ES-1 to prevent blow-off.
- Recommendation #FL-23c. In high-wind regions, designers should provide an enhanced closure detail for hip and ridge closures on metal panel roofs, and contractors should take special care in properly installing them.
- Recommendation #FL-23d. Designers, contractors, and inspectors should place more emphasis on proper soffit installation to limit wind-driven rain.
- Recommendation #FL-24b. Existing glazing assemblies that have inadequate wind pressure or wind driven rain resistance should be replaced with new assemblies rather than being retrofitted with shutters.
- Recommendation #FL-25a. Designers should specify, and contractors should properly install, standing seam metal panel systems that have been tested in accordance with ASTM E1592.
- Recommendation #FL-25b. Designers should specify, and contractors should install, a roof deck with a secondary roof membrane for critical facilities designed with structural standing seam metal roof panels.
- Recommendation #FL-28b. Design professionals and contractors should improve installation of brick veneer in high-wind regions for new construction by ensuring it is properly attached.

- Recommendation #FL-29. Designers should consider specifying a more robust wall assembly than EIFS for new critical facilities.

Infrastructure Program: Elevation Standards

Infrastructure projects will incorporate appropriate flood resilience approaches and DCA and its Subrecipients will follow applicable state/local codes and standards for floodplain management. Nonresidential structures must be elevated to the standards described in this paragraph or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above the 100-year (or 1 percent annual chance) floodplain. All Critical Actions, as defined at 24 CFR 55.2(b)(3), within the 500-year (or 0.2 percent annual chance) floodplain must be elevated or floodproofed (in accordance with the FEMA standards) to the higher of the 500-year floodplain elevation or 3 feet above the 100-year floodplain elevation. If the 500-year floodplain or elevation is unavailable, and the Critical Action is in the 100-year floodplain, then the structure must be elevated or floodproofed at least 3 feet above the 100-year floodplain elevation. Critical Actions are defined as an "activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons or damage to property." For example, Critical Actions include hospitals, nursing homes, police stations, fire stations, and principal utility lines.

Infrastructure Program: Dam and Levee Requirements

As stated in the original CDBG-MIT Federal Register notice, 84 FR 45838 (August 30, 2019), CDBG-MIT funds are prohibited from being used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. DCA will ensure that if subrecipients use CDBG-MIT funds for levees and dams, the subrecipients will (1) register and maintain entries regarding such structures with the U.S. Army Corps of Engineers (USACE) National Levee Database or National Inventory of Dams, (2) ensure that the structure is admitted in the USACE PL 84–99 Program (Levee Rehabilitation and Improvement Program), and (3) ensure the structure is accredited under the FEMA NFIP.

High Hazard and Significant Hazard Dam inundation areas shall be considered for all projects funded with CDBG-DR monies.

Infrastructure Program: Public Service Activities

It is anticipated that public service activities may need to be utilized to complement the mitigation activities that have been proposed. Public service activities may include but are not limited to: implementing and enforcing the most recent modern, resilient, building codes and training, post disaster damage assessment training, and education for construction tradespeople, supervisors, and inspectors.

Infrastructure Program: Civil Rights Obligations

Each subrecipient will be required to comply with all Civil Rights Related Requirements. These requirements are listed in each Subrecipient Agreement that must be executed by the Subrecipient and DCA before any activities are undertaken.

Administration

As stated in the federal register notice, grantees may use up to 5% of the total grant award for administration. This allocation will cover administrative costs to run the program and is designated for the local government and DCA. As authorized under the notice, DCA is authorized to use administrative funds appropriated by any of the acts listed below without regard to the disaster appropriation from which such

funds originated. These acts include: Public Laws 114–113, 114–223, 114–254, 115–31, 115–56, 115–123, and 115–254. DCA will ensure that the amount of grant administration expenditures for each of the aforementioned grants will not exceed 5 percent of the total grant award for each grant (plus 5 percent of program income), review and modify its financial management policies and procedures regarding the tracking and accounting of administration costs, as necessary, and address the adoption of this treatment of administrative costs in the applicable portions of its Financial Management and Grant Compliance submissions.

National Objectives

The Georgia Department of Community Affairs has designed this CDBG-MIT program in compliance with the National Program Objectives and will ensure that assistance is prioritized toward the most disadvantaged populations. DCA will ensure, as required in the corresponding Federal Register Notice (86 FR 561) that no less than 50 percent of the aggregate CDBG-MIT program funds will be used to support activities benefitting low- and moderate-income persons. This equates to the total allocation minus the funding percentages directed towards administration and planning activities. LMI status will be determined by evaluating income as a percentage of the Area Median Income (AMI). The AMI for Seminole County is provided by HUD on the Income Limits Documentation System webpage.

As stewards of federal CDBG funds, the State of Georgia complies with HUD's mission to develop viable communities by the provision of decent housing, a suitable living environment, and expanding economic opportunities. To this end, all funded activities administered by the State of Georgia will one of the three named HUD national objectives listed below:

1. **Providing Benefit to Low-and Moderate-Income Individuals**
    - LMA Area Benefit Activities – the area benefit category is the most associated with the national objective for activities that benefit a residential neighborhood in relation to mitigation activities. An area benefit activity is one that benefits all residents in a particular area, where at least 51 percent of the residents are LMI persons.
2. **Urgent Need Mitigation (UNM)** – Activities funded with the UNM national objective must result in measurable and verifiable reductions and address current and future risks. For infrastructure activities using the Urgent Need national objective, local governments must reference current and future risks identified in the Mitigation Needs Assessment, as well as the impact. Additionally, applicants using this national objective must demonstrate how it will result in a measurable and verifiable reduction in the risk of loss of life and property in the wake of future natural disasters.
3. **Preventing and/or eliminating slum and blighting conditions** –Grantees shall not rely on the national objective criteria for elimination of slum and blighting conditions without approval from HUD since this objective is generally not appropriate in the context of mitigation activities.

Expenditure Schedule

Disclaimer: these are projections for planning purposes. Actual expenditure rates may vary.

Quarter	Admin	Infrastructure	Total	%
Q1			$0.00	0.00%

Q2	$4,100.00	-	$4,100.00	0.15%
Q3	$4,100.00	-	$4,100.00	0.15%
Q4	$4,140.00	-	$4,140.00	0.16%
Q5	$4,330.00	$95,000.00	$99,330.00	3.72%
Q6	$4,330.00	$105,000.00	$109,330.00	4.10%
Q7	$4,330.00	$105,000.00	$109,330.00	4.10%
Q8	$4,330.00	$105,000.00	$109,330.00	4.10%
Q9	$4,330.00	$105,000.00	$109,330.00	4.10%
Q10	$4,330.00	$105,000.00	$109,330.00	4.10%
Q11	$4,330.00	$105,000.00	$109,330.00	4.10%
Q12	$4,330.00	$105,000.00	$109,330.00	4.10%
Q13	$4,330.00	$155,000.00	$159,330.00	5.97%
Q14	$4,330.00	$155,000.00	$159,330.00	5.97%
Q15	$4,330.00	$155,000.00	$159,330.00	5.97%
Q16	$4,330.00	$155,000.00	$159,330.00	5.97%
Q17	$4,330.00	$160,000.00	$164,330.00	6.16%
Q18	$4,330.00	$160,000.00	$164,330.00	6.16%
Q19	$4,330.00	$160,000.00	$164,330.00	6.16%
Q20	$4,330.00	$160,000.00	$164,330.00	6.16%
Q21	$4,330.00	$100,000.00	$104,330.00	3.91%
Q22	$4,330.00	$100,000.00	$104,330.00	3.91%
Q23	$4,330.00	$80,000.00	$84,330.00	3.16%
Q24	$4,330.00	$80,000.00	$84,330.00	3.16%
Q25	$4,330.00	$40,000.00	$44,330.00	1.66%
Q26	$4,330.00	$40,000.00	$44,330.00	1.66%
Q27	$4,330.00	$5,550.00	$9,880.00	0.37%
Q28	$4,330.00	-	$4,330.00	0.16%
Q29	$4,330.00	-	$4,330.00	0.16%
Q30	$4,200.00	-	$4,200.00	0.16%
Q31	$4,330.00	-	$4,330.00	0.16%
Q32	$4,330.00	-	$4,330.00	0.16%
Total	**$133,450.00**	**$2,535,550.00**	$2,669,000.00	100.00%

Appendix A: Public Hearing Notices

NOTICE OF PUBLIC HEARING

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

CDBG-MIT PROGRAM

PUBLIC NOTICE IS HEREBY GIVEN that the Georgia Department of Community Affairs will hold three public hearings from 4:00- 7:30PM(4:00-5:00PM, 5:15-6:15PM, 6:30-7:30 PM) on January 29, 2020 at the Dougherty County Government Center located at 222 Pine Avenue, Albany, GA 30101 in Room 120 or such other room as noted outside Room 120 at the time of the hearing.

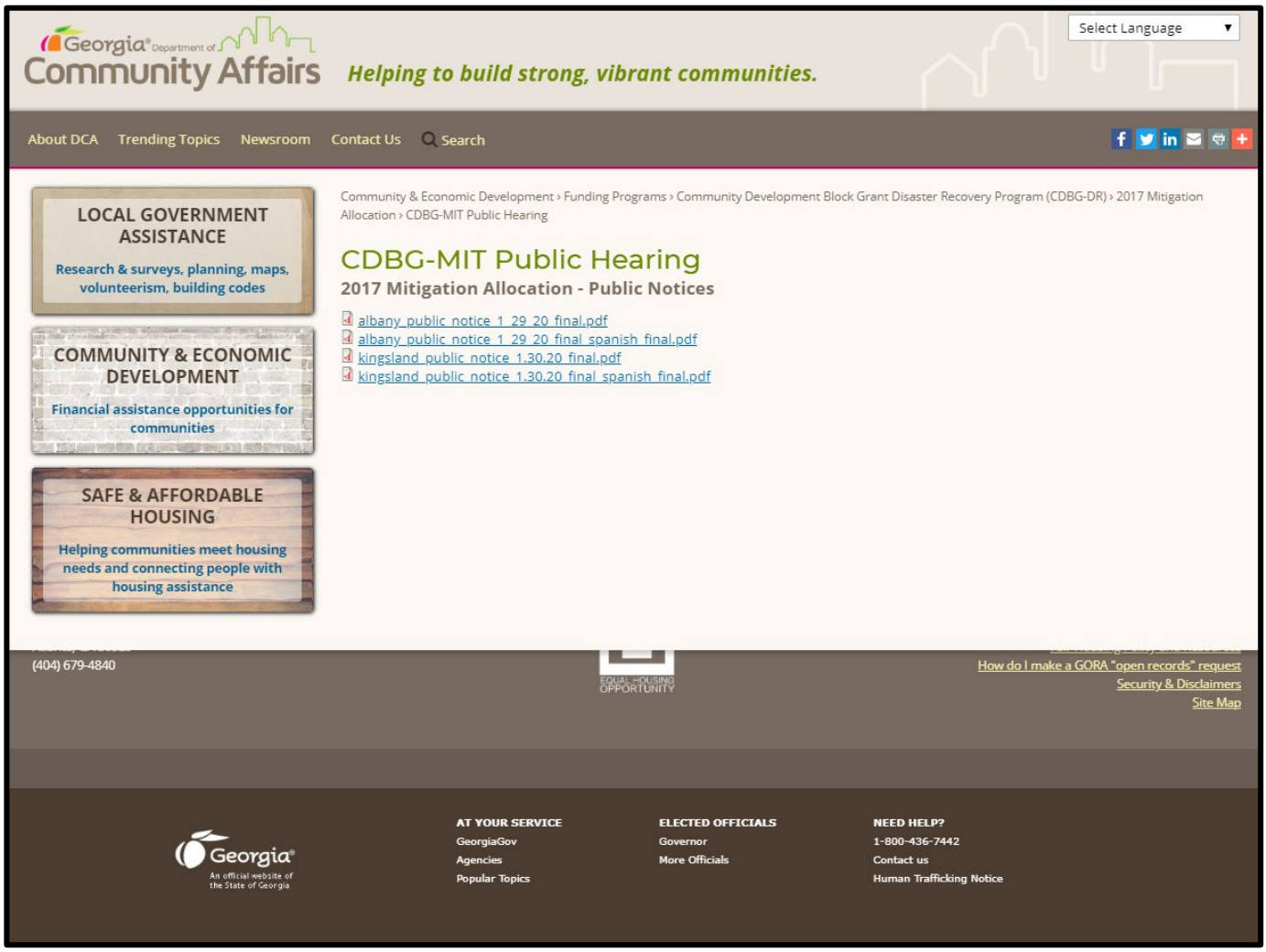
The purpose of the hearing is to provide an opportunity for public engagement on The U.S. Department of Housing and Urban Development (HUD) awarded Georgia $26,961,000 in Community Development Block Grant Mitigation (CDBG-MIT) funds. These funds are to be used for Mitigation activities in the areas affected by Hurricane Irma (DR # 4338) as well as the 2017 tornadoes (DR #4294 and 4297). The Federal Register Notice states HUD seeks to 'support data-informed investments in high-impact projects that reduce risks attributable to natural disasters, build the capacity of States and local governments to comprehensively analyze disaster risks, support the adoption of policies that reflect local and regional priorities that will have long-lasting effects on community risk reduction, and maximize the impact of available funds by encouraging leverage, private-public partnerships, and coordination with other Federal programs".

Through coordinated efforts with the Georgia Emergency Management Agency (GEMA) and Local Governments, the Georgia Department of Community Affairs (DCA) is in the process of drafting an action plan. The Action Plan will identify the intended use of mitigation funds and is due to HUD on April 6, 2020.

DCA will take input from citizens at each of the three public hearings. Any comments (both written and oral) will be recorded and submitted in the action plan. All comments will be considered but may not ultimately affect programmatic decisions.

The Georgia Department of Community Affairs, the administrator of the CDBG-MIT funding, is committed to providing all persons with equal access to its services, programs, activities, education, and employment regardless of race, color, national origin, religion, sex, familial status, disability, or age. For reasonable accommodation, hearing impairment assistance, or language access assistance, please contact fairhousing@dca.ga.gov by Wednesday, January 22, 2020.

Below displays the Public Hearing Notices as they appeared on DCA's CDBG-MIT website.


Georgia Department of Community Affairs
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Community & Economic Development › Funding Programs › Community Development Block Grant Disaster Recovery Program (CDBG-DR) › 2017 Mitigation Allocation › CDBG-MIT Public Hearing
CDBG-MIT Public Hearing
2017 Mitigation Allocation - Public Notices
albany_public_notice_1_29_20_final.pdf
albany_public_notice_1_29_20_final_spanish_final.pdf
kingsland_public_notice_1.30.20_final.pdf
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Appendix B: Citizen Participation Plan

CDBG-MIT Citizen Participation Plan

In accordance with Public Law 115-123, this document was prepared by DCA to meet the requirements of the CDBG-MIT funding following the presidentially declared 2017 disasters. The Citizen Participation Plan reflects the alternative requirements as specified by the U.S. Department of Housing and Urban Development (HUD) in the Federal Register 84 FR 45838 and any amendments, as applicable. DCA will ensure the Citizen Participation Plan meets the CDBG-MIT regulations and takes into consideration any waivers and alternatives made available by HUD.

The Citizen Participation Plan is designed to ensure citizens of the State of Georgia, particularly persons of low and moderate income residing in areas where it is proposed that such funds are to be used, are provided the opportunity and encouraged to participate in the planning and implementation of CDBG-MIT activities.

Outreach Summary

In anticipation of receiving CDBG-MIT funds, DCA incorporated specific citizen participation requirements into its CDBG-MIT Action Plan. This plan outlines how DCA intends to meet these requirements. The objectives of DCA's outreach activities are to ensure that all citizens are aware of the CDBG Mitigation funding and the planning process and have the opportunity to comment on or suggest proposed uses for the funds.

The State of Georgia will ensure all HUD requirements for citizen engagement are met. DCA will hold meetings that are open to elected and appointed officials from all FEMA Individual Assistance (IA) and Public Assistance (PA) declared counties as a result of the 2017 disasters. DCA will initiate outreach through the following mechanisms: conference calls, webinars, emails, and in-person meetings. DCA will also host phone calls and communicate through email with local elected officials to ensure feedback is consistent and continual. DCA will also distribute periodic CDBG-MIT status updates produced by the State's CDBG-DR Director, Project Manager, and/or Coordinator and facilitate community meetings with local officials and staff to discuss program guidelines, planning, and to receive feedback from local jurisdictions.

Fair Housing

DCA is committed to furthering fair housing through established affirmative marketing and outreach activities. DCA will take steps based on the Fair Housing Act of 1968 to reduce disparities in housing choice, access, and opportunities based on protected class (e.g., race, color, religion, familial status, sex, national origin or disability). Toward achieving that objective, DCA will ensure that its outreach, communication and public engagement efforts are comprehensive in order to reach as many impacted citizens as possible.

DCA will make every attempt to hold all stakeholder meetings in a time and location convenient to potential beneficiaries. The meetings will be held in an accessible location, and sign language interpreters will be made available upon advance request. DCA will also provide interpretation services for non-English speaking residents at the meetings upon advance request. Stakeholders and citizens will be notified of the public hearing at least two (2) weeks before they are held.

DCA will require subrecipients to certify that they will Affirmatively Further Fair Housing (AFFH). This section of the Citizen Participation Plan outlines various options available to local governments in meeting this grant obligation. While the law does not specify what type of action subrecipients must take, it is clear that by virtue of receipt of CDBG funds, local government subrecipients are obligated to take some sort of action to affirmatively further the national goal of fair housing. DCA will require subrecipients to document and keep record of fair housing activities.

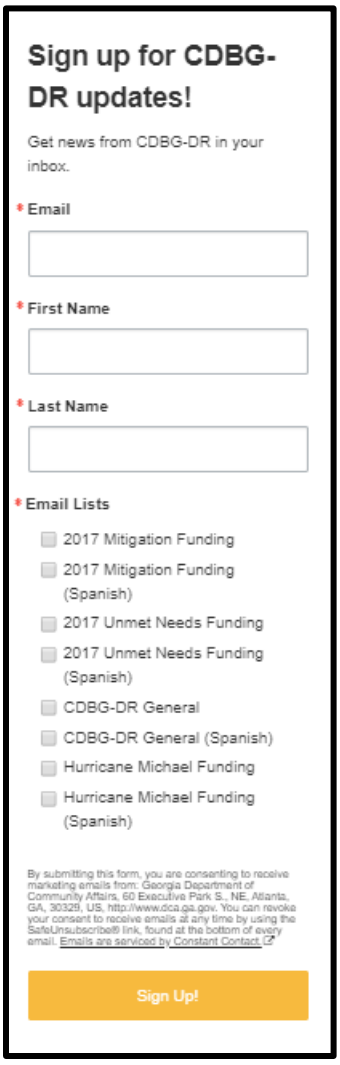
Copies of brochures provided to participants, minutes of meetings where fair housing is discussed, and any other records must be available for review by the DCA CDBG-DR Program Representative(s). The following is an example of possible fair housing activities. Although not inclusive, its purpose is to suggest a range of activities that would satisfy the subrecipient's obligation. Technical assistance would be available from DCA if subrecipients desired to implement any of these suggestions. DCA will monitor subrecipients to ensure AFFH obligations were met.

Possible Actions to Affirmatively Further Fair Housing

- Analyze any impediments to fair housing choice which may exist in your community. Contact HUD or DCA for an analysis of any fair housing complaints from the area.
- Review local zoning laws and procedures to determine whether they contribute to, or detract from, progress in fair housing. Establish a collection of zoning and land use planning material to have available for the use of local fair housing groups as well as subrecipient staff.
- Provide funding for local fair housing groups (eligible under the CDBG-DR Program) or provide financial or technical assistance to citizens wishing to organize such a group.
- Adopt a local Fair Housing Ordinance or a resolution supporting the state and/or federal law.
- Distribute brochures outlining fair housing law to persons attending community meetings or CDBG Public Hearings.
- Post a fair housing poster at City Hall or Courthouse.
- Require owners of rental property receiving CDBG-DR assisted rehabilitation loans to sign fair housing agreements as a condition of receiving assistance.
- Develop an active public information and educational campaign to promote fair housing awareness in the community.
- Include a discussion of fair housing in public meeting agendas.
- Provide persons relocated to new housing with fair housing information and referrals.

Email Updates

In order to distribute the status updates to elected and appointed officials, local government employees from the impacted counties, and private citizens, the CDBG-DR team worked with DCA's Marketing and Communications Team to create an email-sign up page located on the left-hand side of the CDBG-DR webpage (https://www.dca.ga.gov/community-economic-development/funding-programs/community-development-block-grant-disaster-recovery). Participants have the option to sign up for one or multiple lists including a specific tab for 2017 Mitigation Funding. Participants are also able to select an option to receive communication in Spanish.



Public Notice and Comment Period to Review Draft Action Plan

Prior to finalizing the CDBG-MIT Action Plan, DCA will make available to stakeholders, citizens, public agencies and other interested parties information that includes the amount of assistance DCA expects to receive and the range of activities that may qualify, including the estimated amount that will benefit persons of low and moderate income.

DCA will provide public notice and seek feedback for the development of the CDBG-MIT Action Plan through emails, website postings, and public meetings. DCA will publish the draft CDBG- MIT Action Plan and the time period for public comment on the DCA CDBG-DR Website. The website is linked below:

https://www.dca.ga.gov/community-economic-development/funding-programs/community- development-block-grant-disaster-recovery

For those who cannot access the draft CDBG-MIT Action Plan online, a copy will be made available at DCA Headquarters. Citizens who wish to participate in the planning process are encouraged to contact their local government or reach out to DCA via email at CDBG-DR@dca.ga.gov.

Development of CDBG-MIT Action Plan

The State is developing a Disaster Recovery Action Plan that will include:

1. The amount of assistance expected to be received, based on projected amounts provided by HUD;
2. The range of activities that can be undertaken including the estimated amount that will benefit persons of low and moderate income;
3. Plans to minimize displacement of persons and assist any persons displaced;
4. An anticipated time schedule for submission of the Action Plan to the Department of Housing and Urban Development; and
5. Incorporation of and response to public comments received during the public comment period.

Amendments to the Action Plan

As additional information becomes available and programs evolve through the grant administration process, amendments will be made to the Action Plan in accordance with 84 FR 45838. Updates to the plan may be substantial or non-substantial. Program changes that result in a Substantial Amendment are:

- Addition or deletion of any allowable activity described in the approved Action Plan
- A funding allocation or re-allocation of $1 million or more
- A change in program benefit, planned beneficiaries, or eligibility

Substantial Amendment(s) will be posted for public comment for a minimum of 30 days. DCA and/or MID area local governments will notify affected citizens through electronic mailings, press releases on websites, and/or social media. A summary of all comments received, and responses provided will be included in the appendices of the final Substantial Amendment submitted to HUD for approval. The HUD- approved Substantial Amendment will be posted to DCA's public website, in English and Spanish.

Written comments on the initial CDBG-MIT Action Plan or subsequent substantial amendments to the plan may be submitted to DCA via email at CDBG-DR@dca.ga.gov or mailed to the following address by 5:00 PM EST on the pre-approved date as set forth in the applicable FRN:

Georgia Department of Community Affairs
Attention: CDBG-DR

60 Executive Park South, NE

For non-substantial amendments, DCA will notify HUD but not post for public comment. Each amendment, substantial or not, will be posted to DCA's CDBG-DR public website, not replacing, but in addition to all previous versions of the plan.

Citizen Complaints Process and Procedures

Citizens may file a written complaint or appeal through the CDBG-DR email at CDBG-DR@dca.ga.gov or submit via mail to:

Georgia Department of Community Affairs Attention:
CDBG-DR
60 Executive Park South, NE
Atlanta, GA 30329

DCA's goal is to attempt to resolve all complaints in a manner that is both sensitive to the complainants' concerns and achieves a fair result. DCA will make every effort to provide a timely written response within 15 working days of the receipt of the complaint, where practicable.

Complaints regarding fraud, waste, or abuse of government funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov).

Citizen Advisory Groups

After HUD approval of DCA's CDBG-MIT Action Plan, a Citizen Advisory Committee will be established. The Committee will meet at least twice per year in an open forum. The purpose of this committee will be to provide on-going public input into mitigation activities, to continuously inform the mitigation program and assist with program refinement, and to solicit and respond to public comment on mitigation activities.

Performance Reporting

In accordance with HUD requirements DCA will submit a Quarterly Performance Report (QPR) through the Disaster Recovery Grant Reporting (DRGR) system no later than 30 days after the end of each calendar quarter. QPR's will be posted to the DCA CDBG-DR public website within three (3) days of submission to HUD each quarter until all funds have been expended and all expenditures have been reported.

Each QPR will include information about the uses of funds in activities identified in the Action Plan, as entered in the DRGR reporting system. This includes, but is not limited to:

- Project name, activity, location, and national objective
- Funds budgeted, obligated, drawn down, and expended
- The funding source and total amount of any non-CDBG-MIT funds to be expended on each activity
- Beginning and actual completion dates of completed activities
- Achieved performance outcomes such as number of housing units completed or number of low- and moderate-income persons benefiting
- The race and ethnicity of persons assisted under direct-benefit activities
- Amount of funding expended for each contractor identified in the Action Plan
- Efforts to affirmatively further fair housing made by DCA and Subrecipients

Limited English Proficiency (LEP)

DCA is committed to providing all citizens with equal access to information about CDBG-MIT, including persons with disabilities and limited English proficiency (LEP). DCA follows HUD's regulation, 24 CFR Part 1, "Non-Discrimination in Federally Assisted Programs of the Department of Housing and Urban Development-Effectuation of Title VI of the Civil Rights Act of 1964," which requires all recipients of federal financial assistance from HUD to provide meaningful access to LEP persons.

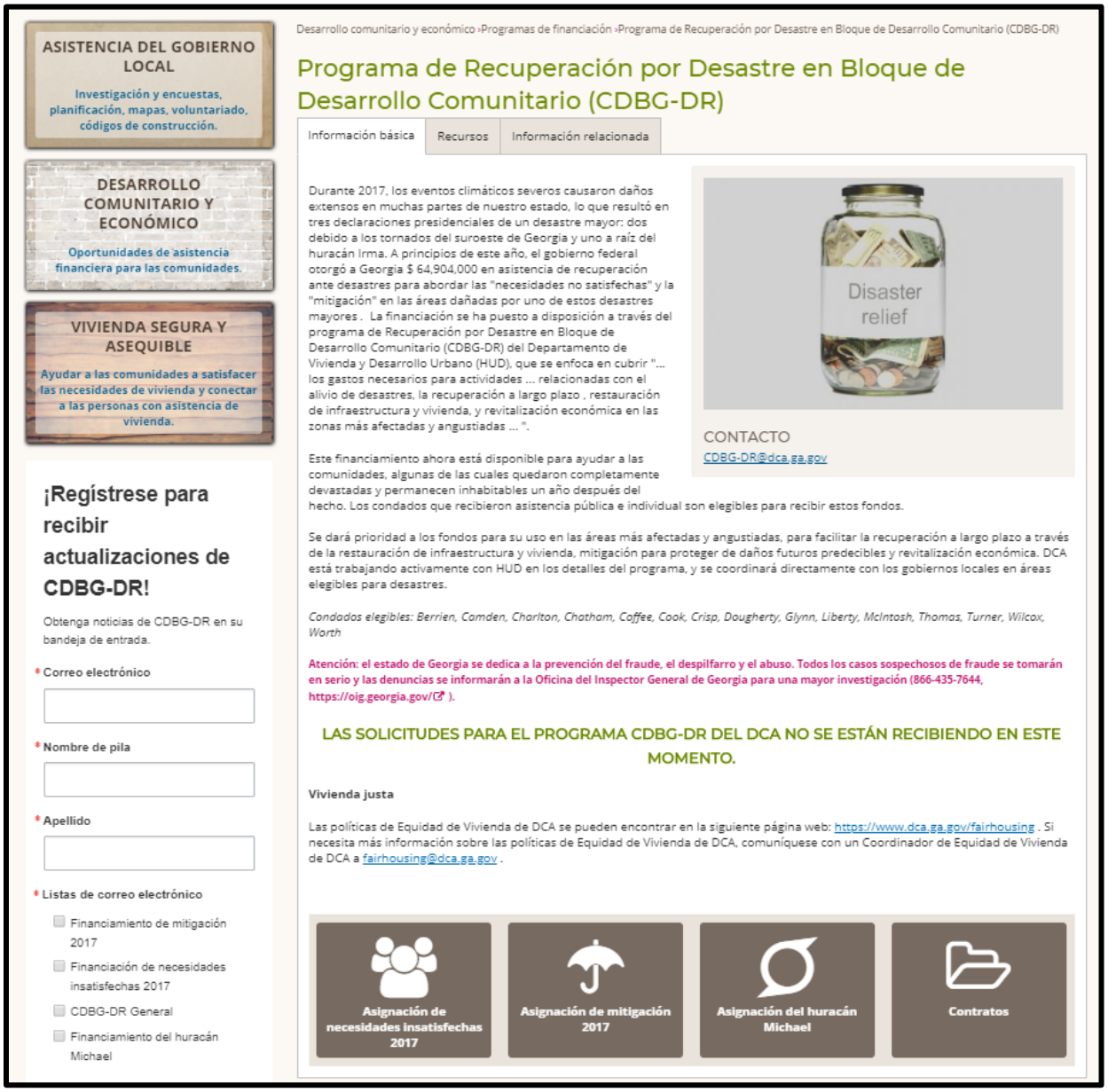
Persons who do not speak English as their primary language and who have limited ability to read, write, speak, or understand English may be entitled to language assistance with respect to a service, benefit, or encounter. Where a significant number of non-English speakers can be reasonably expected to participate in a public hearing or public comment periods, materials to be handed out will be translated into the appropriate language, citizen comments in a language other than English will be translated, and translator options will be available.

DCA will take reasonable steps to ensure that LEP persons are informed of the availability of the Action Plan and have the opportunity to provide comments. The Action Plans and all amendments (substantial

and non-substantial) will be translated into Spanish and posted on Georgia's CDBG-MIT webpage at: https://www.dca.ga.gov/community-economic-development/funding-programs/community-development-block-grant-disaster-3.

DCA Website Accessibility

DCA's website can be translated into many languages. Below is a screenshot from DCA's website as it is translated into Spanish.



Section 508 Accessibility

DCA's website complies with Section 508 of the Rehabilitation Act of 1973, making content accessible to people with disabilities. Section 508 requires that anyone with disabilities must be able to access and use information and data on a website, comparable to the way people without disabilities can get that

information and data, unless it would cause our agency an undue burden.

If you use assistive technology (such as a screen reader, Braille reader, etc.) and have problems accessing information on our website, please contact CDBG-DR@dca.ga.gov and tell us about your problem. Be sure to include the URL (web address) of the material you tried to access and your contact information. We will try to provide the information you are seeking.

Provision of Language Access Services

All programs with direct contact with the public are responsible for providing written or oral language services. "I Speak" cards are used by all staff who may have direct interaction with LEP individuals to identify language needs and begin the provision of access services.

Plan for Providing Interpreters and Spoken Translation

For oral encounters, program staff have access to three contracted translation service providers that can interpret program information into the applicant's native language:

- Interpreters Unlimited (In person only – 800-726-9891)
- Language Line Services (Telephonic or recording – 800-752-6096)
- LATN, Inc. (In-person or telephonic – 800-943-5286)

The program applicant will identify him/herself as an LEP individual. By way of this designation, public-facing program staff are instructed to call a toll-free number and assist applicants with the help of the telephone operator and interpreters available through this service.

DCA will partner with organizations to develop additional translating resources for written materials.

Plan for Providing Language Access Services to Meeting Participants and Attendees

DCA and Subrecipients will leverage the contracted translation services or bilingual staff to provide interpretation services as needed for all meetings related to program eligibility determinations. DCA is committed to providing interpreters for large, medium, small, and one-on-one DCA meetings with any LEP individuals or organizational representatives as needed and as appropriate.

DCA will include a statement in its meeting notices indicating that 1) DCA is prepared to provide appropriate language services for LEP individuals and 2) requesting that the respondent identify any language services needed within a specified period of time, including which language(s) such services are required.

DCA's ability to provide an in-person interpreter upon request is limited by available resources and the scheduling availability of the translation service(s). DCA will provide interpretation services in a meeting in the following manner:

- If the meeting is small (less than 10 people), telephone interpreter services will be provided.
- If the meeting is medium (11-20 people) or large (21 or more people), an in-person interpreter will be provided upon request.

When the meeting is off-site and/or open to the public, DCA will include the sentence, "Translation of the notice and interpretation services for this event are available upon request" in both Spanish and English in communication about the meeting**.**

Appendix C: Program Implementation Plan

Mitigation Implementation Plan

The Georgia Department of Community Affairs (DCA) is the administrator and fiscal agent for the CDBG-MIT grant. The head of DCA, Commissioner Christopher Nunn, reports directly the Governor of the State of Georgia. DCA has prior experience in managing HUD funds through a variety of programs, including the 2017 CDBG-DR Unmet Needs Allocation and Annual CDBG Funding.

The Department of Community Affairs has existing systems and procedures, as well as formally established monitoring strategies that meet or exceed the regulatory requirements including those related to HUD program rules and regulations, civil rights, environmental, labor standards, fair housing, citizen participation and record-keeping.

The Georgia Department of Community Affairs (DCA) will manage the CDBG-MIT funds responsibly, efficiently, and transparently. DCA has financial management systems, policies, procedures, and practices in place necessary to uphold the fiscal responsibility, as detailed in this plan.

1. Financial Controls

The Georgia Department of Community Affairs certifies its proficiency in in financial management using established financial systems and controls. The sections below provide further description of existing risk management measures.

HUD Financial Management Guide

The Georgia Department of Community Affairs has completed the Community Development Block Grant – Mitigation (CDBG-MIT) P. L. 115-23 Financial Management and Grant Compliance Certification for all Grantees Receiving CDBG-MIT Funds and the guide, with all accompanying procedures, will be submitted to HUD along with the Action Plan and this Implementation Plan. The completed guide provides additional information related to specific questions about financial standards and which personnel or department is responsible for each item.

Single Audit

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

DCA is included in the State's fund level and entity wide financial statements as part of the Comprehensive Annual Financial Report (CAFR) of Georgia. Additionally, DCA is also included in the Single Audit Report issued by the Department of Audits. The Single Audit indicates that DCA has no findings, material weaknesses, significant deficiencies, or questioned costs. The audit can be viewed at the following link: https://www.audits.ga.gov/SGD/single_audit.html

DCA will monitor its Subrecipients for compliance with financial administration requirements in accordance with Single Audit requirements now codified in 2 CFR 200, Subpart F. DCA requires all Subrecipients who expend $750,000 or more in federal funds during the fiscal year to submit their Single Audit for review through the Georgia Department of Audits and Accounts, Nonprofit and Local Government Audits Division, as part of their annual requirement in OCGA 36-81-7.

Financial Management Systems

DCA maintains accounting and grants management systems to support a multi-functional grants management program. DCA has the requisite financial controls in place to account for and properly manage the CDBG-MIT funds. These systems provide accurate, current, and complete disclosure of the financial status of the CDBG-MIT supported activity. The systems meet all Federal and State requirements.

Subrecipient accounting records are supported by source documentation that is stored in compliance with record-keeping requirements. DCA has record-keeping procedures to retain source documentation for records applied to the CDBG-MIT program to ensure records adequately identify the source and application of CDBG-MIT funds provided and to maintain source documentation evidence to confirm the costs incurred and the date of expenditure.

Internal Controls

DCA has existing policies and procedures to meet financial management requirements including but not limited to applicable regulations and requirements, financial accountability and records, authorized signatures for payments, requests for payment, bank accounts, escrow accounts, administrative costs, and audit requirements.

DCA's organizational structure includes risk management measures that establish clear lines of authority and approval, segregation of duties, and secure access to financial resources. DCA's financial division is overseen by the Chief Financial Officer.

DCA has sufficient internal controls in place to account for and properly manage the CDBG-MIT funding in a manner that is consistent with all federal accounting requirements. These internal controls will support the prevention of fraud, waste, and abuse to ensure:

- No person involved in the program decision-making process obtains a financial benefit;
- No single point of sign off for financial transactions;
- Separate record-keeping for CDBG-MIT funds versus general accounting operations;
- Reconciliation of accounts handled by employees who are not responsible for payroll preparation and/or paycheck issuance;

- Policies and procedures in place to maintain effective control and accountability for all cash, real and personal property, and other assets;
- Policies and procedures in place to control access to assets and documents; and
- Policies and procedures in place to control access to Personally Identifiable Information (PII).

Timely Expenditure of Funds

Per Federal Register Notice 84 FR 45845, CDBG-DR funds must be expended within a twelve (12) year period beginning on the date the grant agreement is signed by HUD. However, we understand that HUD will periodically review DCA's progress in drawing down funding from its grant award. DCA will review in-house expenditures and sub recipient's expenditures to ensure that funds are spent on eligible costs and in a timely manner. Project funds and schedules will be monitored by DCA's Community Finance Division, CDBG-DR Regional Representatives and DCA's State CDBG Compliance Team.

DCA administers Georgia's State CDBG program, therefore staff members have experience with monitoring the expenditure rate of the State CDBG program. With DCA's annual CDBG Program, DCA's Community Finance Division maintains detailed reports monitoring the expenditure of funds and project schedules. All data for the CDBG-MIT Program will be tracked through Filemaker Pro. Monthly and annual expenditures can be found in this system. Considering that the amount of the CDBG-DR grant is larger than the usual annual allocation, DCA will adapt and enhance its current processes by establishing standard tracking mechanisms, processes and templates to ensure consistency and continuity among program activities. DCA will also maximize its use of technology to support and augment any standard processes instituted to ensure timely expenditure of funds.

DCA will hold all Subrecipients and/or contractors accountable through the establishment of benchmarks and other critical milestones. Subrecipients and/or contractors will be required to provide detailed reports concerning expenditure of funds and project progress to DCA upon its request. At a minimum, DCA requires each subrecipient complete a quarterly report detailing project progress, documenting contracts, and financial reporting.

DCA will develop policies and procedures that ensure timely payment and expenditure of funds for contracts and bills. The policies and procedures will also ensure the actual and projected expenditure of funds is accurately reported in the DRGR Quarterly Reporting System (QPR).

DCA will submit a projection of expenditures and an Outcomes Plan to HUD with the initial Action Plan, in compliance with Federal Register Notice 84 FR 45845. Revised projections will be sent to HUD when program changes impact projected outcomes, funding levels, and recovery timelines. We understand HUD will use this information to track DCA's proposed versus actual performance. It will serve as a tool to measure overall performance as well as project specific performance. DCA will aggressively monitor Subrecipients and/or contractors, using benchmarks, milestones and projections as a means to minimize delays in expending funds for eligible project activities.

Reprogramming Funds in a timely manner for activities that have stalled

DCA reserves the right to cancel a Subrecipient Grant Award if sufficient progress is not being made toward completion of the project. CDBG-DR representatives will conduct an on-site monitoring visit at least once a quarter with each Subrecipient. DCA will also monitor the financial progress as the draw requests are sent to DCA. If sufficient progress is not being made, CDBG-DR program staff will notify the Subrecipient in writing detailing the lack of progress, possible corrective actions, possible conditions (if necessary), and the date which DCA will re-evaluate the progress. If the Subrecipient is unable to get back on track, the funds will be reprogrammed. Actions will be consistent with 2 CFR 200.338 and 2 CFR 200.207.

Program Income

If program income is generated by CDBG-DR programs, the State of Georgia will follow guidance provided in section 17 (Program income alternative requirement) in 81 FR 39702 (2016). Per that guidance, income received prior to the grant closeout will be utilized as additional CDBG-DR funds in the same manner as other CDBG-DR funds referenced. Any income received after the grant closeout, will be transferred to DCA's annual CDBG award.

Procurement

In accordance with 24 CFR 570.489 (g), DCA has chosen to follow its own procurement policies and procedures for procurement of goods and services procured directly by DCA that is paid for in whole or in part with CDBG-MIT funds. The DCA Finance Division is responsible for CDBG-MIT procurement. Demetria Jones, Purchasing Card Administrator, is the point of contact for all procurement inquires.

For Subrecipients, the following policies and procedures are established to ensure full and open competition in the procurement of goods and services when CDBG-MIT funds are used, in whole or in part, for the implementation of CDBG-MIT projects at the local level. Note that DCA's procurement policies and procedures implement the requirements of 24 CFR 570.489 (g) for its Subrecipients including:

- Full and open competition;
- Identification of Methods of Procurement and their applicability;
- Prohibition of cost plus a percentage of cost and percentage of construction costs methods;
- Assurance that all purchase orders and contracts include any clauses required by Federal statutes, Executive orders, and implementing regulations; and
- Subrecipient and contractor determinations shall be made in accordance with the standards in 2 CFR 200.330.

Generally, the governing statutes can be found in State Purchasing Act (O.C.G.A. Section 50-5-50 et seq.). These rules govern the purchasing activities of all Georgia state government entities. The Georgia Department of Administrative Services, State Purchasing Division publishes the Georgia Procurement Manual that governs all solicitations made by state government entities. A copy of the Georgia Procurement Manual (GPM-V7-May 2018) is provided with the Financial Management and Grant

Management Certification documentation. DCA will address all procurement compliance when completing the required financial certifications for CDBG-MIT.

2. Detection of Fraud, Waste, and Abuse

DCA is committed to the prevention of fraud, waste, and abuse. All suspected cases of fraud will be taken seriously and reported to the Georgia Office of the Inspector General for further investigation. DCA staff shall attend and require subrecipient staff to attend fraud related training provided by HUD OIG (as available) to assist in the proper management of CDBG-MIT funds.

DCA has a monitoring process which includes several layers of approval before funds are expended, allowing us to monitor the use of funds on an individual basis. This process includes a multi-level review of the use of funds. These reviews occur throughout the process, beginning with the front-line contractor, through the subrecipient process, and finally ending with the Community Finance Division at DCA. There is an evaluation to determine the use of funds is legitimate and keeping with the requirements of the governing policies, procedures, rules, regulations, ordinances, and laws. If any other determination is reached, the use of funds is delayed and additional information is requested. If the additional information does not result in a change in determination, the use of funds for that purpose will be denied.

DCA's monitoring process includes on-site and desk monitoring. The priority and frequency of these monitoring activities is determined using a risk assessment. The completed risk assessment provides the basis for determining an individual Subrecipient's monitoring schedule. This individualized schedule will allow for DCA to apply staff and travel resources for monitoring, training, and technical assistance. Each subrecipient will be monitored using this schedule throughout the life of the project and close-out. DCA will utilize existing processes for the State's CDBG program for conducting on-site reviews that include written monitoring and technical assistance guidelines, as well as checklists, policies and procedures. Individual project files will be monitored during on-site monitoring for compliance with HUD requirements.

Procedures to Prevent Duplication of Benefits

Federal law prohibits any person, business concern, or other entity from receiving Federal financial assistance for any part of a loss to which he or she has already received financial assistance through any other program, insurance, or funding source. DCA has policies and procedures in place to confirm that recipients of funds under its CDBG-MIT award do not receive a duplicate benefit. In accordance with the Robert T. Stafford Act, as amended, DCA will take the actions necessary to conduct comprehensive analyses of assistance provided to Subrecipients in order to prevent Duplication of Benefits (DOB) from occurring.

DCA's CDBG-MIT program will require a DOB analysis for each applicant to consider other disaster mitigation funding sources when processing applications. Common assistance funding sources include but are not limited to:

- Federal Emergency Management Agency (FEMA);
- Small Business Administration (SBA);

- National Flood Insurance Program (NFIP);
- Private Insurance; and
- Private and nonprofit disaster assistance.

DCA will consider assistance amounts received/approved from alternate sources such as FEMA, insurance coverage, SBA and/or philanthropic organizations. DCA has data sharing agreements with FEMA and SBA to ensure the most recent assistance is used in DOB/VOB analyses.

The DCA duplication of benefits review process currently includes forms that each subrecipient will complete for all proposed CDBG-MIT activities, prior to approval:

- Georgia Eligibility Release Form;
- Georgia Duplication of Benefits Calculation Form; and
- Georgia Insurance Affidavit.

Additionally, DCA will have a subrogation clause in each subrecipient agreement. These agreements will be signed at the time of application, prior to receiving assistance. Per the subrogation clause, any funds found to be a Duplication of Benefits must be returned to DCA. Under this clause, should a subrecipient receive CDBG-MIT funding to support an activity and subsequently receive outside funding that would represent a Duplication of Benefits, the duplicative CDBG-MIT funds must be returned the Community Finance Division of DCA. DCA may withhold payment on any project or outright suspend activities, if a duplication of benefits issue is not resolved in a timely manner. Furthermore, DCA will not initiate or complete contract close-out processing until any identified duplication of benefit issues are resolved to DCA's satisfaction.

Technical Assistance

CDBG-DR staff will provide technical assistance to Subrecipients from application stage through completion of projects to ensure that funds are used for eligible CDBG-MIT activities and appropriate National Objectives are met.

CDBG-DR staff have some technical assistance capacity through implementation of the Unmet Needs CDBG-DR grant, however, DCA may contract with a technical assistance provider should the needs of Subrecipients be greater than the capacity of existing CDBG-DR staff.

DCA is currently meeting with the Georgia Historic Preservation Department (HPD), which is Georgia's State Historic Preservation Office (SHPO) to revise a Programmatic Agreement for the CDBG-DR programs, including CDBG-MIT. This agreement will address processes that will be used to ensure review and compliance with Section 106 of the NHPA, where required.

DCA will also consult with the Georgia Field Office of the U.S. Fish and Wildlife Service and the Southeast Regional Office of the NOAA Fisheries concerning Section 7 of the Endangered Species Act prior to program implementation.

CDBG-DR staff will consult with the Indian tribe with jurisdiction over the tribal area if CDBG-MIT activities are provided in tribal areas.

3. Internal Auditing

DCA has an internal auditor on staff reporting directly to the Agency's Chief Operating Officer. The internal auditor will review files and test for compliance with financial standards and procedures, including procurement practices and cost reasonableness for all grant funded activities. The internal auditor will review programmatic manuals, documents, etc. to ensure compliance with all rules and regulations. All reviews will be completed on an ongoing basis through the life of the CDBG-MIT grant.

Internal Audit Function

DCA covers the costs associated with internal audit functions with state bond allocation dollars. The Internal Auditor will perform a full program compliance, systems and financial audit review. The auditor will review files and test for compliance with financial standards and procedures including procurement practices and adherence to cost reasonableness for all operating costs and grant-funded activities.

All program expenditures will be evaluated to ensure they are:

- Necessary and reasonable;
- Allocable according to the CDBG-DR or MIT grant agreement(s);
- Authorized or not prohibited under State/local laws and regulations;
- Conform to limitations or exclusions (laws, terms, conditions of award, etc.);
- Consistent with policies, regulations and procedures;
- Adequately documented; and
- Treated consistently (with non-CDBG costs)

Enhancing the internal audit function

In an effort to increase internal audit capacity, DCA's Internal Auditor is collaborating with other Disaster Recovery Internal Auditors. Through this collaboration, the Internal Auditors share best practices in development of policies and procedures.

Independence and Objectivity

The Internal Audit (IA) function shall perform its activities in accordance with the principles of the Institute of Internal Auditors' (IIA's) Code of Ethics: Integrity, Objectivity, Confidentiality, and Competency. The IA function shall conduct work in an unbiased manner, consider relevant circumstances, respect the value and ownership of information, and apply and seek knowledge and skills needed to perform services.

The IA function will conduct services independently by reporting to executive management. The IA function will consider independence and objectivity when undertaking and executing projects. When there are internal and external threats to objectivity or independence, they will be considered and documented when considering the ability to conduct work. Consulting engagements will be considered during this process. The IA function may not objectively conduct work for areas over which they made management decisions in the prior year. The IA function will document the consideration of organizational and individual independence in fact and in appearance and any impairments for each assurance engagement on a signed Statement of Independence.

Audit Schedule

The IA function shall conduct an entity-wide risk assessment on an annual basis. This risk assessment shall consider risk and control concerns of management and stakeholders as well as inherent risk. The IA function will propose an audit plan to the Executive Audit Committee for approval. The audit plan will address why specific processes or programs were identified as well as preliminary objectives. This will help insure the IA function adds value to the organization and contributes to improvement of organizational risk management.

Engagement Planning

Upon approval of the audit plan, the IA function will initiate engagement planning for each activity. The IA function will send an engagement letter to appropriate management to schedule an entrance conference at the outset of projects. The purpose of the entrance conference will be to inform planning efforts by determining applicable criteria, systems, records, personnel, property, and reports from other assurance providers. Engagement planning will include identification of the audited entity's objectives, criteria, process and fraud risks, and relevant controls.

Engagement Execution

The factors identified during planning will help to establish and document the project objectives, scope, budget, schedule, and necessary resources. Sources of information will be documented in audit project work papers. This documentation may include whether information is sufficient, reliable, relevant, and useful. The project plan may be adjusted throughout the project if a need arises.

The IA function will use the International Standards for the Professional Practice of Internal Auditing (The Standards) as issued by the Institute of Internal Auditors (IIA) as guidance when planning and performing work. The Chief Operating Officer (COO) and Executive Audit Committee will provide oversight of the audit activity and planning efforts. Changes to audit plans may be adjusted as projects progress based on organizational needs. Opportunities for consulting efforts may also be considered while executing engagements.

Internal Audit Reporting

The IA function will periodically meet with management of audited activities to communicate project progress. Prior to drafting a final report, the IA function will meet with relevant management to discuss the engagement's objectives, scope, and results to obtain feedback or clarification of outstanding issues.

The IA function will share the written report with management for review and response, if applicable. Audit reports will be distributed to relevant management, the COO, and the Executive Audit Committee. If engagement results are released to parties external to the organization, distribution and limits of use shall be discussed with senior management and legal counsel as appropriate. Communications will be accurate, objective, clear, concise, constructive, complete, and timely. If a communication contains an error or omission, the IA function will communicate corrected information with the parties who receive the initial communication.

The Standards will be used to guide engagement activities, but communications will not cite compliance or nonconformance with the Standards.

Monitoring Progress

The IA function will establish a process to follow-up on engagement results communicated to management. If management has accepted a level of risk the IA function believes to be unacceptable, the Director of IA will discuss the matter with the COO and/or the Executive Audit Committee.

4. Procedures to Maintain a Comprehensive Website

DCA has a public website providing access to information and programs administered by the State. In accordance with HUD requirements, the CDBG-DR page is accessible directly from the main landing page of the main website (www.dca.ga.gov) and separate pages can be accessed for CDBG-DR and CDBG-MIT grant information. See the images provided on the following pages.

DCA maintains compliance with ADA requirements for website accessibility and readability. DCA supports accommodation for citizens with limited English proficiency and will provide documents on the public website in languages other than English based upon the need of the non-English speaking communities.

DCA's Marketing/Communications department maintains control of the DCA public website and is involved in publishing all website content. Content for the site will consist of information from all aspects of the program and will be drafted by CDBG-DR team members. The website will be updated in a timely manner to reflect the most up-to-date information about the use of all CDBG-MIT funds, as well as any changes to policies and procedures. All content will be draft reviewed in cooperation with the Marketing/Communications department prior to final posting. The following information will be posted on the public website *(not an exhaustive list)*:

- Announcement of public hearings;
- Action Plan;
    - Initial Action Plan will be posted for no less than 45 days, prior to submission to HUD, to solicit public comment; and
    - Final approved Action Plan will be permanently posted.
- DRGR Action Plan will be posted upon approval from HUD;
- Substantial Amendments to Action Plan;
    - Substantial Amendments will be posted for no less than 30 days, prior to submission to HUD, to solicit public comment; and
    - Final approved Substantial Amendments will be permanently posted.
- Non-Substantial Amendments to Action Plan will be permanently posted;
- Quarterly Performance Reports (QPRs) will be posted within 3 days of submission to HUD; and
    - Rejected QPRs will be re-published to the website within 3 days of submission of the revised version to HUD.
- The Citizen Participation Plan;
- Program announcements;
- Executed contracts.

Georgia Department of Community Affairs Website (Main Landing Page)

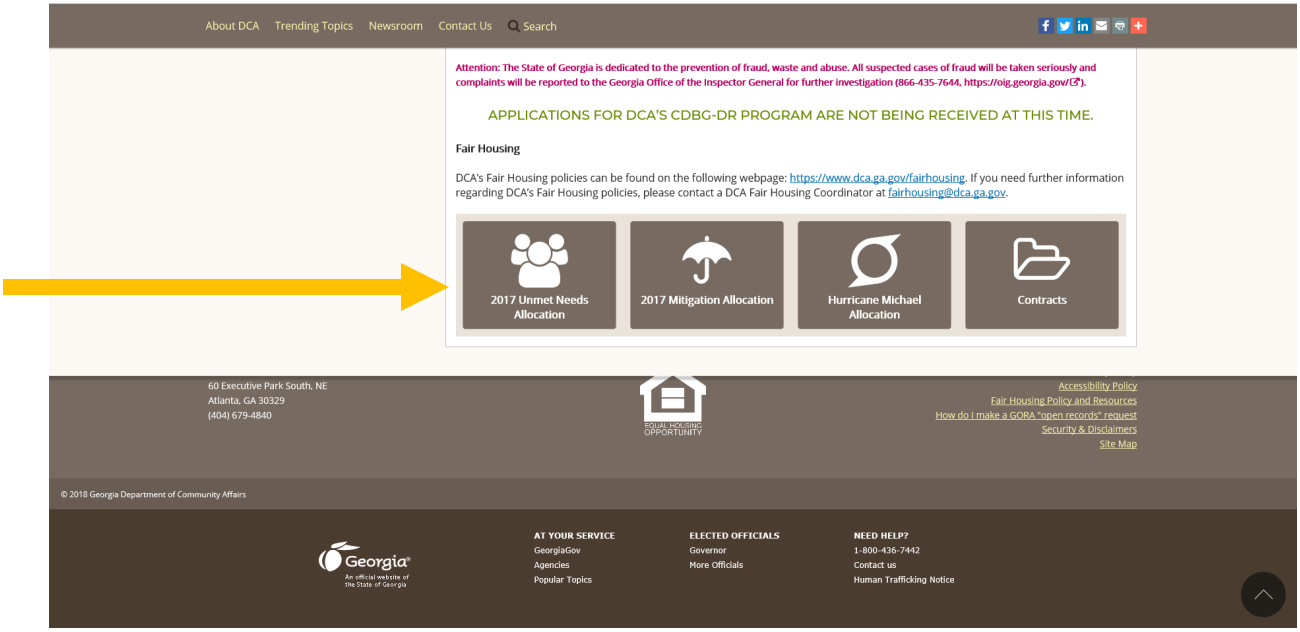
www.dca.ga.gov

CDBG-DR Program Page (Central Landing Page Information)

https://www.dca.ga.gov/community-economic-development/funding-programs/community-development-block-grant-disaster-recovery

CDBG-DR Program Page (Central Landing Page Links)

https://www.dca.ga.gov/community-economic-development/funding-programs/community-development-block-grant-disaster-recovery



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5. Staffing

As mentioned previously, DCA has existing staff resources, but will maximize the use of the resources available and bring on additional staff as needed and to the extent, funds are available. As DCA has developed its staffing model, it has considered all options and determined what the most reasonable staffing model looks like in relation to the program activities it undertakes.

Since program activities have not yet been determined, DCA's staffing model will be flexible to accommodate the needs associated with program activities. As the programs get underway, DCA will make the appropriate adjustments to accommodate the workload. The organizational chart in this section gives a visual of the various functions associated with the program activities undertaken with the CDBG-MIT funds. Job descriptions are also included following the organizational chart.

Key staff members have prior experience with the HUD funded CDBG annual program. DR staff will work closely with experienced CDBG staff to ensure the timely development and implementation of mitigation programs particularly as it relates to activities in infrastructure, housing, and economic development. The position descriptions outlined below align with the functional areas identified in the organizational chart. The organization chart can be seen on the following page.

Please note that positions on the following organization chart noted as "TBH" are currently advertised with an anticipated hire date of March 2, 2020 – April 1, 2020. Positions noted with "Hired" have been hired with a confirmed start date of February 17, 2020.

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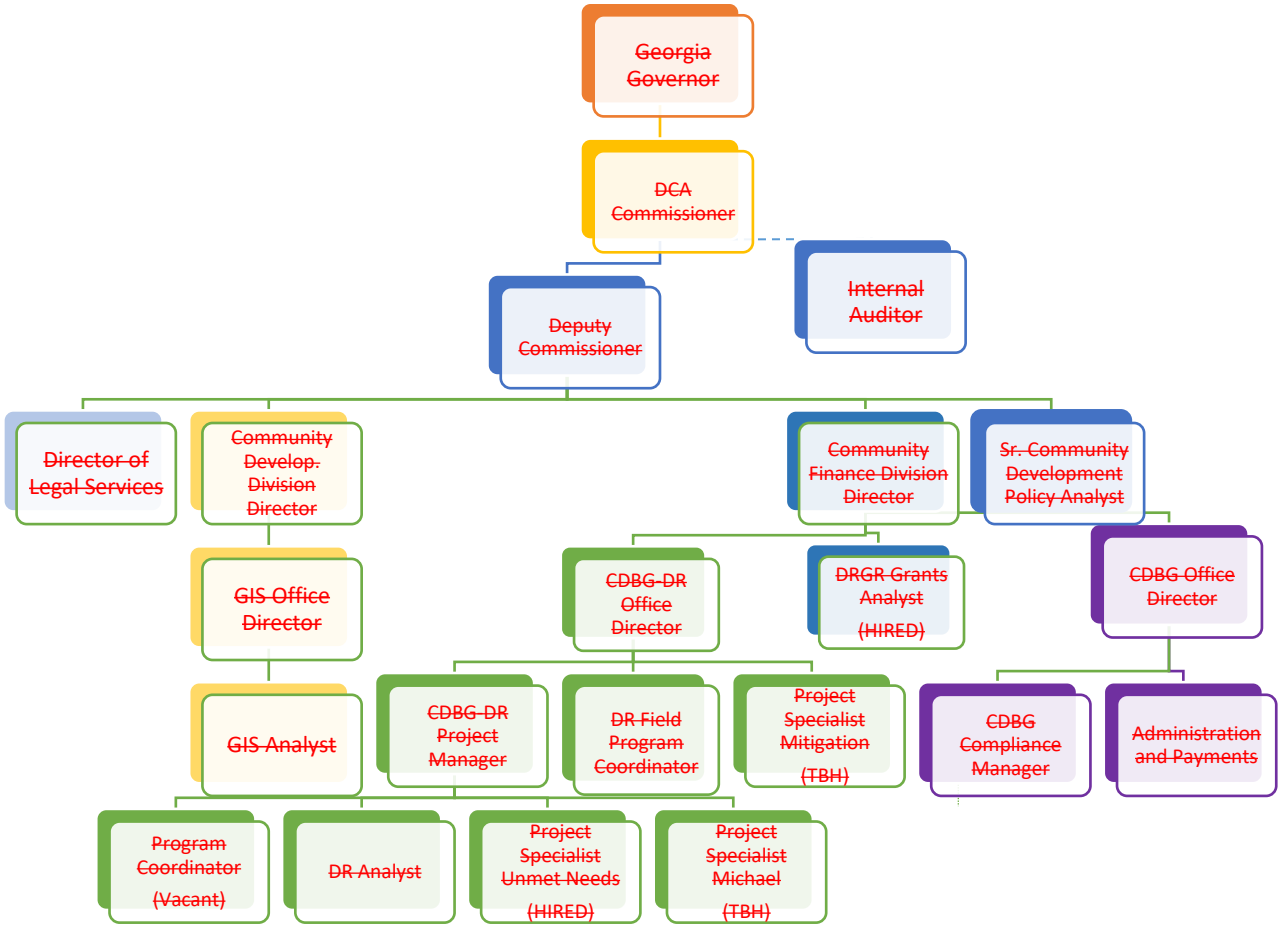
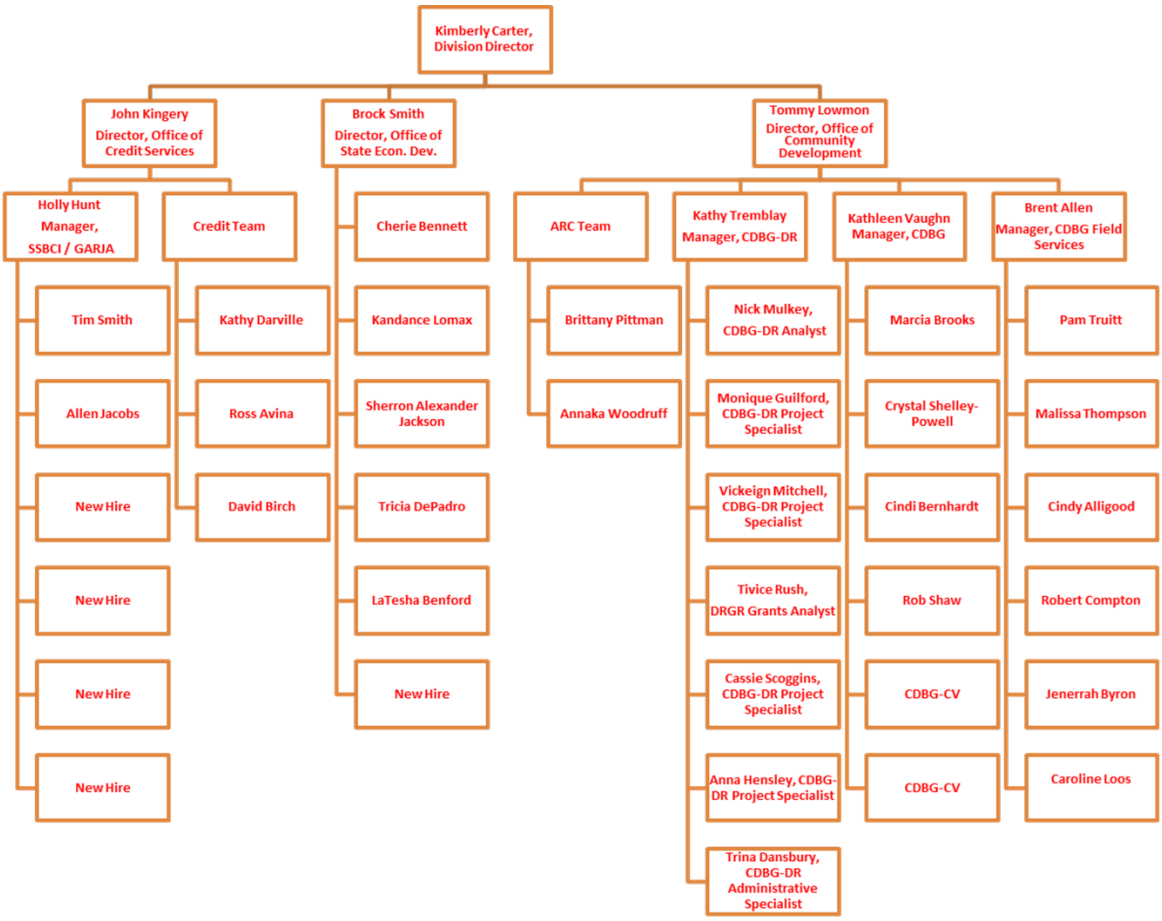
~~Georgia Department of Community Affairs Organizational Chart~~



Community Finance Division Reorganization Plan



Descriptions of the CDBG-MIT positions are as follows[8]:

Director, Office of Community Development (In place)

The Director will operate under the supervision of the Community Finance Division Director. The Director will coordinate and provide technical assistance and guidance to implement the federal recovery programs within the Community Finance Division. The Director leads, implements, coordinates, and advocates goals, objectives, and outcomes set by the Georgia Department of Community Affairs. The Director links all Federal, State and Local resources to deliver the most optimal objectives for all federal program, including disaster recovery.

CDBG-DR Program Manager (In place)

The Program Manager will operate under the supervision of the Director, Office of Community Development. The Program Manager directs, implements, coordinates, and advocates disaster recovery goals, objectives, and outcomes set by the State. The CDBG-DR Program Manager provides overall management, strategic operations, administrative support, and communication for the recovery effort. The Project Manager provides executive direction to ensure efficient administrative and operational oversight of readiness and field operations. Leads the conceptualization, development, coordination, and evaluations of policies to ensure program coordination guidance and policies are in alignment with State Action Plan.

CDBG-DR Field Program Coordinator - (Vacant)

The CDBG-DR Field Program Coordinator reports to the CDBG-DR Program Manager. The CDBG-DR Field Program Coordinator is responsible for monitoring and servicing complex Disaster Recovery related Community Development Programs within a designated region. The Field Program Coordinator maintains

[8] The organizational chart and corresponding positions noted in this plan may be modified as needed throughout the implementation process, as warranted by the program needs.

an awareness of the status of potential and existing projects and provides advice and assistance to other Community Development and Finance Division Office of Field Services and/or Office of Community Development personnel. The coordinator has duties related to oversight and compliance with CDBG-MIT grants and will provide technical assistance to program administrators and local governments in the region. The coordinator will meet on-site with local officials or representative(s) to monitor for CDBG-MIT program compliance. The coordinator has knowledge of CDBG and CDBG-MIT guidelines and applicable federal regulations and confer with CDBG and CDBG-MIT staff and units of local government on a regular basis to evaluate work progress and solve problems or develop solutions. The coordinator will create and deliver technical presentations associated with CDBG-MIT compliance matters for grant applications and/or grant awards. The coordinator will conduct site visits to verify grant application statements of need/target area conditions.

CDBG-DR Project Specialists (4) – (In place)

Under the supervision of the CDBG-DR Program Manager, the CDBG-DR Project Specialists will coordinate, provide technical assistance and guidance to implement the federal recovery program within the Community Finance Division. The position's responsibilities involve the coordination of delivery of technical assistance and understanding and maintaining a detailed working knowledge of over 25 federal and state statutes. The position will work with and coordinate closely with staff in the Office of Community Development which administers the State CDBG program. The position will be responsible for coordinating and/or supporting the State's application/request process from application development, roll-out of the program, administration and coordination of the program, and closeout of the program. The Project Specialist will monitor progress of projects and ensure timely submissions of requests for extensions, changes to scope, etc. and make recommendations for changes in procedures and other activities to accomplish program objectives and timelines. The coordinator will assist with validation of grant reimbursement requests and coordinate with appropriate staff to process/approve grant reimbursement requests. Additionally, the Project Specialist will conduct training on disaster assistance programs and other associated topics.

CDBG-DR Program Coordinator – (Vacant)

Under the supervision of the CDBG-DR Program Manager, the CDBG-DR Program Coordinator will be responsible for service to a complex network of Disaster Recovery related activities. The Program Coordinator will be responsible for work products and project management techniques related to CDBG-DR activities. In addition, the position works with Subrecipients, vendors, and suppliers through the process of contract management. The Program Coordinator ensures that the highest quality of customer service is provided through the CDBG-DR office and provides administrative support with regulatory compliance, project management, and policies and procedures.

CDBG-DR Administration Specialist – (In place)

Under the supervision of the CDBG-DR Program Manager, the CDBG-DR Administration Specialist will be responsible for providing administrative support with regulatory compliance, project management, and policy and procedures. In addition, the position will be responsible for all internal invoice review and

approval, support for subrecipient financial reports, and back-up for all the CDBG-DR Project Specialists. The position will maintain responsibility for the office SharePoint site, as well as maintaining the CDBG-DR website.

CDBG-DR Analyst – (In place)

Under the supervision of the CDBG-DR Project Manager, the CDBG-DR Analyst provides technical support to staff within the CDBG-DR office; ensures the highest quality of customer service is provided through all delivery systems within the office; and provides administrative support in areas of compliance, project management, training and development, regulations, and policies and procedures. The analyst will also be responsible for coordination of outreach and visualization of program highlights.

Additional Support

DRGR Grants Analyst – (In place)

The DRGR Grants Analyst will perform highly specialized work in complex data management and statistical systems, such as the Disaster Recovery Grant Reporting (DRGR) system and DCA's official grants management system, Grant Application Administration and Management (GrAAM). The DRGR Grants Analyst will prepare databases that provide up-to-date information on the CDBG-DR and CDBG-MIT activities that are underway, including funding data. This position will also conduct desk reviews of all CDBG-DR and CDBG-MIT subrecipient draw requests, including supporting documentation and recommend approval to the Director or other designee. Upon approval, the DRGR Grants Analyst will draw funds from HUD using the DRGR system.

CDBG Compliance Officer – (In place)

The Compliance Officer supervises, coordinates and reviews the work of the CDBG Compliance staff and field staff and reviews applicable laws, regulations and HUD monitoring guidance and develops forms, and reports and procedures to correctly implement requirements. The Officer serves as the subject matter expert in the following areas: The Housing and Community Development Act of 1974, as amended, and implementing regulations, federal financial management regulations, national Environmental Policy Act of 1969 and implementing regulations, the National Historic Preservation Act of 1966 and implementing regulations, labor laws, e.g., the Davis Bacon Act, the Contract Work Hours and Safety Standards Act, and the Copeland "Anti-Kickback" Act, acquisition and relocation laws and regulations, e.g., The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, State of Georgia Procurement law – O.C.G.A. 36-91.

GIS and Research Analyst – (In place)

The analyst will collect and interpret geographic information provided by geodetic surveys, aerial photos, and satellite data. The analyst will evaluate, measure, and record geospatial data using geographic information systems software and related hardware and software specific to the area of assignment. The analyst will create or maintain GIS databases and cartographic products. The incumbent will perform geospatial analyses of moderate complexity and present data in cartographic form. The analyst will monitor adherence to policies and procedures and locate and obtain existing geographic information databases.

DCA Office of Finance - (In place)

The Finance Manager and support staff are responsible for managing both grants and contracts for agency services and monitoring compliance with contractual provisions. The office performs managerial and professional duties in accounting, budgeting, and finance. The Chief Financial Officer directs and oversees all aspects of the Finance, Procurement, and Accounting functions of the programs within the Department. This position is responsible for directing the development and establishment of policies and procedures as it pertains to finance and accounting.

Director of Legal Services - (In place)

The Director of Legal Services provides legal guidance to the CDBG-MIT team on the development of disaster recovery plans, policies, and the implementation of activities.

Fair Housing, Section 504, ADA Coordinator - (In place)

The role of DCA's Fair Housing/Section 504/ADA Coordinator is held by a qualified individual who serves as the agency's official Fair Housing/Section 504/ADA Coordinator in compliance with 24 CFR §8.53 and 28 CFR § 35.107. The Fair Housing/Section 504/ADA Coordinator publishes agency-adopted grievance procedures that incorporate appropriate due process standards and provides for the prompt and equitable resolution of complaints alleging any action prohibited under Section 504 or the Americans with Disabilities Act, as well as oversees the resolution of those complaints and allegations. The role and designation of DCA's Fair Housing/Section 504/ADA Coordinator is communicated to all its employees, contractors, and other agents who may be in contact with any individuals with disabilities. This position is held by DCA's Director of Legal Services.

Internal Auditor – (In place)

The Internal Auditor will perform audits or oversee audits of financial records, electronic data processing systems, and program activities and operations to ascertain financial status, accuracy of data, efficiency, or compliance with laws and regulations. In addition, the Internal Auditor will evaluations of the administrative, financial, and operational activities of the program and provide required updates to HUD.

Appendix D: Grantee Certifications

Georgia® Department of Community Affairs

Appendix C: Certifications

CDBG-MIT Grants under Public Laws 115-123

a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.

b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.

c. The grantee certifies that the Action Plan is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this Notice. The grantee certifies that activities to be administered with funds under this Notice are consistent with its Action Plan.

d. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for in this Notice.

e. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.

f. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each local government 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. The grantee certifies that it has consulted with affected local governments in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including method of distribution of funding, or activities carried out directly by the State.

h. The grantee certifies that it is complying with each of the following criteria:

(1) Funds will be used solely for necessary expenses related to disaster relief, long-term mitigation, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2017 pursuant to the Robert T. Stafford Disaster Relief and emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).

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

(3) The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent of the grant amount is expended for activities that benefit such persons.

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

i. The grantee certifies that it grant will conduct and carry out the grant in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601–3619) and implementing regulations, and that it will affirmatively further fair housing.

j. The grantee certifies that it has adopted and is enforcing the following policies. In addition, States receiving a direct award must certify that they will require UGLGs that receive grant funds to certify that they have adopted and are enforcing:

(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. The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster mitigation activities in a timely manner and that the grantee has reviewed the requirements of this notice. The grantee certifies to the accuracy of its Public Law 115-56 Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced at A.1.a under Section VI and its Implementation Plan and Capacity Assessment and related submission to HUD referenced at A.1.b under Section VI.

l. The grantee certifies that it considered the following resources in the preparation of its action plan, as appropriate: FEMA Local Mitigation Planning Handbook: https:// www.fema.gov/media-library-data/ 20130726-1910-25045-9160/fema_local_ mitigation_handbook.pdf; DHS Office of Infrastructure

Protection: https:// www.dhs.gov/sites/default/files/ publications/ip-fact-sheet-508.pdf; National Association of Counties, Improving Lifelines (2014): https:// www.naco.org/sites/default/files/ documents/NACo_ResilientCounties_ Lifelines_Nov2014.pdf; the National Interagency Coordination Center (NICC) for coordinating the mobilization of resources for wildland fire: https:// www.nifc.gov/nicc/); the U.S. Forest Service's resources around wildland fire (https://www.fs.fed.us/managing-land/ fire); and HUD's CPD Mapping tool: https://egis.hud.gov/cpdmaps/.

m. The grantee will not use grant funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the State, local, or tribal government or delineated as a special flood hazard area (or 100-year floodplain) in FEMA's most recent flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the State, local and tribal government land use regulations and hazard mitigation plan and the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

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

o. The grantee certifies that it will comply with environmental requirements at 24 CFR Part 58.

p. The grantee certifies that it will comply with applicable laws.

Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S. C. 287, 1001 and 31 U. S. C. 3729.

G. Christopher Nunn, Commissioner
Georgia Department of Community Affairs

02-06-2020
Date

Appendix E: Grantee SF-424

OMB Number: 4040-0004
Expiration Date: 10/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☐ Preapplication	☒ New	
☒ Application	☐ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

* 3. Date Received:	4. Applicant Identifier:

5a. Federal Entity Identifier:	5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:	7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:	Georgia Department of Community Affairs
* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. Organizational DUNS:
58-1259426	8074790840000

d. Address:

* Street1:	60 Executive Park South NE
Street2:	
* City:	Atlanta
County/Parish:	
* State:	GA: Georgia
Province:	
* Country:	
* Zip / Postal Code:	30329

e. Organizational Unit:

Department Name:	Division Name:
Grant Administration	Community Finance Division

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:	Mr.	* First Name:	Tommy
Middle Name:			
* Last Name:	Lowmon		
Suffix:			

Title: Director, CDBG-DR Program

Organizational Affiliation:

* Telephone Number:	404-977-0929	Fax Number:	

* Email: tommy.lowmon@dca.ga.gov

Application for Federal Assistance SF-424

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

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

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

Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.228

CFDA Title:

*** 12. Funding Opportunity Number:**

84 FR 45838

* Title:

CDBG-MIT

13. Competition Identification Number:

NA

Title:

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

Add Attachment | Delete Attachment | View Attachment

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

CDBG- MIT PL 115-123

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: 1,2,8 * b. Program/Project: 1,2,8

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

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/10/2020 * b. End Date: 10/10/2028

18. Estimated Funding ($):

* a. Federal	26,961,000.00
* b. Applicant	0
* c. State	0
* d. Local	0
* e. Other	0
* f. Program Income	0
* g. TOTAL	

*** 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

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** 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:	Mr.
* First Name:	G. Christopher
Middle Name:	
* Last Name:	Nunn
Suffix:	
* Title:	DCA Commissioner
* Telephone Number:	404-679-0585
Fax Number:	
* Email:	christopher.nunn@dca.ga.gov
* Signature of Authorized Representative:	
* Date Signed:	02-11-20

Appendix F: MID Expansion Request

Brian P. Kemp
Governor

Georgia® Department of Community Affairs

Christopher Nunn
Commissioner

February 13, 2020

Mr. Marvie Epps
Community Planning & Development Disaster Recovery Specialist
Office of Block Grant Assistance
U.S. Department of Housing and Urban Development
451 7th Street, SW, Room 7272
Washington, D.C. 20410

Dear Mr. Epps,

The Georgia Department of Community Affairs (DCA) is formally requesting the designation of additional zip codes as Most Impacted and Distressed for Georgia's 2017 CDBG-DR allocation. Currently there are three MID zip codes, 31548, 31520, and 31705. While preparing to deploy the Homeowner Rehabilitation and Reconstruction Program, Dougherty County (31705) realized the need to serve zip codes 31701 and 31707. These areas desperately need assistance and are adjacent to 31705.

DCA is currently drafting the first substantial amendment for the 2017 Unmet Needs Allocation, and is drafting the MIT Action Plan. If this request is approved, DCA will include the additional zip codes in both Action Plans.

In accordance with 84 FR 45838, DCA has prepared this request to include the additional zip codes, as they were affected by the January 2017 tornadic events. The pages following this letter contain data to substantiate the need. Thankyou for your consideration of this request. If you have any questions or require additional information, please call 404-977-0949 or email tommy.lowmon@dca.ga.gov.

Sincerely,

Tommy Lowmon
Director, CDBG-DR Program

CC: Mr. William Bedford, Assistant Director- ATL, Disaster Recovery and Special Issues Division, HUD

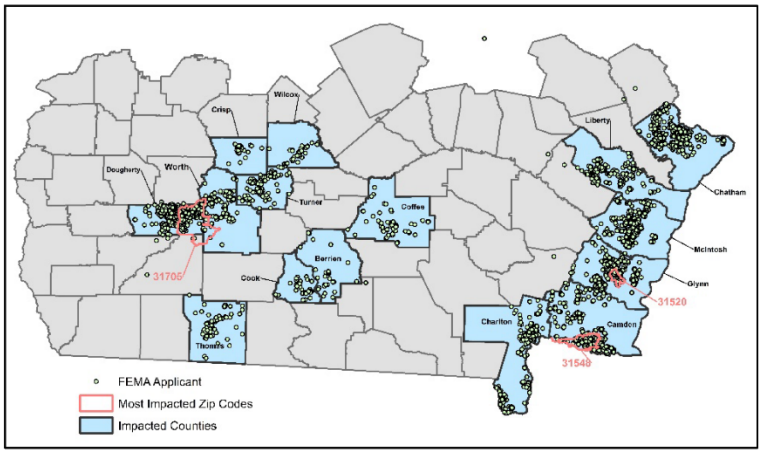
Enclosures

60 Executive Park South, NE | Atlanta, GA 30329-2231 | 404-679-4940
www.dca.ga.gov | An Equal Opportunity Employer

Equal Housing Opportunity

Summary

On 1/16/2020, DCA received a request from the Dougherty County Board of Commissioners to add two additional zip codes to the Most Impacted and Distressed areas for both Unmet Needs and Mitigation 2017 allocations. The following map shows the CDBG-DR eligible counties in blue and the original HUD identified MID Zip Codes outlined in red.



Housing

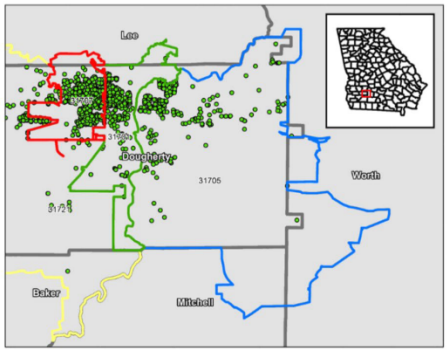
When considering the request from Dougherty County, DCA gathered the following data to analyze the two zip codes. First DCA looked at the Total number of FEMA applicants with actual FEMA Verified Loss (FVL) in the additional zip codes from damage related to DR 4294. DCA analyzed the data from DR 4294 because the storm made a larger impact than DR 4297 in Dougherty County.

For the first tornado in Southwest Georgia (DR 4294), 31705 (a current MID) had less FVL than zip codes 31707 and 31701. Additionally, there were more applicants in both of the requested zip codes than in 31705. Zip code 31701 had 772 applicants and $81,442.31 in FVL and 31707 had 1091 applicants and $179,878 of FVL.

While these numbers are substantial and devastating to the community, they failed to meet the threshold for being considered a MID. To be considered a MID, a zip code must have two million dollars in Unmet Need. Unfortunately, zip codes 31701 and 31707 are smaller geographically, making it extremely difficult to reach this threshold.

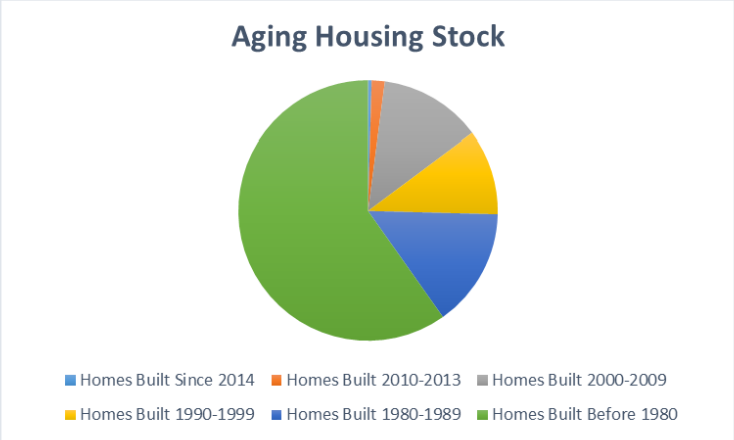
Dougherty County Zip Codes, FVL and Number of Applicants, DR-4294 ONLY

FEMA Verified Loss & Number of Applicants, DR-4294 ONLY				
Zip Code	# of Applicants	FVL	% of Applicants	FVL %
31707	1091	$179,878.31	38.44%	49.47%
31701	772	$81,442.31	27.20%	22.40%
31705	716	$54,624.53	25.23%	15.02%
31721	238	$47,620.96	8.39%	13.10%
31730	1	$0.00	0.04%	0.00%
31791	1	$0.00	0.04%	0.00%
No Zip	19	72	0.67%	0.02%
Grand Total	2838	$363,638.11	100.00%	100.00%

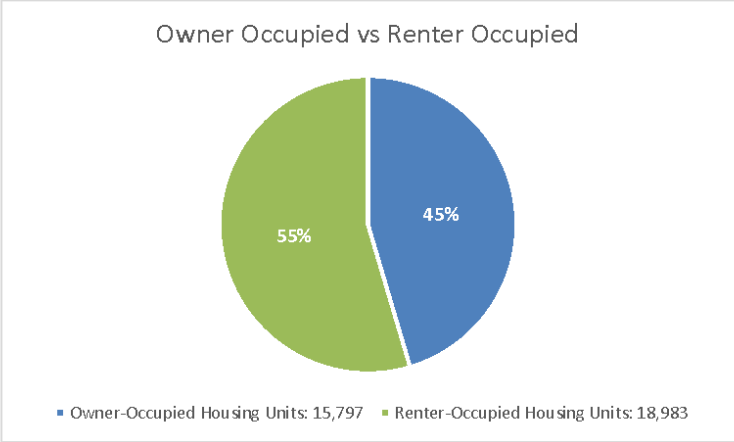


A reason for low values of assessed damage stems from the FVL only calculating the cost to get homeowners back in a safe and sanitary condition and not to fully restore the home. After discussions with Dougherty County we wholeheartedly believe unmet needs still exist within the two proposed zip codes.

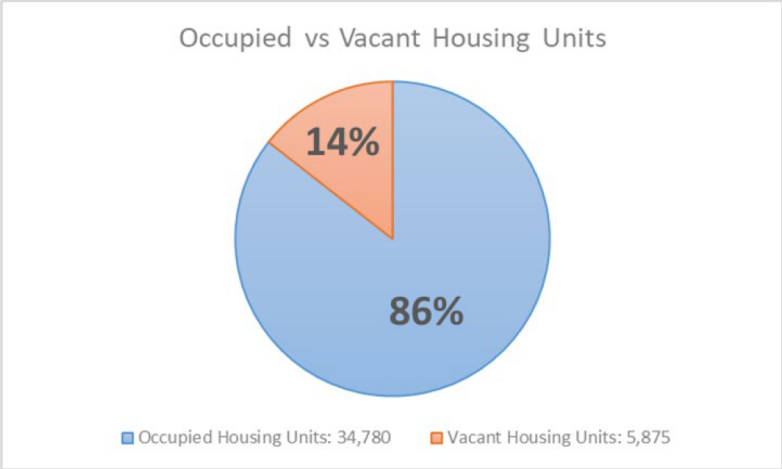
Additionally, the chart below shows the aging housing stock, which by nature have lower home values. These homes are more vulnerable to damage by natural disasters.



It is also important to note that there are more renters than owners in Dougherty County. When FEMA is inspecting for damage, they do not count structural damage to rental property. See chart below.



Also, vacant homes are not usually inspected by FEMA, but the county must repair the damage to reduce blight and keep areas safe and secure. Within the zip codes, 14% of the homes are vacant, which mean approximately 1 out of every 7 homes was not counted in the initial damage assessment.

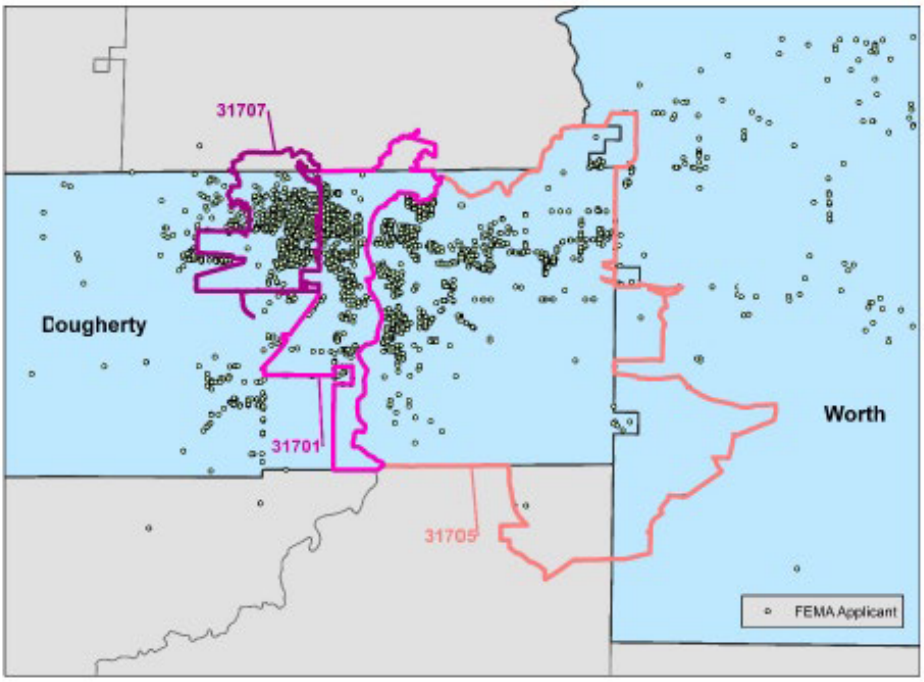


Current local data was provided by Dougherty County and can be seen below. The number of damaged properties is shown for each individual zip code. When combined, more damaged was sustained in 31701 and 31707 than in 31705 (an existing MID). While we do not seek to diminish the impact of the storms in 31705, we are merely stating these adjacent areas also suffered damage.

ZIP CODE	STORM	# DAMAGED
31701	# 1 (January 2017)	341
31701	#2 (January 2017)	0
31707	#1 (January 2017)	532
31707	#2 (January 2017)	0
31721	#1 (January 2017)	53
31721	#2 (January 2017)	0
31705	#1 (January 2017)	163
31705	#2 (January 2017)	622

There is a possible total of $48,700,000 in unmet need that was undercounted in the proposed additional MID areas. We arrived at this number by taking the number of currently damaged properties reported by the impacted local community and multiplying those numbers by the major-high multiplier from HUD (as an average estimate to repair those homes). The data showed 341 homes for 31701 and 532 homes for 31707, which totals 873.

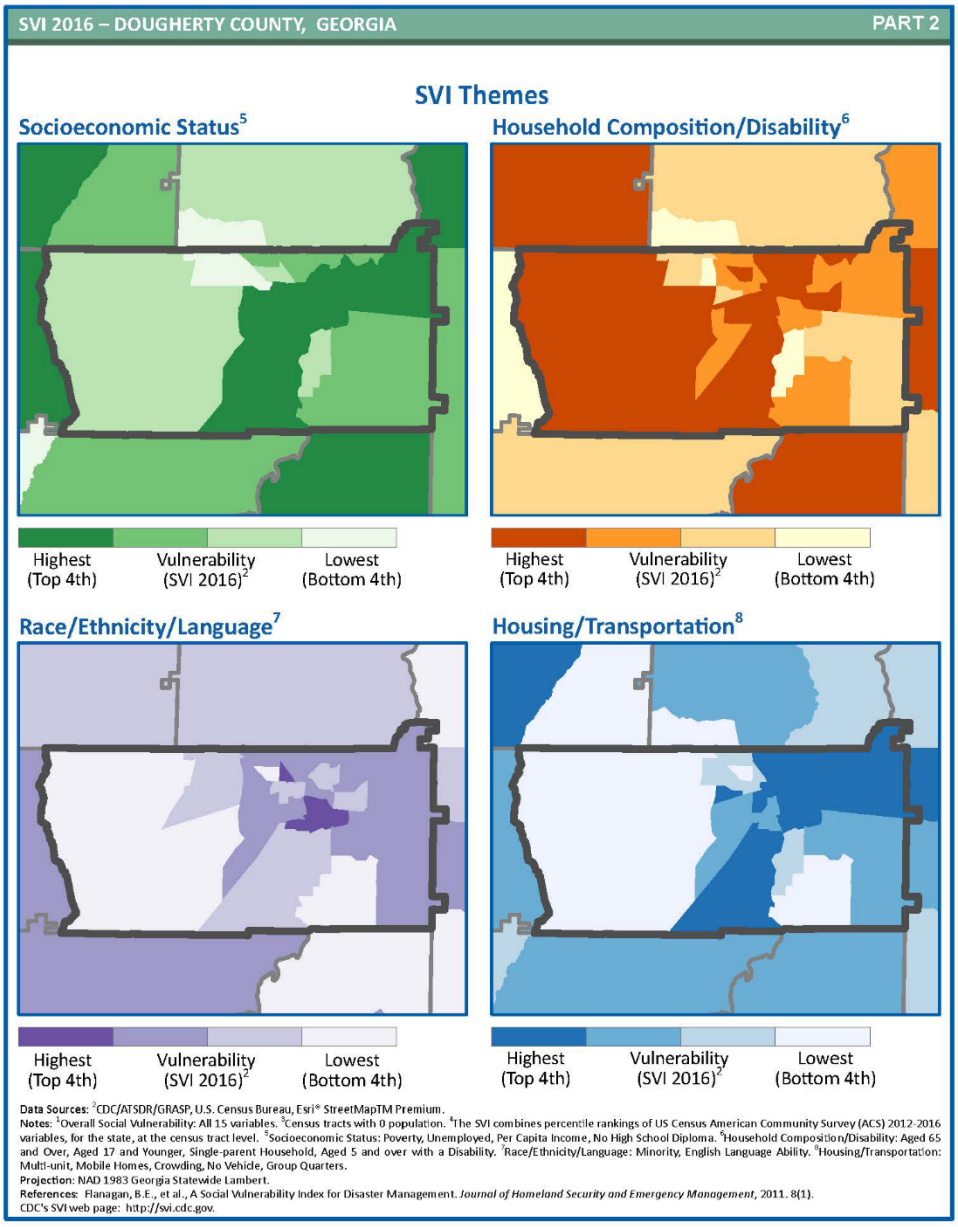
873 x $55,812 = $48.7M



**31701 and 31707 are the zip codes DCA is requesting to include in the MIDs*

Social Vulnerability

The SOVI themes represented on the following page describe the different aspects of Dougherty County's social vulnerability. The City of Albany, located within Dougherty County, is in the highest ranking area for each of the four SOVI components. The proposed MID zip codes are part of the City of Albany. The themes below point to household composition and show high vulnerability of households with disabilities within the City of Albany and Dougherty County. In addition, there is a high concentration of socioeconomic vulnerability in the proposed MID areas. The constant impact from multiple disasters to an already distressed area creates barriers to making a full recovery and becoming more resilient in the future.



FINAL - FOR EXTERNAL USE

Infrastructure:

Due to the impacts of the disasters, Dougherty County has several infrastructure needs located within the proposed expanded zip codes.

The following activities have no dedicated funding source:

1. Three Oaks Drainage Project: In the vicinity of 31.594122, -84.207246. This project would prevent localized flooding and traffic issues in a large residential area and also includes an elementary school. Approximate cost is **$3 million**.

2. 8th Avenue, 3rd Avenue and Booker Alley Basins. These are three separate projects that are located from downtown Albany north to 8th Ave. The projects involve separating sanitary and storm sewers and will improve drainage and lessen potential sewage overflows into the Flint River. The approximate center of the three projects is 31.592578, -84.152636. The total project cost was estimated at **$200 million**, but we are working with an engineering consultant presently to devise alternative, less expensive solutions.

3. Holloway Drainage: This project is for stormwater improvements to eliminate localized flooding. This project area serves a very low-income neighborhood between approximately four housing authority developments on the north (31.585802, -84.163248) and the Oglethorpe commercial corridor on the south (31.575172, -84.166885). The estimated cost is **$15 million**.

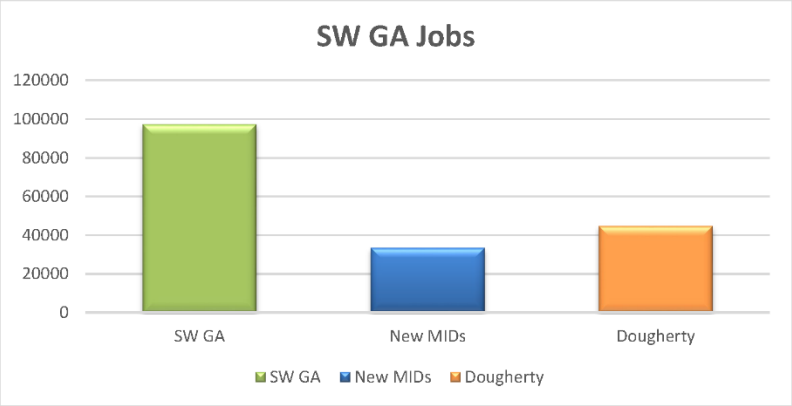
4. Front Street-Washington Street Connector: This project is a transportation project that will provide access to businesses and residents once the 7th avenue railroad crossing is closed. The project spans from Society and 3rd on the south (31.586614, -84.148312) to the Liberty Expressway on the north (31.604348, -84.152539). The project will be partially funded by city but has approximately a **$3 million** shortfall in funding.

There is a total of approximately **$221 million** in infrastructure projects unmet or mitigation needs within 31701 and 31707.

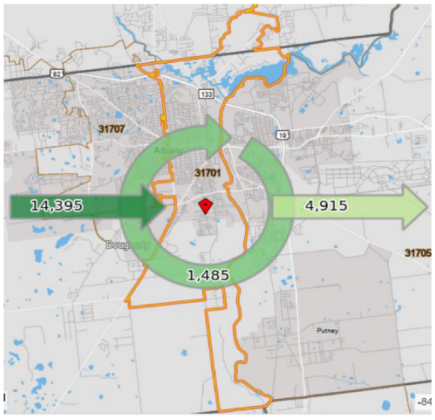
Business:

Collectively, zip codes 31701 and 31707 are the retail and business hub for most of Southwest Georgia. These two zip codes account for 74% of all the jobs in Dougherty County (Southwest Georgia's most populated county) and 34% of all the jobs in the 15 county Southwest Georgia region.

Due to this, damage sustained within 31701 and 31707 is especially crippling to Georgia's economy. One out of every three southwest Georgians work in these two zip codes. It is gravely important that these two zip codes are repaired in order to restore the economic pillar that upholds a region that was already distressed, even before the disasters.



Nearly 30,000 households from within the region are dependent up the businesses within these 31701 and 31707, making this geographic area a major regional economic hub.



Conclusions

Expanding the Most Impacted and Distressed Areas to include zip codes 31701 and 31707 is vital for Dougherty County's recovery from the two tornadoes of January 2017. There are currently 873 unmet housing needs within the two zip codes and 785 unmet needs in our MID zip code 31705. DCA is requesting this expansion per guidance from the Federal Register Notice. Notice FR 84 FR 45838 states, "CDBG–MIT funds are the same as those identified for each grantee in the Prior Notices, a grantee seeking to amend its HUD- identified MID area for purposes of its CDBG–MIT grant, must also amend the HUD-identified MID area for its corresponding 2015, 2016, or 2017 CDBG–DR grant. Grantees proposing to add to the HUD-identified MID area for their existing CDBG–DR grant shall do so through a substantial amendment that includes a consideration of unmet housing recovery needs". Upon approval of this request, DCA will make a substantial amendment to the 2017 Unmet Needs allocation Action plan. The 2017 unmet needs allocation includes the Homeowner Rehabilitation and Reconstruction Program to assist homeowner within the MID Areas. Residents within 31701 and 31707 also need access to these vital programs.

One-third of all of the jobs in Southwest Georgia are located in the proposed expanded zip codes. This shows their importance to the community and the larger region. If the area does not properly recover and become more resilient towards future disasters, jobs could potentially be uprooted and lost to other locations. More people rely on the rebuilding and health of these zip codes than just the citizens of Dougherty County. This also highlights the importance of the $221 million in unmet infrastructure needs in 31701 and 31707. If infrastructure needs are not addressed, individuals and businesses will not continue to locate or thrive in this area. Recovery of these areas is vital for the City of Albany, Dougherty County, and the surrounding region. Adding these zip codes will help the county recover and move forward for the good of the region.

Appendix G: Draft Action Plan Comments and Responses

Comments From Jim Cika, International Code Council, Inc. 4/3/20 4:23PM

International Code Council
t: 888.ICC.SAFE (422.7233)
www.iccsafe.org

April 3, 2020

Georgia Department of Community Affairs
Attention: CDBG-DR
60 Executive Park South, NE
Atlanta, Georgia 30329

Via email: CDBG-DR@dca.ga.gov

To Whom it May Concern,

I am writing on behalf of the International Code Council (the "Code Council") to provide comments on the "State of Georgia CDBG-MIT Action Plan" (CBDG-MIT Plan).

The Code Council is a member-focused non-profit association dedicated to building safety and sustainability and we are proud to count Georgia and many of its local jurisdictions as our Governmental Members. The Code Council develops the model building codes, the I-Codes, used in the design, build and compliance process to construct safe, sustainable, affordable and resilient structures. The I-Codes, including the International Building Code (IBC), the International Residential Code (IRC), the International Fire Code (IFC), and International Energy Conservation Code (IECC) are the most widely used and adopted set of building codes in the U.S. and around the world. Developed through a consensus-based process, the I-Codes incorporate the latest technology and provide the safest, most resilient structures for our families and communities.

We commend the State of Georgia for the CDBG-MIT Plan's attention to flood mitigation, tornado mitigation, and construction standards and its emphasis on the importance of the adoption, implementation and enforcement of green building standards and practices; however the Plan is silent on two important issues: 1. that effectively implementing and enforcing the most recent modern, resilient, building codes is the first and most impactful step towards mitigation, and 2. the importance of training and continuous education for construction tradespeople, supervisors, and inspectors. For this reason, our comments focus on the importance of incorporating code adoption, training, and enforcement into Georgia's CDBG-MIT implementation. Georgia and its local communities should take steps to advance long-term resilience and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property by adopting and applying the most recent editions of the national model codes that address existing natural hazards.

STUDIES SHOW BENEFITS OF MODERN BUILDING CODES AGAINST DISASTERS

Numerous studies confirm that the adoption and implementation of current model building codes is one of the nation's best defenses against the natural hazards Georgia's CDBG-MIT Plan identifies as presenting the greatest risks to the state, including hurricanes, tornadoes, and flooding. For example:

- The 2019 FEMA Mitigation Assessment Team (MAT) report following Hurricane Harvey found that National Flood Insurance Program (NFIP) regulations reduced average claim payments by almost half and following modern code requirements reduced the average claim payments by an additional 90%.[1]

[1] FEMA P-2022, *Mitigation Assessment Team Report: Hurricane Harvey in Texas, Building Performance Observations, Recommendations, and Technical Guidance*, February 2019, See https://www.fema.gov/media-library-data/1551991528553-9bb91b4bfe36f3129836fedaf263ef64/995941_FEMA_P-2022_FINAL_508c.pdf

- The National Institute for Building Sciences (NIBS) Natural Hazard Mitigation Saves report found that designs meeting the 2018 IBC and IRC result in a national benefit of $11 for every $1 invested against flood, hurricane, and earthquake risk. The report also found that adhering to current codes' flood mitigation requirements in the floodplain saves $6 for every $1 invested.[2]

- A FEMA analysis from 2014 estimated approximately $500 million in annualized loss avoided in eight southeastern states, including Georgia, due to do the adoption of modern building codes based on the I-Codes.[3]

- Although building code adoption alone generates enormous mitigation benefits, code enforcement is equally important. FEMA quantified the cost of Dade County Florida's inadequate code enforcement as a quarter of the $16 billion in insured losses from Hurricane Andrew in 1992.[4] Researchers found similar results about 15 years later: that implementing building codes at the local level by ensuring proper staffing, training, and certification provides an additional loss reduction value on the order of 15 to 25 percent.[5]

- The Insurance Service Office's (ISO) 2019 National Building Code Assessment Report outlines clear advantages to adoption of the latest codes as well as proper enforcement. As stated in the report "The ISO industry data analysis is clear: Communities with well-enforced, up-to-date codes generally demonstrate better loss experience, both monetarily and in terms of human suffering. Reducing catastrophe-related damage and ultimately lowering insurance premiums provide strong incentives for communities to adopt and rigorously enforce effective building codes. Even so, code adoption and enforcement practices vary widely from community to community, even within the same state." [6]

Recognizing the life safety and mitigation benefits that current building codes provide for communities, the U.S. Department of Housing and Urban Development' (HUD) has both required applicants for disaster recovery and mitigation funding commit to adopt resilient codes and make available significant sums for codes' adoption and implementation. For the past seven years, and across multiple allocations, HUD has required Community Development Block Grants for Disaster Recovery (CDBG-DR) and Mitigation (CDBG-MIT) applicants demonstrate in their action plans how they will support the adoption of resilient building codes.[7]

HUD's CDBG-MIT funding notice states that "through this allocation for mitigation," HUD seeks to "support the adoption…" of the "…latest edition of the published disaster-resistant building codes and standards (to include wildland urban interface, flood and all hazards, ASCE-24, and ASCE-7 respectively)." As such, "[g]rantees are encouraged to propose an allocation of CDBG-MIT funds for building code development and implementation, land use planning and/or hazard mitigation planning activities that may include but need not be limited to: (a) The development and implementation of modern and resilient building codes consistent with an identified model or standard, such as ASCE 24 and ASCE 7 as may be applicable, in order to mitigate against current and future hazards."[8]

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[2] National Institute for Building Sciences, Natural Hazard Mitigation Saves: 2018 Interim Report
[3] FEMA, *Phase 3 National Methodology and Phase 2 Regional Study Losses Avoided as a Result of Adopting and Enforcing Hazard-Resistant Building Codes* (2014).
[4] Burby, R., *Hurricane Katrina and the paradoxes of government disaster policy: Bringing about wise governmental decisions for hazardous areas* (2006) citing *FEMA Building Performance Assessment Team, Preliminary Report in Response to Hurricane Andrew, Dade County, Florida* (1992).
[5] Czajkowski, J. et. al., *Demonstrating the Intensive Benefit to the Local Implementation of a Statewide Building Code* (2017).
[6] National Building Code Assessment Report, 2019 pg. 2.
[7] HUD, Allocations, Common Application, Waivers, and Alternative Requirements for 2017 Disaster Community Development Block Grant Disaster Recovery Grantees, 83 Fed. Reg. 5844, (Feb. 9, 2018); Notice of National Disaster Resilience Competition Grant Requirements, 81 Fed. Reg. 36,557 (June 7, 2016); Allocations, Common Application, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy, 78 Fed. Reg. 14,329 (Mar. 5, 2013).
[8] HUD, Allocations, Common Application, Waivers, and Alternative Requirements for Community Development Block Grant Mitigation Grantees, 84 Fed. Reg. 45838 (Aug. 30, 2019).

FEMA concluded in its most recent five-year strategic plan that current building code adoption and enforcement are two of the most effective mitigation measures a jurisdiction can undertake by stating: "[d]isaster resilience starts with building codes, because they enhance public safety and property protection."[9] In the Plan's very first objective, FEMA highlighted the importance of the Agency's "advocate[ing] for the adoption and enforcement of modern building and property codes."[10]

In August of last year, the Mitigation Framework Leadership Group (MitFLG)—chaired by FEMA and made up of another 13 federal agencies and departments as well as state, tribal, and local officials— released the National Mitigation Investment Strategy (NMIS). The Strategy makes several recommendations concerning the use, enforcement, and adoption of building codes: "[a]rchitects, engineers, builders, and regulators should use the latest building codes for the most up-to-date requirements for structural integrity, mechanical integrity, fire prevention, and energy conservation," "trained, certified professionals [should] handle building inspections and code administration," and "[u]p-to-date building codes and standard criteria should be required in federal and state grants and programs."[11]

Lastly, FEMA's "Required Minimum Standards" for all FEMA funded construction require the latest I-Codes.[12] For post-disaster recovery, FEMA requires construction meet the latest editions of the IBC, IRC, International Existing Building Code (IEBC), International Energy Conservation Code (IECC); International Wildland-Urban Interface Code (IWUIC); International Plumbing Code (IPC); International Mechanical Code (IMC); International Fuel Gas Code (IFGC); International Fire Code (IFC); ICC 500-14, ICC/NSSA Standard on the Design and Construction of Storm Shelters; ICC 600-14, Standard for Residential Construction in High-wind Regions.[13] The Agency has deemed adherence to the current versions of these codes to be so important that it will not fund rebuilding of public facilities post-disaster if that construction deviates.

THE BENEFITS OF CODE ADOPTION, TRAINING, AND ENFORCEMENT FOR GEORGIA

Unfortunate events like Hurricane Irma and other extreme weather events that cause flooding and tornados have shown the need for Georgia to become better prepared to take mitigating steps to build stronger for the future. As demonstrated above, adopting current codes is one of the most effective means to do so.

Fortunately, Georgia has recently adopted the 2018 editions of the IBC, IRC, IFC, IPC, IMC, IFGC and ISPSC and the 2015 edition of the IECC as Mandatory Codes throughout the state.[14] The 2018 editions of these codes include numerous provisions that mitigate the hazards Georgia has identified as presenting the greatest risk to the State. In addition to these Mandatory Codes, Georgia has adopted the "Disaster Resilient Building Code IBC Appendix" and the "Disaster Resilient Building Code IRC Appendix" as Permissive Codes that must be adopted at the local government level. These two appendices improve code provisions relating to hurricane, flood, and tornado disasters.

GEORGIA CDBG-MIT PLAN RECOMMENDATIONS

Georgia has adopted 2018 IBC, IRC, and other codes noted above, effective January 1, 2020. The state's Draft Plan proposes to use CDBG-MIT funds to carry out strategic and high-impact projects in targeted areas, subject to the greatest potential damage, that will help mitigate disaster risks and reduce future losses. However, as written, the Draft Plan does not explicitly address the use of CDBG-MIT funds for building code implementation, training, or enforcement activities.

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[9] FEMA's 2018-2022 Strategic Plan (2018)
[10] *Id.*
[11] Mitigation Framework Leadership Group, *National Mitigation Investment Strategy* (Aug. 2019).
[12] FEMA Policy 204-078-2.
[13] FEMA Recovery Interim Policy FP- 104-009-11 Version 2.
[14] See https://www.dca.ga.gov/local-government-assistance/construction-codes-industrialized-buildings/construction-codes

The following recommendations urge the State of Georgia to recognize as eligible for funding within the CDBG-MIT Action Plan, activities related to the state's recent adoption of the latest building codes. These recommendations also encourage the State of Georgia to recognize as eligible for funding within the CDBG-MIT Action Plan, staffing, training and all other necessary activities to improve code enforcement. Finally, our recommendations suggest funding for post-disaster damage assessment training.

The State Plan Should Specify Available funds for Code Implementation

The Code Council strongly encourages the state to recognize as eligible for funding within the CDBG-MIT Action Plan, the purchase of necessary activities and materials required by local jurisdictions for the implementation of, and transition to, Georgia's recently adopted construction codes, as well as future adoptions that may take place during the Plan period. Examples of eligible activities include but are not limited to the purchase of 2018 code books (in hardcopy, electronic, or remotely accessible formats), support materials and services.

The State Plan Should Specify Available funds for Staffing and Training Activities to Improve Code Enforcement

The Code Council strongly encourages the state to recognize as eligible for funding within the CDBG-MIT Action Plan, training activities for code officials as well as all construction tradespeople, supervisors, and inspectors, on the recently adopted codes, as well as future adoptions during the Plan period. Training will improve code enforcement, which alone has been shown to provide 15% to 25% in loss avoidance, in addition to the benefits provided by the underlying adopted codes. Training also allows jurisdictions facing flood hazards to fully understand, properly apply, and properly enforce the flood mitigation measures found in the latest codes and can reduce losses by 90% and would, per the Mitigation Saves study, save $6 for every dollar invested. Additionally, based on the CDBG-MIT program requirements which stipulate that a significant portion of the funding to be used in low-and-moderate income areas, the Code Council believes that special consideration should be given to expanding enforcement and monitoring in those areas of concern.

Making funding available for code and enforcement is consistent with HUD's recommendation on the allocation of funding as specified in its notice allocating CDBG-MIT funding. The Notice states that "through this allocation for mitigation, HUD seeks to [support] adoption of forward-looking land use plans that integrate the hazard mitigation plan, latest edition of the published disaster-resistant building codes and standards (to include wildland urban interface, flood and all hazards, ASCE-24, and ASCE-7 respectively)." As such, "[g]rantees are encouraged to propose an allocation of CDBG-MIT funds for building code development and implementation, land use planning and/or hazard mitigation planning activities . . . ." Within a state's action plan, the applicant must "[p]romote local and regional long-term planning and implementation informed by its Mitigation Needs Assessment, including through the development and enforcement of building codes and standards (such as wildland urban interface; and flood and all hazards, including ASCE-24 and ASCE-7, as may be applicable)."

The State Plan Should Provide Funding for Post-Disaster Damage Assessment Training

We recommend the State of Georgia partner with the Code Council and the Building Officials Association of Georgia (BOAG) to promote and alert communities about post disaster damage assessment training programs and to provide funding for these programs. After a disaster, an affected community is often left on its own to struggle with assessing its damage and determining whether structures can be re-inhabited. Local government officials may not be instructed on how to perform rapid safety evaluations or what data to collect. When assessments are not conducted quickly, a community's residents may potentially reoccupy unsafe structures. Effective post-disaster building damage assessment can minimize the possibility for additional bodily injury by advising residents and aiding providers of eminent hazards at specific locations.

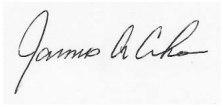
To this end, we recommend the State of Georgia promote participation in existing post-disaster damage assessment training programs like the "When Disaster Strikes Institute."[15] This institute provides hands-on instruction on assessing damage through activities, case studies and interactive simulations that walk participants through various disaster scenarios. The institute stimulates discussion between participants and describes how paperwork should be completed. Participants learn techniques on how to become a properly trained second responder and, on completion, can be relied on to assist with performing post-disaster building assessments.[16]

SUMMARY

We believe it is crucial for the CBDG-MIT Plan to support efforts to enhance Georgia's building codes and their enforcement at both the State and local level. Studies prove that the the adoption and enforcement of up-to-date building codes increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property.

Thank you for the opportunity for the International Code Council to submit our public comments on this extremely important topic. The Code Council is happy to serve as a resource to the State of Georgia and to follow-up with additional materials or data to aid in the development and implementation of the State of Georgia CDBG-MIT Action Plan. Please feel free to contact me with any questions or concerns.

Sincerely,



James A. Cika
Government Relations Regional Manager, GA
International Code Council

[15] See https://learn.iccsafe.org/ihtml/application/student/interface.icc/index.htm?course_id=34141; See also https://learn.iccsafe.org/ihtml/application/student/interface.icc/index.htm?course_id=34141

[16] See https://learn.iccsafe.org/ihtml/application/student/interface.icc/index.htm?course_id=34141

DCA Response: 4/6/2020

Thank you for taking the time to review and comment on the Draft Action Plan. After consideration of your comments, DCA has incorporated the following language into the Action Plan:

"It is anticipated that public service type activities may need to be utilized to complement the mitigation activities proposed in the Method of Distribution. Public service activities may include but are not limited to: implementing and enforcing the most recent modern, resilient, building codes and training, post disaster damage assessment training, and education for construction tradespeople, supervisors, and inspectors."