

State of Georgia
Disaster Recovery Plan

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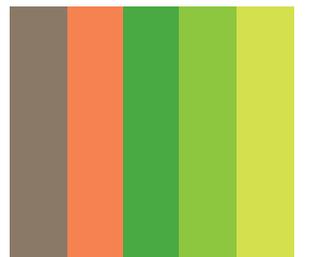
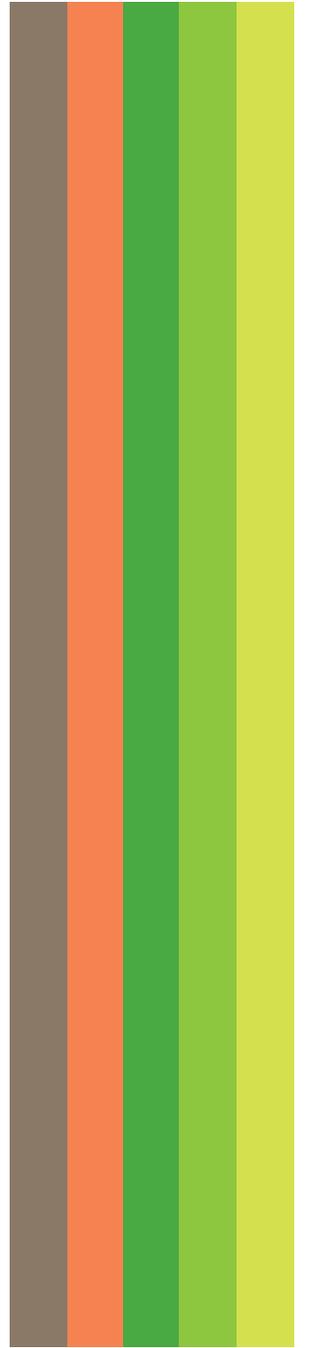


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Executive Summary

On April 10, 2018, HUD allocated \$37,943,000 in Community Development Block Grant Disaster Recovery Funds to the State of Georgia in response to two tornadoes occurring in January 2017 and Hurricane Irma. HUD identified three zip codes as “most impacted” and required that at least 80 percent of the allocation must address unmet needs within those areas. In addition, 15 counties were deemed eligible for FEMA individual and public assistance and therefore eligible for the remaining 20% of the funds. This Action Plan will detail the proposed use of all funds, criteria for eligibility and how the use of these funds will address long-term recovery and restoration, unmet needs, and program administration.

1. Introduction

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 21st and 22nd (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, 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 recovery.

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 trash littered the area causing damages to homes, buildings, and other infrastructure. The widespread nature of the damage resulted in millions of dollars in cleanup costs alone.

Overview of 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. The most concentrated damage was in the city of Adel, where one tornado hit the Sunshine Acres Mobile Home Park. This single neighborhood alone experienced the deaths of seven residents, ranging from 19 to 62 years of age. 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.

Overview of 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 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 mosquitoes 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 her large rainfall totals and the 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.

Summary and Conclusion:

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. Thousands of private citizens and many local governments felt the impact of the damaging winds, wind-tossed debris, flooding, and downed trees and power lines. These smaller, underreported stories are the ones that require the attention of the CDBG-Disaster Recovery funding. After the storms were over, the national newspapers left, and the cleanup began, locals were unable to apply for and receive federal assistance that makes the difference between barely getting by and truly recovering. 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. Many individuals were already back working, trying to put food on their tables for themselves and their families, to deal with the federal requirements at the time. In fact, it took months for many people to truly understand the nature of their recovery needs. It was not until a washed-out drain or a weakened structure failed that these needs were fully realized.

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 feet of storm surge. Roads were washed out, parks were flooded and destroyed, and commercial areas damaged, some buildings beyond repair.

Photographs of the disaster events:



Paradise Village Trailer Park, Dougherty County January 2017 Tornado (Photo by: Brad McEwen Albany Harold)



A family collects salvageable belongings after the January 2017 Tornado. Adel, Ga (Photo by: Branden Camp AJC)



A woman holds a child, after a tornado along Hwy 122 near Barney, Ga (Photo by: Phil Sears AJC)



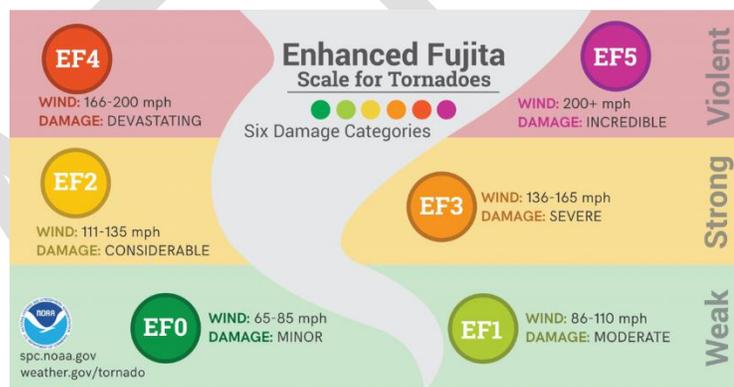
Flooding occurring in the Shady Acres Mobile Home Community in Sterling, located in Glynn County, on September 12, 2017. (Photo by: Tiffany Fields, The Brunswick News)

2. Unmet Needs Background

Community Profile: Summary of Impact and Presidentially Declared Counties

Between January and September of 2017 South Georgia experienced tremendous disasters in the form of tornados, straight line winds, and Hurricane Irma. These disasters damaged homes, destroyed businesses, and above all claimed 14 lives. In accordance with Federal HUD Community Development Block Grant Disaster Recovery funding regulations, the State of Georgia is prepared to assess the unmet needs of the areas affected by the 2017 disasters.

On January 20-22, 2017, an upper-level low pressure system moved along the Gulf Coast and spawned tornados from Texas to South Carolina. Ahead of the storm system, southerly flow allowed warm and moist air to infiltrate the Southeast with record high temperatures exceeding 80°F and dewpoints greater than 70°F. This created conditions favorable for severe weather as colder air from the northwest moved towards the region behind the upper-level low. On January 22, two EF-3 tornados were responsible for 16 fatalities. The deadliest tornado of the outbreak impacted Brooks, Cook, and Berrien counties and killed 11 people. The EF-3 had a path length of nearly 25 miles and a width of 700 yards with estimated winds of 140 mph. The most destructive tornado, in terms of property damage, was an EF-3 that tracked 70.7 miles across southern Georgia. The tornado caused significant damage to homes and businesses in Albany, Georgia, and caused five fatalities and at least 40 injuries.

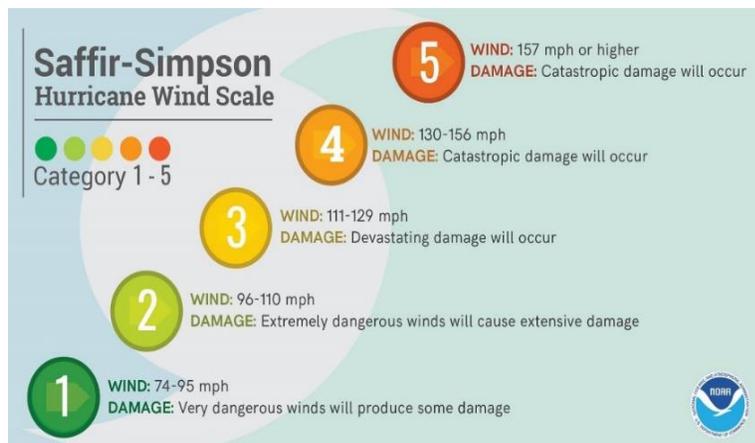


The image above shows the Enhanced Fujita scale and the corresponding magnitude and intensity measures.

A total of 41 tornados were confirmed from January 21-22 in Georgia, making this event the largest two-day outbreak in the state on record. The outbreak featured one of the longer tornado tracks on record, according to data from the National Weather Service. The tornado also had a maximum width spanning 1.25 miles wide. The tornado was on the ground for an hour and 12 minutes, tearing an almost 71-mile path through parts of five Georgia counties. The NWS damage survey noted severe tree damage along the entire path, with 90 to 100 percent of the trees in the path uprooted or snapped. A portion of a Proctor and Gamble plant in Dougherty County collapsed, and a concrete block church was demolished, suggesting estimated winds speeds reached 150 mph.

As a result of Hurricane Irma, In September 2017 major flooding occurred along the Georgia coast, particularly on St. Simon's Island and along the Satilla River. Rainfall totals were generally between 5 and 10 inches in coastal Georgia, and the maximum rainfall measured in the state was 10.34 inches in Nahunta in Brantley County from September 11-12. In Camden County, numerous trees and power lines were damaged due to the strong winds. Dozens of people were rescued by boats near the coast from flooding

caused by storm surge and rainfall. Across the state, there were widespread downed trees, and over 1.5 million people lost power during the storm.



Hurricane intensity categories using the Saffir-Simpson Hurricane Scale.

Hurricane intensity is classified into categories using the Saffir-Simpson Hurricane Scale. Irma was a long-lived Cape Verde hurricane that reached category 5 intensity across the northern Caribbean Islands. Irma made landfall as a category 4 hurricane in the Florida Keys and struck southwestern Florida at category 3 intensity. After hitting South Florida, Irma quickly moved north into Northern Florida, and then northwest into Georgia on September 11th as a tropical storm.

The combined effect of storm surge and the tide produced maximum inundation levels of 3 to 5 ft above ground level along the coast of Georgia. The NOS tide gauge in Chatham County measured a peak water level of 4.7 ft MHHW.¹ The heaviest rainfall totals were confined to southeast Georgia and widespread sustained winds of 30-45 mph with gusts in the 50-65 mph range downed numerous trees and power lines.

Georgians experienced more than approximately \$54.7 million in FEMA verified losses as a result Disasters 4294, 4297, and 4338. In a memo from Todd Richardson, Acting General Deputy Assistant Secretary for Policy Development and Research, HUD estimates there to be more than \$37,943,000 in unmet needs imposing strain on persons affected by the 2017 disasters.² Individual Assistance Applications totaled 10,308 Individuals & households, with \$17,196,246 in approved dollars. Total Public Assistance Grants Dollars totaled \$127,342,879.³

More than 785,704 people were affected by disasters 4294, 4297, and 4338. Of those, 50,141 residents received FEMA individual assistance. Disasters had a real property FEMA Verified Property Loss and an additional 1,780 homes saw verified losses in personal property as a result of this event.¹

Due to the extent of the disasters, President Trump approved major Disaster Declarations for 15 counties within the State of Georgia. The Declarations were made for the severe storms, tornadoes, and straight-line wind events on January 26, 2017 and Hurricane Irma on September 15, 2017. A list of the counties and disaster events can be seen in Table 1 below.

¹ NOAA Hurricane Irma Report

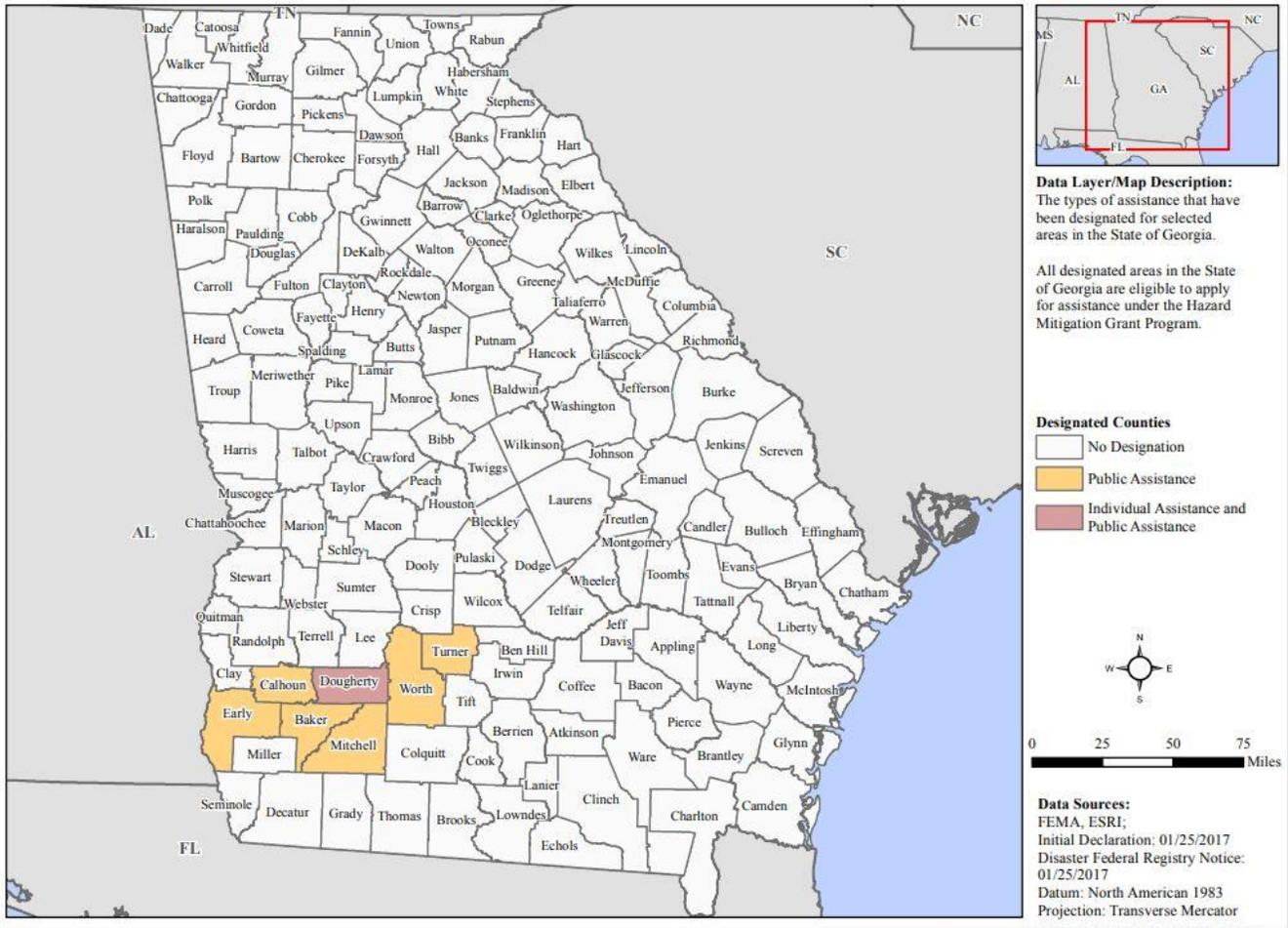
² Memo from Todd Richardson, Acting General Assistant Secretary for Policy Development and Research

³ www.fema.gov/disaster/4294

Table 1: List of disaster events by county

COUNTY	DISASTER EVENT
BERRIEN	Severe Storms, Tornadoes, and Straight-line Winds (DR 4297)
CAMDEN	Hurricane Irma (DR 4338)
CHARLTON	Hurricane Irma (DR 4338)
CHATHAM	Hurricane Irma (DR 4338)
COFFEE	Hurricane Irma (DR 4338)
COOK	Severe Storms, Tornadoes, and Straight-line Winds (DR 4297)
CRISP	Severe Storms, Tornadoes, and Straight-line Winds (DR 4297)
DOUGHERTY	Severe Storms, Tornadoes, and Straight-line Winds (DR 4294); (DR 4297)
GLYNN	Hurricane Irma (DR 4338)
LIBERTY	Hurricane Irma (DR 4338)
MCINTOSH	Hurricane Irma (DR 4338)
THOMAS	Severe Storms, Tornadoes, and Straight-line Winds (DR 4297)
TURNER	Severe Storms, Tornadoes, and Straight-line Winds (DR 4297)
WILCOX	Severe Storms, Tornadoes, and Straight-line Winds (DR 4297)
WORTH	Severe Storms, Tornadoes, and Straight-line Winds (DR 4297)

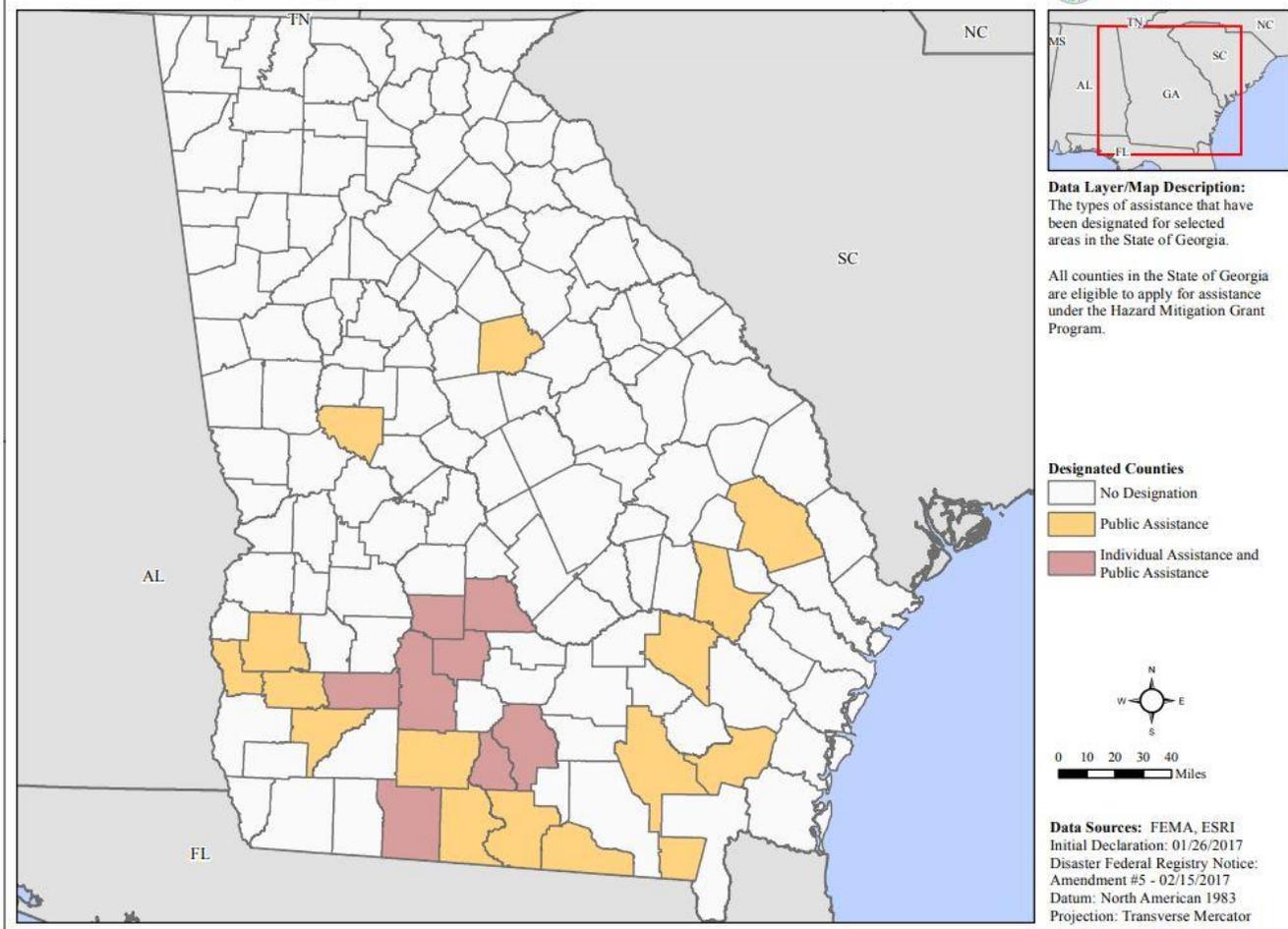
FEMA-4294-DR, Georgia Disaster Declaration as of 01/25/2017



The Disaster Declaration for the severe storms, tornadoes, and straight-line winds occurring on January 2, 2017 is shown in the figure above. Dougherty County was deemed eligible for Public Assistance and Individual Assistance.



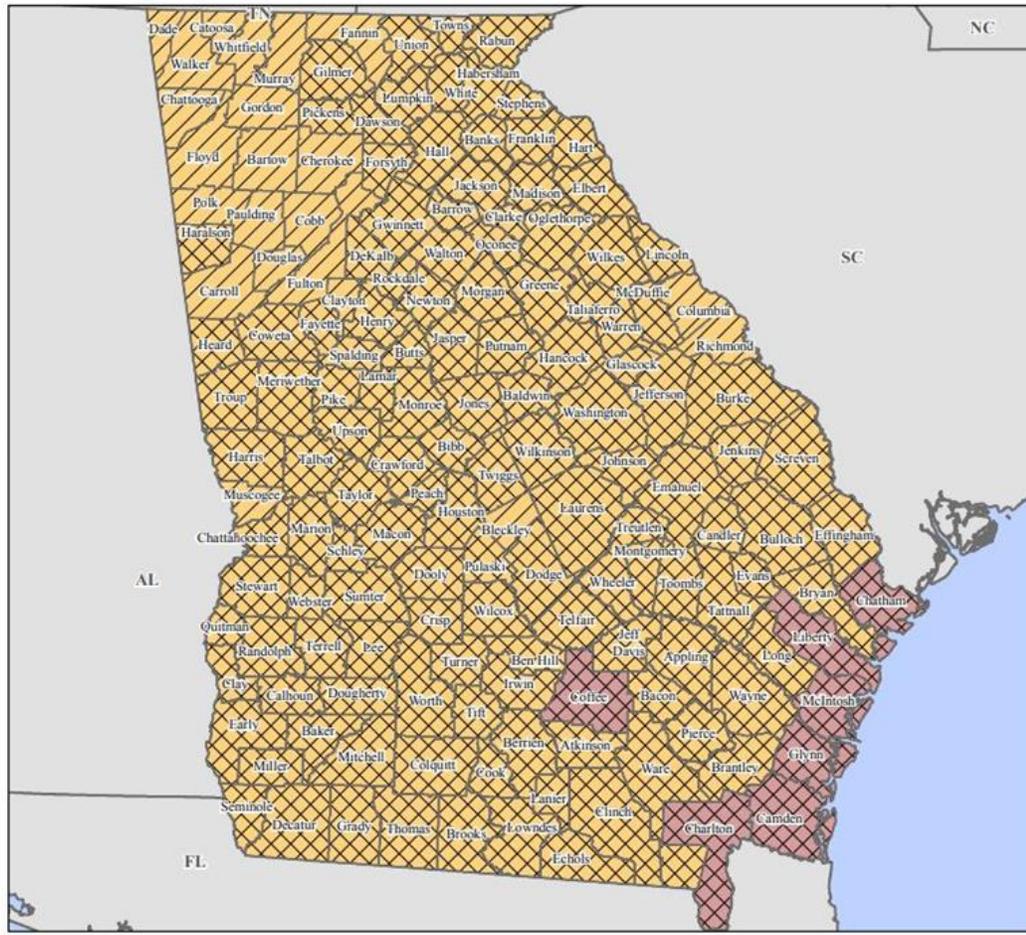
FEMA-4297-DR, Georgia Disaster Declaration as of 03/06/2017



An image depicting the Disaster Declaration for the severe storms, tornadoes, and straight-line winds occurring on January 21-22, 2017 can be seen in the image above. The following counties were deemed eligible to receive Individual and Public Assistance: Berrien, Cook, Crisp, Dougherty, Thomas, Turner, Wilcox, and Worth.



FEMA-4338-DR, Georgia Disaster Declaration as of 10/26/2017

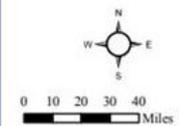


Data Layer/Map Description:
The types of assistance that have been designated for selected areas in the State of Georgia.

All designated areas in the State of Georgia are eligible to apply for assistance under the Hazard Mitigation Grant Program.

Designated Counties

- Public Assistance (Categories A and B)
- Individual Assistance and Public Assistance (Categories A - G)
- Public Assistance (Categories A - G)

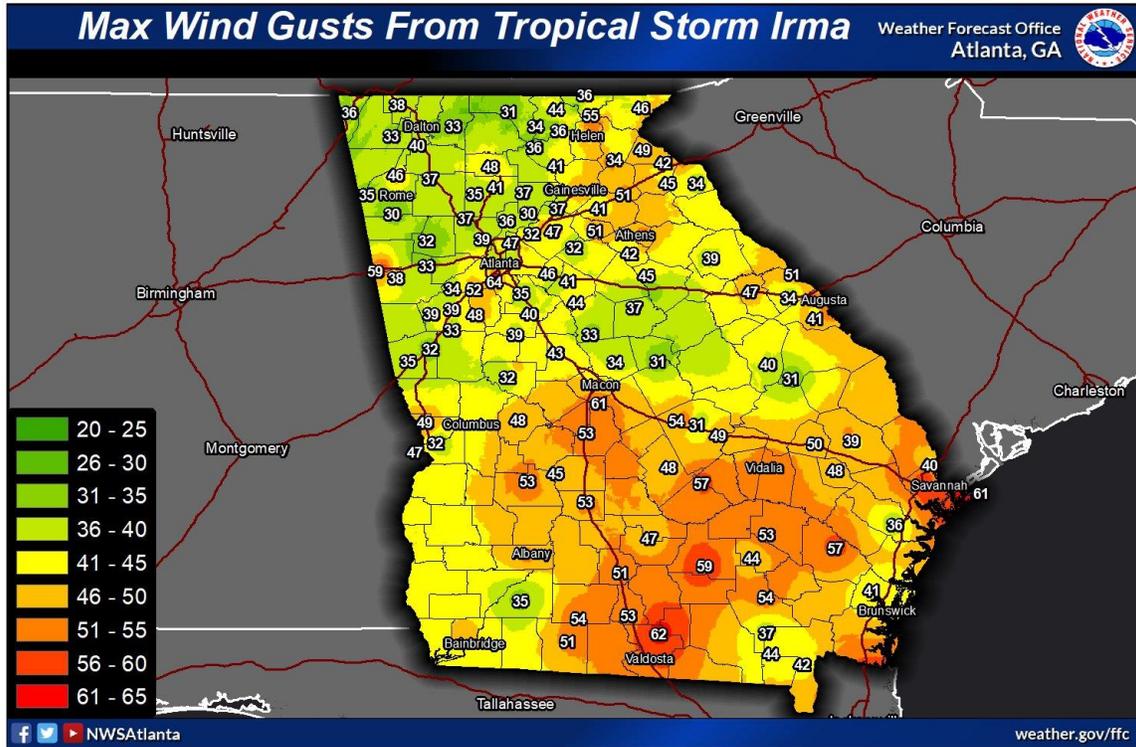


Data Sources:
FEMA, ESRI;
Initial Declaration: 09/15/2017
Disaster Federal Registry Notice:
Amendment #7 - 10/26/2017
Datum: North American 1983
Projection: Transverse Mercator

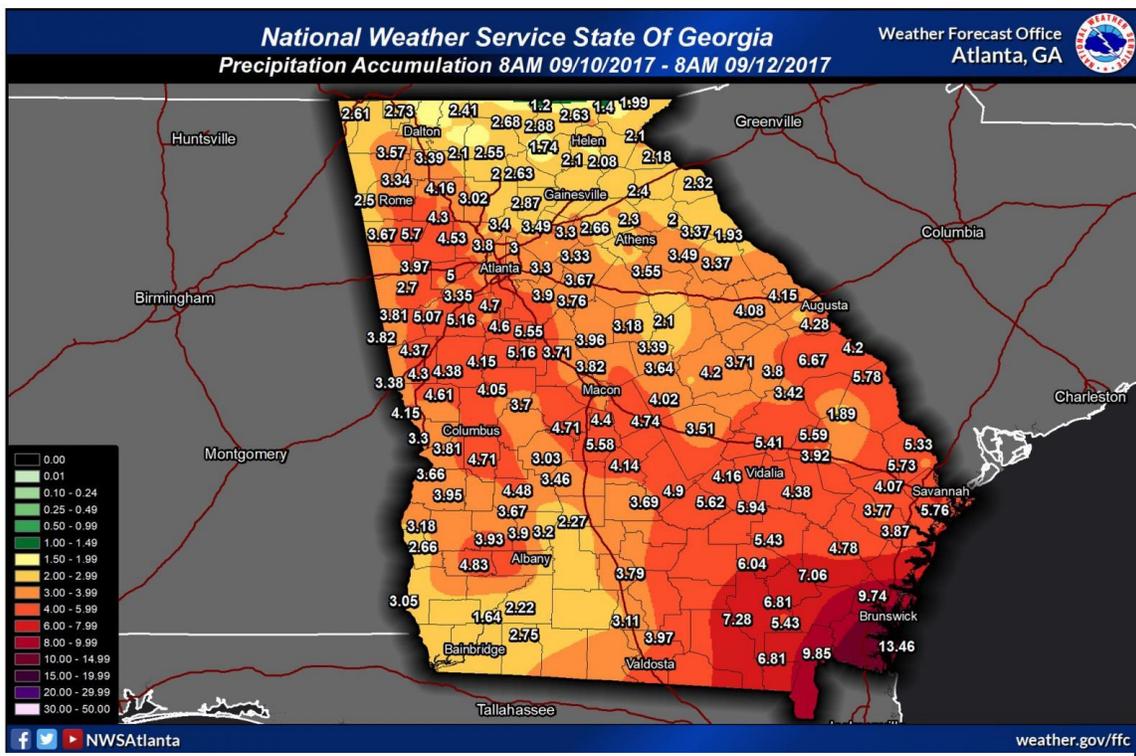
MapID 561993ed589110171131hqprod

An image depicting the Disaster Declaration for Hurricane Irma occurring in September 2017 can be seen above. The following counties were deemed eligible to receive Individual and Public Assistance: Camden, Charlton, Chatham, Coffee, Glynn, Liberty, and McIntosh.

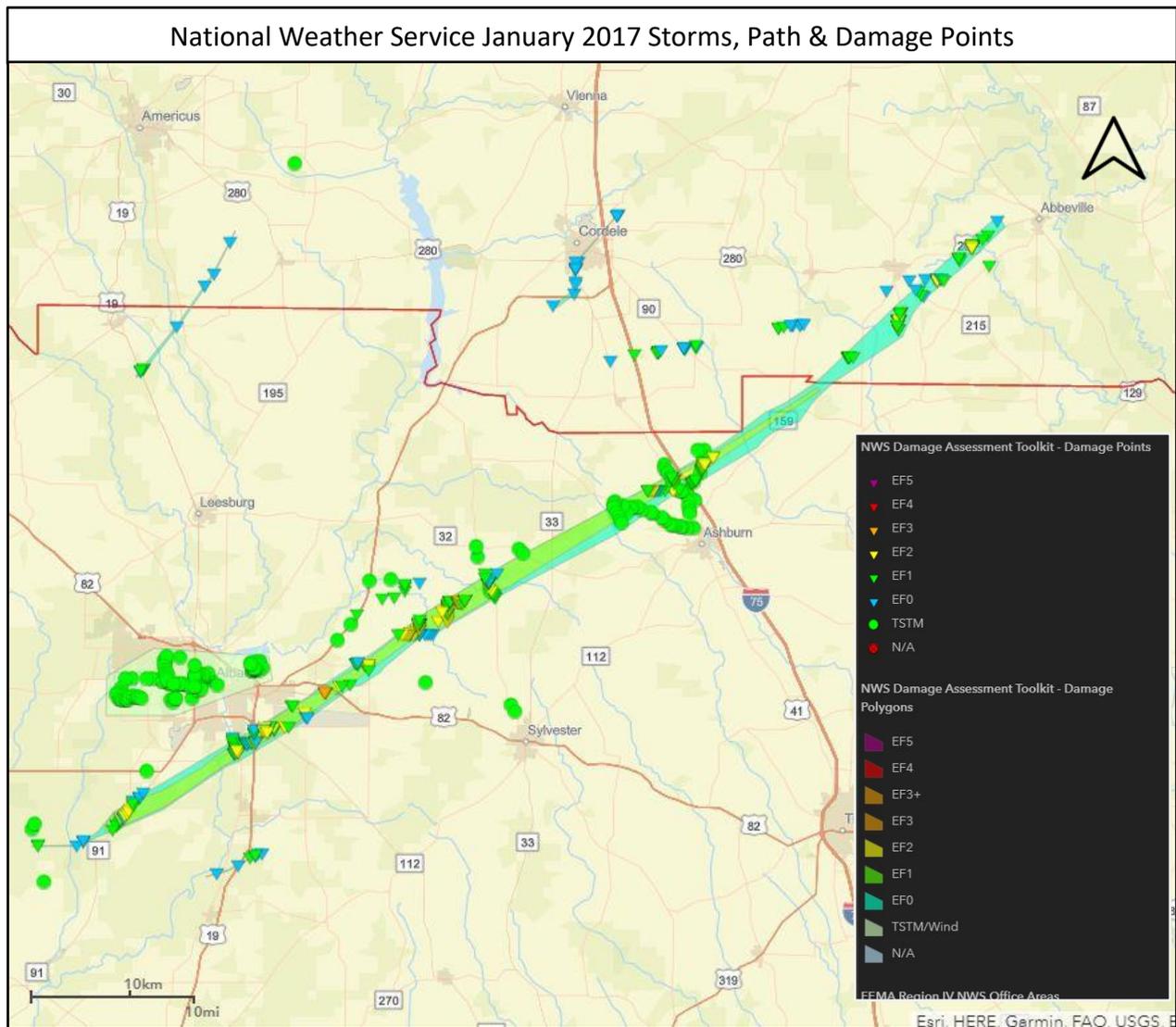




The figure above shows max wind gusts in Georgia resulting from Tropical Storm Irma. Southern Georgia and Southeast Georgia experienced the greater wind gusts.



The figure above shows precipitation accumulation in Georgia as a result of Hurricane Irma. Coastal Georgia experienced the highest amounts of precipitation with Camden and Glynn Counties receiving the most rain.



The image above shows the path and damage points for the storms occurring in January 2017. This information and graphic was obtained from the National Weather Service Damage Assessment Dashboard.



Targeting Priority Needs

Through partnerships with the affected local city and county governments, the state has composed a comprehensive plan that seeks to address unmet needs. The percentage of persons living below the poverty level within the three most impacted zip codes ranges from 13.2-35.0%.⁴ These residents generally do not have the ability to adequately prepare for, respond to, and rebound from disasters, environmental impacts, shocks, and stresses. The Georgia CDBG-DR program constructed an index value to prioritize and determine the amount of funding that will be made available to grantees in order to fulfill unmet needs. The index was created by utilizing census, SOVI, FEMA, SBA, and HUD data.

Utilizing the social vulnerability index (SOVI) in concert with FEMA damage data provides a standardized, replicable, and pragmatic process for understanding where resources would be most helpful in driving successful disaster recovery. While overlaying the FEMA and SOVI data, DCA's GIS team created a visualization of loss and vulnerability for the state showing densely populated areas such as the City of Savannah, Albany and Brunswick. These areas showed high social vulnerability and were also some of the most impacted areas from the disasters. Populations residing in more rural areas of the state are also characterized by higher levels of social vulnerability. FEMA provided an address list of Individual Assistance (IA) applicants and identified those applicants with a FEMA verified real property (housing) loss.

Targeting resources to these most heavily impacted and vulnerable areas will yield the highest benefit since these areas are less able to recover from a disaster without outside assistance. Targeting support for areas of high damage and high social vulnerability to the immediate and long-term recovery phases of the flood disaster will yield the best outcomes for those with the highest need. The comprehensive analysis of Unmet Needs is discussed in great detail in Section 3, Unmet Needs Assessment.

⁴ City-Data 31705, 31548, 31520

3. Impact and Unmet Needs Assessment

Demographic Profile of Most Impacted and Distressed Areas

While many community characteristics across the impacted area are similar to state trends and percentages, there are specific socio-demographic differences. The table below shows a breakdown of socio-economics and demographics for the three most impacted zip codes from the 2017 Disasters. Two of the three most impacted zip codes have higher rates of populations that are not high school graduates, this coupled with more than 30% of households earning less than \$15,000 per year compounds the issue of poverty within zip codes 31520 and 31705. These population estimates were obtained from the U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates.

TOPIC	ZIP CODE 31520	ZIP CODE 31548	ZIP CODE 31705
POPULATION	22,167	20,720	32,979
PERCENTAGE OF POPULATION AGES 65+	15.2%	9.8%	11.4%
MEDIAN AGE	38.2	32.2	31.4
MEDIAN HOUSEHOLD INCOME	\$ 27,444	\$ 52,846	\$ 26,809
HOUSEHOLDS EARNING LESS THAN 15K PER YEAR	30.8%	8.4%	30.4%
POPULATION 18-24 LESS THAN HIGH SCHOOL GRADUATE	24.4%	25.4%	14.2%
HOUSEHOLDS RECEIVING FOOD STAMP BENEFITS IN PAST 12 MONTHS	32.5%	11.2%	33.2%

According to the U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates, there is a high percentage of renters living within the area of impact. In particular, in Dougherty County 54.23% of residents rent while 45.77% own a home. (Table below)

HOUSING OCCUPANCY: RENTER/OWNER OCCUPIED					
COUNTY	OWNERS	% OWNERS	RENTERS	% RENTERS	TOTAL
BERRIEN	5,058	71.16%	2,050	28.84%	7,108
CAMDEN	10,846	58.13%	7,812	41.87%	18,658
CHARLTON	2,588	74.50%	886	25.50%	3,474
CHATHAM	57,385	53.76%	49,364	46.24%	10,6749
COFFEE	9,308	65.97%	4,802	34.03%	14,110
COOK	4,114	68.81%	1,865	31.19%	5,979
CRISP	4,876	57.30%	3,633	42.70%	8,509
DOUGHERTY	16,090	45.77%	19,066	54.23%	35,156
GLYNN	19,760	60.57%	12,863	39.43%	32,623
LIBERTY	10,368	45.51%	12,412	54.49%	22,780
MCINTOSH	4,116	79.05%	1,091	20.95%	5,207
THOMAS	10,460	60.57%	6,809	39.43%	17,269
TURNER	2,141	69.72%	930	30.28%	3,071
WILCOX	1,955	72.46%	743	27.54%	2,698
WORTH	5,533	70.28%	2,340	29.72%	7,873

Median Household Income and Population Estimates by County ACS 2012-2016		
County	Median Household income	Population estimate
Berrien	\$35,740	19,186
Camden	\$53,327	53,044
Charlton	\$43,871	12,715
Chatham	\$49,596	290,501
Coffee	\$34,536	43,014
Cook	\$35,199	17,277
Crisp	\$31,672	22,736
Dougherty	\$33,605	89,502
Glynn	\$46,475	85,282
Liberty	\$42,484	61,386
McIntosh	\$45,248	14,106
Thomas	\$38,241	44,779
Turner	\$34,667	7,961
Wilcox	\$34,071	8,800
Worth	\$38,684	20,533

Impact on Low and Moderate-Income Populations

All programs supported by HUD CDBG Disaster Recovery assistance must demonstrate benefit to individuals and communities by meeting one of the program's three National Objectives for all money spent on projects. The national objectives are:

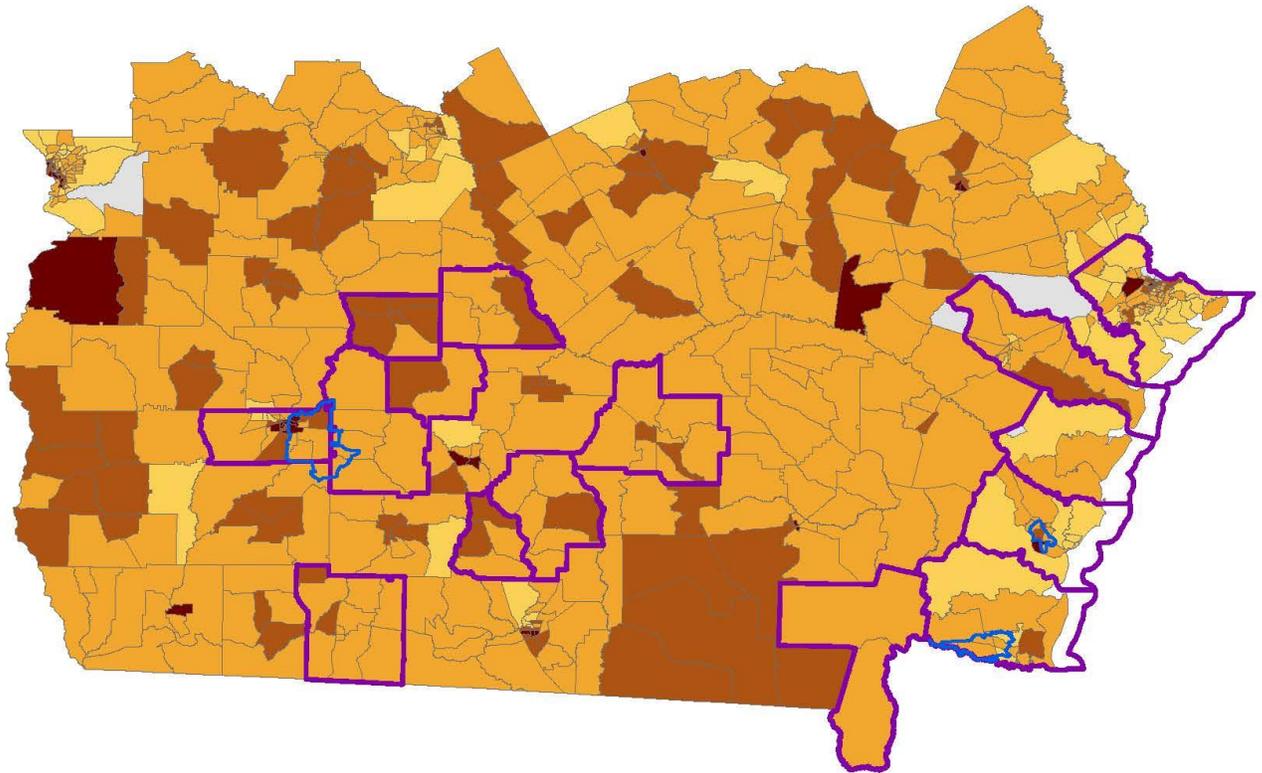
- (1) Benefiting low-and moderate- income (LMI) persons
- (2) Aiding in the prevention or elimination of slums or blight
- (3) Meeting a need having particular urgency (urgent need)

Low to moderate income households are defined as households that do not exceed 80% of the median income for their area, as determined by HUD. These income categories are grouped into the following classifications:

- Very low income** – has an annual income at 30% or below the area median income
- Low income** – has an annual income at 31% to 50% of the area median income; and
- Moderate income** – has an annual income at 51% to 80% of the area median income.

HUD Program Income Limits are published annually for use across all HUD funded programs. Income limits differ by county. County specific HUD income limits are located in the Appendices.

Percentage of persons below poverty



Legend

 3 most impacted zip codes

 Impacted county

Poverty

 No data

 Less than 9.9%

 10% - 29.9%

 30% - 44.9%

 45% - 94.4%

Data source: Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry (ATSDR)/ Geospatial Research, Analysis, and Services Program. Social Vulnerability Index 2016 Database Georgia. <http://svi.cdc.gov/SVIDataToolsDownload.html>. Accessed on 2016

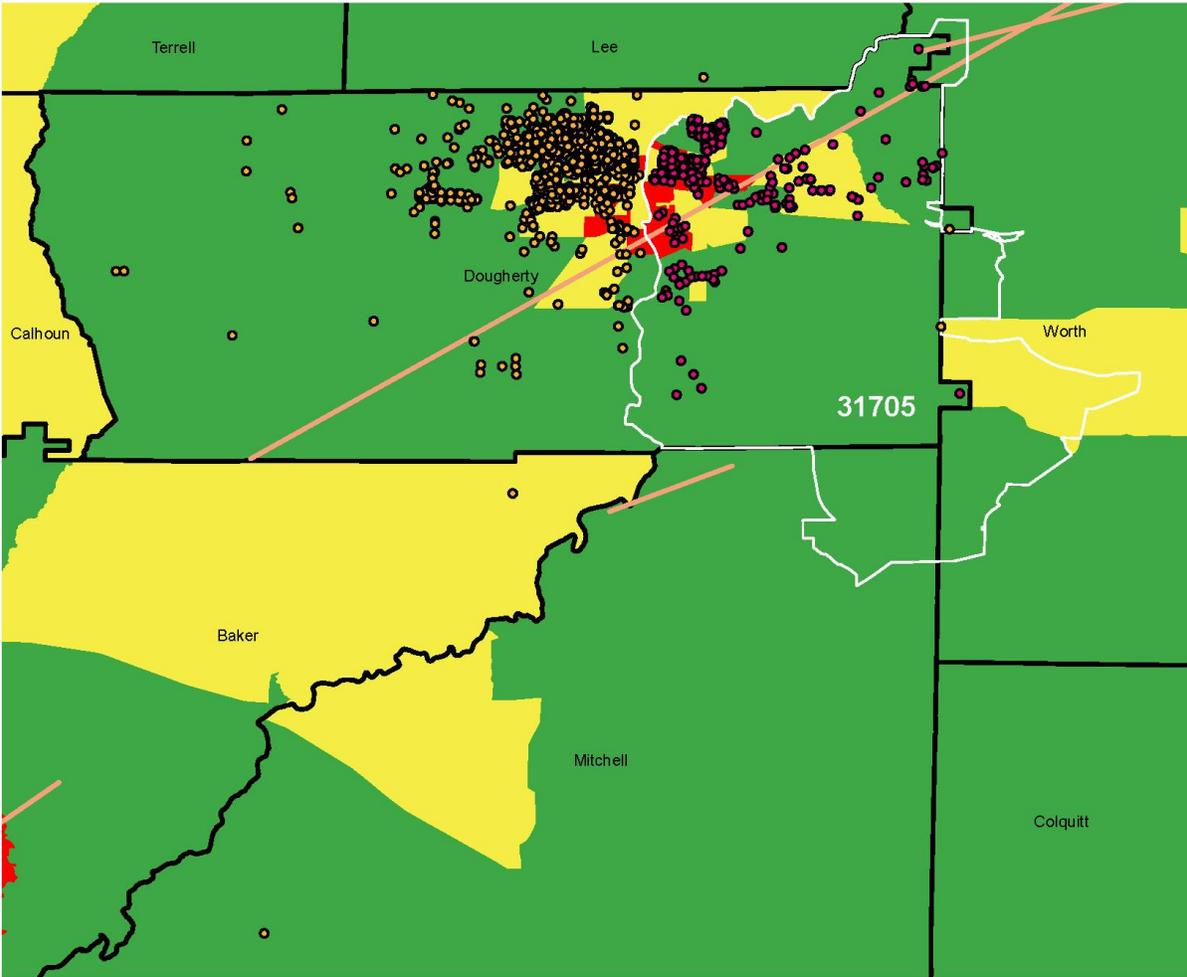
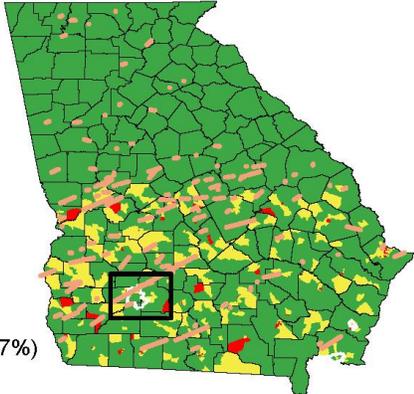
ATSDR's Geospatial Research, Analysis & Services Program (GRASP) created the Social Vulnerability Index (SVI) to help public health officials and emergency response planners identify and map the communities that will most likely need support before, during, and after a hazardous event.

The SVI provides specific socially and spatially relevant information to help public health officials and local planners better prepare communities to respond to emergency events such as severe weather, floods, disease outbreaks, or chemical exposure.

Number of Applicants for DR- 4294

% of Low & Moderate Income Households in Block Group

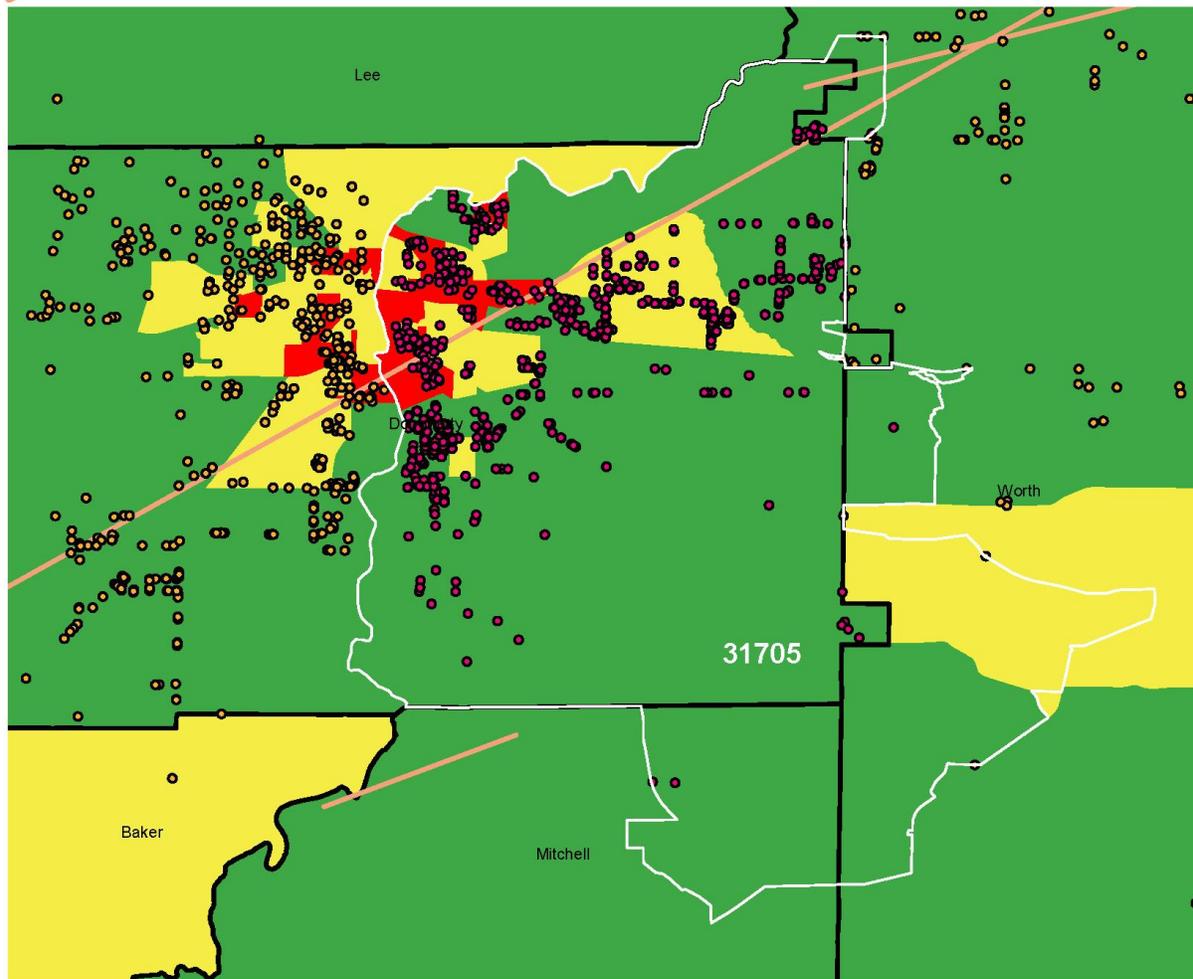
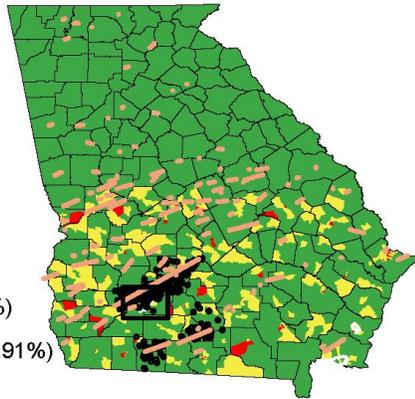
- Greater than 75.0% : 291 damaged properties (40.25%)
- 51.0% - 74.9% : 280 damaged properties (38.73%)
- Less than 51.0% : 152 damaged properties (21.02%)
- Within Most Impacted Zip Codes: 723 damaged properties (20.3%)
- Not Within Most Impacted Zip Codes: 2,837 damaged properties (79.7%)
- Zip Code 31705 (Dougherty, Mitchell, Worth)
- Storm Paths in 2017



Number of Applicants for DR- 4297

% of Low & Moderate Income Households in Block Group

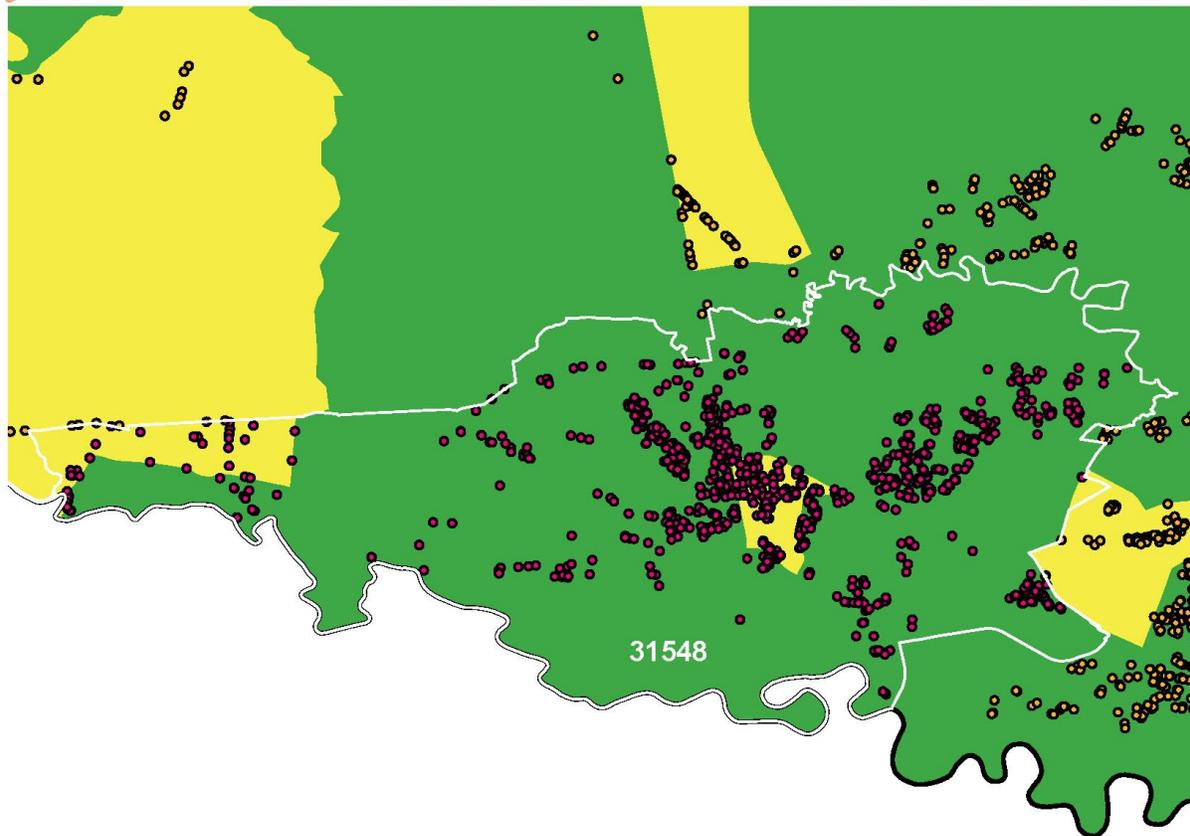
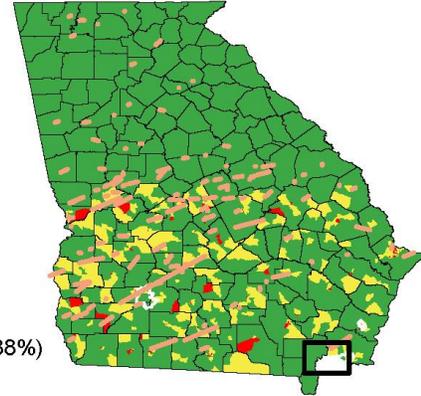
- Greater than 75.0% : 106 damaged properties (6.29%)
- 51.0% - 74.9% : 570 damaged properties (33.83%)
- Less than 51.0% : 1,009 damaged properties (59.88%)
- Within Most Impacted Zip Codes: 1,685 damaged properties (49.09%)
- Not Within Most Impacted Zip Codes: 1,747 damaged properties (50.91%)
- Zip Code 31705 (Dougherty, Mitchell, Worth)
- Storm Paths in 2017



Number of Applicants for DR- 4338

% of Low & Moderate Income Households in Block Group

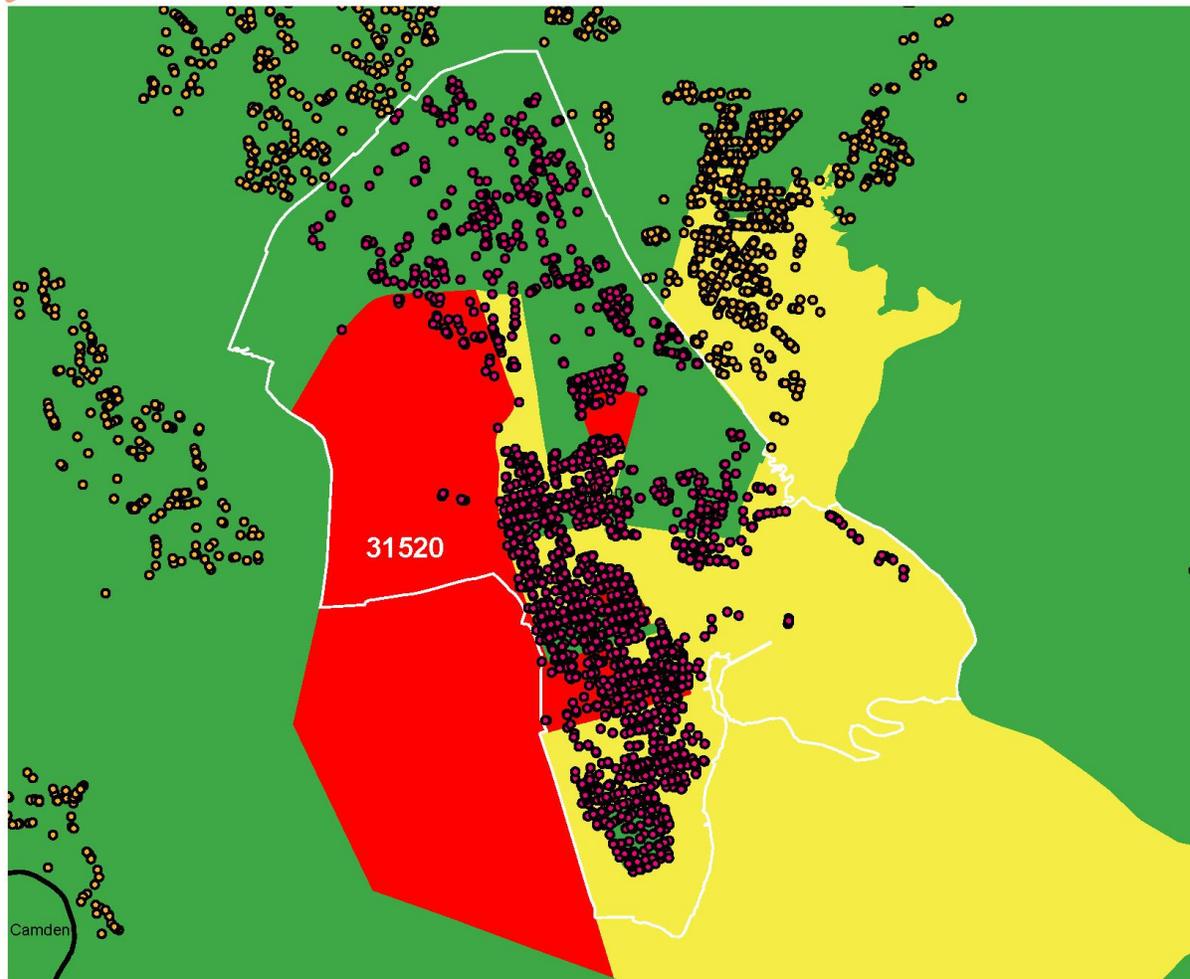
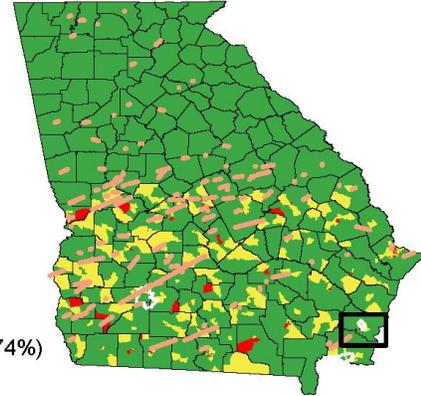
- Greater than 75.0% : 0 damaged properties (0%)
- 51.0% - 74.9% : 383 damaged properties (17.83%)
- Less than 51.0% : 1,764 damaged properties (82.17%)
- Within Most Impacted Zip Code: 2,147 damaged properties (4.12%)
- Not Within Most Impacted Zip Code: 50,027 damaged properties (95.88%)
- Zip Code 31548 (Camden)
- Storm Paths in 2017



Number of Applicants for DR- 4338

% of Low & Moderate Income Households in Block Group

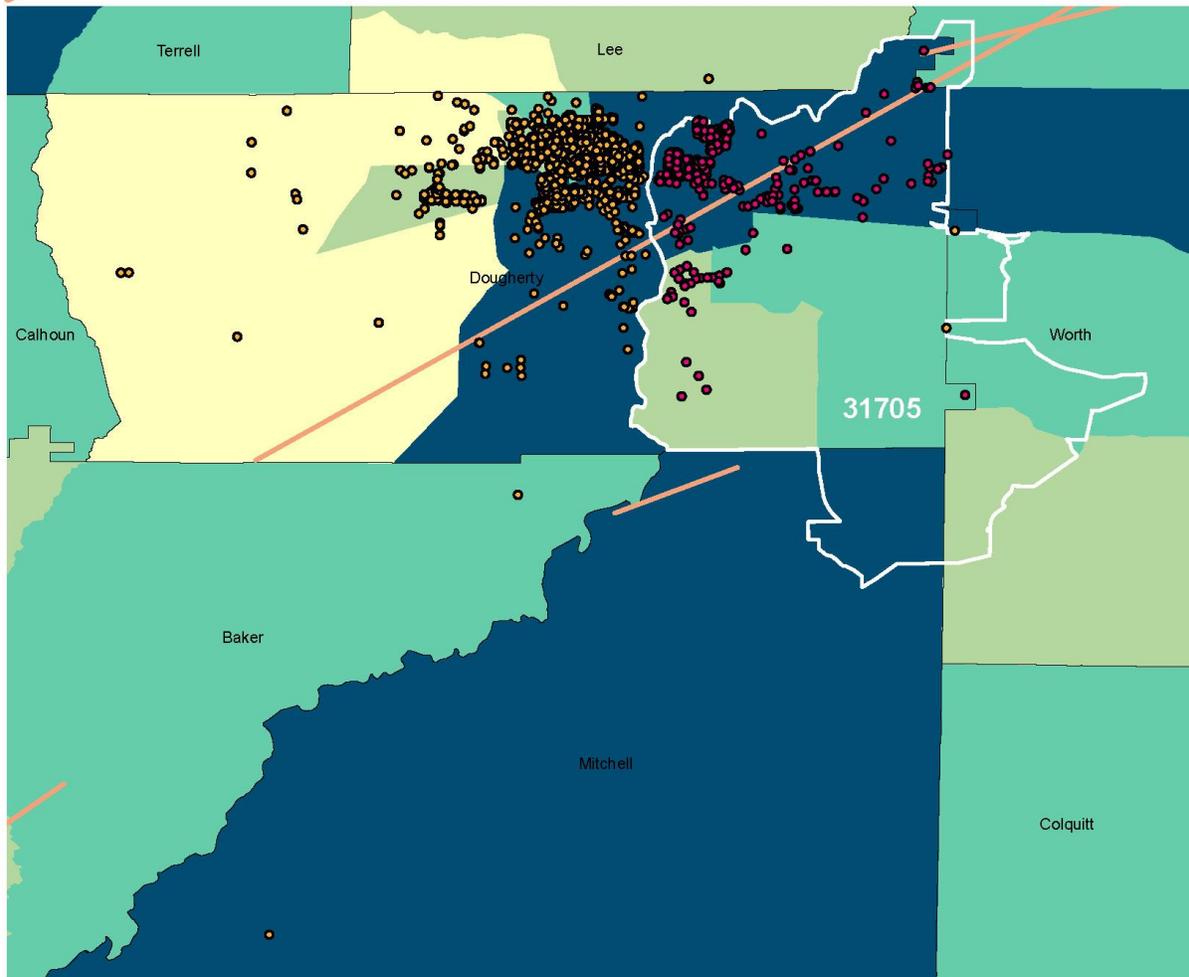
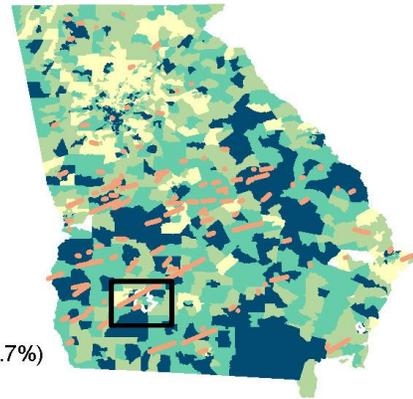
- Greater than 75.0% : 861 damaged properties (17.85%)
- 51.0% - 74.9% : 2,275 damaged properties (47.16%)
- Less than 51.0% : 1,688 damaged properties (34.99%)
- Within Most Impacted Zip Code: 4,824 damaged properties (9.26%)
- Not Within Most Impacted Zip Code: 47,350 damaged properties (90.74%)
- Zip Code 31520 (Glynn)
- Storm Paths in 2017



Number of Applicants for DR- 4294

Social Vulnerability Index

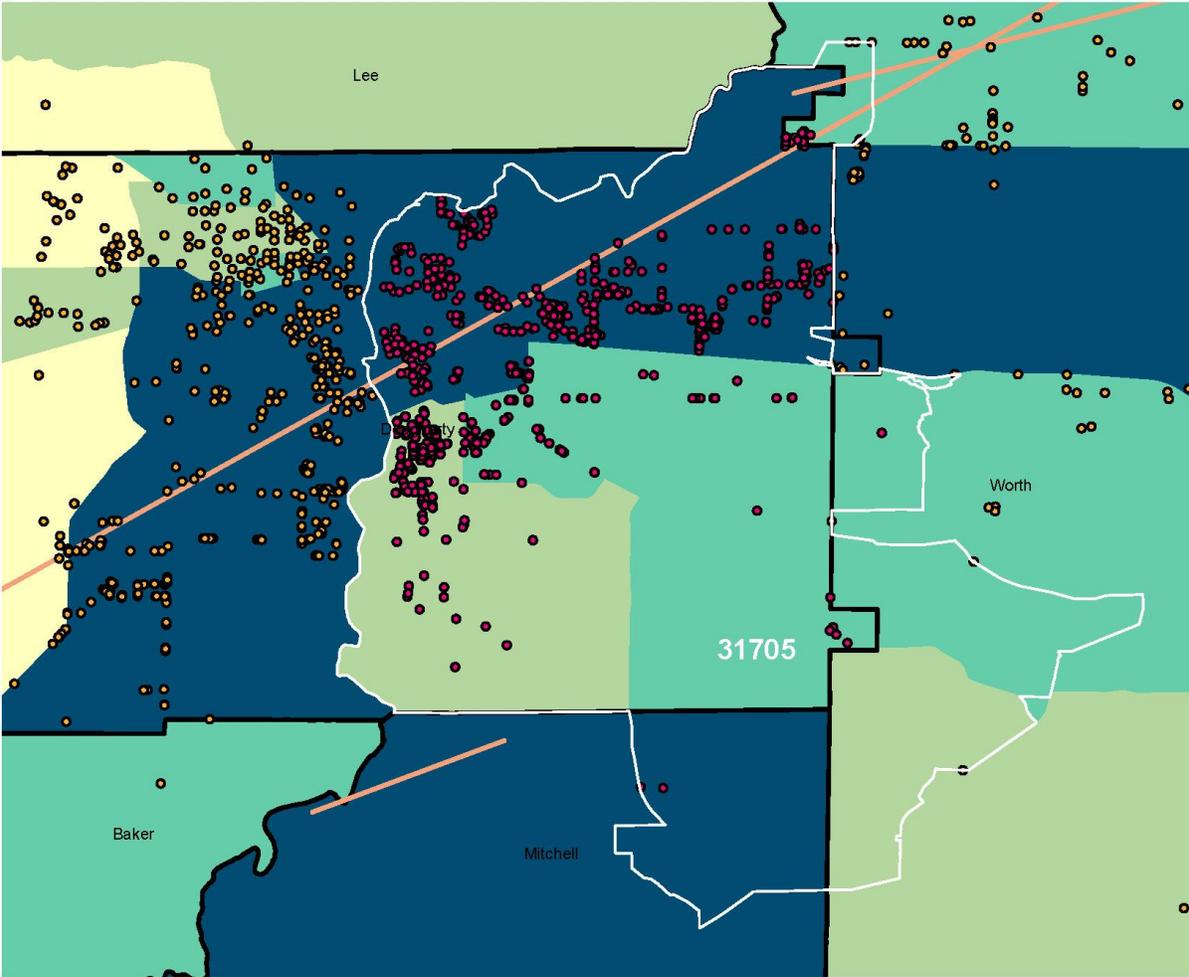
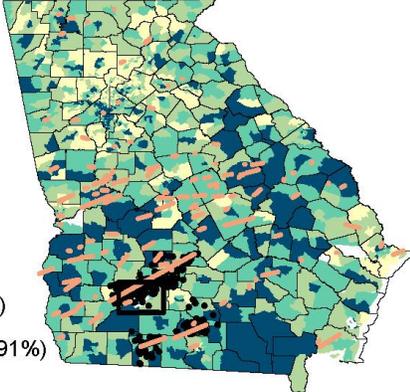
- Highest (Top 4th) : 670 damaged properties (92.66%)
- Higher Middle 4th : 30 damaged properties (4.14%)
- Lower Middle 4th : 23 damaged properties (3.2%)
- Lowest (Bottom 4th) : 0 damaged properties (0%)
- Within Most Impacted Zip Codes: 723 damaged properties (20.3%)
- Not Within Most Impacted Zip Codes: 2.837 damaged properties (79.7%)
- Zip Code 31705 (Dougherty, Mitchell, Worth)
- Storm Paths in 2017



Number of Applicants for DR- 4297

Social Vulnerability Index

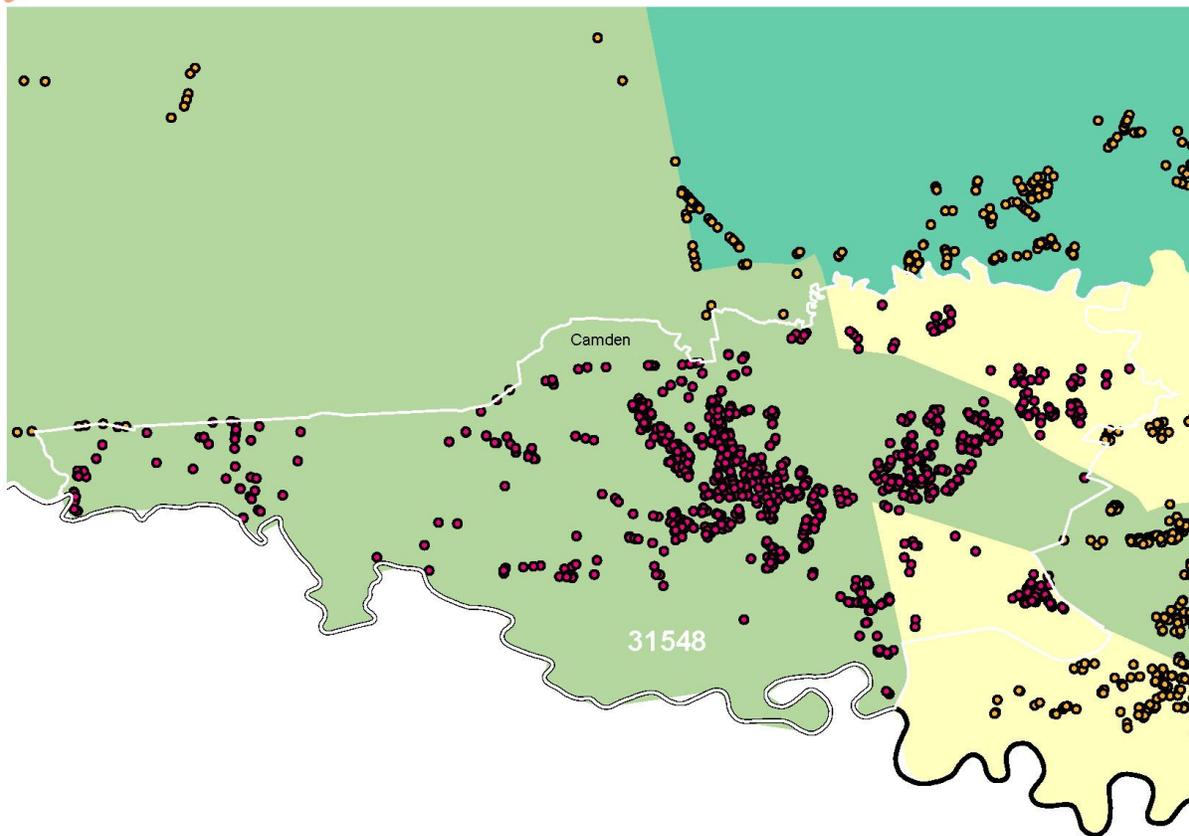
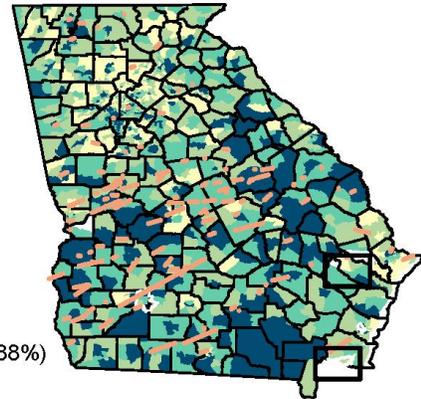
- Highest (Top 4th) : 913 damaged properties (54.18%)
- Higher Middle 4th : 376 damaged properties (22.31%)
- Lower Middle 4th : 396 damaged properties (23.51%)
- Lowest (Bottom 4th) : 0 damaged properties (0%)
- Within Most Impacted Zip Codes: 1,685 damaged properties (49.09%)
- Not Within Most Impacted Zip Codes: 1,747 damaged properties (50.91%)
- Zip Code 31705 (Dougherty, Mitchell, Worth)
- Storm Paths in 2017



Number of Applicants for DR- 4338

Social Vulnerability Index

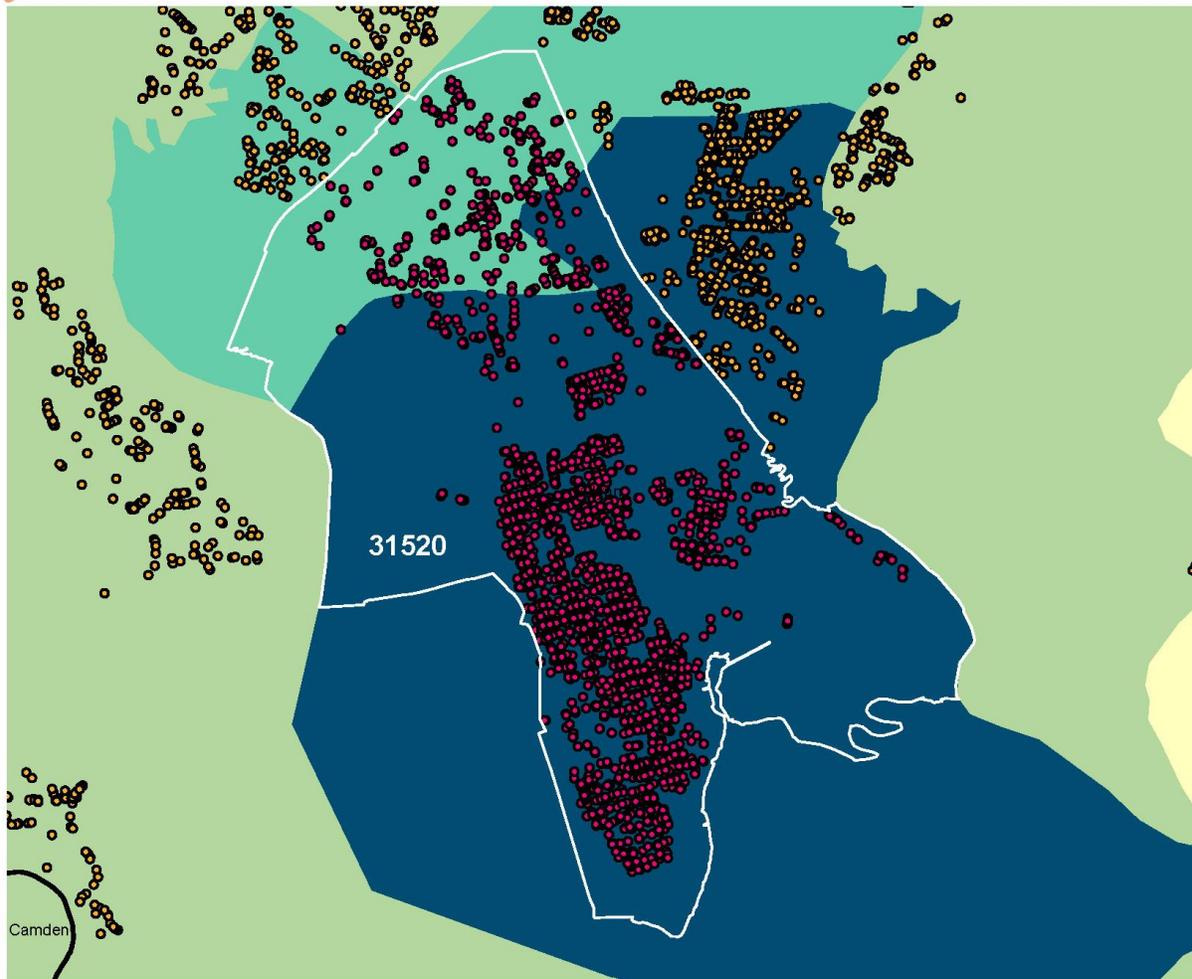
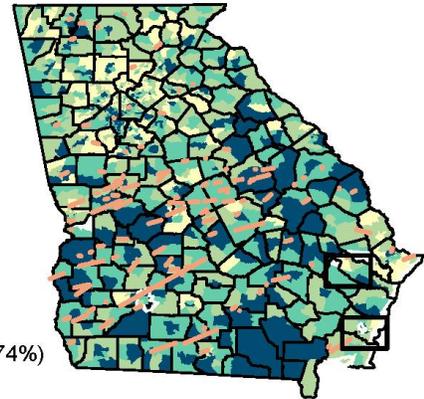
- Highest (Top 4th) : 0 damaged properties (0%)
- Higher Middle 4th : 0 damaged properties (0%)
- Lower Middle 4th : 1,950 damaged properties (90.82%)
- Lowest (Bottom 4th) : 197 damaged properties (9.18%)
- Within Most Impacted Zip Code: 2,147 damaged properties (4.12%)
- Not Within Most Impacted Zip Code: 50,027 damaged properties (95.88%)
- Zip Code 31548 (Camden)
- Storm Paths in 2017



Number of Applicants for DR- 4338

Social Vulnerability Index

- Highest (Top 4th) : 4,300 damaged properties (89.14%)
- Higher Middle 4th : 524 damaged properties (10.86%)
- Lower Middle 4th : 0 damaged properties (0%)
- Lowest (Bottom 4th) : 0 damaged properties (0%)
- Within Most Impacted Zip Code: 4,824 damaged properties (9.26%)
- Not Within Most Impacted Zip Code: 47,350 damaged properties (90.74%)
- Zip Code 31520 (Glynn)
- Storm Paths in 2017



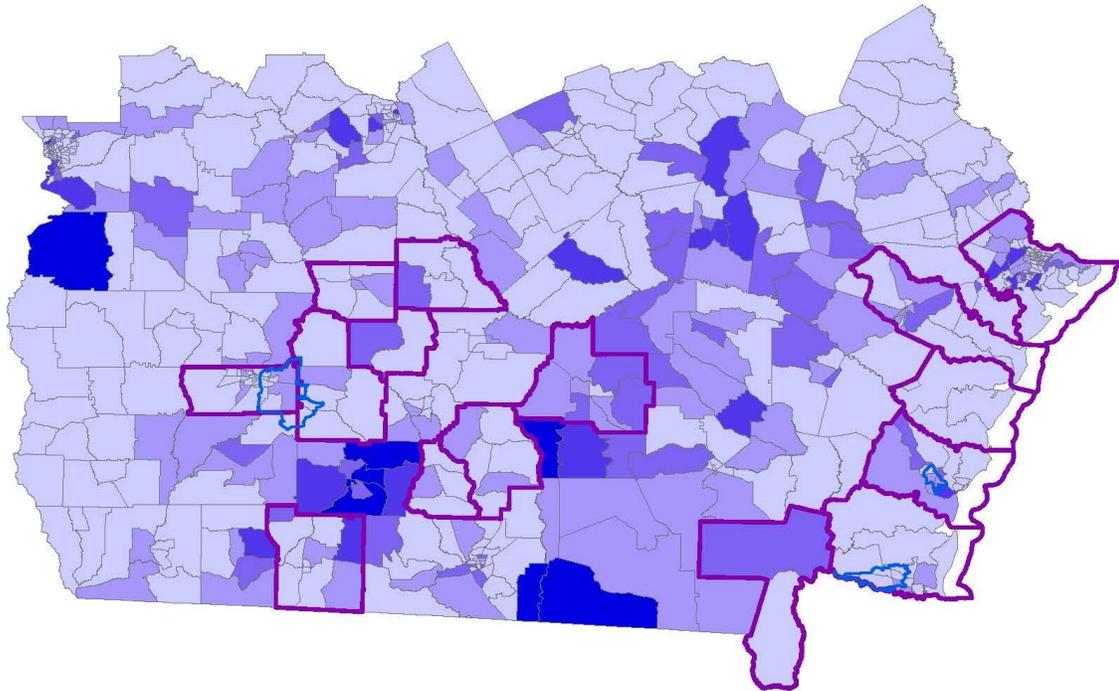
Impact on Special Needs Populations

Individuals with access and functional needs limitations will require assistance with accessing and/or receiving disaster resources. These individuals could be children, older adults, pregnant women, from diverse cultures, transportation disadvantaged, homeless, have chronic medical disorders, and/or a pharmacological dependency. They could have disabilities, live in institutions, have limited English proficiency or altogether non-English speaking. Specialized resources may include, but are not limited to social services, accommodations, information, transportation, or medications to maintain health. Regardless of the nature of the need, care must be taken to ensure that all individuals are able to access disaster recovery resources.

According to U.S. Census data, approximately 3 to 10% of the population in the impacted counties speaks a language other than English at home and does not understand English well, with Charlton (9.6%), Glynn (8.6%), Coffee (10.4%), and Turner (6.3%) counties having the highest relative percent of the population speaking different languages and not understanding English well.¹⁰ Careful consideration of the language needs of these populations will be taken during the applicant intake process. The table below indicates the number of residents who speak only English or who speak Spanish or other languages, by county. In total, over 33,000 residents in the impacted counties primarily speak Spanish in the home, while over 50,000 speak a language other than English.

Language Spoken at Home and Ability to Speak English						
County	Speaks Only English		Speaks Spanish		Speaks Language Other Than English	
	Number	Percent	Number	Percent	Number	Percent
Berrien	16,785	94.2%	815	4.6%	1,039	5.8%
Camden	44,890	93.3%	2,118	4.4%	3,198	6.7%
Charlton	11,102	90.4%	1,082	8.8%	1,183	9.6%
Chatham	238,513	90.4%	13,866	5.3%	25,266	9.6%
Coffee	35,948	89.6%	3,623	9.0%	4,177	10.4%
Cook	15,235	94.5%	642	4.0%	716	4.5%
Crisp	20,511	95.3%	562	2.6%	1,016	4.7%
Dougherty	82,766	96.6%	1,612	1.9%	2,948	3.4%
Glynn	70,868	91.4%	4,955	6.4%	6,703	8.6%
Liberty	29,712	96.8%	641	2.1%	993	3.2%
McIntosh	12,911	97.2%	194	1.5%	376	2.8%
Thomas	40,162	95.5%	1,431	3.4%	1,896	4.5%
Turner	7,170	93.7%	375	4.9%	482	6.3%
Wilcox	8,078	95.6%	333	3.9%	371	4.4%
Worth	31,510	94.8%	1,187	3.6%	1,738	5.2%

Percentage of persons (age 5+) who speak English "less than well"



Legend

 3 most impacted zip codes

 Impacted county

Limited English

 0% - 0.9%

 1% - 2.5%

 2.6% - 4.9%

 5% - 9.9%

 10% - 18.2%

Data source: Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry (ATSDR)/ Geospatial Research, Analysis, and Services Program. Social Vulnerability Index 2016 Database Georgia. <http://svi.cdc.gov/SVIDataToolsDownload.html>. Accessed on 2016

ATSDR's Geospatial Research, Analysis & Services Program (GRASP) created the Social Vulnerability Index (SVI) to help public health officials and emergency response planners identify and map the communities that will most likely need support before, during, and after a hazardous event.

The SVI provides specific socially and spatially relevant information to help public health officials and local planners better prepare communities to respond to emergency events such as severe weather, floods, disease outbreaks, or chemical exposure.

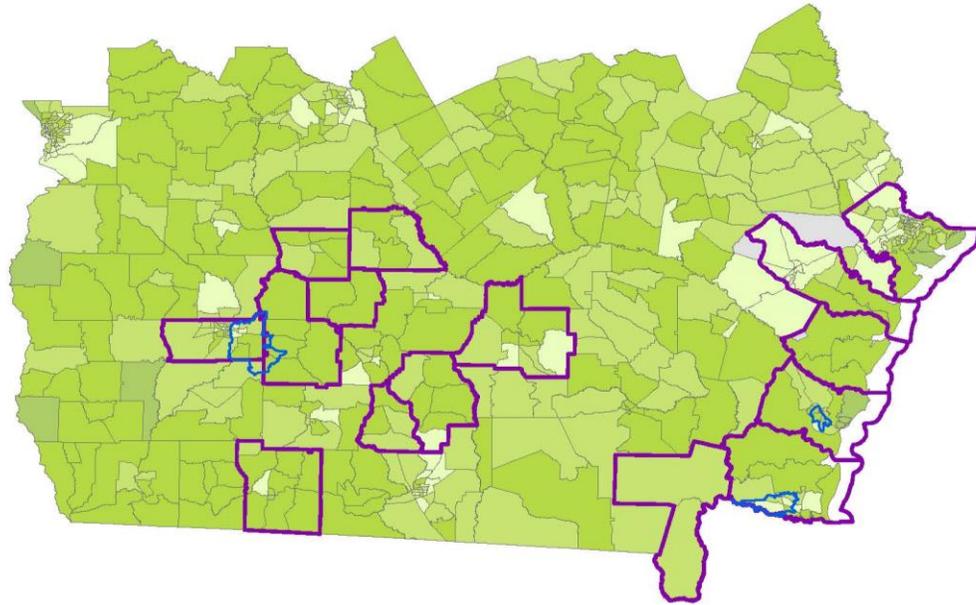


The figure above shows concentrations of limited English by census tract. As seen above, many of the impacted counties have areas where concentrations of persons with limited English speaking abilities exist.

COUNTY POPULATION WITH A DISABILITY			
COUNTY	TOTAL POPULATION	TOTAL POPULATION WITH A DISABILITY	PERCENTAGE OF POPULATION WITH A DISABILITY
BERRIEN	18696	3835	20.5%
CAMDEN	48375	5968	12.3%
CHARLTON	11838	1729	14.6%
CHATHAM	274555	34881	12.7%
COFFEE	39652	7026	17.7%
COOK	16969	2904	17.1%
CRISP	22633	4246	18.8%
DOUGHERTY	90428	13509	14.9%
GLYNN	81610	12595	15.4%
LIBERTY	57948	7359	12.7%
MCINTOSH	13827	3692	26.7%
THOMAS	44305	7656	17.3%
TURNER	7802	1597	20.5%
WILCOX	6818	1350	19.8%
WORTH	20826	3663	17.6%

According to the U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates, the greatest concentrations of persons with a disability are within McIntosh (26.7%) Berrien (20.5%), Turner (20.5%), and Wilcox Counties (19.8%). Persons suffering from disabilities have a hard time simply surviving, let alone recovering from disasters. Additionally, the rural nature of the affected counties makes it increasingly difficult for disabled persons to access food, healthcare, and emergency services. In the aftermath of disaster, these persons are often unable to seek additional assistance due to the barriers placed between them and accessing the services. For this reason, these persons are considered a vulnerable population.

Percentage of persons aged 65 and older



Legend

 3 most impacted zip codes

 Impacted county

Aged 65 and older

 No data

 Less than 9.9%

 10% - 14.9%

 15% - 24.9%

 25% - 49.8%

Data source: Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry (ATSDR)/ Geospatial Research, Analysis, and Services Program. Social Vulnerability Index 2016 Database Georgia. <http://svi.cdc.gov/SVIDataToolsDownload.html>. Accessed on 2016

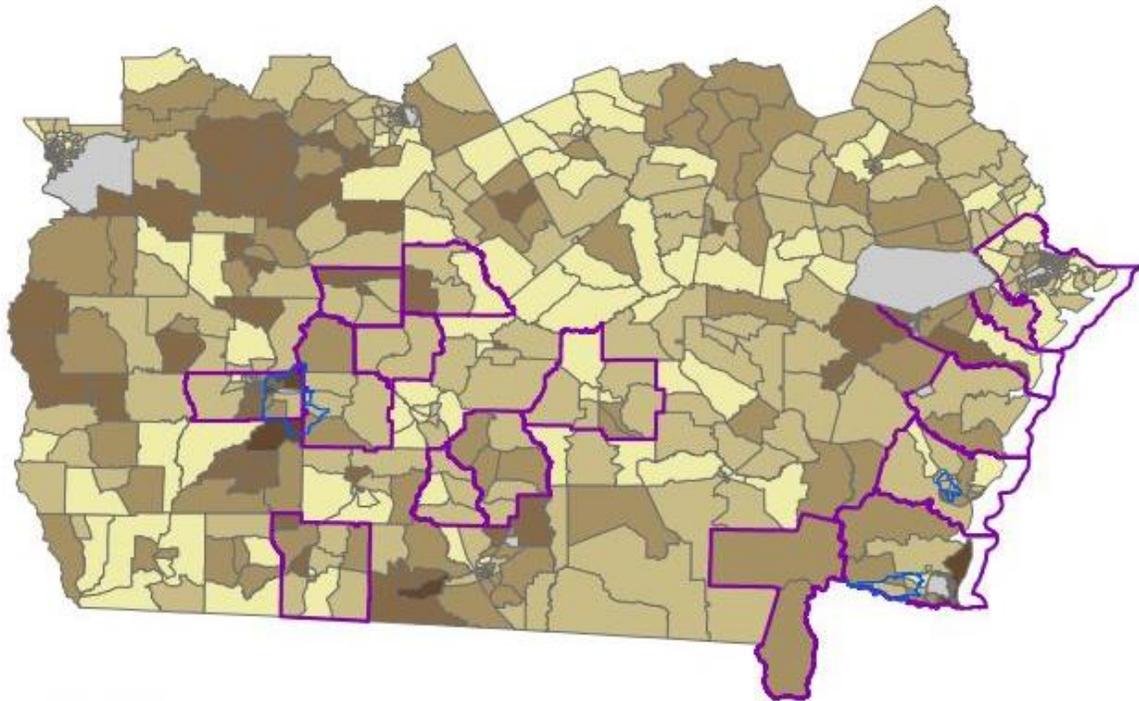
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The SVI provides specific socially and spatially relevant information to help public health officials and local planners better prepare communities to respond to emergency events such as severe weather, floods, disease outbreaks, or chemical exposure.



Being over the age of 65 contributes to the potential vulnerability of a household. The map above shows concentrations of households with age dependent populations, by census tract. Like persons with a disability, emergency relief and even more basic services are often not easily within reach of these populations and decreased access to personal vehicles for persons over the age of 65 act as barriers to access for these groups.

Percentage of unemployed



Legend

- 3 most impacted zip codes
- Impacted county
- Military installation
- % Unemployment (civilian, age 16+)**
- 0% - 5%
- 6% - 10%
- 11% - 15%
- 16% - 25%
- 26% - 37%

Data source: Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry (ATSDR)/ Geospatial Research, Analysis, and Services Program. Social Vulnerability Index 2016 Database Georgia. <http://svi.cdc.gov/SVIDataToolsDownload.html>. Accessed on 2016

ATSDR's Geospatial Research, Analysis & Services Program (GRASP) created the Social Vulnerability Index (SVI) to help public health officials and emergency response planners identify and map the communities that will most likely need support before, during, and after a hazardous event.

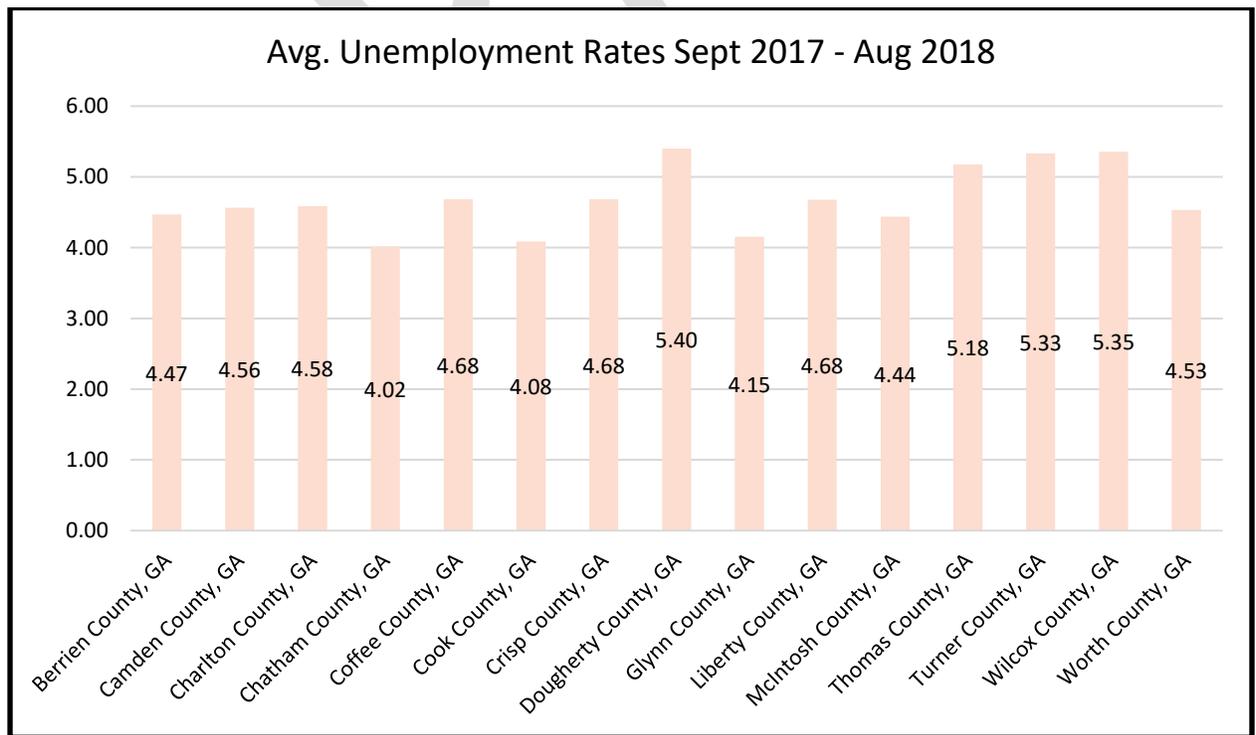
The SVI provides specific socially and spatially relevant information to help public health officials and local planners better prepare communities to respond to emergency events such as severe weather, floods, disease outbreaks, or chemical exposure.



The map above illustrates the larger concentrations of unemployment across the area. As can be seen from the map, the affected counties were dealing with high unemployment rates even before disaster struck. These communities are rural in nature and have not taken part in the sweeping economic recovery that has taken place nationwide since the Great Recession. In many of the census tracts in these counties, unemployment affects as many as 1 in 3 civilians aged 16+. These populations are less likely to have access to the resources needed to fully recover from disaster, especially when they were barely making ends meet before property damage affected their homes and community.

The unemployment rates vary by county and month. The table below includes unemployment rates by county from August 2017 to August 2018. The data was obtained from the Bureau of Labor Statistics. The rates that are light green in color are higher than or equal to the state average, and the rates colored orange have the highest rate within the affected area. It is important to note, Dougherty, Thomas, Turner and Wilcox Counties had unemployment rates higher than the state average ALL twelve months of the past year.

County	Aug 2017	Sept 2017	Oct 2017	Nov 2017	Dec 2017	Jan 2018	Feb 2018	Mar 2018	Apr 2018	May 2018	Jun 2018	Jul 2018	Aug 2018
Berrien	5.3	4.8	4.7	4.5	4.5	4.9	4.8	4.4	3.8	3.7	4.5	4.2	4
Camden	5.3	5.1	4.8	4.6	4.6	4.7	4.9	4.6	4	3.8	4.5	4.3	4.1
Charlton	5.6	4.9	4.7	4.6	4.9	5.2	4.9	4.6	3.9	3.8	4.5	4.2	3.8
Chatham	4.7	4.3	4.2	4	4.1	4.3	4.2	3.9	3.5	3.4	4.1	3.8	3.7
Coffee	4.9	4.5	4.4	4.5	4.9	6.3	5.3	4.8	4.2	3.9	4.6	4.5	4.1
Cook	4.8	4.5	4.1	3.9	4.2	4.4	4.4	4	3.5	3.4	4.3	4	3.6
Crisp	5.4	4.8	4.9	4.6	4.6	5.3	5	4.6	4.2	4	4.7	4.5	4.3
Dougherty	6.5	5.8	5.6	5.4	5.3	5.6	5.6	5.2	4.8	4.6	5.5	5.3	5
Glynn	4.7	6.3	4.5	4.1	4.2	4.3	4.3	3.9	3.4	3.3	3.9	3.6	3.5
Liberty	5.3	5	4.8	4.7	4.9	5.1	5	4.7	4.2	4	4.6	4.4	4.1
McIntosh	5.2	5.8	4.8	4.3	4.5	4.7	4.7	4.4	3.7	3.7	4.2	4	3.7
Thomas	6.2	5.7	5.6	5.5	5.4	5.6	5.4	5	4.4	4.3	5	4.8	4.4
Turner	5.8	5.4	5.2	5.1	5.3	6.5	6.2	5.2	4.7	4.6	5.3	4.9	5.1
Wilcox	6.1	5.5	5.9	5.3	5.3	6.1	5.8	5	4.5	4.4	5	5.8	4.9
Worth	5.1	4.6	4.6	4.5	4.7	4.8	4.7	4.4	4	4	4.7	4.5	4.3
State Average	4.5	4.5	4.5	4.5	4.5	4.5	4.4	4.4	4.3	4.2	4.1	3.9	3.8



Transitional Housing/Homelessness

The triple threat of wind, rain, and flooding brought about by tornados and Hurricane Irma impacted community members across all walks of life. While some lost homes, others were without homes both prior and following the events of 2017. These events lead to shelters becoming overcrowded. According to a 2016 Point-In-Time report from the Georgia Homelessness and Special Needs Housing office, there were over 308 homeless people in the disaster affected counties, approximately 48% are considered to be unsheltered.⁵ The report referenced was funded by the Emergency Solutions Grant: a HUD program that aims to help homeless families and persons by improving the amount and quality of emergency shelters available, re-housing the homeless, and preventing more individuals and families from encountering homelessness. The state office of Homelessness and Special Needs Housing, provides opportunities for persons with illness, homelessness, and disabilities the opportunity for safe and sanitary housing.

People who are experiencing homelessness or who are precariously housed will be affected directly and indirectly by the disaster as both the formal support infrastructure (e.g. emergency shelters, supportive services only facilities) and informal support structures (e.g. families sharing spaces, informal leases) may be compromised. A comprehensive long-term recovery will take into account the housing and economic needs of the entire community; restore sufficient housing, jobs, and services to meet the broad spectrum of local needs; and help ensure that people who were experiencing homelessness or were precariously housed prior to the disaster become stably housed. With energy and resources focused on rebuilding, there is room to consider improvements and new approaches to community challenges such as preventing and ending homelessness. The community may have access to special funding allocations, such as CDBG-DR funds, that require an expansive analysis of community needs and a broad-based response that includes economic development, infrastructure, and housing. Instead of restoring pre-disaster conditions (and shortcomings), the community should assess its full needs and establish a recovery strategy to meet those needs.

Emergency Shelters

In the aftermath of the two tornados and Hurricane Irma, local governments along with non-governmental organizations and voluntary organizations including churches, charitable groups, and schools stepped up quickly to help their fellow neighbors. Shelters opened up across the state to provide those in need with a place to stay and to receive necessities and nourishment. Over 126 shelters were opened as a result of the three disasters occurring in 2017. The Georgia Emergency Management and Homeland Security Agency assisted with the coordination of these efforts to establish safe refuge for the storm victims. The table (right) indicates the number of shelters and capacity by county.

County	Shelters	Capacity
Berrien	8	1,359
Camden	11	2,714
Charlton	4	1,200
Chatham	27	13,899
Coffee	12	5,380
Cook	9	2,635
Crisp	7	2,648
Dougherty	13	3,489
Glynn	4	946
Liberty	9	2,660
McIntosh	3	1,231
Thomas	9	1,983
Turner	5	420
Wilcox	0	0
Worth	5	310

⁵ Georgia Point in Time Homelessness Survey

County	Unsheltered Homeless Persons	Sheltered Homeless Persons	Total Homeless Persons	Total Emergency Shelter & Transitional Housing Beds	Imminent Homeless	Unsheltered Veterans	Unsheltered Chronic Extrapolation
Berrien	0	0	0	0	14	0	0
Camden	20	9	29	23	55	4	3
Charlton	2	0	0	0	0	1	1
Chatham	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Coffee	16	0	16	0	1	2	0
Cook	0	0	0	0	12	0	0
Crisp	8	0	8	0	15	0	1
Dougherty	20	40	60	96	4	7	1
Glynn	68	44	112	62	41	11	15
Liberty	8	34	42	34	4	0	1
McIntosh	5	0	5	0	1	0	0
Thomas	10	20	30	23	7	0	4
Turner	0	0	0	0	6	0	0
Wilcox	4	0	4	0	16	0	0
Worth	0	0	0	0	2	0	0

The table above indicates the number of unsheltered, sheltered, and total homeless persons within the impacted counties. The counties experiencing population of unsheltered homeless persons are: Camden, Coffee, Dougherty, Glynn, Liberty, McIntosh, Thomas, and Wilcox.

A map illustrating the total number of homeless persons on a state-wide level is provided on the following page.

Focus on Vulnerable Populations

Georgia has adopted an innovative approach to its disaster recovery process by assessing social vulnerability as part of its recovery strategy. The social vulnerability index utilizes the most recent census data (2011-15) to measure the social vulnerability of all census tracts with population in areas of interest. The index is a comparative metric facilitating examination of differences in social vulnerability across census tracts. It graphically illustrates the variation in social vulnerability across the three 2017 disasters. The index seeks to show and strategically account for uneven capacity for preparedness and response, and helps pinpoint where resources might be used most effectively to reduce the pre-existing vulnerability and encourage recovery. The social vulnerability index synthesizes socioeconomic variables, which the research literature suggests contribute to reduction in a community's ability to prepare for, respond to, and recover from hazards. An outline of the variables influential in vulnerability for recovering from the three 2017 disasters. The index for impacted counties is shown in the table below.

COUNTY	POPULATION	POVERTY	PERCENT	PCI Benchmark	Percent Benchmark	Poverty Benchmark	PCI Score	Percent Score	Poverty Score	Demo Total Score
Berrien	18,808	4,811	25.58%	\$9,688.00	41.41%	48,550	22.79	24.71	3.96	51.46
Camden	50,293	7,029	13.98%	\$9,688.00	41.41%	48,550	15.90	13.50	5.79	35.19
Charlton	11,757	2,420	20.58%	\$9,688.00	41.41%	48,550	20.73	19.88	1.99	42.61
Chatham	269,919	48,550	17.99%	\$9,688.00	41.41%	48,550	14.24	17.37	40.00	71.62
Coffee	39,265	9,618	24.50%	\$9,688.00	41.41%	48,550	21.46	23.66	7.92	53.04
Cook	16,887	4,429	26.23%	\$9,688.00	41.41%	48,550	22.06	25.33	3.65	51.05
Crisp	22,587	7,439	32.93%	\$9,688.00	41.41%	48,550	19.43	31.81	6.13	57.37
Dougherty	88,450	26,982	30.51%	\$9,688.00	41.41%	48,550	18.99	29.47	22.23	70.69
Glynn	81,134	15,177	18.71%	\$9,688.00	41.41%	48,550	13.93	18.07	12.50	44.50
Liberty	61,676	10,443	16.93%	\$9,688.00	41.41%	48,550	19.31	16.36	8.60	44.27
McIntosh	13,847	2,788	20.13%	\$9,688.00	41.41%	48,550	16.26	19.45	2.30	38.01
Thomas	44,017	9,377	21.30%	\$9,688.00	41.41%	48,550	17.47	20.58	7.73	45.78
Turner	7,802	2,157	27.65%	\$9,688.00	41.41%	48,550	22.60	26.71	1.78	51.08
Wilcox	6,814	1,422	20.87%	\$9,688.00	41.41%	48,550	26.66	20.16	1.17	47.99
Worth	20,807	3,837	18.44%	\$9,688.00	41.41%	48,550	19.31	17.81	3.16	40.28

Notes: Component scores and composite social vulnerability scores are relative and comparable across the State of Georgia. The cardinalities of components have been adjusted as indicated above. The social vulnerability composite score is obtained by summing all component scores. Input data are derived from the Five-Year American Community Survey, 2011-15.

The Social Vulnerability Index provides actionable and useful information to decision makers. The index is instrumental in targeting resources to those who are in most need during recovery and rebuilding operations in South Georgia following the 2017 disasters. The January tornadoes and Hurricane Irma occurring in 2017 had severe impacts on highly vulnerable communities. These communities experience high unemployment rates, substantial renter populations, and a considerable percentage of residents living below the state poverty rate. The State of Georgia intends to address the areas that continue to suffer in the aftermath of the 2017 disasters. The state will implement a methodology to understand pre-event social conditions across the impacted area in a post-event recovery context.

Social vulnerability was utilized by the Georgia Community Department of Community Affairs to identify target areas that require outside assistance to rebound from this disaster. Social vulnerability scores, coupled with FEMA and SBA data to highlight areas with greatest need for additional recovery resources and more importantly to determine unmet needs. These measures provided an approach for distributing scarce disaster recovery dollars and rebuilding resources for the most benefit to the impacted areas that are least able to recover from these disasters.

Summary of Impact

Housing

Single family homeowners in stick-built homes, single family homeowners in mobile homes, and renters in various housing types of housing stock were affected. The tables below shows the FEMA Full Verified Loss (FVL) determinations in the 4294, 4297, and 4338 disaster-impacted counties.

2017 FEMA Disaster Totals							
County	# Applicants	# Inspected	% Inspected	Applicants With FVL	% Inspected with FVL	FVL Dollars	Average FVL Dollars
Berrien	46	34	74%	29	85%	\$68,220	\$2,352
Camden	4,861	2,020	42%	653	32%	\$1,589,581	\$2,434
Charlton	735	387	53%	188	49%	\$309,636	\$1,647
Chatham	22,858	7,900	35%	662	8%	\$2,051,833	\$3,099
Coffee	695	417	60%	218	52%	\$279,120	\$1,280
Cook	107	78	73%	23	29%	\$59,999	\$2,609
Crisp	160	114	71%	78	68%	\$77,423	\$993
Dougherty	5,146	2,651	52%	887	33%	\$2,241,620	\$4,624
Glynn	11,132	4,123	37%	956	23%	\$3,118,836	\$3,262
Liberty	2,103	785	37%	146	19%	\$482,942	\$3,308
McIntosh	1,556	629	40%	274	44%	\$520,909	\$1,901
Thomas	86	54	63%	41	76%	\$28,637	\$698
Turner	227	161	71%	119	74%	\$1,045,149	\$8,783
Wilcox	62	32	52%	28	88%	\$184,494	\$6,589
Worth	173	95	55%	65	68%	\$415,042	\$6,385
Total	49,947	19,480	54%	4,367	50%	\$12,473,441	\$49,966

2017 FEMA Disaster 4338 Totals							
County	# Applicants	# Inspected	% Inspected	Applicants With FVL	% Inspected with FVL	FVL Dollars	Average FVL Dollars
Berrien	0	0	0	0	0	0	0
Camden	4,861	2,020	42%	653	32%	\$1,589,581	\$2,434
Charlton	735	387	53%	188	49%	\$309,636	\$1,647
Chatham	22,858	7,900	35%	662	8%	\$2,051,833	\$3,099
Coffee	695	417	60%	218	52%	\$279,120	\$1,280
Cook	0	0	0	0	0	0	0
Crisp	0	0	0	0	0	0	0
Dougherty	0	0	0	0	0	0	0
Glynn	11,132	4,123	37%	956	23%	\$3,118,836	\$3,262
Liberty	2,103	785	37%	146	19%	\$482,942	\$3,308
McIntosh	1,556	629	40%	274	44%	\$520,909	\$1,901
Thomas	0	0	0	0	0	0	0
Turner	0	0	0	0	0	0	0
Wilcox	0	0	0	0	0	0	0
Worth	0	0	0	0	0	0	0
Total	43,940	16,261	20%	3,097	15%	\$8,352,857	\$2,697

As seen in the table above, DR-4338, or Hurricane Irma, resulted in a total of \$8,352,857 in FEMA Full Verified Losses.

2017 FEMA Disaster 4294 Totals							
County	# Applicants	# Inspected	% Inspected	Applicants With FVL	% Inspected with FVL	FVL Dollars	Average FVL Dollars
Berrien	0	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	0	0	0	0	0
Coffee	0	0	0	0	0	0	0
Cook	0	0	0	0	0	0	0
Crisp	0	0	0	0	0	0	0
Dougherty	2,837	1,428	50%	372	26%	\$363,638	\$978
Glynn	0	0	0	0	0	0	0
Liberty	0	0	0	0	0	0	0
McIntosh	0	0	0	0	0	0	0
Thomas	0	0	0	0	0	0	0
Turner	0	0	0	0	0	0	0
Wilcox	0	0	0	0	0	0	0
Worth	0	0	0	0	0	0	0
Total	2,837	1,428	50%	372	26%	\$363,638	\$978

As seen in the table above, DR-4294, or the tornado occurring on January 2, 2017, resulted in a total of \$363,638 in FEMA Full Verified Losses.

2017 FEMA Disaster 4297 Totals							
County	# Applicants	# Inspected	% Inspected	Applicants With FVL	% Inspected with FVL	FVL Dollars	Average FVL Dollars
Berrien	46	34	73%	29	85%	\$68,220	\$2,352
Camden	0	0	0	0	0	0	0
Charlton	0	0	0	0	0	0	0
Chatham	0	0	0	0	0	0	0
Coffee	0	0	0	0	0	0	0
Cook	107	78	72%	23	29%	\$59,999	\$2,609
Crisp	160	114	71%	78	68%	\$77,423	\$993
Dougherty	2,309	1,223	52%	515	42%	\$1,877,981	\$3,647
Glynn	0	0	0	0	0	0	0
Liberty	0	0	0	0	0	0	0
McIntosh	0	0	0	0	0	0	0
Thomas	86	54	62%	41	75%	\$28,637	\$698
Turner	227	161	70%	119	73%	\$1,045,149	\$8,783
Wilcox	62	32	51%	28	87%	\$184,494	\$6,589
Worth	173	95	54%	65	68%	\$415,042	\$6,385
Total	3,170	1,791	35%	898	35%	\$3,756,946	\$4,184

As seen in the table above, DR-4297, or the tornadoes occurring on January 21-22, 2017, resulted in \$3,756,946 in FEMA Full Verified Losses.

Housing Types Affected

Approximately 50,000 applicants filed for FEMA (IA) Individual Assistance in the eligible counties as a result of the 2017 Disasters. Of those who specified housing unit type, only 40% are homeowners, including single-family homes, duplex units, mobile homes and other housing types. The remaining 60% are renters, including renters of single-family homes, mobile homes, apartment units and other housing types. The table below displays the different housing types and whether the occupant is a renter or owner.

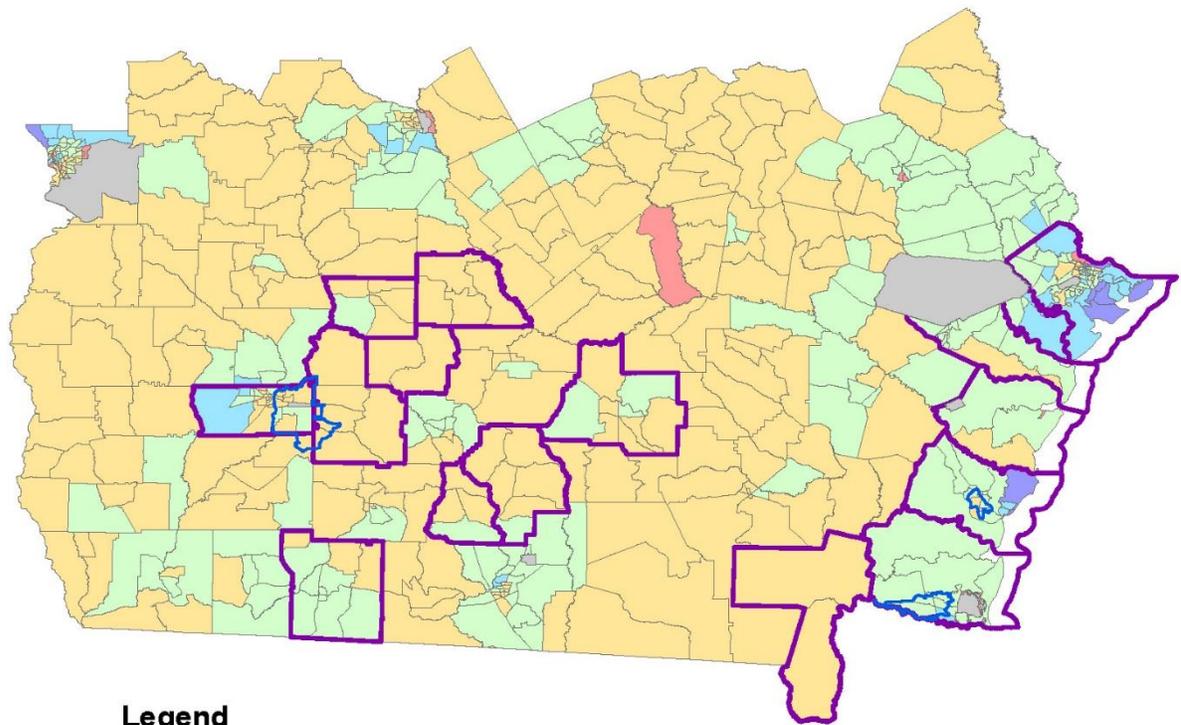
Total 2017 Disasters			
Housing Unit Type	Owner	Renter	Not Specified
House/Duplex	16,381	14,888	92
Mobile Home	2,791	2,431	21
Other*	1,043	12,280	20
Total:	20,215 (40%)	29,599 (60%)	133 (<1%)
*Includes: Apartment, Assisted Living, Boat, College Dorm, Condo, Correctional Facility, Military Housing, Other, Townhouse, Travel Trailer			

Single Family

Median housing values range from less than \$39,999 to greater than \$350,000 throughout Southern Georgia. The map below shows higher value homes concentrated along the coast. While the coastal areas experienced greater swaths of damage throughout the community creating higher damage cost estimates, the individual devastation in the southwestern portions of the state was immensely high. Both sets of communities have high levels of unmet need for repair and recovery, with each community facing its own set of unique challenges.

Median Value (Dollars)

Owner-occupied housing units



Legend

 3 most impacted zip codes

 Impacted county

 Military installation

Median Value

 Less than \$39,999.99

 \$40,000.00 - \$99,999.99

 \$100,000.00 - \$174,999.99

 \$175,000.00 - \$349,999.99

 \$350,000.00 and above

Data Source: MEDIAN VALUE (DOLLARS)
Universe: Owner-occupied housing units more information
2012-2016 American Community Survey 5-Year Estimates, Table B25077

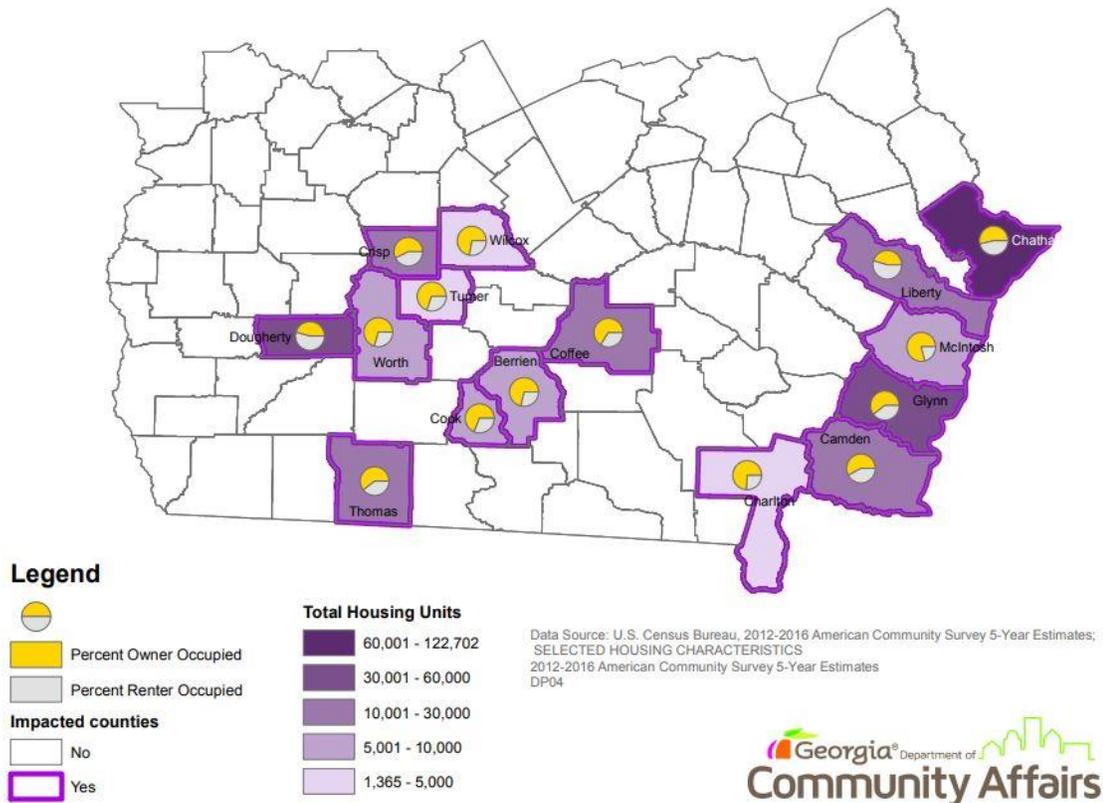
There are over 1.5 million housing units in the entire impacted area, many of which were built between 1980-1999. The table below shows the percentage of units by the year they were built. With much of the housing stock in the 30-year range, key systems such as electrical, roofing, water heaters and furnaces may have already cycled through a replacement life-span in many homes. This means that many homes will be replacing essential systems for a second time, further compounding the financial hardship and mental frustration that accompanies disaster recovery.

Age of Housing Stock: Percentage of Units by Year Built, by County (ACS 2011-2015)											
County	Total Housing Units	Percentage of Units by Year Built									
		2014 or later	2010-2013	2000-2009	1990-1999	1980-1989	1970-1979	1960- 1969	1950- 1959	1940- 1949	Pre 1939
Berrien	8641	0.00%	1.59%	16.57%	21.84%	14.10%	17.91%	9.08%	9.04%	4.62%	5.25%
Camden	21415	0.20%	3.27%	23.17%	26.75%	21.22%	9.95%	4.50%	4.54%	3.39%	3.00%
Charlton	4425	0.25%	2.44%	15.12%	23.12%	17.45%	13.83%	8.86%	9.13%	4.41%	5.40%
Chatham	122702	0.42%	3.44%	20.28%	13.22%	14.10%	12.99%	9.51%	10.33%	5.58%	10.13%
Coffee	16909	0.18%	1.81%	15.87%	26.23%	17.93%	15.47%	8.81%	5.59%	4.02%	4.10%
Cook	7239	0.17%	2.11%	13.08%	25.31%	13.32%	18.03%	10.21%	8.34%	1.81%	7.63%
Crisp	10715	0.00%	0.48%	11.10%	14.86%	18.31%	19.64%	12.55%	10.31%	7.27%	5.49%
Dougherty	40713	0.04%	1.53%	11.93%	12.56%	13.88%	21.27%	17.03%	12.75%	5.70%	3.30%
Glynn	41748	0.71%	1.35%	22.21%	16.48%	17.26%	15.72%	9.66%	8.12%	3.87%	4.62%
Liberty	27233	0.10%	3.36%	21.37%	28.99%	20.40%	12.94%	5.85%	0.41%	1.70%	1.20%
McIntosh	9289	0.81%	1.44%	27.29%	27.88%	15.19%	7.83%	6.84%	5.02%	2.23%	5.48%
Thomas	20323	0.45%	1.37%	17.53%	18.30%	17.05%	13.13%	9.41%	8.29%	4.57%	9.89%
Turner	3838	0.21%	0.99%	15.42%	15.16%	8.88%	16.44%	15.06%	13.78%	2.74%	11.31%
Wilcox	3483	0.14%	2.24%	9.27%	16.16%	17.97%	17.86%	12.29%	7.49%	6.32%	10.25%
Worth	9205	0.55%	1.60%	11.95%	21.03%	22.06%	16.28%	10.14%	4.79%	2.66%	8.93%
Total	347878	0.28%	1.93%	16.81%	20.53%	16.61%	15.29%	9.99%	7.86%	4.06%	6.40%

Rental Housing

According to the US Census 2012-2016 5-Year Estimates, the rental vacancy rate for Georgia is 37.2%. The median rent for the State of Georgia is \$897 monthly. As indicated by the map below, rental units in the non-urban counties are primarily single family and mobile home units, with the majority of renters in those unit types as opposed to multi-family complexes. This is due to the rural nature of the communities.

Housing Units



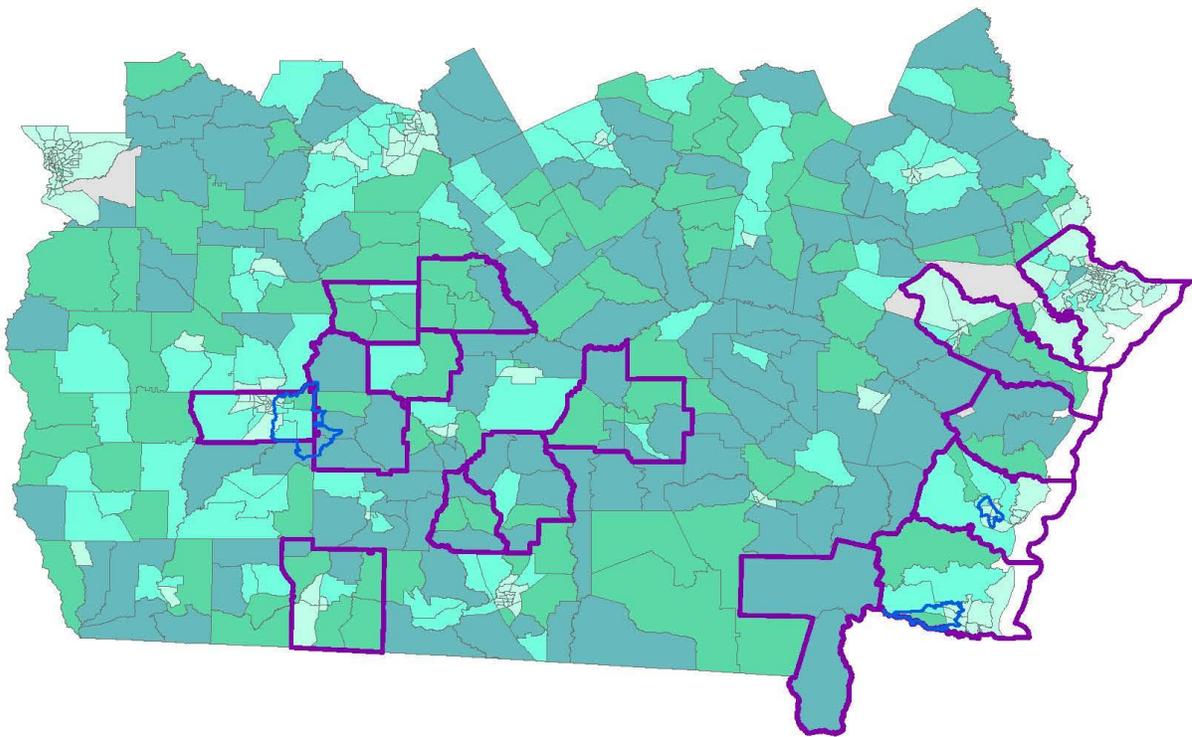
Mobile Homes

Damage caused to mobile homes by wind, rain, and flooding is often difficult to repair, due to the integrated nature of the building components. In addition, when considering whether or not a structure is repairable, the cost of making those repairs may be disproportionately high when considering the overall value of the structure. Often, the full extent of mobile home damage is not always realized in the early months after an event and can go unreported in the initial damage inspection. Damage such as water saturation of the particle board material that makes up the floor framing and decking can cause unsafe deterioration over time. The potential for mold and mildew in the home's structure or insulation can develop over time as well. Limited assistance funds portioned out through fragmented assistance programs can lead to piecemeal repairs that add up in cost, without adequately addressing restoration of the home's structural integrity to a decent, safe and sanitary standard. Of the 49,950 FEMA IA applicants in the state-assessed areas, approximately 5,243 of them reside in mobile home units.

As seen in the table below, damage to mobile homes was concentrated in certain areas. These areas include Camden, Coffee, Dougherty, Glynn, and McIntosh counties. Across the state there were 1442 mobile homes with a FEMA Real Property Verified Losses due to the 2017 disasters.

Mobile Homes with FEMA Verified Losses	
County	Mobile Homes with FEMA Verified Loss
Berrien	20
Camden	177
Charlton	116
Chatham	53
Coffee	133
Cook	19
Crisp	52
Dougherty	241
Glynn	233
Liberty	63
McIntosh	173
Thomas	23
Turner	62
Wilcox	25
Worth	52
Total:	1442

Percentage of mobile homes



Legend

 3 most impacted zip codes

 Impacted county

Mobile homes

 No data

 Less than 9.9%

 10% - 24.9%

 25% - 34.9%

 35% - 63.6%

Data source: Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry (ATSDR)/ Geospatial Research, Analysis, and Services Program. Social Vulnerability Index 2016 Database Georgia. <http://svi.cdc.gov/SVIDataToolsDownload.html>. Accessed on 2016

ATSDR's Geospatial Research, Analysis & Services Program (GRASP) created the Social Vulnerability Index (SVI) to help public health officials and emergency response planners identify and map the communities that will most likely need support before, during, and after a hazardous event.

The SVI provides specific socially and spatially relevant information to help public health officials and local planners better prepare communities to respond to emergency events such as severe weather, floods, disease outbreaks, or chemical exposure.



The map above shows the percentage of mobile homes by block group throughout the State of Georgia. Many of the impacted areas fall within the highest category (35% - 63.6%).

Public Housing

Public Housing is an integral piece of the State of Georgia’s housing resources for low-income persons. Statewide, there are approximately 4,328 rental assistance participants who were in some way impacted by disasters 4294, 4297, and 4338. The table below shows the number of impacted households by county. Fortunately, none of these households were heavily impacted and all public housing residents remain in a home.

Rental Assistance By County		
County	# Rental Assistance Participants	# of Rental Assistance Households
Berrien	36	13
Camden	333	112
Charlton	4	1
Chatham	N/A	N/A
Coffee	191	59
Cook	45	15
Crisp	291	112
Dougherty	2658	967
Glynn	N/A	N/A
Liberty	359	622
McIntosh	33	15
Thomas	220	91
Turner	81	14
Wilcox	2	1
Worth	75	32

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 throughout non-entitlement areas of the state. This document can be accessed using the link below:

https://www.dca.ga.gov/sites/default/files/analysis_of_impediments_2016.pdf

In addition, the State of Georgia Consolidated Plan was updated in 2018 by assessing affordable housing, market conditions, and community development needs in order to make data-driven investment decisions. This plan can be accessed using the link below:

https://www.dca.ga.gov/sites/default/files/final_con_plan_to_hud.pdf

Housing Funds Made Available

The main federal funding sources that are available for impacted residents in the immediate aftermath of a disaster are FEMA Individual Assistance, low-interest loans from the U.S. Small Business Association (SBA), and insurance proceeds from the National Flood Insurance Program (NFIP). These three funding streams account for the majority of the housing recovery funds made available before CDBG-DR.

FEMA Individual Assistance (IA)

The FEMA Individual Assistance program (IA) consists of a multitude of services for individuals in disaster declared counties. Specifically, housing funds are for bridging the gap from sheltering to the return to

permanent housing. These funds can be used for limited basic home repairs and replacement of essential household items as well as rental payments for temporary housing. Importantly, FEMA IA is limited to bring a home back to a basic level of “safe and sanitary living or functioning condition,” and may not account for the full extent of the home’s damage or need.

According to available data as of July 30, 2018, FEMA registered over 49,952 applicants, however reports indicate significant ineligible rates and low payouts, with **only 1,195** approved for housing repair or replacement assistance.

Renter-occupied homes with repair needs represent the largest group of impacted properties across the State of Georgia. According to FEMA, 29,734 renters applied for FEMA assistance. More than 37,099 applicants to FEMA housing programs resided in single family housing. Upon FEMA inspection, 4,317 single-family residences had more than \$12,343,347 in real property verified losses.

National Flood Insurance Program (NFIP) Coverage

The National Flood Insurance Program (NFIP) provides insurance coverage to any property owner willing to pay the associated premiums. At this time NFIP data has not been shared with DCA. This section along with all relevant sections will be updated as the information becomes available.

Small Business Administration (SBA) Home Loans

The SBA has made \$ 23,742,300 in assistance available to 743 homeowner applicants in the areas of impact. The low-interest loans are made available for the purposes of home repair and personal property loss. The average loan for this disaster event was \$31,954. Homeowners may apply for SBA loans up to \$200,000 to restore their primary residence to its pre-disaster condition. The total amount of the loan is depends on the cost to repair the residence, less any insurance settlements or grants.

SBA Home Loan Applications (As of 7/11/18)				
County	FEMA Referrals	Applications Received	Applications Approved	Amount Approved
Berrien	22	7	4	\$ 297,700
Camden	2081	342	146	\$ 4,037,300
Charlton	259	40	10	\$ 215,500
Chatham	5241	348	67	\$ 2,642,000
Coffee	279	54	13	\$ 258,100
Cook	40	12	2	\$ 42,100
Crisp	56	15	5	\$ 88,300
Dougherty	2,347	615	230	\$ 7,085,100
Glynn	3,644	529	194	\$ 6,449,300
Liberty	653	65	20	\$ 610,400
McIntosh	473	57	23	\$ 329,700
Thomas	47	18	5	\$ 236,900
Turner	116	32	13	\$ 990,300
Wilcox	40	9	1	\$ 46,700
Worth	103	32	10	\$ 412,900
TOTAL	15,401	2,175	743	\$ 23,742,300

Unmet Needs

The Unmet Needs Assessment seeks to evaluate the three core aspects of recovery – housing, infrastructure (which includes public facilities and services), and economic development. In this section remaining unmet need will be calculated by first estimating the portion of unmet need likely to be addressed by insurance proceeds, other federal assistance, or any other funding source by using the most recent available data.

The preliminary total estimated impact from the January 2017 tornadoes and Hurricane Irma in Georgia is \$188,791,536 across the housing, economy, and infrastructure sectors combined. These estimates are based on best available data at this time and may be adjusted in the future as additional data becomes available. After taking into account the funds already made available through state and other federal assistance and other funds, the remaining estimated unmet need is approximately \$79,768,286. **The federal allocation of \$37,943,000 million will allow the State of Georgia to address 48% of the total estimated unmet need.**

When examining the relative need by sector, housing represents the greatest need with \$52,446,536 (66%) of unmet need, followed by the infrastructure sector with \$12,621,750 (16%) of unmet need, followed by the economic sector with \$14,700,000 (18%) of unmet need. Each of these three sectors will be addressed in detail in the sections to follow.

Summary of Impacts/Support	Housing	Infrastructure	Economy	Total
Amount of Estimated Impact	81,946,536	84,145,000	22,700,000	188,791,536
Amount of Funds Available	29,500,000	71,523,250	8,000,000	109,023,250
Remaining Unmet Needs	52,446,536	12,621,750	14,700,000	79,768,286

Housing Unmet Needs

The core data on housing damage for both the unmet housing needs calculation and the concentrated damage are based on home inspection data for FEMA’s Individual Assistance program. HUD calculates “unmet housing needs” as the number of housing units with unmet needs times the estimated cost to repair those units less repair funds already provided by FEMA and SBA.

Each of the FEMA inspected units are categorized by HUD into one of five categories:

Category	FEMA inspected real property damage
Minor-Low	< \$3,000
Minor-High	\$3,000 - \$7,999
Major-Low	\$8,000 - \$14,999 and/or 1 to 4 feet of flooding on the first floor;
Major-High	\$15,000 - \$28,800 and/or 4 to 6 feet of flooding on the first floor.
Severe	> \$28,800 or determined destroyed and/or 6 or more feet of flooding on the first floor.

The average cost to fully repair a home for a specific disaster to code within each of the damage categories noted above is calculated using the median real property damage repair costs determined by the Small Business Administration for its disaster loan program for the subset of homes inspected by both SBA and FEMA for each eligible disaster. Under the SBA Disaster Loan Program, homeowners may apply for up to \$200,000 to repair or replace their primary residence to its pre-disaster condition. The loans may not be used to upgrade homes or make additions unless as required by local building authority/code. Loans may be increased up to 20 percent of the total amount of physical loss, as verified by SBA, to make improvements that lessen the risk of property damage by future disasters of the same kind. Because the SBA inspection reflects the full cost to repair or replace the home back to the pre-disaster condition, the estimates are generally more than the FEMA estimates. FEMA estimates are based on making the home habitable.

The minimum cost multipliers, provided by HUD, are: \$40,323 for major-low damage; \$55,812 for major-high damage; and \$77,252 for severe damage. By multiplying the number of units by the multipliers, the housing unmet needs was calculated.

Category of Damage	Number of Units	Serious Unmet Needs Multipliers	Total Unmet Needs
<i>Major-Low</i>	308	40,323	\$ 12,419,484
<i>Major-High</i>	183	55,812	\$ 10,213,596
<i>Severe</i>	53	77,252	\$ 4,094,356
<i>Total:</i>	544		\$ 26,727,436

The data does not entirely represent the impacts sustained within the 15 affected counties as defined by the FR Notice.

An analysis to further, better and more comprehensively determine what else may need to be served by this source of funds is needed. DCA is working with local communities to get a clear picture of the overall remaining unmet need. Meetings with local communities revealed a greater number of damaged units than the disaster data shows. A particular inconsistency relates to Disasters 4294 and 4297, affecting Dougherty County. FEMA data quantified 57 destroyed mobile homes within Dougherty County and the SBA reported 58 mobile home units that were damaged. Dougherty County collected residential impact data from local residents after the disasters.

The data indicates more than 200 units were destroyed. Data provided by Dougherty County can be seen in the figure below.

Damaged Manufactured Housing Units in Dougherty County				
Location	Number of MHUs Lots	Number of MHUs Damaged by January 2017 storms	Number of MHUs Replaced	Current MHU Unmet Need
3527 Sylvester Hwy	15	12	2	10
3420 Sylvester Hwy	20	10	0	10
3501 Sylvester Hwy	40	30	0	30
3203 Sylvester Hwy	35	4	0	4
3714 Old Mill Rd	5	5	0	5
600 Holly Dr	227	174	0	174
1714 Wildflower Ln	1	1	0	1
2515 Imperial St	1	1	0	1
2517 Imperial St	1	1	0	1
2506 Bridgeboro St	1	1	0	1
Total	346	239	2	237

Between the two storm events, there were 5,248 incidents of residential property damage reported to Dougherty County. The county then made efforts to verify damage from the calls received. The county was able to confirm 1,727 impacted residential structures throughout the county. FEMA data indicates there were 889 residential units with Real Property FEMA Verified Losses in Dougherty County for Disaster Events 4294 and 4297.

SBA Data

The approved amount of SBA loans does not represent the total estimated housing impact needs; rather, it only identifies the households and needs the SBA program is able to assist. To be approved for a SBA loan the following criteria is required of the damaged property applicant:

1. Applicants must have a credit history acceptable to SBA.
2. Applicants must show the ability to repay all loans.
3. Collateral is required for physical loss loans over \$25,000 and all EIDL loans over \$25,000. SBA takes real estate as collateral when it is available. SBA will not decline a loan for lack of collateral, but requires you to pledge what is available.

In addition, applicants who did not comply with the terms of a previous SBA loan may be considered ineligible. This includes borrowers who did not maintain flood and/or hazard insurance on previous SBA loans. According to the SBA, “the majority of the declines are due to low credit scores. Applicants with

credit score below the SBA's limit are automatically declined.”⁶ **Many of the applicants in the affected areas are not able to meet the SBA's criteria.** This is an indicator of greater needs for LMI and more distressed populations that these funds seek to prioritize.

FEMA data

The FEMA Individual Assistance program (IA) consists of a multitude of services for individuals in disaster declared counties. Specifically, housing funds, made available through the Housing Assistance (HA) program, help to bridge the gap from sheltering to permanent housing. These funds can be used for limited basic home repairs and replacement of essential household items, as well as rental payments for temporary housing. FEMA IA is limited to bring a home back to a basic level of “safe and sanitary living or functioning condition,” and may not account for the full extent of the home’s damage or need.

In Georgia, out of the 25,505 FEMA Housing Assistance referrals, only 6,321 (25%) received housing assistance within the state-assessed area. In essence, there were 19,184 storm damaged properties not assisted by FEMA. It is possible these properties did not sustain enough obvious damage to warrant housing assistance, or there are a variety of reasons why an applicant may be deemed ineligible for assistance. According to FEMA, a few of these reasons are:

- *Ineligible - Missed Inspection*
- *Ineligible - No Contact for Inspection*
- *Ineligible - No substantiation submitted*
- *Ineligible - Signature not Obtained*
- *Ineligible - Occupancy Not Verified*

Another scenario where an applicant may be determined to be ineligible because a FEMA damage inspector attributes damage claimed by the applicant as flood/storm-related to have been caused by pre-disaster conditions, or deferred maintenance. In older homes that lower-income and vulnerable applicants may live in can complicate the rapid inspections conducted by FEMA field officers.

Additionally, the FEMA data used in determining the total housing unmet needs only analyzes homeowner real property FEMA verified losses and not damage to the rental stock. FEMA offers eligible renters grants to help pay for temporary housing while a damaged home or apartment is being repaired, or cover other needs such as child care, moving and storage expenses, disaster-related funeral expenses, disaster-related dental and medical expenses, or repair or replacement of storm-damaged personal property, including furniture and appliances, as well as job-related tools and equipment required by the self-employed primary vehicles, and approved second or modified vehicles damaged by the disaster. The services are crucial in assisting disaster victims and an integral part of the recovery process post disaster. However, the loss of affordable housing stock has impacted the entire community.

⁶ <https://www.sba.gov/sites/default/files/articles/sba-disaster-loans-faq.pdf>

Because accurate/complete data sources are often difficult to obtain after a major disaster event, HUD has stated that empirically justified calculations may be used to determine the average cost to fully repair a home.

Empirically Justified Calculations

Impact assessment methodologies have often utilized the Small Business Administration estimates of damage and repair needs, FEMA IA Housing Assistance data, and National Flood Insurance data in combination with each other to triangulate and identify more accurate levels of unmet need than if the FEMA estimated losses were the sole source of information. Utilizing SBA loan values as an indicator of the amount of support any individual household will require to fully repair their homes again provides a more comprehensive look at recovery than simply looking at a FEMA inspected damage. SBA sends “construction specialists” trained to evaluate a more detailed determination of current market cost to repair or replace a damaged structure. They also include costs that consider mitigation or resiliency needs for supporting a more comprehensive and often higher dollar estimate of recovery than that coming from FEMA. Although the SBA estimates are the greater of the two data sets, the figure is likely an underestimate. HUD assisted homes could require and will fund greater levels of energy efficiency, resilience or mitigation, causing the costs to be greater. FEMA Individual Assistance data accurately reflects the impact of a disaster on a population by illustrating the number of registrations and the number of households ultimately approved for housing assistance. This shows us where the damage is found. SBA disaster home loan data reflects registrations and applications for loans which result in valuations of verified loss that are more true to scale than FEMA verified loss calculations. This data shows us the cost to repair.

Further accounting for under-representation of impacted populations stemming from FEMA ineligible applicants provides a more accurate picture of overall housing impact needs across a study area. When utilizing the average loan amount (\$31,954) of all approved applicants (743) and applying it to those who were disqualified from SBA and FEMA assistance, the full extent of housing impact caused by the 2017 disasters is over \$90 million (before any deductions for funds already provided are calculated).

In an effort to more finely calibrate the impact amount, the housing impact for this needs assessment was calculated using SBA data compared with FEMA applicant information. Here, we utilize the median SBA loan amount of \$19,700 to account for outliers in the SBA data that were impacting the average. This data was applied to the universe of 1,371 FEMA applicants where an inspection was not performed (less duplicate applicants, SBA applicants, blanks, and other categories) and the 1,432 SBA applicants who were not approved.

This identifies a total of 2,824 persons under-represented within the data. Using the under-represented population and multiplying it by the median SBA loan amounts establishes a more comprehensive un-met needs estimate that accounts for this under-represented population.

Under-Represented Population	Median SBA Loan Amount	Total Unmet Needs of Population Under-represented in FEMA/SBA data
2,803	\$19,700	\$55,219,100

These totals less the FEMA Repair and Replacement (\$5.8M) and SBA (\$23.7M) aid provided gives the remaining unmet need for housing for the 2017 disasters is approximately \$52,446,536

\$26,727,436	+	\$55,219,100	-	\$29,500,000	=	\$52,446,536
Total unmet needs (Traditional Calculation)		Total Unmet Needs of Population Under-represented in FEMA/SBA data		Funds provided by FEMA/SBA		

Infrastructure Impact and Unmet Needs

Infrastructure damage occurred in areas along the coast and throughout many areas of South Georgia due to 2017 disaster events. Roadways, bridges, water control facilities, utilities, sections of the coastline, and many other infrastructure systems were affected. While conducting initial meetings with the impacted communities it was clear that the 2017 disasters affected each area differently. The straight-line wind damage from tornadoes is often easier to assess than the damage from the rising flood waters as a result of the hurricane. Communities along the coast affected by Hurricane Irma stated they were suffering from more infrastructure issues than housing. Because of this, DCA expects to see more applications from these areas for the mitigation portion of the DR funds. Using FEMA and GEMA data, The Georgia Department of Community Affairs has preliminarily identified more than 1,540 damaged infrastructure sites with a total estimated repair cost of \$175.5 million across all public assistance categories. The federal share is calculated at \$131.6 million in funding will be provided to projects that were approved.

The infrastructure categories include:

- Category A: Debris Removal
- Category B: Emergency Protective Measures
- Category C: Roads and Bridges
- Category D: Water Control Facilities
- Category E: Buildings and Equipment
- Category F: Utilities
- Category G: Parks, Recreational and Other Facilities

Based on this data, a remaining unmet need of \$12,621,750 (applicant share) in identified infrastructure damage eligible under FEMA-PA Categories C-G remains. The State of Georgia stepped in to help offset the burden on local governments by covering 10% of their local match. This left the remaining unmet need balance of \$12,621,750 for the local communities state wide.

To calculate unmet needs for infrastructure projects, the Georgia Department of Community Affairs used data obtained from FEMA as of August 15, 2018 showing the amount needed to repair the permanent public infrastructure (Categories C to G) to their pre-storm condition.

FEMA Totals: Georgia

Public Assistance Projects by Category, 2017 Disasters

Infrastructure Category	Estimated Cost	Estimate Federal Share	Estimate Applicant Share
A (Debris)	\$ 64,705,636.93	\$ 48,529,227.70	\$ 16,176,409.23
B (Emergency Measures)	\$ 26,668,693.94	\$ 20,001,520.46	\$ 6,667,173.49
C (Roads and Bridges)	\$ 13,027,035.62	\$ 9,770,276.72	\$ 3,256,758.91
D (Water Control Facilities)	\$ 5,222,787.34	\$ 3,917,090.51	\$ 1,305,696.84
E (Buildings and Equipment)	\$ 3,279,913.86	\$ 2,459,935.40	\$ 819,978.47
F (Utilities)	\$ 60,491,704.93	\$ 45,368,778.70	\$ 15,122,926.23
G (Other)	\$ 2,123,559.81	\$ 1,592,669.86	\$ 530,889.95
Totals	\$ 175,519,332.43	\$ 131,639,499.32	\$ 43,879,833.11
Totals minus A & B	\$ 84,145,001.56	\$ 63,108,751.17	\$ 21,036,250.39
Minus State Share			\$ 8,414,500.16
Total Unmet Need			\$ 12,621,750.23

Source: <https://www.fema.gov/media-library/assets/documents/28331>

***incentive counties received 12.5 % from the State, numbers will be adjusted as information comes in.*

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The tables below break down the infrastructure impact by county. Camden County and Dougherty County have the greatest number of Category C (Roads and Bridges) projects with 6 and 7, respectively. Chatham County and Glynn County each have 9 Category E (Buildings and Equipment) projects, while Dougherty County has 12.

Public Assistance by County: Categories A and B						
County	Category A		Category B		Total Projects (A+B)	
	# of Projects	Cost of Projects	# of Projects	Cost of Projects	# of Projects	Cost of Projects
Berrien	4	\$195,234.50	3	\$19,383.35	7	\$214,617.85
Camden	10	\$1,258,433.88	4	\$209,325.33	14	\$1,467,759.21
Charlton	6	\$118,058.36	3	\$156,978.09	9	\$275,036.45
Chatham	16	\$2,100,780.52	13	\$1,723,810.21	29	\$3,824,590.73
Coffee	12	\$402,055.85	7	\$105,712.47	19	\$507,768.32
Cook	11	\$679,319.50	6	\$218,656.99	17	\$897,976.49
Crisp	8	\$201,733.33	4	\$55,290.31	12	\$257,023.64
Dougherty	16	\$13,366,218.85	11	\$1,969,015.75	27	\$15,335,234.60
Glynn	2	\$195,858.22	7	\$579,353.86	9	\$775,212.08
Liberty	8	\$259,899.31	5	\$227,985.15	13	\$487,884.46
McIntosh	3	\$424,101.23	3	\$253,543.76	6	\$677,644.99
Thomas	5	\$549,202.94	4	\$54,170.60	9	\$603,373.54
Turner	4	\$408,431.98	5	\$208,138.81	9	\$616,570.79
Wilcox	1	\$9,336.73	2	\$5,918.00	3	\$15,254.73
Worth	13	\$713,186.71	8	\$215,641.50	21	\$928,828.21
Total	119	\$20,881,851.91	85	\$6,002,924.18	204	\$26,884,776.09

Public Assistance by County: Categories C-G								
County	C Roads & Bridges	D Water Control	E Buildings & Equipment	F Utilities	G Other	Cost of Projects	Federal Share	Applicant Share/ Potential Unmet Need
Berrien	-	-	-	-	-	-	-	-
Camden	6		5		2	\$ 569,189.11	\$ 426,891.83	\$ 142,297.28
Charlton	1		1	1		\$ 387,912.00	\$ 290,934.00	\$ 96,978.00
Chatham			9	2	5	\$ 619,651.20	\$ 464,738.43	\$ 154,912.77
Coffee	2		2	1		\$ 98,289.18	\$ 73,716.89	\$ 24,572.29
Cook	3			1		\$ 432,915.10	\$ 324,686.34	\$ 108,228.76
Crisp	3		3	1		\$ 257,291.39	\$ 192,968.55	\$ 64,322.84
Dougherty	7		12	6	6	\$ 8,665,567.62	\$ 6,499,175.73	\$ 2,166,391.89
Glynn	2		9		6	\$ 408,975.17	\$ 306,731.40	\$ 102,243.77
Liberty			1	1	2	\$ 516,080.55	\$ 387,060.41	\$ 129,020.14
McIntosh	2		1	1		\$ 181,213.49	\$ 135,910.12	\$ 45,303.37
Thomas			1	2	2	\$ 201,413.83	\$ 151,060.38	\$ 50,353.45
Turner	3					\$ 889,398.71	\$ 667,049.03	\$ 222,349.68
Wilcox	2			1		\$ 60,445.49	\$ 45,334.12	\$ 15,111.37
Worth	5	1	3	4	3	\$ 791,642.80	\$ 593,732.12	\$ 197,910.68
Total	36	1	47	21	26	\$14,079,985.64	\$ 10,559,989.35	\$ 3,519,996.29

Economic Impact and Unmet Needs

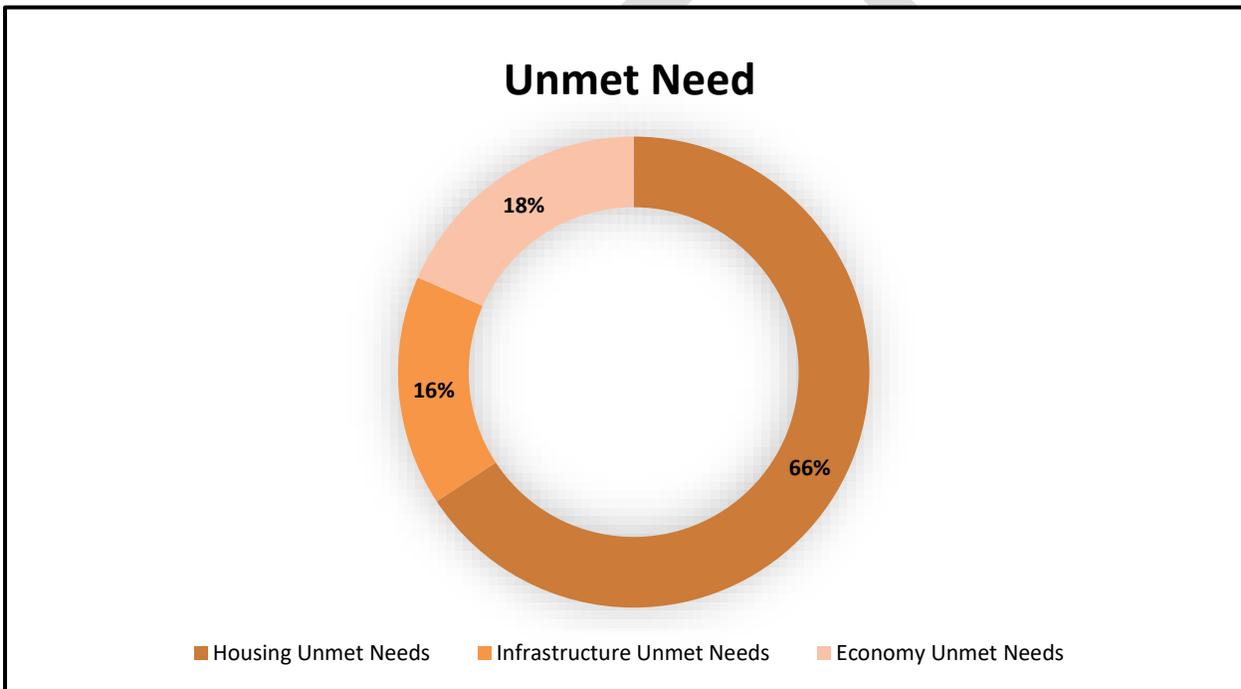
Using SBA business data to understand the financial impact to livelihoods provides a comprehensive understanding of impacts and unmet recovery needs across the state. The Small Business Administration makes low-cost disaster loans available to qualified businesses to repair or replace disaster-damaged property owned by the business, including real estate, inventories, supplies, machinery, equipment, and working capital until normal operations resume. According to data provided by the SBA, more than 3,500 applicants were referred the SBA for business loans by FEMA. Of those, 264 (7.5%) applied for assistance, but only 93 were approved. The approved loans as a result of the 2017 disasters totaled \$8,008,100. An average business loan amount of \$86,108.06 was calculated by taking the total amount of loans, \$8,008,100, and dividing it 93 (the total number of loans). By taking the average loan amount and multiplying it by 171 (the number of businesses that were denied a loan), DCA calculated a total unmet business need of **\$14,724,570.97**.

The SBA approved 13 Economic Injury Disaster Loans (EIDL) totaling \$843,300. Since these loans do not cover property losses, these figures were not calculated in the unmet needs data.

SBA Business Loan Applications (As of 7/11/18)				
County	FEMA Referrals	Applications Received	Applications Approved	Amount Approved
Berrien	4	2	0	\$ 0
Camden	400	46	20	\$ 1,806,000
Charlton	51	1	0	\$ 0
Chatham	1,152	29	2	\$ 98,200
Coffee	57	5	1	\$ 76,900
Cook	11	3	1	\$ 19,100
Crisp	17	6	4	\$ 679,300
Dougherty	590	101	45	\$ 4,088,100
Glynn	886	42	11	\$ 886,000
Liberty	123	8	3	\$ 97,300
McIntosh	131	11	5	\$ 220,200
Thomas	9	4	1	\$ 37,000
Turner	41	3	0	\$ 0
Wilcox	9	0	0	\$ 0
Worth	23	3	0	\$ 0
TOTAL	3,504	264	93	\$ 8,008,100

In sum, the following table indicates the unmet needs created by the disasters of 2017. The housing unmet needs (\$52,446,536) far exceeds the total unmet needs allocation from HUD (\$37,943,000). To address the greatest extent of the unmet needs and improve the conditions within the impacted areas, DCA will use the total allocation to address housing and housing related issues afflicting the counties and their resident's.

Unmet Needs Summary Table				
Summary of Impacts/Support	Housing	Infrastructure	Economy	Total
Amount of Estimated Impact	81,946,536	84,145,000	22,700,000	188,791,536
Amount of Funds Available	29,500,000	71,523,250	8,000,000	109,023,250
Unmet needs	52,446,536	12,621,750	14,700,000	79,768,286



4. Funding Priorities

When the emergency declaration was issued for Georgia, 15 counties were designated for Federal Emergency Management Agency (FEMA) Public Assistance and Individual Assistance. Public Assistance grants were provided to governmental units for emergency infrastructure repairs and debris removal. Individual Assistance grants provided emergency funding to individuals to fulfill immediate housing and safety needs.

Despite many counties in Georgia being declared eligible for FEMA Individual Assistance, many people were left with their housing needs unmet by FEMA. Across the 15 counties, only 8.6% of Individuals and Household Program (IHP) applicants received any funds from FEMA.

Counties Eligible for Assistance

DCA will provide assistance to eligible applicants in the following 15 Individual Assistance declared counties only:

Berrien	Chatham	Crisp	Liberty	Turner
Camden	Coffee	Dougherty	McIntosh	Wilcox
Charlton	Cook	Glynn	Thomas	Worth

HUD has provided the State of Georgia with \$37,943,000 in disaster recovery funds for unmet needs to assist in recovery efforts from the 2017 disasters. HUD has further stipulated that 80% of the efforts must address unmet needs within zip codes: 31520, 31548, and 31705.

The estimated impact from the tornado events and Hurricane Irma, occurring in 2017, is \$188,791,536 across the housing, economy, and infrastructure sectors combined. The figure is based on best available data and may be adjusted in the future as additional data becomes available. After taking into account the funds already made available through insurance, state, and federal assistance, the remaining overall unmet need is approximately \$79,768,286. The federal allocation of \$37,943,000 million will allow the State of Georgia to address 48% of the overall unmet need.

When examining the relative need by sector, housing represents the greatest need with \$52,446,536 (66% of total) in unmet need, followed by the infrastructure sector with \$12,621,750 (18% of total) in unmet need, followed by the economy sector with \$14,700,000 (16% of total) in unmet need. Each of these three sectors are addressed in greater detail in the Unmet Needs Assessment section.

When comparing these three sectors, it becomes clear where the greatest unmet needs exist, housing. The housing unmet need is far greater than the infrastructure and the economy sector need. Therefore, the primary focus will be to address the housing unmet needs with these limited federal dollars. DCA will accomplish this goal through the housing programs focusing on Homeowner Rehabilitation Program, Multifamily Rental Program, and a Buyout Program. These programs will be discussed in Section 5, Method of Distribution.

The most socially vulnerable population was determined by analyzing a number of social vulnerability factors. Utilizing social vulnerability information combined with FEMA damage data provides a

standardized, replicable, and pragmatic process for finding and understanding people and places where scarce resources would be most helpful in driving successful disaster recovery. Using the SOVI data along with FEMA data, shows the areas of highest vulnerability and those containing significant numbers of damaged homes. Targeting support to these areas in the immediate and long-term recovery phases of the disaster will yield the best outcomes for those with the highest need.

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5. Method of Distribution

Connection to Unmet Needs

As detailed in the Impact and Unmet Needs Assessment section, Hurricane Irma and the two January tornadoes caused extensive loss. The estimated impact from the 2017 disaster events is approximately \$188 million and, despite funds committed for emergency response and immediate recovery efforts, at least \$79 million in unmet needs remain based on existing data. While the unmet needs far exceed CDBG-DR Action Plan allocations, DCA has developed a several programs to serve as a framework for its overall recovery. These programs will address the unmet needs in homeowners' primary residences and rental housing. All programs will be implemented the Presidentially-declared disaster areas for both Individual and Public Assistance and 80% of the total allocation will be used in the three Zip Codes designated by HUD as the "most impacted and distressed areas" in the State of Georgia.

CDBG-DR Program National Objectives

The Georgia Department of Community Affairs has designed this CDBG-DR program in compliance with the National Program objectives, and will ensure that assistance is prioritized toward the most disadvantaged populations. DCA will spend a minimum of 70% of program funds on activities that benefit the Low-and-Moderate Income (LMI) population. LMI status is determined by evaluating income as a percentage of the Area Median Income (AMI) in the region in which the applicant lives.

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, principally for LMI persons. To this end, all funded activities administered by the State of Georgia will meet one of three named HUD national objectives:

- i. Benefitting LMI Persons;
- ii. Preventing or Eliminating Slum or Blight; or
- iii. Meeting Urgent Needs.

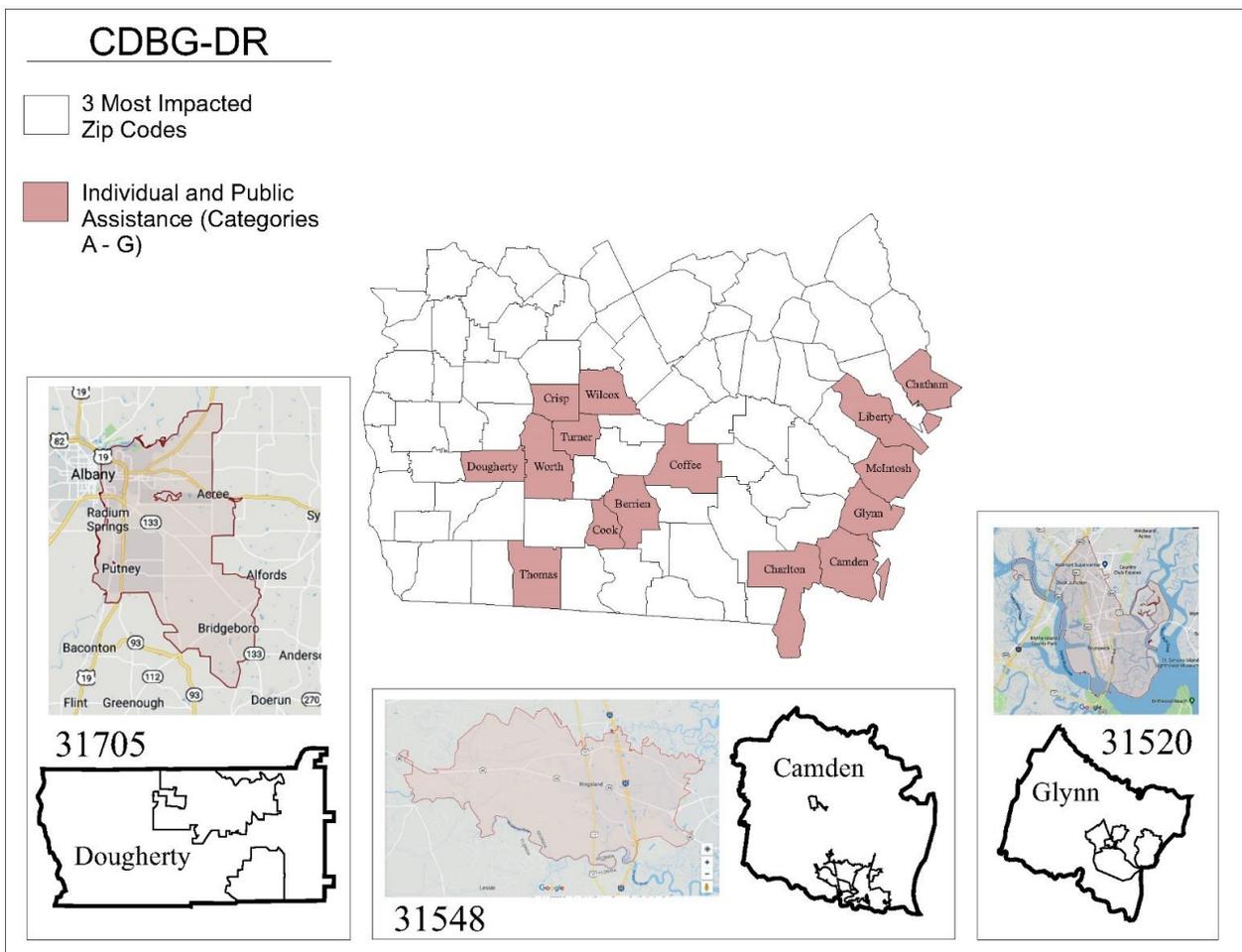
In addition, the state will further target benefits within these income categories by considering disability and age-dependent status. Where practicable, vulnerable and special needs populations will be given urgent attention.

In accordance with the Robert T. Stafford Act, as amended, the DCA will implement policies and procedures to ensure no individual receives a duplication of benefit for the same purpose and/or effect to recover from 2017 Presidentially Declared Disasters. Federal law prohibits any person, business concern, or other entity from receiving Federal funds for any part of such loss for which the person has received financial assistance under any other program, from private insurance, charitable assistance or any other source.

The Georgia Emergency Management and Homeland Security Agency (GEMA) has developed a comprehensive hazard mitigation strategy. DCA will work in partnership with GEMA to enhance and update this plan on a state, regional and local level. The plan is available at:

[http://www.gema.ga.gov/Plan%20Library/Georgia%20Hazard%20Mitigation%20Plan%20\(2014\).pdf](http://www.gema.ga.gov/Plan%20Library/Georgia%20Hazard%20Mitigation%20Plan%20(2014).pdf)

CDBG-DR funds will be used for necessary expenses related to long-term recovery, restoration and revitalization within the impacted and distressed areas resulting from the two January 2017 Tornadoes and Hurricane Irma as declared in DR-4294, DR-4297, and DR-4338. To prioritize limited funding in areas with highest damage, HUD identified three zip codes as “most impacted” and required that at least 80 percent of the allocation must address unmet needs within those areas. In addition, 15 counties were deemed eligible for FEMA individual assistance and public assistance and are therefore eligible for the remaining 20 percent of the funds. The DCA disaster recovery program assistance outlined in this Method of Distribution will be limited to persons within zip codes 31520, 31548, 31705 and the following counties: Berrien, Camden, Charlton, Chatham, Coffee, Cook, Crisp, Dougherty, Glynn, Liberty, McIntosh, Thomas, Turner, Wilcox, and Worth. The map below indicates the three most impacted zip codes and fifteen eligible counties.



Program Budget

Because it is anticipated that the unmet housing needs of Georgia’s most vulnerable citizens will exceed the available funding, DCA will allocate all program dollars for housing recovery activities, buyout programs and HMGP match. *To note, the 5% Administration allotment is not sufficient to perform all of the required duties. As a result, DCA is seeking additional funds from the State of Georgia to offset the difference.*

The following table details the programs as well as the budget allocations:

Budget	Allocation	%	Projected Accomplishments
Administration	\$ 1,897,150	5%	
Planning	\$ 5,691,450	15%	
Housing Program Type	Allocation	%	Projected Accomplishments
Affordable Multifamily Rental Program	\$12,500,000	33%	
Home Owner Rehabilitation	\$ 8,000,000	21%	
Buyout Program	\$ 6,854,400	18%	
HMGP (15% Match)	\$ 3,000,000	8%	
Infrastructure	\$ -	0%	
Economic Development	\$ -	0%	
Total	\$ 37,943,000	100%	

The counties and zip codes identified as “most impacted” experienced multiple disasters and some have suffered repetitive loss. Due to the propensity for tornadoes and flooding within these areas and with the goal of being safer and stronger, DCA does not wish to repair or replace damaged mobile home units (MHU) with new mobile home units. In order to provide a safer and more resilient option, the agency will assist the owners and renters with the programs detailed on the following pages.

Affordable Multifamily Rental Program

NATIONAL OBJECTIVE: Benefit to low- and moderate-income persons [24 CFR 270.208(a)(3)]

CDBG-DR ALLOCATION: \$12,500,000

PROJECTED ACCOMPLISHMENTS: The State estimates it will be able to assist up to 550 low and moderate income households.

DCA will offer an Affordable Multifamily Rental Program which will leverage Low Income Housing Tax Credits (LIHTC) and CDBG-DR funds to address the overwhelming need for multifamily housing. This program will meet several program objectives by providing affordable rental units to low and moderate income persons in communities most impacted by the hurricane. The program's eligible activities will include construction of new and/or rehabilitation of existing affordable rental housing units in areas impacted by Hurricane Irma and the two tornadoes in 2017. The Affordable Rental Multifamily Program will provide alternative funding mechanisms to facilitate the creation of quality, affordable housing units to help Georgia build resiliency and alleviate the rental stock shortage caused by the storms in the most impacted areas of the state. This program will also provide integrated affordable housing options for vulnerable populations to reduce the risk of homelessness with the 811 rental assistance program.

The Multifamily Low Income Housing Tax Credit/CDBG DR Disaster Loan Program will include the following:

- A set aside of approximately \$2.1 million in new Federal LIHTC credits with matching Georgia State credits will be allocated under Georgia's 2019 Qualified Allocation Plan.
- \$12.5 million of Community Development Block Grant Disaster Recovery Funds (CDBG-DR funds) will be designated to leverage Low Income Housing tax credits in accordance with CDBG-DR Requirements. LIHTC properties eligible for this loan program include properties allocated new credits under the 2019 set aside and properties with an award of 2017 and 2018 credits that have a funding gap or have the ability to add units with additional funds
- Approximately \$31.5M of equity generated by the sale of \$2.1 million of ten-year federal and state credits

DCA will issue a general NOFA for this program in January, 2019 that will include the following:

- Developments eligible for CDBG awards will be new construction and/or re-development/rehabilitation of uninhabitable dwellings
- Underwriting requirements that ensure the long term financial sustainability of the properties
- Construction and Rehabilitation standards
- Any new/rehabilitated multifamily rental housing will be required to meet the LIHTC 15 year compliance period and 15 year Extended use period for affordability
- Properties will be monitored for compliance with all statutory regulations and DCA/GHFA program requirements by GHFA's Compliance and Portfolio Management Office

Homeowner Rehabilitation Program

NATIONAL OBJECTIVE: Benefit to low- and moderate-income persons [24 CFR 270.208(a)(3)]

CDBG-DR ALLOCATION: \$8,000,000

PROJECTED ACCOMPLISHMENTS: The State estimates it will be able to assist 350 households.

To assist the most vulnerable families in their recovery efforts, DCA has developed a CDBG-DR Homeowner Rehabilitation Program to meet housing needs identified in the unmet needs assessment. The program consists of:

- Repair, rehabilitation, or reconstruction of existing or destroyed housing units
- Completion of work to homes that have been partially repaired
- Temporary Housing Assistance based on individual household needs and their participation in the Housing Repair Program.

Applicant criteria

All applicant homeowners will be held to the following criteria as conditions of eligibility:

- Applicants applying for assistance must have suffered documented damage to their housing units as a result of the presidentially declared disaster. Such documentation must include an inspection report conducted by FEMA, SBA and/or a privately contracted inspector
- Applicant must own and have occupied a single-family home located within the counties, for which FEMA IA was approved for the presidentially declared disaster area
- Applicant must provide evidence of primary residence at the location in which the applicant currently lives or lived at the time of the event and for which they are seeking assistance
- One person on the application with an ownership interest in part or in whole on the property must be able to demonstrate U.S. Citizenship or Lawful Permanent Residence
- The homeowner must agree to own the home and use the home as their primary residence for a designated period of time. Specifics relating to this requirement will be included in the program policies and procedures.

Prioritization Criteria

Due to limited resources, DCA will fund eligible homeowners in accordance with the priority categories described in the criteria outlined below.

- Homes that sustained major-high to severe damage
- Low- to very-low income households
- Persons with documented disabilities
- Age-dependent household members (aged 65 or older, or 5 or below)

If funds are not fully expended during the first phase of the program, DCA may expand the criteria to include additional homeowner populations. This may include households of all income levels with primary residences that exhibit a remaining need for funding to repair or rebuild their homes within the guidelines and parameters of the program.

Duplication of Benefits

To prevent Duplication of Benefits, DCA will require that all sources (federal, state, local, private, charitable) and amounts of disaster assistance received or reasonably anticipated are documented with submission of an application for CDBG-DR funding. DCA will monitor and review information provided to determine what, if any, duplication may occur. Applicant awardees must subrogate any additional funds received for damage caused by the presidentially declared disasters back to DCA.

Maximum Award

Awards will be based on the estimated construction cost of the scope of remaining work based on a consistent economy grade of building materials. Details of maximum award caps and construction requirements will be further defined in the program policies and procedures.

Buyout Program

NATIONAL OBJECTIVE: Benefit to low- and moderate-income persons or households and Urgent Need (24 CFR 570.208(a); and, 24 CFR 570.208(c)).

CDBG-DR ALLOCATION: \$6,854,400

PROJECTED ACCOMPLISHMENTS: The State estimates it will be able to buyout 65 units.

DCA will implement a Buyout Program using CDBG-DR funds to purchase properties in qualifying target areas prone to flooding events. The program will support hazard mitigation, floodplain management goals, and resiliency by removing homeowners from the floodplain, thus eliminating vulnerability to future flooding situations. The local government subrecipients will conduct purchases inside of the buyout areas as defined by HUD, whereby they will be eligible for purchasing. These properties will be identified by DCA and local governments. After homes are purchased, the structures are demolished or relocated. The land reverts to a natural floodplain, converts into a retention area, or is retained as green space for recreational purposes. The buyout option serves multiple objectives and provides a resiliency option versus rebuilding within a floodplain. Buyouts help prevent repetitive loss and extreme risk to human health and safety.

The post-purchase fate of acquired properties will be determined by the local government subrecipients, to ensure these properties best serve the future goals of the community. In some cases, the properties will remain undeveloped and be transformed into parks or other non-residential uses, in other cases they will be redeveloped in a resilient manner. A disposition plan will be further detailed by the state in the policies and procedures for this program.

The buyout program will include the purchase of eligible storm impacted and severely damaged properties inside the 100 or potentially 500-year floodplain in storm impacted areas. Eligibility criteria of severe damage includes, but is not limited to:

- 1) Being declared substantially damaged by a local floodplain administrator;
- 2) Residents were/are displaced for a significant period of time in either the Temporary Sheltering Assistance or Direct Housing programs, or have been displaced with friends/family/non-FEMA

- arrangements;
- 3) The structure is deemed by local officials to not be safe nor sanitary; or
 - 4) Having applied to the state HMGP buyout program

Hazard Mitigation Grant Program (HMGP)

NATIONAL OBJECTIVE: Benefit to low- and moderate-income persons or households and Urgent Need (24 CFR 570.208(a); and, 24 CFR 570.208(c)).

CDBG-DR ALLOCATION: \$3,000,000

PROJECTED ACCOMPLISHMENTS: The State estimates it will be able to assist 70 households.

On November 2, 2018, DCA made a request to HUD to allocate \$3,000,000 of the CDBG-DR funds to match Hazard Mitigation Grant Program Activities. The HMGP requires a 25% non-federal match, the Georgia Emergency Management and Homeland Security Agency is responsible for 10% of this match and the local governments are responsible for the remaining 15%. The disaster events of 2017 weakened revenues within these communities which were needed to pay the local match. In turn, community recovery efforts stalled. Any match funding activities will meet CDBG-DR and HMGP eligibility requirements. Activities may include but are not limited to: structural elevation, localized flood risk reduction, infrastructure retrofit, and post-disaster code enforcement. Applicants are required to submit applications to the Georgia Emergency Management Division.

Leveraging of Funds

CDBG-DR funds are a last resort-funding source. The state has worked with HUD, FEMA, SBA, other federal agencies and state agencies to identify and catalog available sources of assistance for recovery from 2017 Presidentially Declared Disasters. The Georgia Department of Community Affairs will ensure that CDBG-DR funds are only used to address funding needs not satisfied by other funding sources, many of which are already providing disaster relief, including, but not limited to:

- FEMA Individual Assistance grants
- FEMA Hazard Mitigation Grant Program
- SBA Disaster Loans
- National Flood Insurance Program
- Private insurance
- Natural Resources Conservation Service Emergency Watershed programs
- Water Conservation District funds
- USDA Farm Service Agency's Emergency Forest Restoration Program
- Drinking Water and Water Pollution Control funds, and
- Private foundations

Planning Activities

Each subrecipient can apply to the state for a series of planning activities designed in a manner to be replicated in other areas of the state when funding became available.

Examples of planning projects include:

- Working with local governments in their regions to identify and map all the county low water bridges in the region with overlay detail which includes damage, water heights, closure information and casualties. The information is available to inform and prioritize local bridge improvements.
- Pre and post-disaster long term recovery planning processes, communications and techniques, as well as plan content and outline.

Each of the counties in the declared disaster area are required to have hazard mitigation plan.

Given the success of the use of CDBG and CDBG-DR funds for planning purposes, the program will allow for planning costs to be included to further develop both pre and post-disaster plans for the communities identified in the most impacted and distressed areas (zip codes 31520,31548,31705) and the 15 other eligible counties. The recovery plans will enhance existing plans by allowing further assessment of hazard risks, including construction standards, review of land use and wetland practices. These plans will further identify mitigation and resilience opportunities within the community.

In addition, funds not used from the 15% Planning Allocation will be moved into Public Service Funds to the extent allowable within the CDBG-DR regulations and as the needs arise in the communities. Public Service funds will be used to help the most vulnerable populations in the areas of housing counseling and legal services.

6. Program Administration

Citizen Participation – Outreach Efforts

DCA initially met with key staff and elected officials of local governments, chambers of commerce, development authorities, emergency management agencies of the most impacted communities first. The purpose of the meetings were to inform the communities of the CDBG-DR program and to discuss the impact of the disasters and unmet need.

Dougherty County	June 18, 2018
City of Albany	June 18, 2018
Camden County and City of Kingsland	June 21, 2018
Glynn County and City of Brunswick	June 21, 2018

DCA staff presented at the Georgia Municipal Association’s Annual Convention. This informational meeting was held with local elected officials from the four affected GMA regions on June 22 - 24.

Next, meetings were held with the following counties on the following dates:

Liberty County and McIntosh County	July 9, 2018
Charlton County and the Cities of Folkston and Homeland	July 10, 2018
Crisp County, Turner County, Wilcox County, and Worth County	July 28, 2018
Berrien County, Coffee County, Cook County, and Thomas County	July 29, 2018

At these meetings, the local governments listed above indicated they addressed many of their unmet needs. The communities’ greatest remaining needs related to mitigation and resiliency.

Public Notice and Comment Period

The Georgia Department of Community Affairs encourages involvement from citizens in all aspects of the CDBG-DR Program. To this end, DCA seeks to ensure citizens and interested members of the public have an opportunity to review the draft Action Plan. The plan will be posted on DCA’s website for a 30-day public review period beginning on November 19, 2018. A summary of all comments received and responses will be included in the final Action Plan submitted to HUD for approval. The final Action Plan, approved by HUD, will be posted on DCA’s website.

Amendments to the Action Plan

As additional information becomes available through the grant administration process, amendments to this plan are expected. Prior to adopting any substantial amendment to this Action Plan, DCA will publish the proposed amendment on the CDBG-DR website and will afford citizens, affected local governments, and other interested parties a reasonable opportunity to examine the plan or amendment’s contents. Substantial amendments include additions or deletion of any allowable activity described in the approved application; an allocation or re-allocation of more than \$1 million; or a change in planned beneficiaries.

Citizens will be provided with no less than 30 days to review and provide comment on proposed substantial changes. A summary of all comments received will be included in the final Substantial

Amendment submitted to HUD for approval. Final Substantial Amendments approved by HUD will be posted to the Disaster Recovery website.

For other non-substantial amendments, the State shall notify HUD, but public comment is not required. Every amendment, substantial or not, shall be posted on the CDBG-DR website, not replacing, but in addition to all previous versions of the plan.

Performance Reporting

In accordance with HUD requirements, DCA will submit a Quarterly Performance Report (QPR) through the HUD Disaster Recovery Grant Reporting (DRGR) system no later than thirty days following the end of each calendar quarter. Program QPR's will be posted on a quarterly basis until all funds have been expended and all expenditures have been reported.

Limited English Proficiency

DCA is committed to providing all citizens with equal access to information about the recovery program, including persons with disabilities and limited English proficiency. DCA follows HUD's regulation, 24 CFR Part 1, "Nondiscrimination 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 a limited ability to read, write, speak, or understand English may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. Where a significant number of non-English speaking residents can be reasonably expected to participate in public hearings or open 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 translators will be present.

Citizen Complaint Procedures

Citizens may file a written complaint or appeals through the Disaster Recovery email at CDBG-DR@dca.ga.gov or submit by mail to the following address:

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

DCA will make every effort to provide a timely written response within 15 working days of the receipt of complaint, where practicable.

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.

Pre-agreement Activities

The provisions of 24 CFR 570.489(b) and 570.200 (h) permits a state to reimburse itself for otherwise allowable costs incurred by itself or its recipients sub grantees or sub recipients on or after the incident of the covered disaster. The provisions at 24 CFR 570.200(h) and 570.489(b) apply to grantees reimbursing costs incurred by itself or its recipients or subrecipients prior to the execution of a grant agreement with HUD. This includes but is not limited to activities supporting program development, action plan development and stakeholder involvement support and other qualifying eligible costs incurred in response to an eligible disaster covered under Public Law 114-254.

DCA incurred pre-award costs and will seek reimbursement for these costs that are reasonable and allowable under this regulation. These include the cost for salary, fringe benefits, and direct operating costs for each employee based on their individual percentage of time spent on the planning of the CDBG-DR program.

Anti-displacement

The State of Georgia plans to minimize displacement of persons or entities and assist persons or entities displaced as a result of implementing a project with CDBG-DR funds. The state will ensure that the assistance and protections afforded to persons or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), and Section 104(d) of the Housing and Community Development Act of 1974 are available. The URA provides that a displaced person is eligible to receive a rental assistance payment that covers a period of 42 months. The State accepts the HUD waiver of the Section 104(d) requirements which assures uniform and equitable treatment by setting the URA and its implementing regulations as the sole standard for relocation assistance under FR-5938-N-01.

7. Pre-award Implementation Plan

Background

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 21st and 22nd, 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, 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 recovery. Disaster declarations were made and are now known as disasters 4294 and 4297.

September brought another rash 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. 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 trash littered the area causing damages to homes, buildings, and other infrastructure. The widespread nature of the damage resulted in millions of dollars in cleanup costs alone. The flooding events related to Hurricane Irma are referred to as Disaster 4338.

Overview of Tornados

The January tornados may not have been 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. The most concentrated damage was in the City of Adel, where one tornado hit the Sunshine Acres Mobile Home Park. This single neighborhood alone experienced the deaths of seven residents, ranging from 19 to 62 years of age. 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. An EF3 tornado there killed five people, and the Albany Herald reported in a story on the one-year anniversary of the storm that "more than \$1 billion in local damages" resulted from the storm. 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.

Overview of 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, called 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 that

grew up to the beach 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 in order to keep that pestilent population under control. Under normal conditions, places like Glynn County are able to quickly and consistently keep standing water environments at a minimum, but Irma changed the equation with her large rainfall totals and the prioritization of other recovery activities over these regular patrols. This placed many communities in a surprisingly poor position to handle cleanup. 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.

Purpose

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 constituted the damage from the storms. Thousands of private citizens and many local governments felt the impact of the damaging winds, wind-tossed debris, flooding, and downed trees and power lines. These smaller, underreported stories are the ones that require the attention of the CDBG-Disaster Relief funding. After the storms were over, the national newspapers left, and the cleanup began, locals were unable to apply for and receive the federal assistance that make the difference between barely getting by and truly recovering. 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. Many individuals were already back working, and too busy trying to make a living to deal with the federal requirements at the time. In fact, it took months for many people to truly understand the nature of their recovery needs. It was not until a washed-out drain or a weakened structure failed that these needs were fully realized.

Local governments also dealt with these same issues. Georgia, especially South Georgia, has a large number of local governments with populations under 1,000. 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. The cities with larger staffs and budgets experienced 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 feet of storm surge. Roads were washed out, homes were flooded and destroyed, and commercial areas damaged, some buildings beyond repair.

In accordance with Public Law 115 123 Guide for Review of Financial Management of CDBG DR Grantees, each grantee is required to submit an Implementation Plan to describe the grantee's capacity to carry out the recovery, including the operational and program management functions relative to CDBG-DR funding. Any capacity gaps must be identified and filled based on the plan and timeline outlined by the grantee. This document has been prepared in compliance with these requirements and constitutes the Georgia Department of Community Affairs Risk Analysis & Implementation Plan. The plan seeks to establish how the Georgia Department of Community Affairs (DCA) will effectively and responsibly manage grant funds in compliance with the financial requirements, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. It will demonstrate that DCA has all necessary systems, guidance, and policies and procedures to uphold its duty in the administration of these funds. DCA will continue to develop and refine these policies throughout the CDBG-DR grant lifecycle. Furthermore, this plan will demonstrate that DCA has the capacity to deliver benefits to affected citizens in a timely and compliant manner.

Risk Analysis and Documentation

According to Public Law 115-123 Guide for Review of Financial Management of CDBG-DR Grantees, each grantee must submit Risk Analysis Documentation to demonstrate that it has in place proficient controls, procedures, and management capacity. This is inclusive of the grantee's ability to prevent duplication of benefits as defined by Section 312 of the Stafford Act as well as demonstrate the grantee can effectively manage the funds, ensure timely expenditure of funds, maintain a comprehensive website regarding all disaster recovery activities assisted with these funds, and ensure timely communication of application status to applicants for disaster recovery assistance. Finally, the grantee must demonstrate that it has adequate policies and procedures to detect and prevent fraud, waste and abuse.

Financial Controls & Procurement Processes

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 a 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 audit can be viewed at the following link, https://www.audits.ga.gov/SGD/single_audit.html. The Single Audit states the DCA has no findings, material weaknesses, significant deficiencies, or questioned costs.

In collaboration with the Finance Department, the P.L. 115-123 Financial Management and Grant Compliance Certification has been completed. This certification is provided along with DCA's latest single audit, a copy of the DCA Grant Policy Financial Standards, as well as DCA's Procurement Procedure Policy Manual. DCA affirms that it has the requisite financial controls in place to account for and properly manage the CDBG-DR funding in a manner that is consistent with all federal accounting 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 as to which he or she has already received financial assistance through any other program, insurance or funding source. Georgia DCA has policies and procedures in place to confirm that recipients of funds under its CDBG Disaster Recovery award do not receive a duplicative benefit. In accordance with the Robert T. Stafford Act, as amended, Georgia DCA will take actions necessary to conduct comprehensive analyses of assistance provided to disaster recovery subrecipients in order to prevent Duplication of Benefits (DOB) from occurring.

The Georgia DCA Disaster Recovery program will require a DOB analysis for each applicant to consider other disaster recovery funding sources when processing applications for assistance. Duplication of benefits will be calculated by (1) Determining each applicant's remaining recovery need; and then (2) Reducing the remaining recovery need by previously received funding for housing recovery, if any (less amounts expended on Allowable Activities). This activity will be monitored for accuracy and completeness by the Georgia Department of Community Affairs.

Common disaster assistance sources include but are not limited to:

- Federal Emergency Management Agency (FEMA)
- Small Business Administration (SBA)
- National Flood Insurance Program (NFIP)
- Private Insurance
- Private and nonprofit disaster assistance

The State will consider assistance amounts received/approved from alternate sources such as FEMA, insurance coverage, SBA and/or philanthropic organizations used to make repairs due to the declared disaster damage. Subgrantees will be responsible for obtaining documentation from applicants to determine if they received insurance benefits or other resources and how those funds were used, to ensure there is no duplication of benefit. The State will closely monitor any subgrantee, vendor, or subrecipient DOB verification processes. The State has data sharing agreements with FEMA and SBA to ensure the most recent assistance data is used in confirming other Federal assistance. In addition, DCA will secure data from the National Flood Insurance Program (NFIP). This will be used to determine if applicants seeking disaster recovery funding assistance have received other federal funding for the same purpose.

Duplication of benefit for housing assistance will only consider other sources of funding pertaining to structural damage caused by the 2017 Presidentially Declared Disasters. Assistance for contents and personal items will not be considered duplication.

The DCA CDBG-DR duplication of benefits review process currently includes forms the subgrantee will use to determine the amount of any duplicative assistance. Applicants requesting CDBG funds for disaster

recovery assistance may be required to submit the following forms for all proposed activities prior to approval:

1. FEMA Declaration and Release Authorization Form (Attachment DOB-A)
2. Georgia Eligibility Release Form (Attachment DOB-B)
3. Georgia Duplication of Benefits Calculation Form (Attachment DOB-C)
4. Duplication of Benefits Exception Acknowledgement Form, if applicable (Attachment DOB-D)
5. Georgia Insurance Affidavit (Attachment DOB-E)

Additionally, DCA will have a subrogation clause in each sub recipient 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, ineligible, unallowable, unreasonable, or non-compensable, no matter the cause. Under this clause, should a subrecipient or individual receive CDBG-DR funding to support an activity and subsequently receive outside funding that would render the CDBG-DR funds a Duplication of Benefits, the duplicative CDBG-DR funds must be returned to DCA's Community Finance Division. This subrogation clause will be included in any beneficiary agreement.

If a duplicative benefit is received after the disaster recovery award is provided, the applicant must subrogate any additional funds received for the same purpose as the award to the State. DCA and/or the subgrantee will be required to attempt to recapture any amount of duplicative benefits provided. DCA may withhold payment on any project, or outright suspend activities, if a duplication of benefits issue is not resolved in a timely manner. Further, DCA will not complete contract close-out processing until identified duplication of benefits issues are resolved.

Timely Expenditure of the Funds

Per Federal Register Notice 83 FR 40314, CDBG-DR funds must be expended within a six (6) 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. DCA's CDBG Policies & Procedures are provided as an appendix to this document. With DCA's annual allocation of CDBG funds, DCA's Community Finance Division maintains detailed reports monitoring the expenditure of funds and project schedules. Considering that the amount of the CDBG-DR grant to DCA 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 subgrantees and/or contractors accountable through the establishment of benchmarks and other critical milestones. Subgrantees 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 submit a projection of expenditures and an Outcomes Plan to HUD with the initial Action Plan, in compliance with Federal Register Notice 83 FR 40314. 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 subgrantees and/or contractors, using benchmarks, milestones and projections as a means to minimize delays in expending funds for eligible project activities.

Detect and Prevent Fraud Waste and Abuse

The State of Georgia is dedicated to the prevention of fraud, waste and abuse. All suspected cases of fraud will be taken seriously and complaints will be reported to the Georgia Office of the Inspector General for further investigation.

DCA will monitor the application process, ensuring that all required documentation and information is included in the application packet. Specifically, CDBG-DR staff will be trained to address the issue of "Duplication of Benefits" will evaluate the information provided to determine what, if any, duplication may occur. Additionally, those staff members will contact insurance companies, FEMA/Emergency Management staff, NFIP, etc. to verify the information provided by the applicant. We will foster a relationship with the American Red Cross and/or Georgia Voluntary Organizations Active in Disaster (VOAD) to determine and/or verify any efforts performed to assist the applicant.

DCA's State CDBG Program has a monitoring process which includes several layers of approvals before funds are expended, in essence, allowing us to "monitor" the use of funds on an individual basis. This process includes multi-level review of the use of funds. These reviews occur throughout the process, from the front-line contractor(s) through the subgrantee to the Community Finance Division. There is an evaluation made to determine that the use of funds is legitimate and in 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 until further information is obtained. If the additional information does not result in a positive determination, the use of funds for that purpose will not be allowed.

DCA's Disaster Recovery monitoring program also includes desk monitoring and onsite monitoring with priority and frequency based on the results of a risk assessment. The risk assessment provides the basis for developing individual monitoring strategies and documents the decisions and recommendations regarding where to apply staff and travel resources for monitoring, training and/or technical assistance. Each subrecipient application will be evaluated and monitored throughout the duration of the project to ensure compliance with all CDBG-DR regulations.

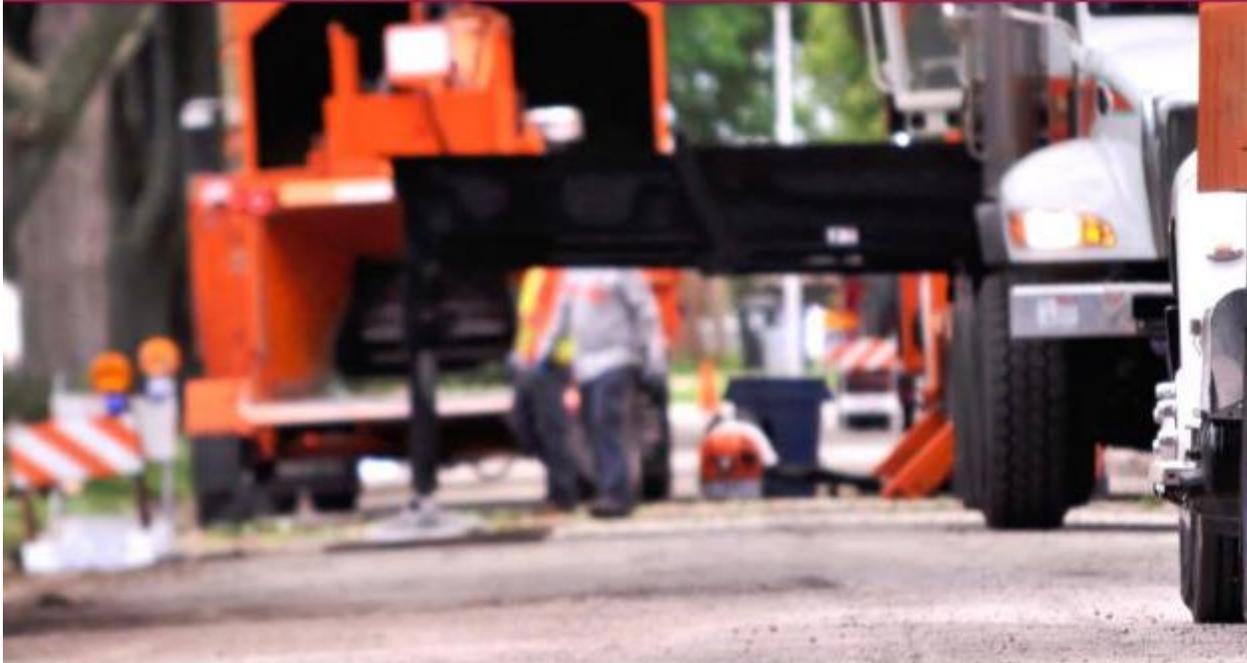
DCA is included in the State's fund level and entity wide financial statements as a part of the Comprehensive Annual Financial Report (CAFR) of Georgia. Additionally, DCA is included in the Single Audit report issued by the Department of Audits.

In an effort to prevent fraud, waste, and abuse, DCA is currently seeking funds to hire an internal programmatic and financial auditor for the agency as a whole. This auditor will conduct programmatic and financial audits on the DR program and will perform these assessments on an ongoing basis.

DCA also requires subgrantees undergo annual independent audits of their financial operations, including compliance with Federal and State law and regulations. CDBG audit requirements are located in Chapter 3 Section 2 of the "State of Georgia Community Development Block Grant Recipients Manual FY2018."

Procedures to Maintain a Comprehensive Website

The Georgia Department of Community Affairs has a public website providing access to information and programs administered by the State. DCA has created a separate and distinct webpage on its website entitled "Disaster Recovery Programs" that includes all information on disaster recovery activities assisted with CDBG-DR funds due to the 2017 natural disasters. The creation and maintenance of the public website is one component of HUD's certification that DCA has proficient financial controls and procurement processes as provided for in the Register. An image of the website can be seen in the figure on the following page.



LOCAL GOVERNMENT ASSISTANCE
Research & surveys, planning, maps, volunteerism, building codes

COMMUNITY & ECONOMIC DEVELOPMENT
Financial assistance opportunities for communities

SAFE & AFFORDABLE HOUSING
Helping communities meet housing needs and connecting people with housing assistance

Community & Economic Development > Funding Programs > Community Development Block Grant Disaster Recovery Program (CDBG-DR)

Community Development Block Grant Disaster Recovery Program (CDBG-DR)

Basic Info

During 2017, severe weather events caused extensive damage in many parts of our state, resulting in three Presidential declarations of a major disaster – two due to Southwest Georgia tornadoes and one in the wake of Hurricane Irma. Earlier this year, the federal government awarded Georgia \$64,904,000 in disaster recovery assistance to address “unmet needs” and “mitigation” in the areas damaged by one of these major disasters. The funding has been made available through the Department of Housing and Urban Development’s (HUD) Community Development Block Grant Disaster Recovery (CDBG-DR) program, which focuses on covering “...necessary expenses for activities...related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas..”.



CONTACT
CDBG-DR@dca.ga.gov

This funding is now available to assist communities, some of which were completely devastated and remain uninhabitable a year after the fact. Counties that received public and individual assistance are eligible to receive these funds.

Funds will be prioritized for use in the most impacted and distressed areas, to facilitate long-term recovery through the restoration of infrastructure and housing, mitigation to protect from predictable future damage, and economic revitalization. DCA is actively working with HUD on program details, and will be coordinating directly with local governments in eligible disaster areas.

Eligible counties: Berrien, Camden, Charlton, Chatham, Coffee, Cook, Crisp, Dougherty, Glynn, Liberty, McIntosh, Thomas, Turner, Wilcox, Worth

Documents


Applications

The Disaster Recovery Program webpage will continue to grow and change as information becomes available. The website will include links to action plans, action plan amendments, citizen participation requirements, the quarterly reporting system, and activity/program information for activities described in the action plan, including details of all contracts and ongoing procurement policies, eligibility, program design, and other pertinent information.

The following details the specifics related to plans, reports, etc. as they will be posted to the website:

Action Plan and Amendments

The Action Plan for disaster recovery will be posted to the website for no less than 14 calendar days to solicit public comment before being submitted to HUD. The final approved Action Plan will then be posted to a permanent section on the webpage designated for action plans and amendments.

All substantial Action Plan amendments will be posted for no less than 14 calendar days to solicit public comment before being submitted to HUD. Non-substantial amendments will not be posted for public comment. All final approved amendments will be posted to a permanent section on the webpage designated for action plans and amendments.

Performance Reports

Within three days of submission to HUD, each DRGR Quarterly Progress Report (QPR) will be posted to a permanent section on the webpage designated for reporting.

Citizen Participation Plan

The Citizen Participation Plan will remain on the website. Although not mandatory, DCA will receive input from local communities to determine the most pertinent unmet needs of the subgrantees. Contact information for DCA will be posted to the webpage for citizens and program participants with questions or complaints. Additionally, interested citizens may submit questions and comments to the CDBG-DR@dca.ga.gov email address on the webpage, which is monitored by disaster recovery analysts for review and action.

Program Activities Information

Program announcements and details of activities will be posted to the website on an ongoing basis. Program guidebooks and manuals will be posted to the website in English and made available in other languages for limited English proficiency audiences, as applicable.

Content Management

Content for the website will be created and updated by the Disaster Recovery Program Manager and provided for review and approval to the Community Finance Division Director. Upon approval by the Community Finance Division Director, the content will be uploaded to the webpage within 48 hours. The Disaster Recovery Program Coordinator will perform monthly tests of the Disaster Recovery Programs webpage to ensure all links are active and documents are current.

Pre-Award Implementation Plan

Capacity Assessment

Through the delivery of the annual Community Development Block Grant (CDBG) program, DCA staff members have developed experience in delivering programs in compliance with many of the regulatory requirements mandated under Register Notice 83 FR 40314 for CDBG-DR funding. However, there are some additional regulations and/or policies that DCA will be required to implement as a part of the CDBG-DR program. The Community Development Block Grant Program (CDBG) provides funding to assist a wide-range of eligible activities, including housing improvement projects, public facilities such as water and sewer lines, buildings such as local health centers or head start centers, and economic development projects. All projects substantially benefit low and moderate-income persons. The total funding level for FY 2018 was approximately \$41 million.

DCA has GIS staff in place to assist the CDBG-DR Program Manager with the Action Plan and Unmet Needs Assessment. Although DCA has the general programmatic and financial infrastructure in place to serve CDBG subrecipients, it will need additional support to efficiently manage the CDBG-DR allocation of \$37,943,000 for unmet housing needs. There is an additional need for supplemental staffing and efforts are currently underway to meet this need. Due to the lack of available funds, DCA will leverage its current CDBG staff and hiring additional staff members will occur in a staged manner to ramp up operations as needed, rather than hiring in mass prior to the signing of the grant agreement. By creating a staged hiring strategy, DCA can most effectively conserve and use its limited resources.

In early October 2018, Michael, a category 4 hurricane, plowed through many parts of Georgia. The losses are preliminary, but are extremely devastating. Anticipating future federal funds, DCA hopes to establish a successful and efficient Disaster Recovery Program and lay the groundwork for future disaster allocations. Additionally, the future allocations may help supplement the costs of growing the program and adding staff members and subject matter experts.

DCA does foresee the possibility of contracting through a sub-grantee and/or procuring the necessary staffing and expertise to augment the DCA's current staff. DCA is exploring the option to leverage our interagency relationships to assist with carrying out the activities under the grant, such as working with the State Historic Preservation Office. These agencies and subcontractors can provide technical assistance to DCA staff, assist with developing standard operating procedures as well as program policies and procedures, provide environmental review, estimating and inspection services, assist with general program management and provide other resources as necessary to fulfill DCA's obligations under the grant. The priorities identified during the Action Planning process will assist in DCA's assessment as to the resources that may be needed to support program management functions. DCA's consultant(s) may provide the following services:

- Environmental Review
- Inspection and Cost Estimating
- Title & Appraisal Services
- Intake Application Review including Duplication of Benefits
- Case Managers
- Uniform Relocation Act Assistance

Staffing

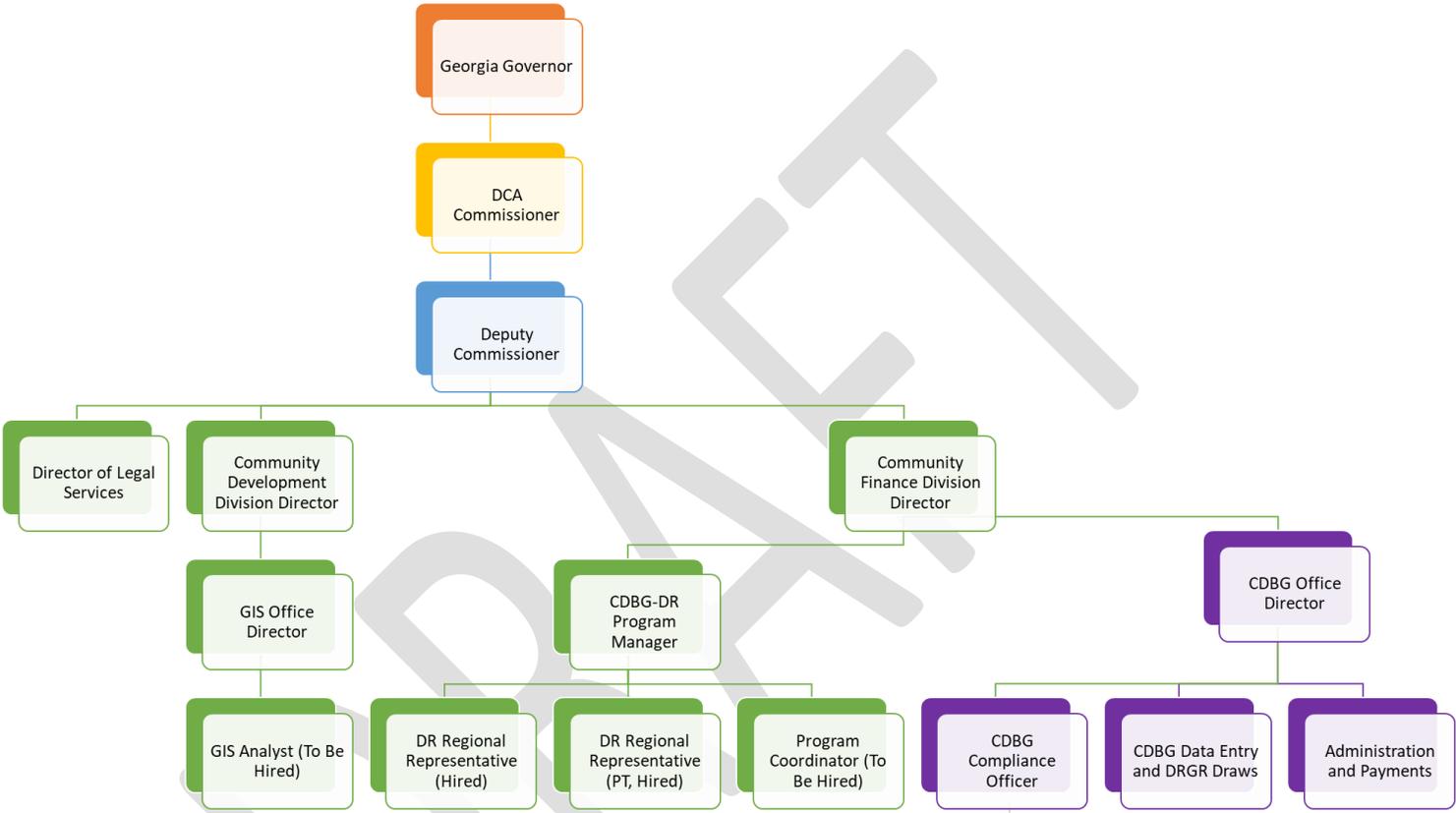
As mentioned previously, DCA has existing staff resources, but will maximize the use of the resources available and bring on additional staff as needed and to the extent, funds are available. As DCA is developing its staffing model, it will consider all options and determine what the most reasonable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

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 work load. The organizational chart in this section gives a visual of the various functions associated with the program activities undertaken with the CDBG-DR funds. Job descriptions are also included following the organizational chart.

Key staff members have prior experience with the HUD funded CDBG annual program. 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.

DRAFT

Georgia Department of Community Affairs Organizational Chart



Descriptions of the CDBG-DR positions are as follows:

CDBG-DR Program Manager – (In place)

The program manager will operate under the supervision of the Community Finance Division Director. The Disaster Recovery Program Manager will coordinate, provide technical assistance and guidance to implement the federal recovery program within the Community Finance Division.

The CDBG-DR Program Manger directs, implements, coordinates, and advocates disaster recovery goals, objectives, and outcomes set by the Georgia Department of Community Affairs. The CDBG-DR Program Manager links all Federal, State and Local resources to deliver the most optimal disaster recovery objectives. The CDBG-DR Program Manager works with government entities, volunteer organizations and staff to analyze data and guide programs that will assist communities in disaster recovery and resilience. Also, the program manager is responsible for producing quarterly reports and keeping the state disaster recovery website up to date.

CDBG-DR Program Coordinator – (To be hired)

Under the supervision of the CDBG-DR Program Manager, the Disaster Recovery Programs Coordinator 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 coordinator 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 also review project expenses and reimbursement requests to ensure that costs are accurate, necessary, and reasonable and in direct support of the proposed project activity. The coordinator will assist with validation of grant reimbursement requests and coordinate with appropriate staff to process/approve grant reimbursement requests. Additionally, the coordinator will conduct training on disaster assistance programs and other associated topics.

CDBG-DR Regional Representative – (1.5 Positions, In place)

The DR regional representatives report to the Community Development Block Grant Disaster Recovery Program Manager. The CDBG-DR Regional Representatives are responsible for monitoring and servicing complex Disaster Recovery related Community Development Programs within a designated region. The Regional Representative maintain an awareness of the status of potential and existing projects and provide advice and assistance to other Community Development and Finance Division Office of Field Services and/or Office of Community Development personnel. The representatives have duties related to oversight and compliance with CDBG-DR grants and provide technical assistance to program

administrators and local governments in the region. The representatives meet on-site with local officials or representative to monitor for CDBG-DR program compliance. The representatives have knowledge of CDBG and CDBG-DR guidelines and applicable federal regulations and confer with CDBG and CDBG-DR staff and units of local government on a regular basis to evaluate work progress and solve problems or develop solutions. The representatives create and deliver technical presentations associated with CDBG-DR compliance matters for grant applications and/or grant awards. The representative conduct site visits in order to verify grant application statements of need/target area conditions

Additional Support

CDBG Office Director – (In place)

Oversees program implementation, compliance, grants management services, and finance services for the Division. The Director manages all CDBG personnel.

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, 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.

CDBG Data Entry and DRGR Draws – (In place)

DCA staff will be responsible for grant and financial management and will implement grant management HUD accounting and reporting requirements in the following areas: 1) financial management and fiscal controls, 2) program income, 3) internal controls; 4) cash management, and 5) single audit requirements. Staff will oversee review and maintenance of grant financial records, supervise the work of other grant/financial management and systems management staff (two positions at this time). The incumbent will also oversee the reconciliation of financial and accounting records involving grant recipient financial reporting, grant recipient draw requests, Grants Management System (GMS) records, and DCA accounting records. In addition, DCA staff will oversee and maintain the Funds databases in GMS to ensure that all funds granted to DCA by HUD are accounted for and produce any financial reports required by HUD. DCA staff will manage the mission-critical divisional Grants Management System (GMS) and maintain and develop online reporting system to collect CDBG quarterly reports, accomplishment reports, NSP project setup and completion reports, and CDBG-R data for ARRA 1512 reports.

CDBG Admin/ Payments – (In place)

Existing CDBG financial management staff will maintain financial records on the Grant Management System (GMS), provide support, review all locally executed grant award documents for accuracy and

completeness. The staff will also create drawdown files using completed award documents, prepare and provide batch sheets to DCA's Office of Accounting, and recommend approval of draws by ensuring all figures on the draw request form. The staff will recommend approval and draw funds from HUD using the IDIS and DRGR databases upon approval from the applicable Office Director or other designee. The staff will also serve as the final check on all draw information prior to entry into the GMS and HUD databases and apply program income/returned checks from various sources to draws and makes the correct program income entries into the HUD databases and the GMS system.

GIS and Research Analyst – (To be filled by the Office of Planning)

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 presents 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 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 at 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-DR team on the development of disaster recovery plans, policies, and the implementation of activities.

Technical Assistance

DCA anticipates the level of Technical Assistance (TA) will be in high demand for this grant since DCA will be using subgrantees to administer this grant who lack experience with CDBG-DR. HUD provided technical assistance to DCA will be used to outline the specific requirements of the Federal Register Notice along with receiving guidance relative to best practices that should be considered by DCA as it undertakes activities under the CDBG-DR program. DCA staff will be provided with training necessary, by HUD provided technical assistance and HUD-provided training, to ensure that activities funded under this Implementation Plan are correctly and efficiently administered. DCA staff members have attended HUD-provided training through the 2016 CDBG-DR webinar series and have access to these resources, as well as the HUD CDBG-DR program management tools provided on the HUD Exchange website. Current CDBG-DR staff are also registered for the CDBG-DR Problem Solving Clinic scheduled for December 2018.

DCA plans to consult with HUD on an as-needed basis for general policy guidance or clarification of statutory requirements, though we do understand there are limited resources. Although DCA anticipates that the disaster recovery grant will be managed out of HUD's Washington, DC office, we will consult with the Atlanta HUD Field Office to seek solutions to issues.

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

The following list contains areas in which Technical Assistance may be necessary:

- New construction
- New building codes and standards to promote resiliency and mitigation
- Green building checklist – energy star
- Contractor prequalification (possibly by State for sub-grantees)
- IT system-of-record
- Training for system management
- Understanding case management processes
- On-going capacity building and training
- Duplication of Benefits (DOB) training

Accountability

DCA shall serve as the lead agency responsible for the implementation of the CDBG-DR award. This implementation will be administered through the Community Finance Division. This department currently administers the State’s CDBG Program. The CDBG-DR program manager will oversee the day-to- day activities of the CDBG-DR Activities.

The Georgia Department of Community Affairs is governed by a policy making board consisting of 14 members representing Congressional districts and five at-large members. The chairperson is Carolyn “Tippi” Cain Burch, the Vice- Chair is George “Chip” Mitchell, and the Secretary is Audrey King. The Board meets quarterly for regularly scheduled meetings.

Certification of Accuracy of Risk Analysis Documentation

On behalf of the Georgia Department of Community Affairs, I certify that the information submitted within this Risk Analysis Documentation is true and accurate at the time of submission to HUD and complies with Federal Register Notice 83 FR 40314 and Public Law 115-123. This certification is limited to the content of the Risk Analysis Documentation.

Printed Name and Title Date

Signature

Appendices

Grantee Certifications

- 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 for Disaster Recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this Notice. The grantee certifies that activities to be administered with funds under this Notice are consistent with its Action Plan.
- 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. Each State receiving a direct award under this Notice 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 recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 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 recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for

purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

- 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. Each State receiving a direct award under this Notice certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that 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 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.
- m. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
- n. The grantee certifies that it will comply with environmental requirements at 24 CFR Part 58.
- o. The grantee certifies that it will comply with applicable laws.

Christopher Nunn, Commissioner
Georgia Department of Community Affairs

Date

[Signed Certifications submitted to HUD]

Income Limits

2018 Georgia HUD Median Income Limits – 80% AMI									
County Name	Area Income	1 Person	2 People	3 People	4 People	5 People	6 People	7 People	8 People
Berrien	44,300	27,400	31,300	35,200	39,100	42,250	45,400	48,500	51,650
Camden	63,800	35,750	40,850	45,950	51,050	55,150	59,250	63,350	67,400
Charlton	55,400	31,050	35,450	39,900	44,300	47,850	51,400	54,950	58,500
Chatham	65,200	36,550	41,750	46,950	52,150	56,350	60,500	64,700	68,850
Coffee	44,200	27,400	31,300	35,200	39,100	42,250	45,400	48,500	51,650
Cook	43,800	27,400	31,300	35,200	39,100	42,250	45,400	48,500	51,650
Crisp	43,200	27,400	31,300	35,200	39,100	42,250	45,400	48,500	51,650
Dougherty	53,400	29,550	33,750	37,950	42,150	45,550	48,900	52,300	55,650
Glynn	53,000	29,700	33,950	38,200	42,400	45,800	49,200	52,600	56,000
McIntosh	53,000	29,700	33,950	38,200	42,400	45,800	49,200	52,600	56,000
Thomas	47,300	27,400	31,300	35,200	39,100	42,250	45,400	48,500	51,650
Turner	40,200	27,400	31,300	35,200	39,100	42,250	45,400	48,500	51,650
Wilcox	43,700	27,400	31,300	35,200	39,100	42,250	45,400	48,500	51,650
Worth	53,400	29,550	33,750	37,950	42,150	45,550	48,900	52,300	55,650

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Expenditure Schedule

Unmet Needs Expenditure Schedule							
Time Period	Admin	Planning	Multifamily Rental Housing	Homeowner Rehabilitation	Buyout Program	HMGP Local Match	100%
Q4 2018		\$200,000					0.5%
Q1 2019		\$550,000					1.4%
Q2 2019	\$45,000	\$650,000				\$750,000	3.8%
Q3 2019	\$105,000	\$750,000	\$3,500,000	\$200,000	\$200,000	\$750,000	14.5%
Q4 2019	\$155,000	\$850,000	\$5,000,000	\$500,000	\$400,000	\$750,000	20.2%
Q1 2020	\$127,150	\$550,000	\$4,000,000	\$1,000,000	\$1,000,000	\$750,000	19.6%
Q2 2020	\$150,000	\$550,000		\$1,750,000	\$1,500,000		10.4%
Q3 2020	\$125,000	\$450,000		\$2,000,000	\$1,500,000		10.7%
Q4 2020	\$115,000	\$286,450		\$2,000,000	\$1,000,000		9.0%
Q1 2021	\$90,000	\$250,000		\$550,000	\$750,000		4.3%
Q2 2021	\$85,000	\$200,000			\$504,400		2.1%
Q3 2021	\$75,000	\$100,000					0.5%
Q4 2021	\$75,000	\$95,000					0.4%
Q1 2022	\$75,000	\$85,000					0.4%
Q2 2022	\$75,000	\$75,000					0.4%
Q3 2022	\$75,000	\$50,000					0.3%
Q4 2022	\$75,000						0.2%
Q1 2023	\$75,000						0.2%
Q2 2023	\$75,000						0.2%
Q3 2023	\$75,000						0.2%
Q4 2023	\$65,000						0.2%
Q1 2024	\$55,000						0.1%
Q2 2024	\$45,000						0.1%
Q3 2024	\$35,000						0.1%
Q4 2024	\$25,000						0.1%
Total	\$1,897,150	\$5,691,450	\$12,500,000	\$8,000,000	\$6,854,400	\$3,000,000	\$37,943,000
Anticipated households assisted:			550	350	65	70	1035
Cost per unit:			\$ 22,727	\$ 22,857	\$ 105,452	\$ 42,857	-