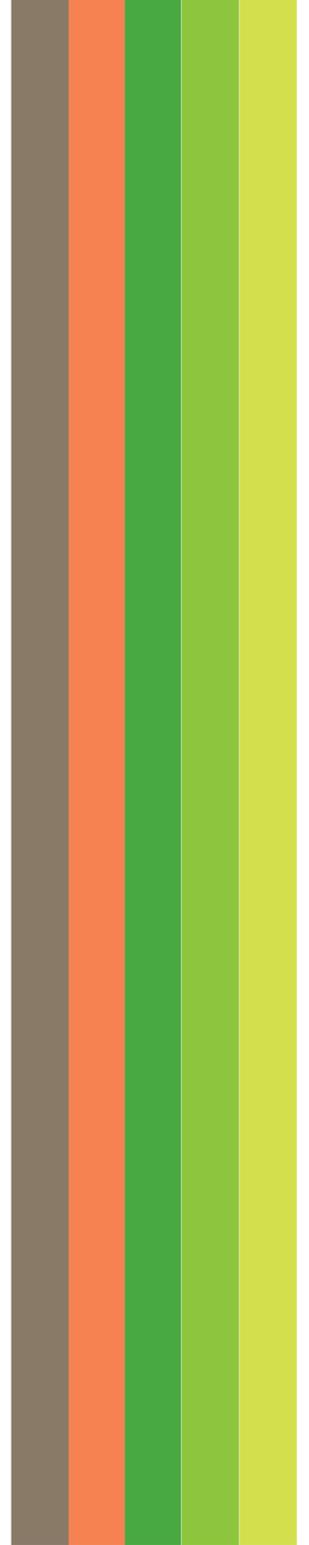


State of Georgia
CDBG-DR Public Action Plan
January 2023 Tornadoes





ABSTRACT

AMENDMENTS

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1. Executive Summary

Overview.

The U.S. Department of Housing and Urban Development (HUD) announced that the State of Georgia will receive \$12,595,000 in funding to support long-term recovery efforts following the January 2023 tornadoes through the Georgia Department of Community Affairs (DCA). Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address remaining unmet need in Butts, Henry, Jasper, Meriwether, Newton, Spalding, and Troup County.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated \$12,595,000 in CDBG-DR funds to the State of Georgia in response to the January 2023 tornadoes, DR-4685, through the publication of the Federal Register, *Vol. 88, No. 226, Monday, November 27, 2023*. This allocation was made available through Public Law 117-328.

Disaster Specific Overview.

On January 12, 2023, Georgia was subjected to strong winds and thunderstorms which resulted in an onslaught of as many as 14 tornadoes and led to widespread power outages across Metro Atlanta and Central Georgia.

According to the National Weather Service, at its height, the storm originated as a supercell thunderstorm before spawning into a mesocyclone. This unique meteorological interaction included at least three to four tornadoes circulating concurrently around an even larger circulation in southwest Spalding County. On a scale of EF0 – EF5, the highest rated tornado out of the 14 that impacted Georgia that day was an EF3, indicating “severe damage”. Winds were as high as 155 mph and created wind damage that had an estimated expanse of 2200 yards in some areas and traveled just under 32 miles across noted regions like Spalding and Henry County. Not only were there multiple tornadoes on the ground simultaneously, but Spalding County also experienced tornadoes that briefly crossed paths. One circulation would hit just minutes after the other and, in some instances, two tornadoes would merge. This likely magnified the damage seen in these areas, increasing the power and intensity of the cyclones. These circumstances made it difficult to track and therefore distinguish between each of the tornadoes, but the impact of their damage was evident.

Over the course of four hours, tornadoes littered Georgia starting around 3 p.m. and carrying into evening hours, the last of which dissipated just after 7 p.m. Within that time, communities sustained substantial property and infrastructure damage that residents are still faced with in the aftermath of the disaster. Overall, the storm resulted in as many as 32 injuries and unfortunately claimed the lives of two individuals.

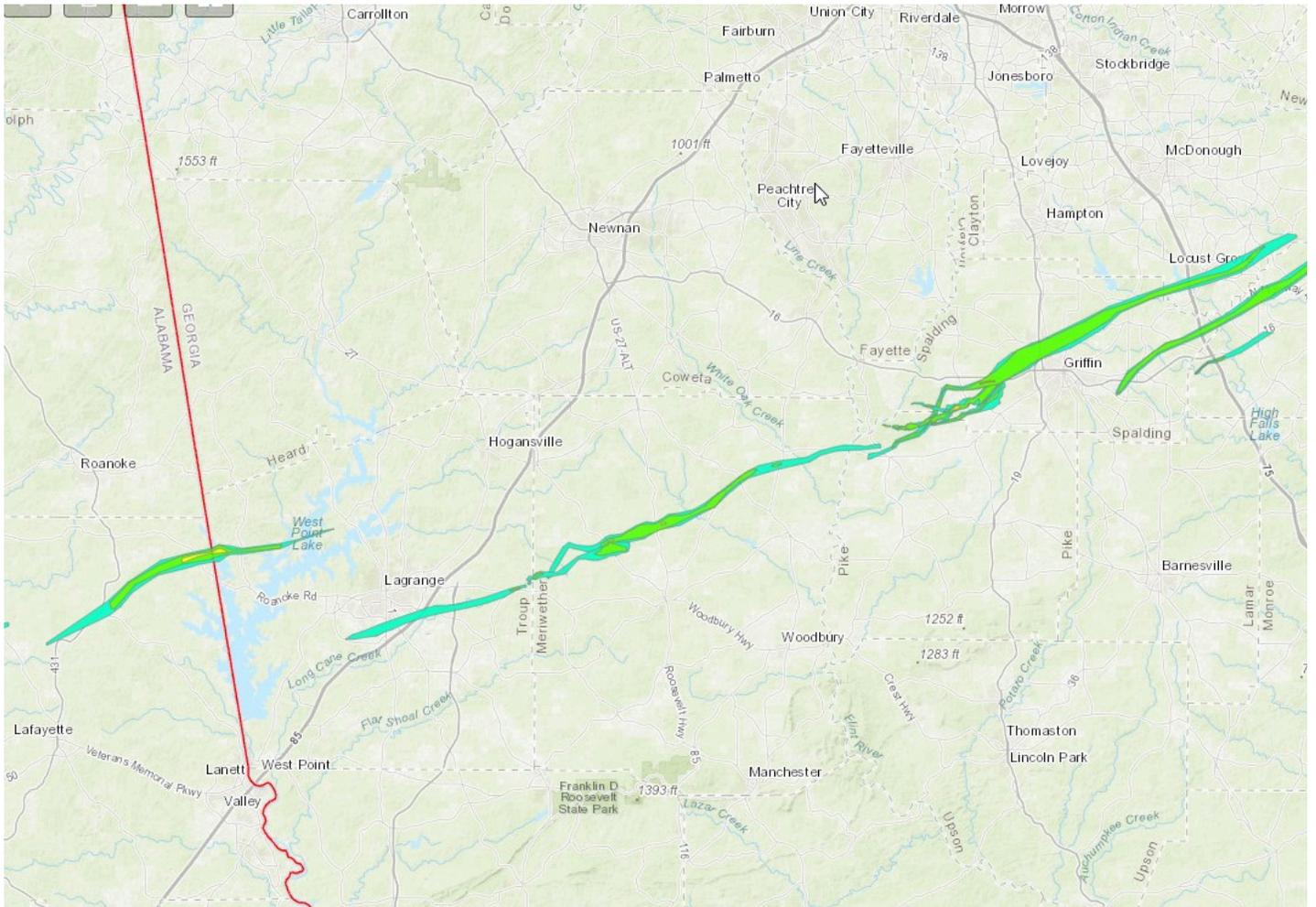


Figure 1: Tornado Track, Courtesy of NOAA

Many of the impacted counties experienced similar issues at varying proportions. Within Spalding County, the City of Griffin noted that they were already faced with a concerning housing shortage prior to the storm, a position other counties shared as well. This was further exacerbated by the events of January 12. Griffin noted that due to their nuisance abatement program, there was a deficit of just over 300 dwelling units. Compounded by the additional 1,007 units impacted by the storm as reported in their Safety Assessment, the city continues to be in vital need of assistance to combat these surmounting challenges. Jasper County also noted that communications within impacted counties were diminished due to the storm including several downed trees and power lines which exposed deficiencies in radio and cell coverage.

In the wake of the storm, volunteer groups like the National Voluntary Organizations Active in Disaster (VOAD) and other community groups set about assessing the damage and assisting the community. They coordinated efforts to remove debris from roads and homes, suspend tarps, and provide supplies for those whose funds and circumstances were hampered by the costly expenses of the disaster. More than a year later, volunteer groups continue to actively assist impacted communities even as their available funds dwindle.

Despite community efforts to address these short and long-term impacts, additional support is integral to not only restore, but augment resilience against future disasters by developing communities into healthier, well-adapting strongholds.



Photo - Damaged Business in Griffin, GA, courtesy of 11 Alive News



Photo - Damaged home in Griffin, courtesy of 11 Alive News



Photo - Damaged home in Troup County, courtesy of 11 Alive News

Summary.

The purpose of this allocation is to address unmet needs founded as a result of DR-4685 and to mitigate further damage in the event of future disasters. When assistance from other sources like the Federal Emergency Management Agency (FEMA) and Small Business Administration (SBA) are exhausted or unavailable, CDBG-DR funds can be used to fill the gaps in funding where needed. DCA seeks to help provide the resources communities and individuals need to address long-term recovery efforts. In response, this Action Plan serves as an illustration of the processes and programs set forth to support housing, infrastructure, economic revitalization, and mitigation measures through CDBG-eligible disaster recovery activities.

The remaining unmet need will be calculated by first estimating the portion likely to be addressed by insurance proceeds, other federal assistance, or alternative funding sources. These estimates are based on the best available data at this time and may be adjusted in the future as additional data becomes available. After accounting for aid already made available through state and other funds like federal assistance, in addition to 15 percent added for resiliency measures, the remaining estimated unmet need is approximately \$284,142,182. **The federal allocation of \$12,595,000 million will allow the State of Georgia to address 4.4 percent of the total estimated unmet need remaining.**

When examining the relative need by sector, housing represents the greatest unmet need of \$248,746,367 (87.5%), followed by the economic sector with \$29,391,294 (10.3%), and the infrastructure sector with \$6,004,521 (2.11%). Each of these three sectors will be addressed in detail in the sections to follow. This data was also substantiated given the feedback received during an outreach meeting prior to the publication of the Action Plan and through subsequent information DCA collected from impacted counties. This includes county-specific information regarding Damage Assessment Field Sheets, internal safety assessments and other relevant materials.

After considering the primary unmet needs identified, citizen input, and the availability of funds awarded, DCA is proposing a Homeowner Rehabilitation and Reconstruction Program (HRRP) for single-family homes and an Affordable Rental Rehabilitation Program (ARRP) for landlords. The objective of the HRRP program for the purposes of this allocation is to strengthen homes to better withstand weathering conditions attributed largely to wind and rain through home hardening initiatives. This includes fortifying roof structures, installing water membranes to prevent leaks caused by displaced shingles, and securing structures to their foundation. The ARRP will seek to provide safe and affordable rental units that are in short supply. DCA will directly implement both programs through the securement of a procured vendor.

The table below outlines DCA’s proposed allocation of funds and remaining unmet need. The Federal Register Notice has established caps for funds designated under administration, planning, and public service activities. Additionally, 15 percent of funds will be set aside for mitigation activities.

Unmet Need and Proposed Allocation

Category	Remaining Unmet Need	% of Unmet Need	Program Allocation Amount	% of Program Allocation
Administration	\$0.00	0.00%	\$629,750.00	5.00%
Planning	\$0.00	0.00%	\$1,000,000.00	7.94%

Category	Remaining Unmet Need	% of Unmet Need	Program Allocation Amount	% of Program Allocation
Housing	\$248,746,367.00	87.54%	\$8,572,250.00	68.06%
Infrastructure	\$6,004,521.00	2.11%	\$0.00	0.00%
Economic Revitalization	\$29,391,294.00	10.34%	\$0.00	0.00%
Public Services	\$0.00	0.00%	\$750,000.00	5.95%
Mitigation	\$0.00	0.00%	\$1,643,000.00	13.04%
Total	\$284,142,182.00	100.00%	\$12,595,000.00	100.00%

Data Source(s): Unmet needs assessment

* Allocation Amount includes project delivery costs and does not include administration and planning costs.

2. Unmet Needs Assessment

Overview.

The Unmet Needs Assessment seeks to evaluate the three core aspects of recovery – housing, infrastructure, and economic revitalization. The data provided in this section will inform the Distribution of Funds in Section 4 to follow.

As outlined in the Federal Register Notice, 80 percent of all CDBG-DR funds will benefit the HUD-identified MID area under zip code 30223 which DCA will expand to the entirety of Spalding County. The remaining 20 percent of the allocation will be spent within areas that received a presidential major disaster declaration for DR-4685 and were eligible for both individual and public FEMA assistance. These state or grantee-identified MID counties include Butts, Henry, Jasper, Meriwether, Newton, and Troup County.

Communities battled rotational wind damage attributed to varying degrees of intense tornadoes as well as straight-line wind damage attributed to strong thunderstorms. The winds uprooted and snapped numerous trees, some of which blocked roads and collapsed on the properties of residents and business owners. The winds also brought upon structural damage to roofs, siding, gutters, and power poles with debris being flown about for hundreds of yards. FEMA stated in a press release that the costs for debris removal and emergency response had exceeded 15 million dollars in the hardest hit areas just following a month after the disaster.

Troup found themselves under dismally similar circumstances when they encountered another two tornadoes, an EF-1 in February and an EF-3 in March. The Official Troup County, Georgia - Government Facebook page shared that 139 homes were damaged during the March 26 tornado. The tornado also made its way into Meriwether County before eventually weakening. Only exacerbating circumstances further, were the seven inches of rain from those weekend storms that threatened the failure of the Spalding County Heads Creek Reservoir Dam. This led to calls for the evacuation of residents that were downstream from the dam as roads and nearby streams and rivers flooded.

For residents and officials who were already preoccupied with impacts from the January 2023 disaster, the storms that came after only added to the strain on the resources and efforts communities were putting forth.

a. Housing Unmet Need

Disaster Damage and Impacts.

This section on housing recovery details the overall impact of the January tornadoes on the 7 counties declared eligible for FEMA’s Individual Assistance (IA) and Public Assistance (PA) and the unmet needs that still exist within the communities.

Conditions Pre-Disaster:

DCA’s most recent [Housing Needs Assessment](#) provided valuable insights into housing conditions prior to the disaster as significant challenges could be noted on both the homeowner and rental front.

Seeing as Georgia’s poverty rate is higher than that of the US at 14.3 versus 11.4 percent in 2020, its apprehensible how this statistic lends to the narrative of home affordability for individuals on the lower end of the income spectrum. In 2019, Georgia identified 29.03 percent of households as cost burdened, having spent more than 30 percent of their monthly income on housing costs. Of this group, a majority of households were renters with 43.4 percent considered cost burdened compared to only 19.3 percent of homeowners. Households considered cost burdened are indicated as paying more than they can reasonably afford for

their housing. As such, those with the lowest income tended to have the highest rate of cost burden. Homeowners in the lowest income tier (0-30% AMI) had the highest rate of cost burden at 69.1 percent. Similarly, renters in the second-lowest income tier (31-50% AMI) had the highest rate of cost burden at 79.1 percent.

What Georgia residents are seeing is a lack of affordable housing that's accessible, contributing to an affordability housing gap. Those in the highest income tier have a limited supply of housing within their pricing bracket with a housing gap of over 900,000 units among homeowners and 395,000 units among renters. This leads households earning 100%+ AMI to occupy housing that would otherwise be affordable to those at a lower income. Households in this higher income bracket ultimately make up the largest group occupying units at all income levels. The outcome is a housing gap across all income tiers between 0-100% AMI and explains the large affordability gap at the lower income tiers.

While single-family dwellings still make up the largest housing type, there has been an increasing expansion of multi-family units. Decline in the homeowner vacancy rate from 2010 to 2020 may have led those looking towards buying, to instead remain and put further strain on the rental market. Likewise, the rental vacancy rate has also decreased, falling over 33 percent within the same time span and decreasing the overall vacancy rate from 13.7 to 11.5 percent. Rental prices as well are climbing due to high demand, with the median gross rent having risen 7.6 percent from \$968 in 2015 to \$1,042 in 2020.

Housing – FEMA Individual Assistance Data:

DCA analyzed several sets of data to gauge the housing impact caused by the January tornadoes. These sets include data from FEMA and limited SBA home loan data. The total number of FEMA applicants within the presidentially declared area is 8,490. Of those, 538 had FEMA Verified Losses (FVL). Data in the table below shows the FVL determinations in the disaster-impacted counties. Spalding County experienced \$3,212,497 in FVL, the highest in the 7-county declared area. Henry County and Butts County ranked second and third with losses totaling \$902,137 and \$522,495, respectively. The total FVL for the disaster is \$5,351,839. On average, applicants from Spalding County and Butts County had the highest FVL amounts. The average FVL amounts were derived by dividing the number of applicants with the FVL and the FVL dollars for each county.

County	# of Applicants	Applicants with FVL	FVL Dollars	Average FVL Dollars
Butts County	542	52	\$522,495	\$10,048
Henry County	1,677	14	\$902,137	\$7,913
Jasper County	231	30	\$160,191	\$5,340
Meriwether County	319	48	\$77,039	\$5,772
Newton County	760	34	\$186,706	\$5,491
Spalding County	4,337	4	\$3,212,497	\$13,220
Troup County	624	17	\$90,775	\$5,340
Total	8,490	538	\$5,351,839	

The FEMA Individual Assistance program (IA) consists of a multitude of services for individuals in disaster declared counties. The Individual and Household Program (IHP) data is broken down into two categories, Housing Assistance (HA) and Other Needs Assistance (ON). Housing funds made available through the Housing Assistance program help to bridge the gap from sheltering to permanent housing. These funds are for limited basic home repairs and replacement of essential household items, as well as rental payments for temporary housing. This assistance brings residences 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. DCA obtained Individual Assistance data from FEMA and the data is current as of November 22, 2022. The data shows Spalding County and Henry County having the greatest amounts of IHP assistance. Overall, throughout the 7-county disaster-impacted area the total amount of IHP assistance dispersed is \$5,296,127. Of that \$4,488,310 was dispersed for HA and \$807,817 for ON. The total figures can be seen in the table below:

County	\$ IHP	\$HA	\$ON
Butts County	\$298,603	\$258,041	\$40,562
Henry County	\$743,152	\$687,824	\$55,328
Jasper County	\$167,825	\$160,837	\$6,988
Meriwether County	\$304,158	\$273,968	\$30,190
Newton County	\$227,314	\$208,702	\$18,612
Spalding County	\$3,464,501	\$2,823,311	\$641,190
Troup County	\$90,574	\$75,627	\$14,947
Total	\$5,296,127	\$4,488,310	\$807,817

The core data on housing damage for the unmet housing needs calculation is 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 3.9 feet of flooding on the first floor
Major-High	\$15,000 - \$28,800 and/or 4 to 5.9 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 multipliers provided by HUD for the State of Georgia (seen in the table below). The multipliers use the median real property damage repair costs determined by SBA for its disaster loan program for the subset of homes inspected by both SBA and FEMA for each eligible disaster. By multiplying the number of units by the multipliers, the housing unmet needs was calculated.

Only FEMA inspected real property damage of \$8,000 or above are utilized to calculate the housing total unmet needs. HUD constitutes said amounts as high levels of damage and as such, homes in the “major-low” category or higher are regarded as serious unmet needs. As indicated in the table below, the summation of serious unmet needs for housing totals \$8,236,138 in damages for those that fell in the Major-Low, Major-High, and Severe categories.

Category of Damage	Number of Units	Serious Unmet Needs Multipliers	Total Unmet Needs
Major-Low	55	52,961	\$2,912,855
Major-High	27	82,582	\$2,229,714
Severe	23	134,503	\$3,093,569
Total	105		\$8,236,138

Additional Housing Unmet Need:

Impact assessment methodologies have often utilized SBA 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. Unfortunately, DCA was unable to obtain NFIP data for this disaster at the time of the development of this Action Plan. Therefore, DCA will use a combination of FEMA and limited SBA data to calculate a comprehensive Unmet Needs amount.

FEMA Individual Assistance data 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 data shows us where the damage is found and indicates the broad concentrated areas of need and the estimated cost to repair each site. While this method is useful, this data lacks an accurate scale and leaves additional unmet needs unaccounted.

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 up to 20 percent in costs for mitigation or resiliency needs to support 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 still likely an underestimate. HUD assisted homes will fund greater levels of energy efficiency, resilience, or mitigation, causing the costs to be greater. The following two tables estimate additional unmet need that is not accounted for:

FEMA Applicants - No SBA Loan, No Insurance, and FVL >\$0	5,148
Average SBA Loan Amount	\$39,306
Estimated Unmet Need	\$202,347,288

Total Applications Approved	160
Total Applications Declined or Withdrawn	403
Average SBA Loan	\$39,306
Estimated Unmet Need	\$15,840,318

These totals, with an added 15% for resiliency measures, less the FEMA Individual Housing Program funds (\$5,351,839) and SBA (\$6,289,100) aid provided gives the remaining unmet need for housing is approximately \$248,746,367.

HUD Calculation of Unmet Needs	\$8,236,138
Additional Unmet Need	\$218,187,606
Resilience Factor (15%)	\$33,963,562
Less Funds Provided by FEMA/SBA	-\$11,640,939
Total Estimated Unmet Need	\$248,746,367

Impact by Housing Ownership Status:

Of the 8,490 FEMA applicants, 4,823 (57%) were homeowners, 3,636 (42%) were renters, and 31 (1%) did not disclose this information. This information shows a greater impact to those owning homes rather than renting.

FEMA IA Owner-Occupied

FEMA IA for owner-occupied units represents a total of \$5,140,535 of FEMA verified loss. Twenty-six percent (26%) of applicants received inspections, of which forty-four percent (44%) of applicants were found to have damage and seventy-four percent (74%) of applicants received assistance. Owners from Spalding County submitted the most applications at 1,709, of which eleven percent (11%) received assistance. Spalding County had the highest FEMA verified loss, totaling \$2,997,598. Henry County submitted the second most applications at 1,258, of which six percent (6%) received assistance. Henry County had the second highest FEMA Verified Loss, totaling \$903,937.

County	# of Applicants	# of Inspections	# of Inspections with Damage	# of Homeowners that Received Assistance	FEMA Verified Loss (FV) (Total)	FEMA Verified Loss (FVL) (Average)
Butts County	390	113	52	36	\$522,495	\$10,048
Henry County	1,258	262	118	83	\$903,937	\$7,660
Jasper County	201	62	33	26	\$161,605	\$4,897
Meriwether County	236	101	49	39	\$277,238	\$5,658
Newton County	596	84	34	26	\$186,706	\$549
Spalding County	1,709	556	249	194	\$2,997,598	\$12,309
Troup County	433	78	18	9	\$90,956	\$5,053

FEMA IA Tenants Applications

FEMA IA Assistance for renter-occupied units represents a total of \$917,938 FEMA verified loss. Fifty-eight percent (58%) of applicants received inspections, fifty-four percent (54%) of applicants were found to have damage, and forty-two percent (42%) of applicants received assistance. Renters from Spalding County submitted the most applications, of which twenty-nine percent (29%) received assistance. Spalding County also had the highest FEMA verified loss, totaling \$806,071.

County	# of Applicants	# of Inspections	# of Inspections with Damage	# of Renters that Received Assistance	FEMA Verified Loss (FVL) (Total)	FEMA Verified Loss (FVL) (Average)
Butts County	150	75	56	22	\$22,829	\$408
Henry County	414	228	160	30	\$25,207	\$158
Jasper County	29	15	13	1	\$0	\$0
Meriwether County	81	4	14	11	\$27,148	\$1,939
Newton County	164	85	73	9	\$12,437	\$1,065
Spalding County	2,608	1,527	757	385	\$806,072	\$1,065
Troup County	190	116	52	20	\$24,244	\$466

FEMA IA Applications by Housing Type

Applications from house/duplex accounted for about sixty-two percent (62%) of applications while about sixteen percent (16%) were townhomes, about eleven percent (11%) were apartments, and nearly seven percent (7%) were from mobile homes.

Residence Type	# of Applicants
Apartment	901
Assisted Living Facility	3
Condo	41
Correctional Facility	1
House/Duplex	5,264
Military Housing	1
Mobile Home	571
Other	289
Townhouse	1,393

FEMA Applicants by Owner-Renter

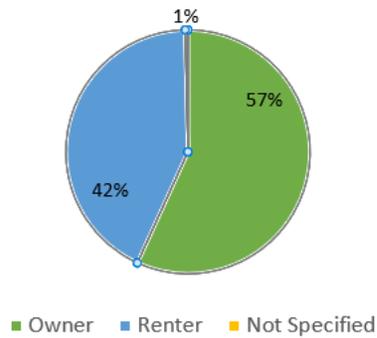


Figure 12

FEMA Homes Destroyed

While performing inspections, FEMA documents when residences are destroyed. According to data provided by FEMA, 18 homeowner residences and 22 rental units were destroyed.

County	Owner Occupied	Renter Occupied
Butts County	2	2
Henry County	3	1
Jasper County	0	0
Meriwether County	2	1
Newton County	1	0
Spalding County	10	18
Troup County	0	0

Rental Housing - Affordable Rents, Income Limits, and Affordability Periods

The following information will apply to all rental housing:

Affordable Rents:

Units that are identified to meet the LMI National Objective in a project must be rented to persons of verified LMI income and are subject to the 65 percent HOME rent limits for the affordability period.

Income Limits:

Assisted units may only be rented to households with an annual income that is less than 80 percent of the Area Median Income (AMI), as published annually.

Rental Housing Activity Affordability Period Per Housing Unit (\$ of CDBG-DR funds)	Minimum Affordability Period in Years
Less than \$15,000	5
\$15,000 - \$40,000	10
Greater than \$40,000	15
New Construction	20

DCA has reached out to several public housing authorities with limited success. Griffin Housing Authority provided the storm impact information detailed in the tables below. DCA also contacted multiple affordable housing communities across the disaster area, with limited success, to determine if they were impacted by the tornadoes. For those communities who responded to requests for information there was a determination that most of the housing was not directly impacted by the tornadoes. In the few cases where impact was felt the damage has been repaired successfully.

Multifamily Assisted Housing

Type Of Damage	# of Properties	# of Units	# of Units Assisted	# of Units Waiting Assistance	Remaining Unmet Need
Minor-Low	0.00	0.00	0.00	0.00	\$0.00
Minor-High	0.00	0.00	0.00	0.00	\$0.00
Major-Low	0.00	0.00	0.00	0.00	\$0.00
Major-High	0.00	0.00	0.00	0.00	\$0.00
Severe	0.00	0.00	0.00	0.00	\$0.00
Total					

Data Source(s): Individual property management companies for HUD assisted properties in affected communities

* FEMA does not inspect rental units for real property damage so personal property damage is used as a proxy for unit damage. The monetary thresholds are defined in Appendix D.

Public Housing Authorities Damaged

County/Municipality	Total # PHAs	Total PHAs Damaged	# of Units Damaged	Remaining Unmet Need
Spalding County/City of Griffin	5.00	1.00	2.00	\$0.00
Total	5.00	1.00	2.00	

Data Source(s): Griffin Housing Authority

Fair Housing, Civil Rights Data and Advancing Equity.

DCA will consider the limitations that come with living in vulnerable populations, racially and ethnically concentrated areas, poverty concentrated areas, historically underserved communities, as well as being a member of protected classes under fair housing and civil rights laws. By identifying these limitations DCA can better serve and amplify the impact CDBG-DR funds may have on these individuals.

Impact of Funds on Select Communities

To ensure funds from DCA's housing programs, HRRP and the Affordable Multi Family Rental Program, are assisting those that have the greatest need, including historically underserved communities, applications from the most socially vulnerable populations will be prioritized. HUD has defined vulnerable populations as a group or community whose circumstances present barriers to obtaining or understanding information or accessing resources. To comply with Federal requirements, 70 percent of program funds must be used to serve Low-to Moderate Income (LMI) individuals. To this end, as expenditures approach 70 percent of the funds appropriated for the program, DCA reserves the right to only accept applications from LMI households. Moreover, the replacement portion of the HRRP program will strive to make decisions to lessen area racial, ethnic and low-income concentrations and/or promote affordable housing in low poverty, non-minority areas. For the Affordable Multi Family Rental Program, vulnerable populations will be given leasing priority of rent restricted units. Further details regarding application intake for at-risk and vulnerable households are provided in DCA's applicable program manuals.

Affirmatively Furthering Fair Housing

DCA will take steps in accordance with the Fair Housing Act of 1968 to reduce disparities in housing choice, access, and opportunities based on protected class (e.g., race, color, religion, familial status, sex, national origin or disability). DCA will work to eliminate disparities in the benefits of, different requirements for participation in, and other forms of discrimination in programs or activities receiving Federal financial assistance in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1975, and Section 109 of the Housing and Discrimination Act of 1974.

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

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

Limited English Proficiency

DCA will ensure that its outreach, communication, and public engagement efforts are comprehensive and accessible in order to reach as many impacted citizens as possible, in accordance with DCA’s Language Access Plan which acknowledges the mandates of Executive Order 13166.

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. The Action Plan, amendments, and vital documents will be translated as needed.

According to U.S. Census data, approximately 1-11 percent of the total population in the impacted counties has limited English proficiency, with Henry (10.4%), Newton (7%), Troup (5.7%), and Spalding (5.3%) counties having the highest relative percent of the population that are considered LEP speakers. Careful consideration of the language needs of these populations will be taken during the applicant intake process. The **Limited English Proficiency Population of Disaster-Related Areas** table indicates the primary language spoken in counties where individuals are identified as LEP speakers including the number of LEP speakers and the percentage that makes up the county’s total population. In each county, Spanish had the highest percentage spoken out of LEP speakers. In total, over 23,470 residents in the impacted counties primarily spoke Spanish in the home, while the remaining 16,857 spoke a different language.

Social Vulnerability Index (SOVI)

The Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry Social Vulnerability Index (CDC/ATSDR SVI) uses 16 U.S. census variables to identify communities that may need assistance before, during, or after disasters occur. Social vulnerability was utilized by DCA to identify target areas that may require additional resources to rebound from this disaster. The SOVI utilizes the most recent census data to measure the social vulnerability of all census tracts in areas of interest. The index is instrumental in targeting resources to those who are in most need during recovery and rebuilding operations following the January 2023 tornadoes. These measures provided an approach for distributing scarce disaster recovery dollars and rebuilding resources for the benefit of impacted areas that are least able to recover from these disasters. SOVI scores for the impacted counties can be seen in Figure 15.

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 where other market forces are less likely to be awarded other support. Possible SOVI scores range from 0-1. A zero score means the community has the lowest vulnerability and a score of 1 indicates the highest vulnerability. It should be noted that within the affected area, Meriwether and Troup had the highest Overall SVI Score with a medium to high level of vulnerability.

County	2020 National Overall SVI Score ¹	Socioeconomic Status ²	Household Characteristics ³	Racial and Ethnic Minority Status ⁴	Housing Type and Transportation ⁵
Butts County	0.2911	0.3608	0.2468	0.4051	0.3481
Henry County	0.1582	0.1582	0.4051	0.8671	0.038
Jasper County	0.1835	0.3165	0.5696	0.2215	0.0823
Meriwether County	0.6899	0.7152	0.7595	0.6392	0.5696
Newton County	0.4684	0.4494	0.6203	0.8228	0.1962
Spalding County	0.4747	0.5633	0.4557	0.5759	0.3038

Troup County	0.6709	0.4304	0.7722	0.6519	0.8544
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Data Source(s): CDC/ATSDR Social Vulnerability Index Interactive Map 2020 Database Georgia

Notes: ¹Overall SVI Score: All 16 variables. ²Socioeconomic Status: Below 150% Poverty, Unemployed, Housing Cost Burden, No High School Diploma, No Health Insurance. ³Household Characteristics: Aged 65 and Older, Aged 17 and Younger, Civilian with a Disability, Single-Parent Household, English Language Proficiency. ⁴Race/Ethnicity: Hispanic or Latino (of any race); Black and African American, Not Hispanic or Latino; American Indian and Alaska Native, Not Hispanic or Latino; Asian, Not Hispanic or Latino; Native Hawaiian and Other Pacific Islander, Not Hispanic or Latino; Two or More Races, not Hispanic or Latino; Other Races, Not Hispanic or Latino. ⁵Housing Type/Transportation: Multi-unit Structures, Mobile Homes, Crowding, No Vehicle, Group Quarters.

Social Vulnerability Maps

CDC/ATSDR Social Vulnerability Index 2020

BUTTS COUNTY, GEORGIA

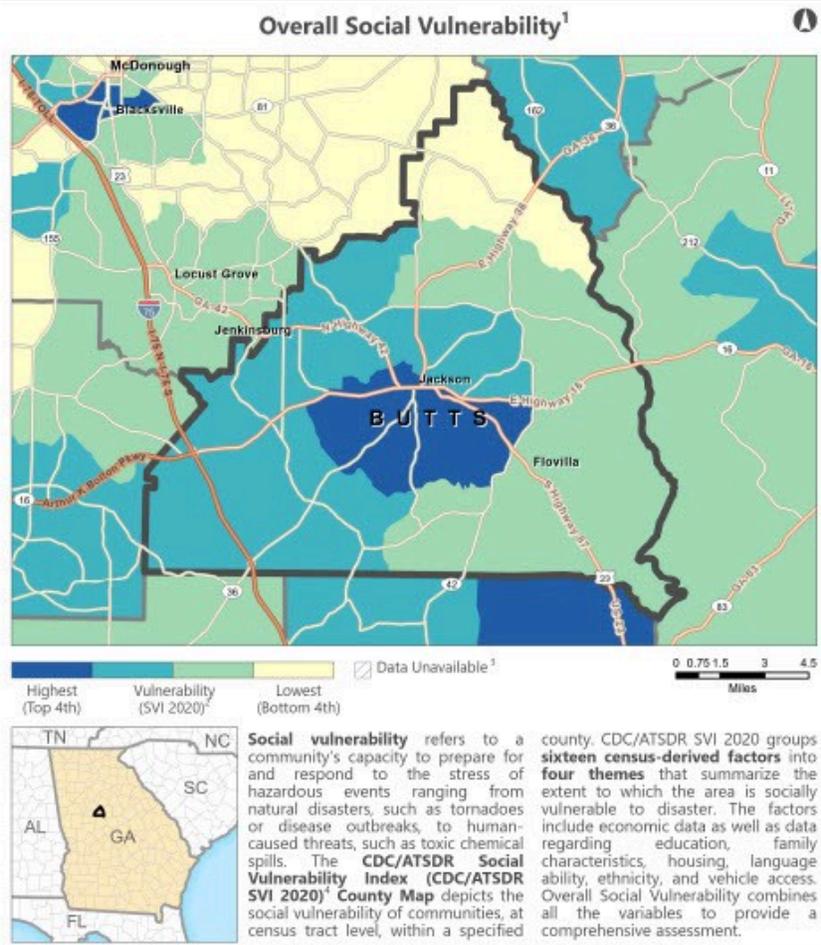


Figure 16

CDC/ATSDR Social Vulnerability Index 2020
HENRY COUNTY, GEORGIA

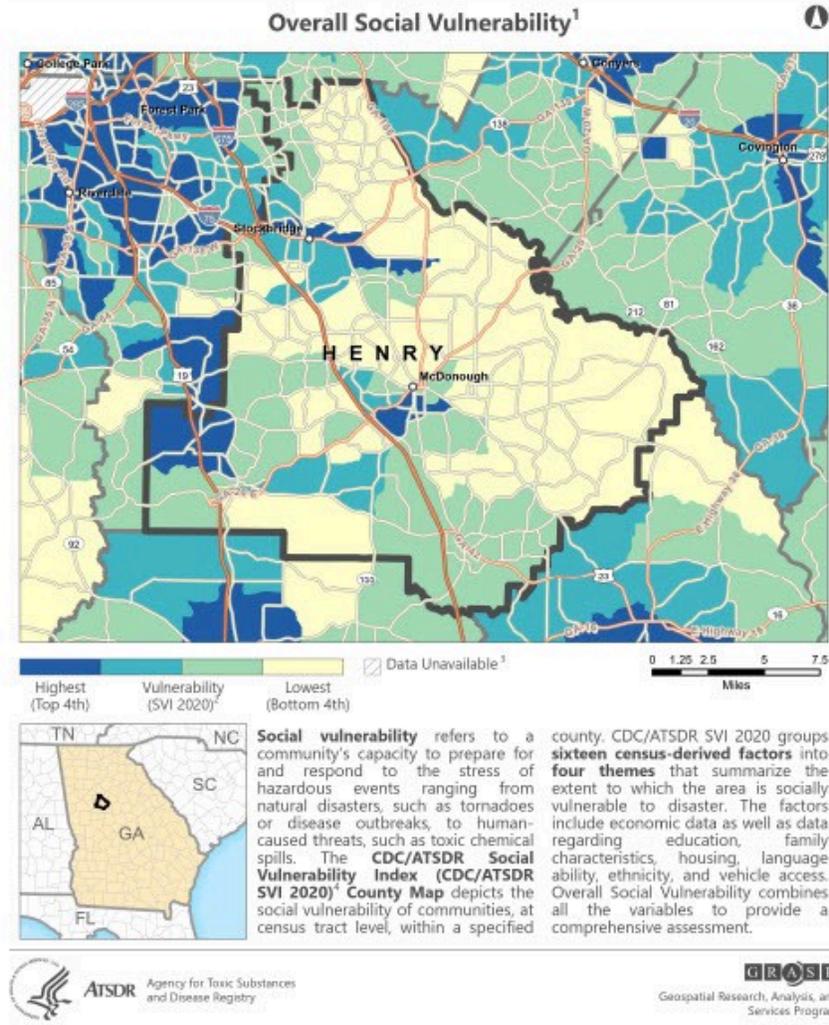


Figure 17

CDC/ATSDR Social Vulnerability Index 2020
 JASPER COUNTY, GEORGIA

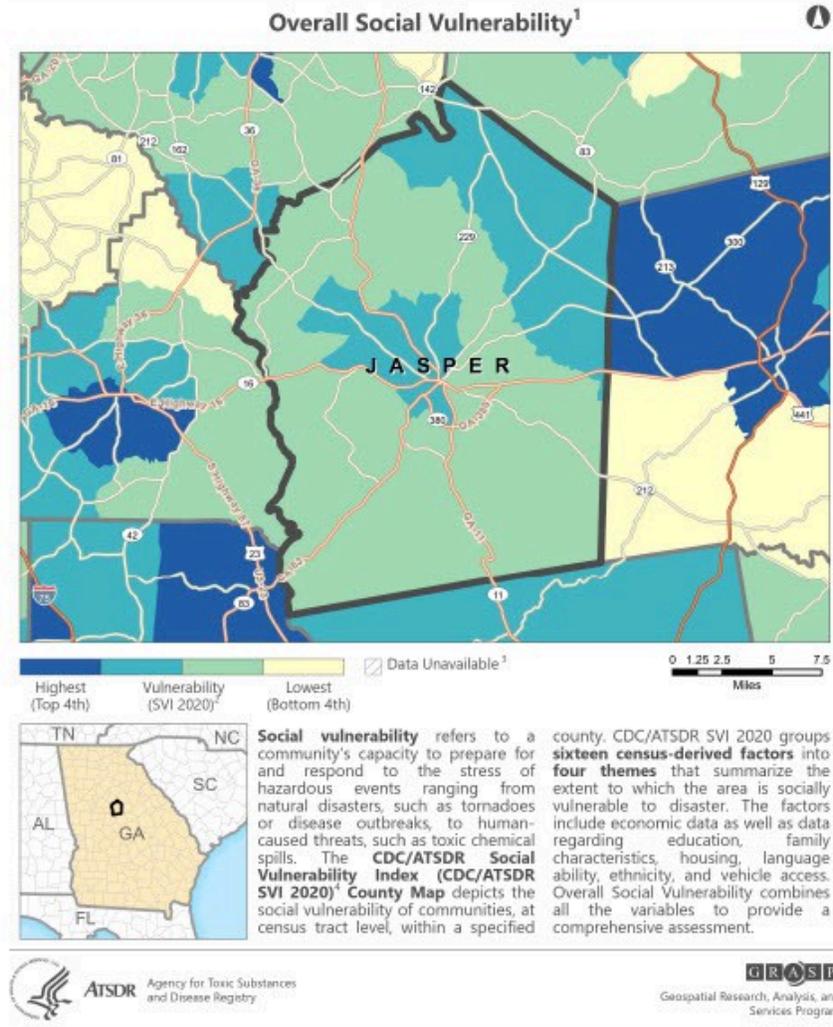


Figure 18

CDC/ATSDR Social Vulnerability Index 2020
 MERIWETHER COUNTY, GEORGIA

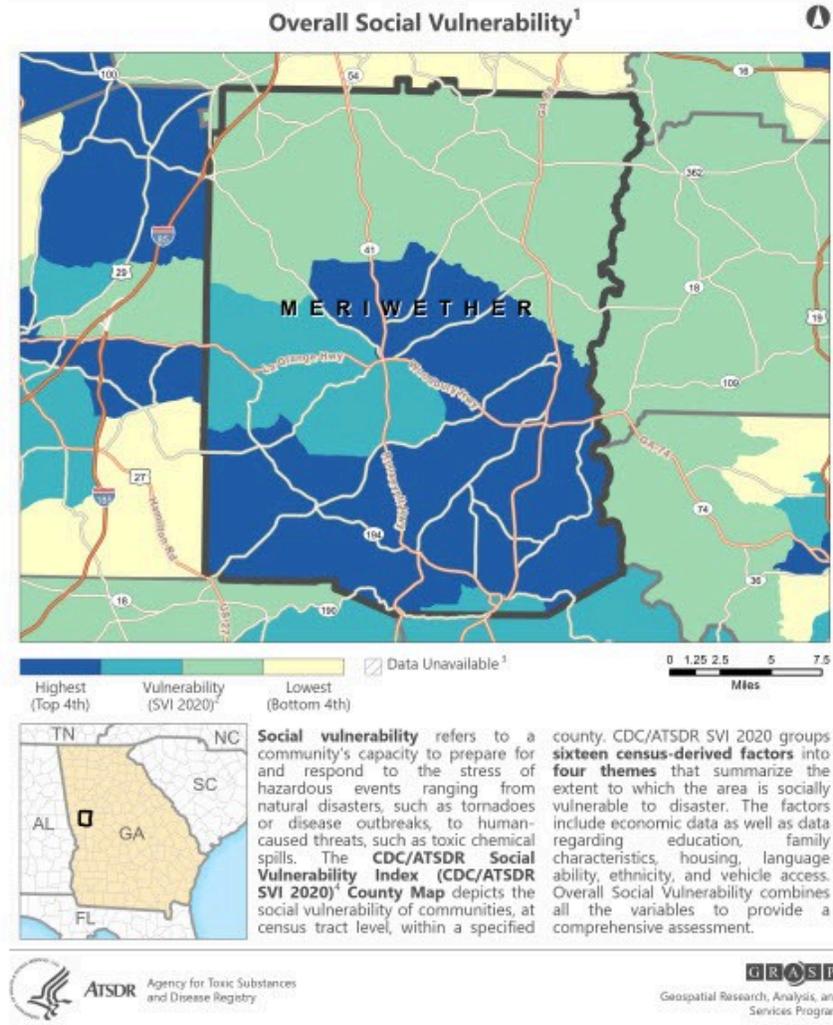


Figure 19

CDC/ATSDR Social Vulnerability Index 2020
 NEWTON COUNTY, GEORGIA

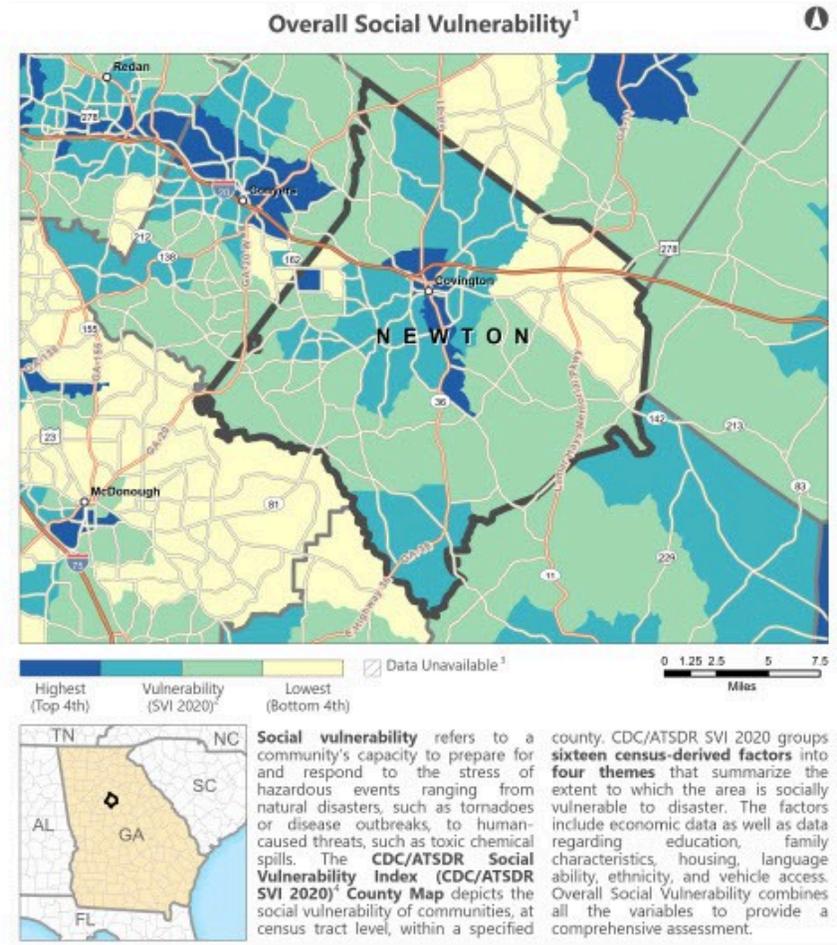


Figure 20

CDC/ATSDR Social Vulnerability Index 2020
 SPALDING COUNTY, GEORGIA

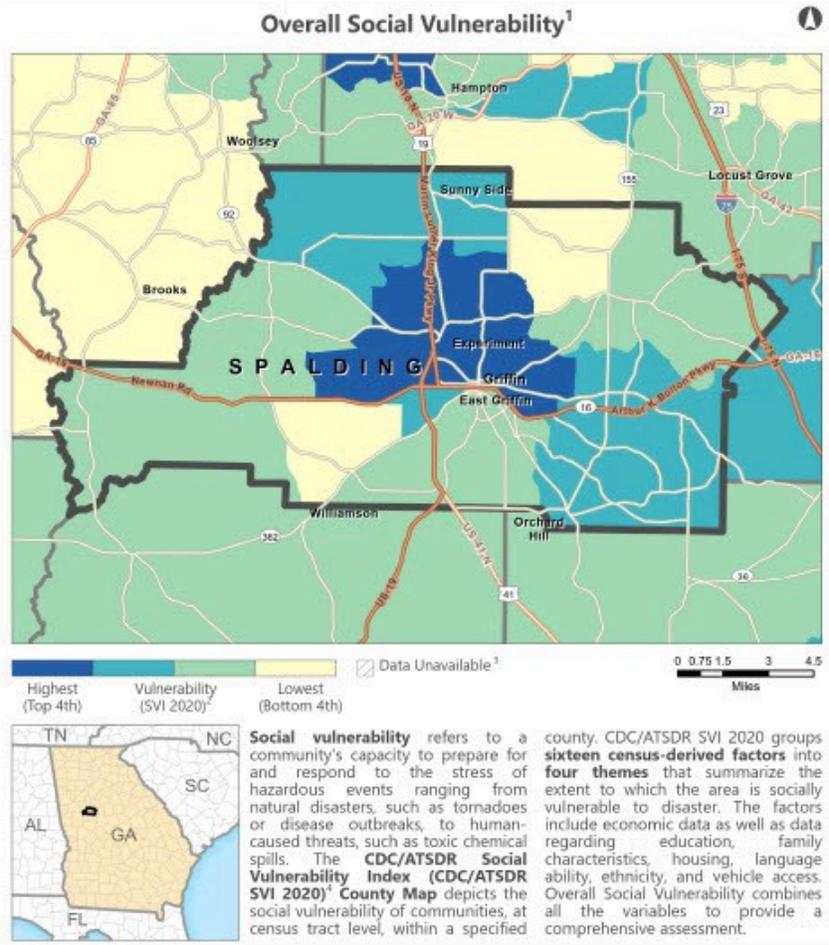


Figure 21

CDC/ATSDR Social Vulnerability Index 2020
 TROUP COUNTY, GEORGIA

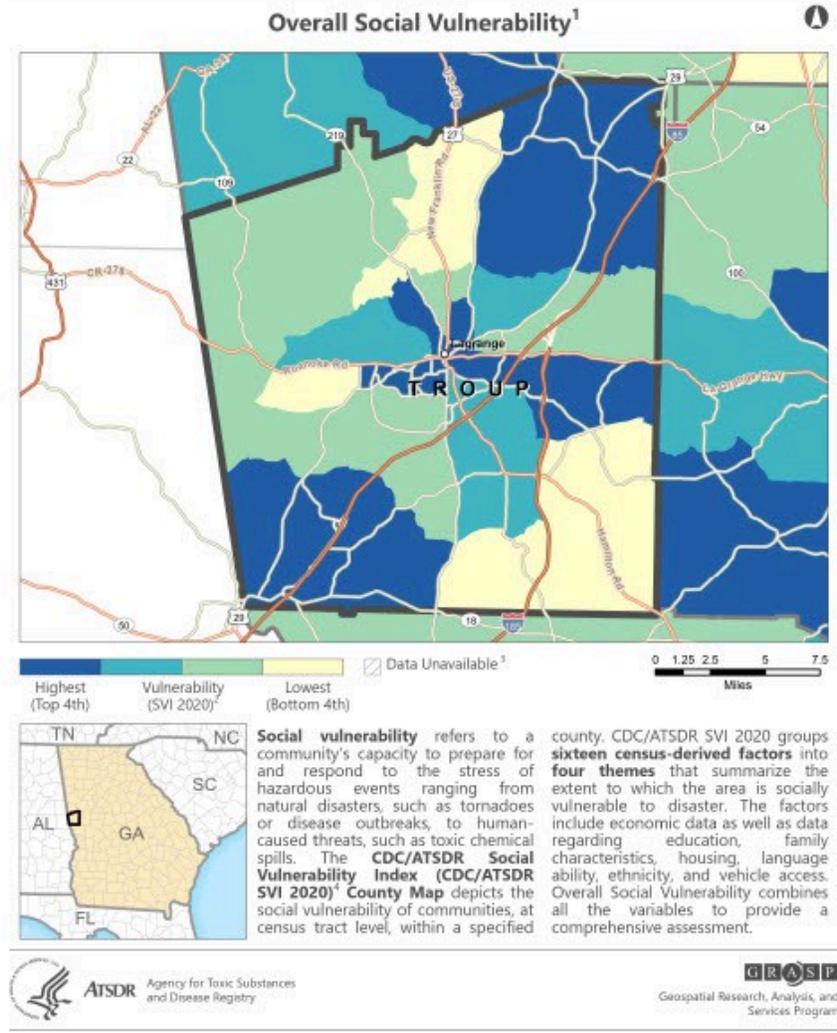
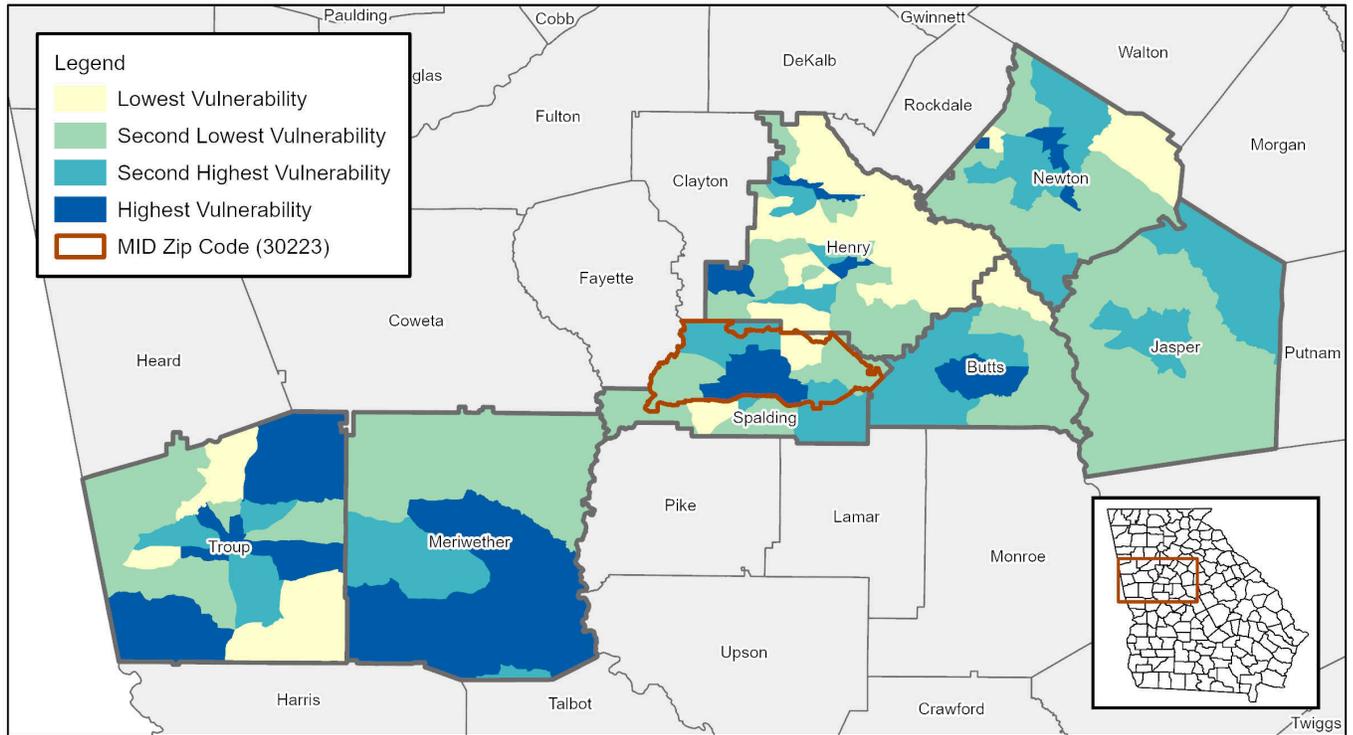


Figure 22

Census Tract Social Vulnerability | FEMA Disaster 4685 IA and PA Counties



Social Vulnerability Information: <https://www.atsdr.cdc.gov/placeandhealth/svi/index.html>



Figure 23

DCA recognizes the importance of advancing equity and reducing barriers among those likely to experience discrimination surrounding their sexual orientation and/or gender identity. As seen in the chart below, the Williams Institute reported that the LGBT community in Georgia had 26 percent of its population with an income under \$24,000. In relation, there was a higher instance of unemployment, food insecurity, and uninsured persons in comparison to the non-LGBT population.

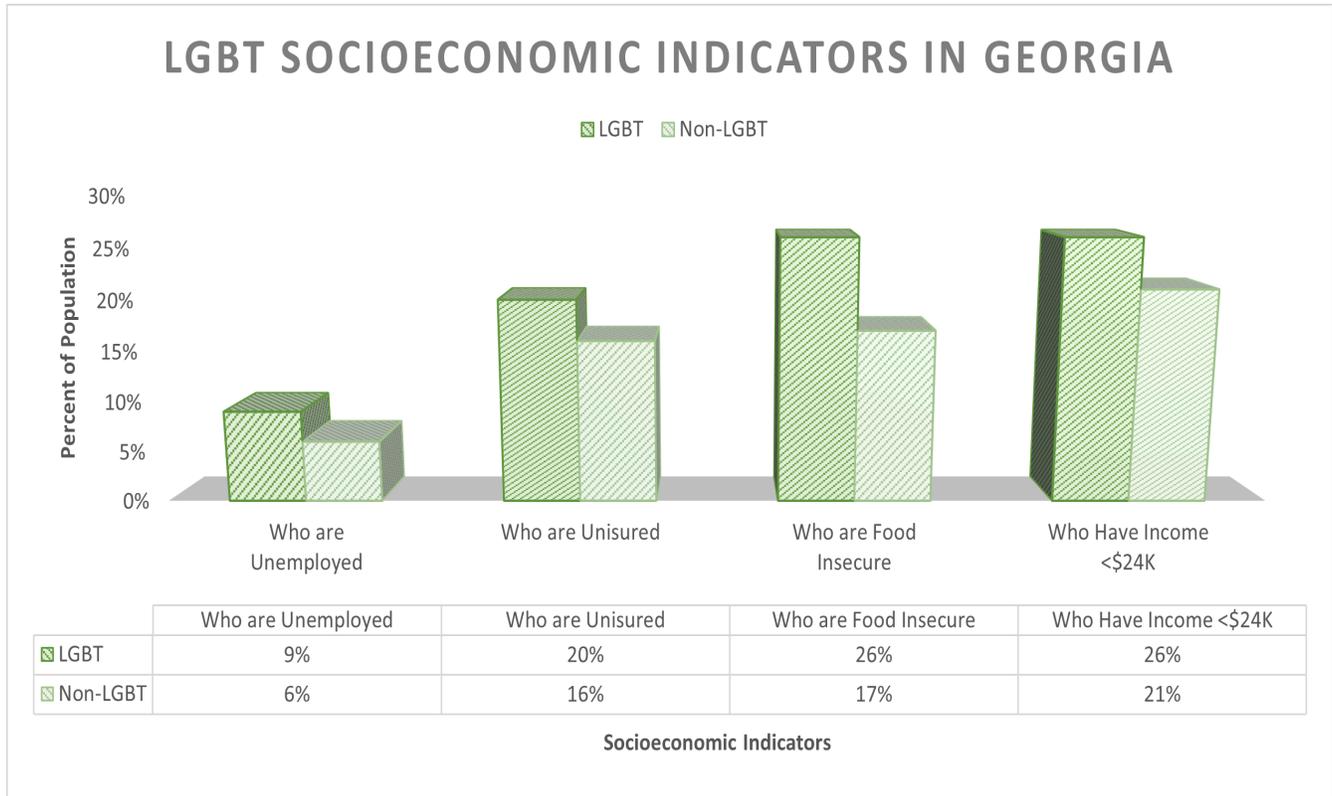


Figure 24

Based on available census data, DCA was able to identify the population of impacted counties based on their marital status and sexual orientation. This information will be noted to ensure this protected class is treated fairly and not subject to discrimination throughout the administration of CDBG-DR funded programs.

Figure 25: Household Type by Relationship									
County	Total Population	Opposite-Sex Spouse Population	Opposite-Sex Spouse Percent	Same-Sex Spouse Population	Same-Sex Spouse Percent	Opposite-Sex Unmarried Partner Population	Opposite-Sex Unmarried Partner Percent	Same-Sex Unmarried Partner Population	Same-Sex Unmarried Partner Percent
Butts County	25,522	3,973	15.6%	196	0.8%	417	1.6%	25	0.1%
Henry County	240,853	41,699	17.3%	527	0.2%	4,899	2.0%	134	0.1%
Jasper County	14,882	3,045	20.5%	0	0.0%	415	2.8%	0	0.0%
Meriwether County	20,679	3,523	17.0%	0	0.0%	378	1.8%	6	0.0%
Newton County	113,298	19,156	16.9%	173	0.2%	2,513	2.2%	179	0.2%
Spalding County	67,415	11,112	16.5%	59	0.1%	1,673	2.5%	36	0.1%
Troup County	69,527	11,404	16.4%	47	0.1%	1,431	2.1%	0	0.0%
State-Wide	10,722,325	1,823,872	17.0%	19,705	0.2%	212,869	2.0%	15,400	0.1%

Data Source(s): U.S. Census Bureau American Community Survey (ACS) 5-year dataset 2018-2022

Racially and ethnically concentrated areas and concentrated areas of poverty.

Two areas in Spalding County as well as one in Troup County are designated as R/ECAP areas. HUDs census-tract based definition of R/ECAPs utilizes a racial/ethnic concentration threshold and a poverty test.

The racial/ethnic concentration threshold, depending on the diversity of a jurisdiction’s population, can be either of the following:

- A non-White population of 50 percent or more for more diverse jurisdictions, typically located in metro areas.
- A non-White population of 20 percent or more for less diverse jurisdictions, typically located outside of metro areas.

The poverty test is defined as census tract neighborhoods of extreme poverty falling into one of two categories depending on which threshold is lower:

- Poverty rates exceeding 40 percent
- Poverty rates exceeding three times the average tract poverty rate for the metropolitan/micropolitan area.

Both criteria from the racial/ethnic concentration and the poverty test must be met to be designated as a R/ECAP area. Some of the protected classes that are disproportionately represented in these areas are outlined in the below tables.

Figure 26: R/ECAP Spalding County Census Tract 160300				
Socioeconomic Indicators	Spalding County Census Tract 160300	% of the Total Population	Atlanta Metro Area	Is Population Overrepresented or Underrepresented in R/ECAPs?
Median Household Income	\$50,080	45.8%	\$82,625	Underrepresented
Predominate Race: Non-Hispanic Black	2,164	69.3%	33.2%	Overrepresented
Below Poverty Level	750	26.2%	10.8%	Overrepresented
Non-Hispanic Black Below Poverty Level	226	12.6%	7.4%	Overrepresented
65 years and over Below Poverty Level	68	14.8%	8.8%	Overrepresented
Families with related children of householder under 5 years Below Poverty Level	75	100%	13.5%	Overrepresented
With a disability	330	11.4%	10.6%	Overrepresented

Data Source(s): U.S. Census Bureau American Community Survey (ACS) 5-year dataset 2018-2022

Figure 27: R/ECAP Spalding County Census Tract 160800				
Socioeconomic Indicators	Spalding County Census Tract 160800	% of the Total Population	Atlanta Metro Area	Is Population Overrepresented or Underrepresented in R/ECAPs?
Median Household Income	\$24,986	48.0%	\$82,625	Underrepresented
Predominate Race: Black Non-Hispanic	2,882	71.4%	33.2%	Overrepresented
Below Poverty Level	1252	29.8%	10.8%	Overrepresented
Non-Hispanic Black Below Poverty Level	1,100	30.6%	7.4%	Overrepresented
65 years and over Below Poverty Level	120	18.2%	8.8%	Overrepresented
Families with related children of householder under 5 years Below Poverty Level	84	69.0%	13.5%	Overrepresented
With a disability	964	22.8%	10.6%	Overrepresented

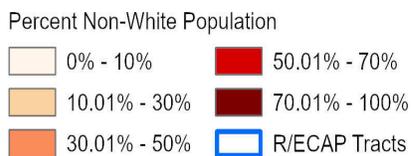
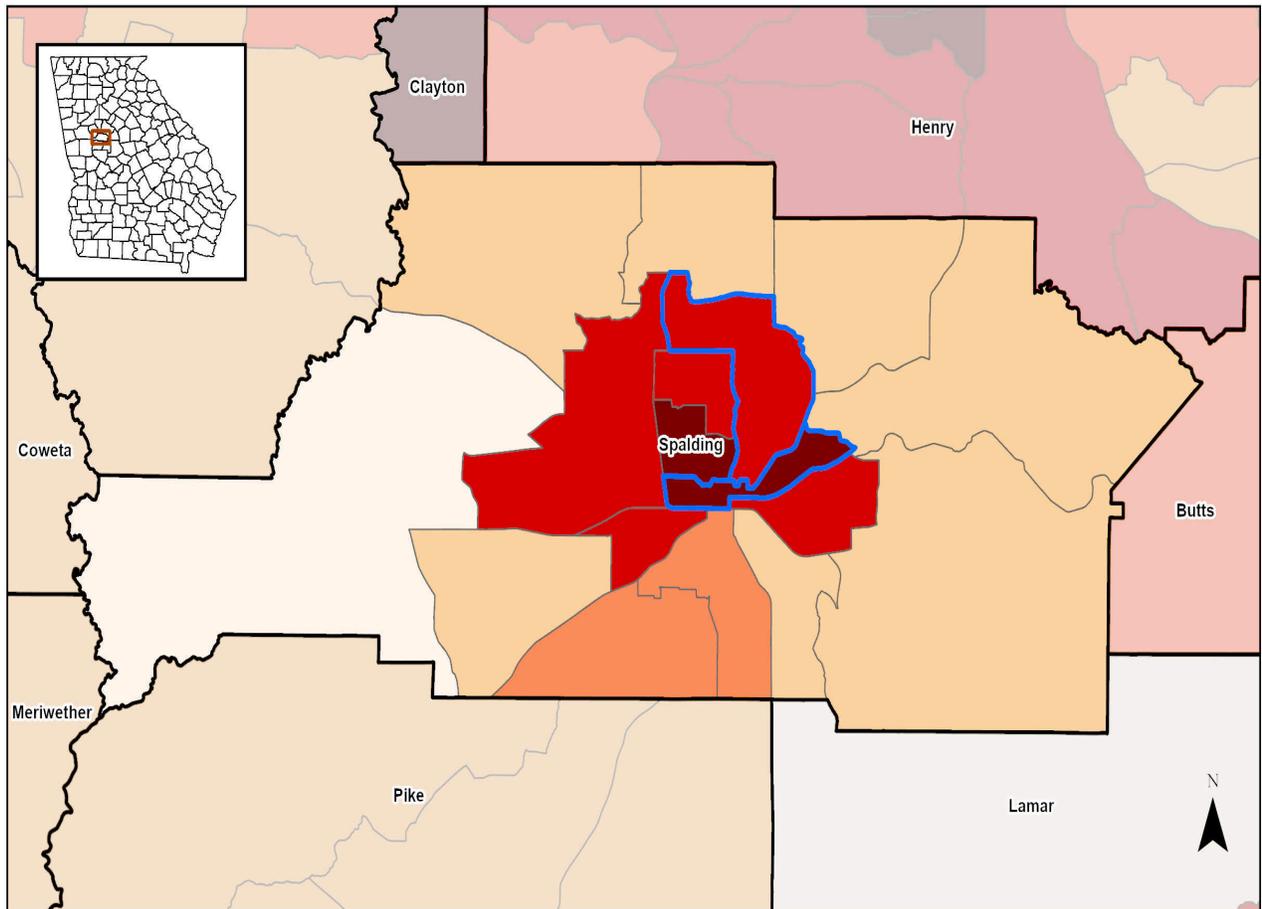
Data Source(s): U.S. Census Bureau American Community Survey (ACS) 5-year dataset 2018-2022

Figure 28: R/ECAP Troup County Census Tract 960800

Socioeconomic Indicators	Troup County Census Tract 960800	% of the Total Population	LaGrange Micro Area	Is Population Overrepresented or Underrepresented in R/ECAPs?
Median Household Income	\$37,444	47.2%	\$52,767	Underrepresented
Predominate Race: Non-Hispanic Black	1,905	60.0%	36.1%	Overrepresented
Below Poverty Level	1,403	31.7%	18.7%	Overrepresented
Non-Hispanic Black Below Poverty Level	330	31.4%	25.6%	Overrepresented
65 years and over Below Poverty Level	84	28.7%	12.6%	Overrepresented
Families with related children of householder under 5 years Below Poverty Level	172	83.7%	31.2%	Overrepresented

Data Source(s): U.S. Census Bureau American Community Survey (ACS) 5-year dataset 2018-2022

R/ECAP Areas and Non-White Population | Spalding County

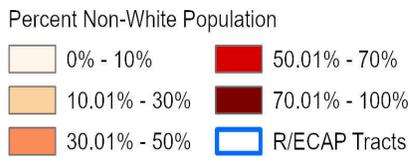
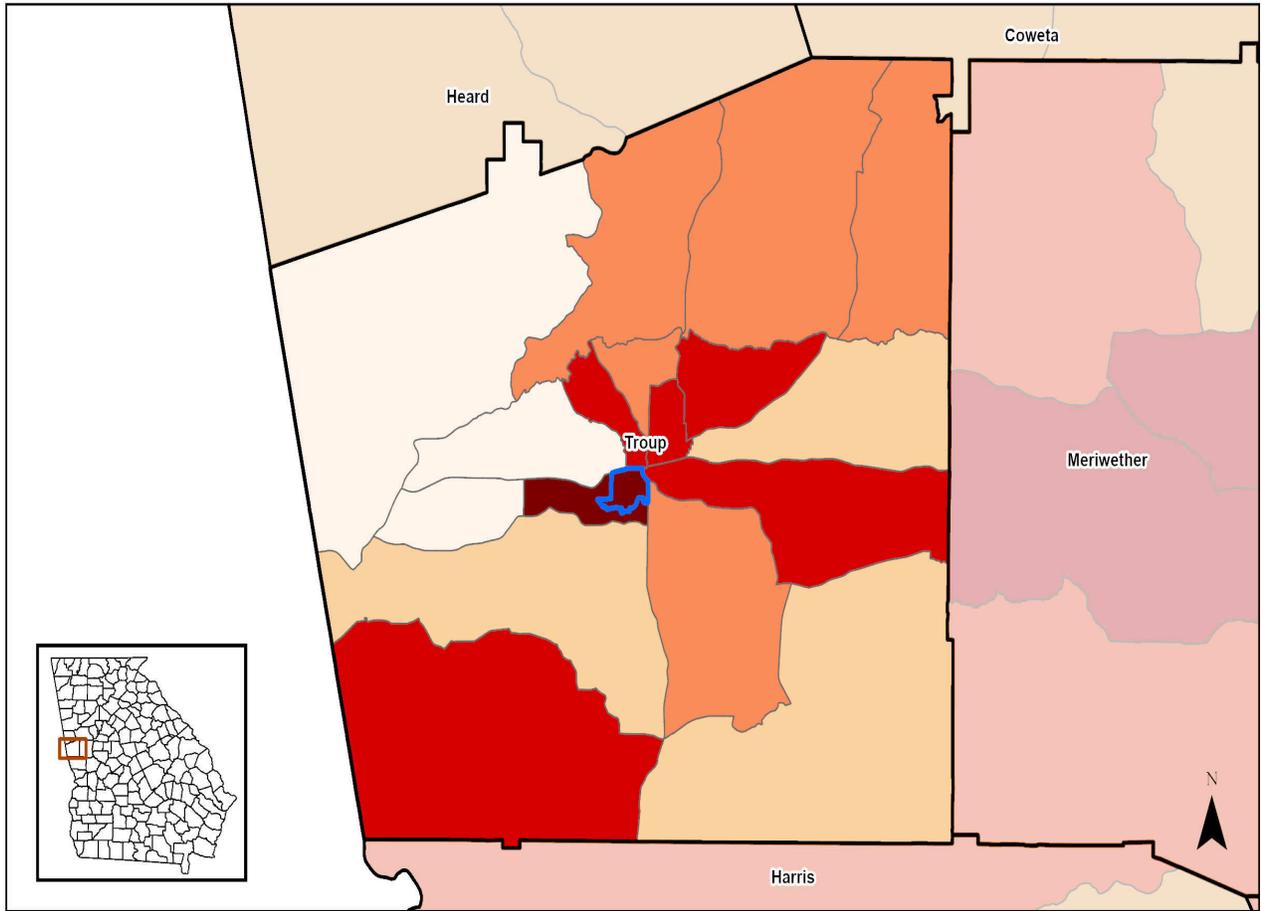


HUD R/ECAP Information:

<https://www.hudexchange.info/programs/fair-housing/best-practices-in-fair-housing-planning/analyzing-data/identifying-areas-of-segregation-integration-and-concentrated-poverty/>

Figure 29

R/ECAP Areas and Non-White Population | Troup County



HUD R/ECAP Information:

<https://www.hudexchange.info/programs/fair-housing/best-practices-in-fair-housing-planning/analyzing-data/identifying-areas-of-segregation-integration-and-concentrated-poverty/>

Figure 30

R/ECAP Areas and Percent Below Poverty | Spalding County

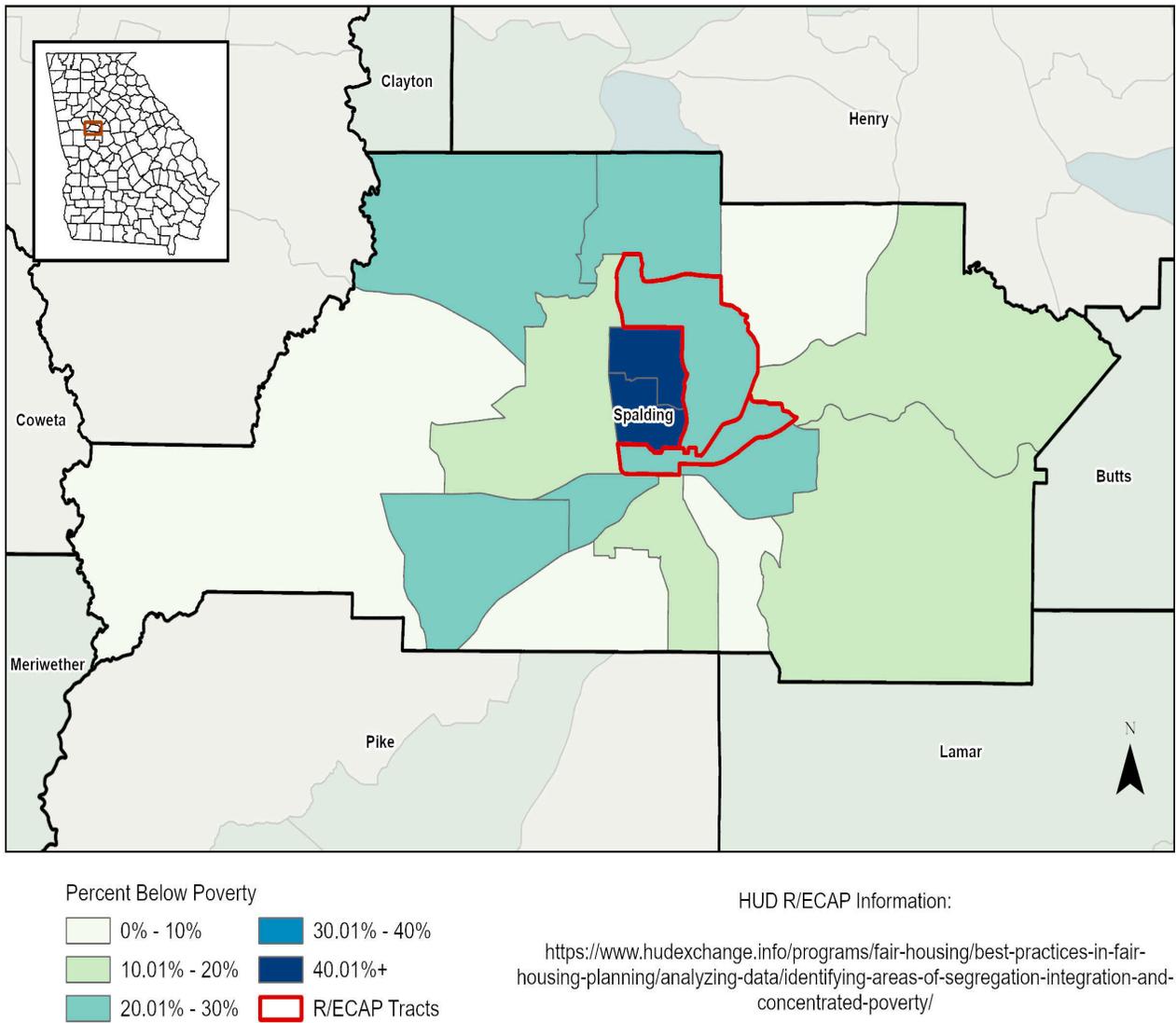


Figure 31

R/ECAP Areas and Percent Below Poverty | Troup County

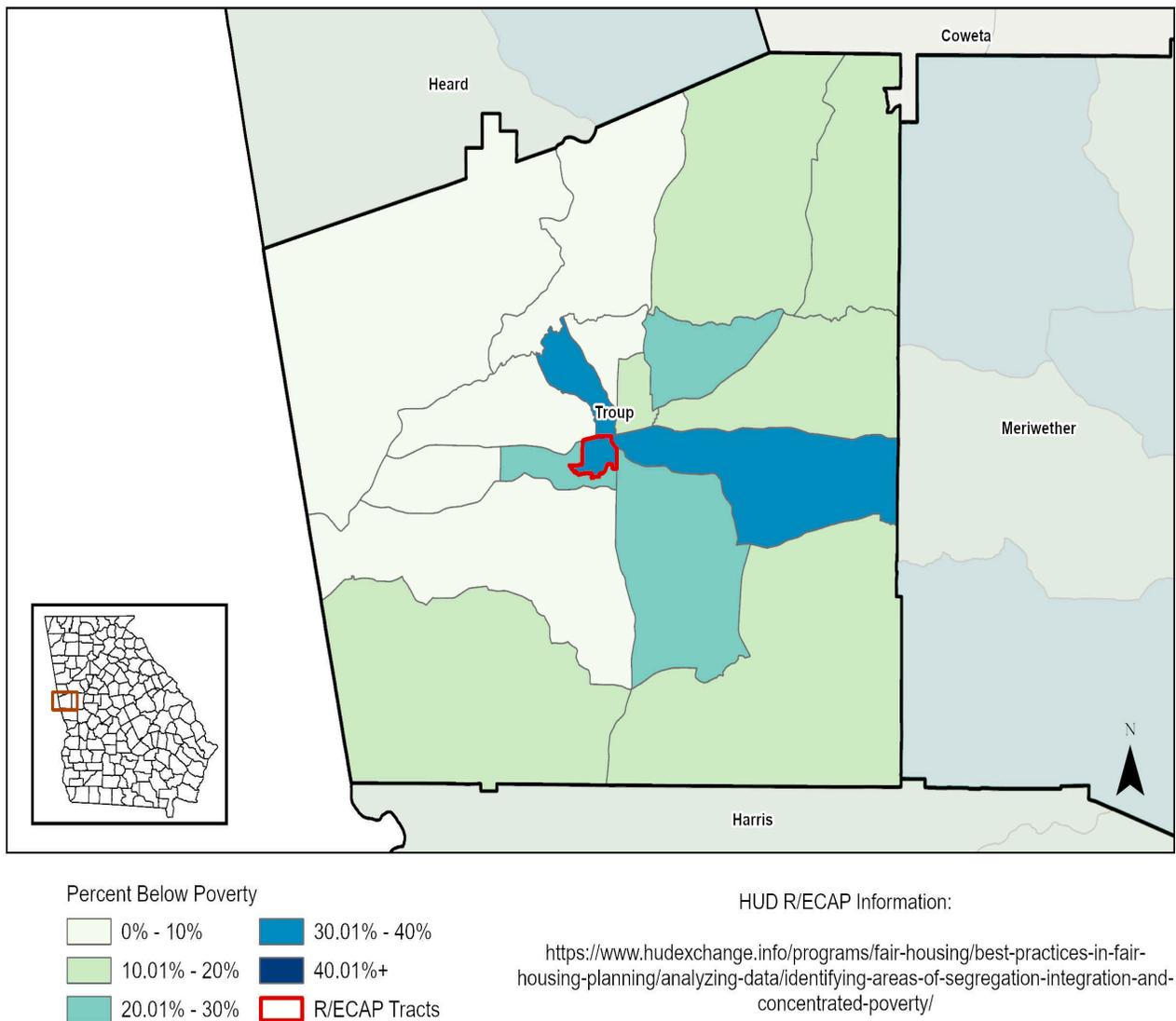


Figure 32

Grantee Demographics and Disaster Impacted Populations

The **Grantee Demographics and Disaster Impacted Populations** table below provides demographic data on all disaster impacted counties including the population of individuals in total, under 5, over 65, disabled, and of different racial groups. Since age discrimination, ancestry, and disability can be seen as protected classes, it's insightful to see what percentage makes up the MID population so that DCA can better support them.

Nearly 15 percent of the MID population has a disability which is more than the area-wide amount of approximately 13 percent. This is notable as individuals with a disability are more likely to experience higher poverty rates than those without a disability according to Georgia's Housing Needs Assessment. Additionally, the State of Georgia Consolidated Plan reported that disability makes up 69 percent of the discrimination complaints received by the Georgia Commission on Equal Opportunities.

Georgia's Housing Needs Assessment notes that Black and Hispanic households have a lower median income than that of the Asian and White populations. This is significant seeing as approximately 35 percent of Black individuals make up the disaster declaration population as shown in the table below. Although Georgia's population is 30 percent Black, they comprised 77.6 percent of those homeless in 2021, demonstrating how this population is experiencing homelessness at a disproportionate rate.

Grantee Demographics and Disaster Impacted Populations

Demographic	Area-Wide Estimates	Area-Wide Percent	Disaster Declaration Estimate	Disaster Declaration Percent	MID Estimates	MID Percent
Total Population	10,711,908.00	100.00%	552,176.00	100.00%	67,415.00	100.00%
Under 5 years	621,126.00	5.80%	32,006.00	0.58%	4,193.00	0.62%
65 years and over	1,644,275.00	15.35%	78,024.00	16.15%	12,423.00	18.40%
Population with a Disability	1,428,789.00	13.34%	70,939.00	14.92%	9,424.00	13.97%
White or Caucasian	5,362,156.00	50.06%	266,349.00	57.20%	39,829.00	59.08%
Black or African American	3,278,119.00	30.60%	236,478.00	35.83%	23,260.00	34.50%
American Indian and Alaska Native	20,375.00	2.00%	856.00	1.38%	309.00	4.58%
Asian	475,680.00	4.40%	12,130.00	12.89%	597.00	0.89%
Native Hawaiian and Other Pacific Islander	6,101.00	0.50%	24.00	0.10%	0.00	0.00%
Other	1,123,457.00	5.20%	36,339.00	15.57%	3,420.00	1.11%

Data Source(s): U.S. Census Bureau American Community Survey (ACS) 5-year dataset 2018-2022

Income Demographics

Income/Economic Demographics	Statewide	Areas Impacted by Disaster	HUD MIDs
Median Household Income	\$72,837.00	\$61,600.00	\$57,367.00
Per Capita Income	\$38,378.00	\$30,748.00	\$35,823.00

Data Source(s): U.S. Census Bureau American Community Survey (ACS) 5-year dataset 2018-2022

Income Demographics - Low Income

Income/Economic Demographics	Statewide	Areas Impacted by Disaster	HUD MIDs
Income in the past 12 months below poverty level	1,348,344.00	70,650.00	12,412.00

Data Source(s): U.S. Census Bureau American Community Survey (ACS) 5-year dataset 2018-2022

LMI Analysis - Overall

Category	Total LMI Persons	Total Population	Percent LMI
Area wide	4,169,270.00	10,711,908.00	39.13%

Data Source(s): U.S. Census Bureau American Community Survey (ACS) 5-year dataset 2018-2022

LMI Analysis - Federally Declared Disaster Areas

County/Municipality	Non-MID-Total LMI Persons	Non-MID-Total Population	Non-MID-Percentage LMI	MID-Total LMI Persons	MID-Total Population	MID-Percentage LMI
Butts County	8,890.00	25,522.00	34.83%	0.00	0.00	0.00%

County/Municipality	Non-MID-Total LMI Persons	Non-MID-Total Population	Non-MID-Percentage LMI	MID-Total LMI Persons	MID-Total Population	MID-Percentage LMI
Henry County	82,370.00	240,853.00	34.20%	0.00	0.00	0.00%
Jasper County	8,050.00	14,882.00	54.09%	0.00	0.00	0.00%
Meriwether County	8,930.00	20,679.00	43.18%	0.00	0.00	0.00%
Newton County	49,555.00	113,298.00	43.74%	0.00	0.00	0.00%
Spalding County	0.00	0.00	0.00%	36,755.00	67,415.00	54.52%
Troup County	25,700.00	69,527.00	36.96%	0.00	0.00	0.00%
Total	183,495.00	484,761.00	37.85%	36,755.00	67,415.00	54.52%

Data Source(s): U.S. Census Bureau American Community Survey (ACS) 5-year dataset 2018-2022

Manufactured Housing Units Impacted by Disaster

County/Municipality	Number of Units	% of Total Units in County/Municipality	Remaining Unmet Need
Butts County	67.00	7.40%	\$107,331.00
Henry County	170.00	6.50%	\$127,710.00
Jasper County	55.00	5.20%	\$326,314.00
Meriwether County	85.00	3.70%	\$41,853.00
Newton County	30.00	2.00%	\$188,358.00
Spalding County	174.00	10.90%	\$158,696.00
Troup County	16.00	1.00%	\$7,147.00
Total	597.00	36.70%	\$957,409.00

Data Source(s): ACS/FEMA

Limited English Proficiency Population of Disaster-Related Areas

County/Municipality	Language	# of LEP Speakers	% of Total Population
Butts County	Spanish	1,031.00	4.20%
Butts County	Other Indo European	61.00	0.20%
Butts County	Other (not specified)	5.00	0.00%
Henry County	Spanish	12,057.00	5.30%
Henry County	Other Indo European	4,888.00	2.10%
Henry County	Asian Pacific Island	4,831.00	2.10%
Henry County	Other (not specified)	2,116.00	0.90%
Jasper County	Spanish	427.00	3.00%
Jasper County	Other Indo European	31.00	0.20%
Jasper County	Asian Pacific Island	15.00	0.10%

County/Municipality	Language	# of LEP Speakers	% of Total Population
Meriwether County	Spanish	164.00	0.80%
Meriwether County	Other Indo European	69.00	0.40%
Meriwether County	Asian Pacific Island	126.00	0.60%
Newton County	Spanish	4,986.00	4.70%
Newton County	Other Indo European	929.00	0.90%
Newton County	Asian Pacific Island	834.00	0.80%
Newton County	Other (not specified)	641.00	0.60%
Spalding County	Spanish	2,508.00	4.00%
Spalding County	Other Indo European	534.00	0.80%
Spalding County	Asian Pacific Island	288.00	0.50%
Spalding County	Other (not specified)	21.00	0.00%
Troup County	Spanish	2,297.00	3.50%
Troup County	Other Indo European	673.00	1.00%
Troup County	Asian Pacific Island	713.00	1.10%
Troup County	Other (Not specified)	84.00	0.10%

Data Source(s): U.S. Census Bureau American Community Survey (ACS) 5-year dataset 2018-2022

Point-in-Time Count - Type of Shelter

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Area wide	3,374.00	1,780.00	5,535.00	10,689.00
FEMA Declared	76.00	5.00	223.00	304.00
MID	16.00	0.00	34.00	50.00

Data Source(s): 2022 HIC Counts by State (National Alliance to End Homelessness) DCA Statewide Point Time Count Homeless Report for 2022

Point-in-Time Count - Impacted by Disaster

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Area wide	0.00	0.00	0.00	0.00
FEMA Declared	0.00	0.00	0.00	0.00
MID	0.00	0.00	0.00	0.00

Data Source(s): Balance of State Continuum of Care. Information related to emergency shelters, transitional housing, and homeless population impacted directly by the disaster was not available at the time of publishing.

Assisted Housing Impacted by the Disaster

County/Municipality	Total Housing Choice Vouchers	Total Impacted Housing Choice Voucher Units	Total LIHTC Units	Total Impacted LIHTC units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units	Remaining Unmet Need
All	0.00	0.00	0.00	0.00	0.00	0.00	\$0.00

Total

Data Source(s): Georgia Department of Community Affairs - Housing Finance and Development Division. Information related to Housing Choice Voucher (HCV) units impacted directly by the disaster was not available at the time of publishing. No LIHTC units were reported to have been impacted directly by the disaster. Public Housing units were identified in a previous section.

b. Infrastructure Unmet Need.

Disaster Damage and Impacts - Infrastructure.

Georgia's January 2023 tornadoes brought with it extensive infrastructure damage in the form of downed power poles, impaired roads, damaged facility buildings, and other wreckage to infrastructure systems. Many roads sustained damage from large trucks during the hauling of materials to and from local landfills as a consequence of the disaster. Moreover, deficiencies in radio tower transmittance was also exposed as communications during and in the aftermath of the disaster were spotty and, at times, unreliable.

Conditions Pre-Disaster

Prior to the disaster, DCA acknowledged in its Consolidated Plan the large demand for community infrastructure in Georgia which included water and wastewater systems in addition to public facilities and services. Georgia was rated a "C+" in infrastructure according to the American Society of Civil Engineers (ASCE). This 2019 Georgia Infrastructure Report Card utilized 14 categories of infrastructure to come up with this cumulative grade. Some of Georgia's lowest markings are in dams ("D"), wastewater ("D+"), and transit ("D+"), all falling in the "poor" category.

With \$2.7 billion in wastewater need, upgrades in Georgia's wastewater treatment systems are needed to meet changing water quality standards as wastewater infrastructure continues to age. Also of note, are the 535 dams in the state with a high hazard potential designation.

Other infrastructure categories that leave considerable room for improvement include roads ("C+"), solid waste ("C"), and stormwater ("C-"). Since the implementation of a Bipartisan Infrastructure Law, \$5.6 billion has been announced in funding for roads and bridges, \$361 million for water, and \$1.5 billion in public transit in the State of Georgia.

Calculating Infrastructure Unmet Need

Using FEMA and Georgia Emergency Management Agency/Homeland Security (GEMA/HS) data, DCA has preliminarily identified approximately 95 damaged infrastructure sites with a total estimated repair cost of \$42.8 million across all public assistance categories A-G. The federal share is calculated at \$32.1 million in funding and 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

To calculate unmet needs for infrastructure projects, DCA used data obtained as of March 20, 2024 from FEMA's Public Assistance Program showing the amount needed to repair the permanent public infrastructure (Categories C to G) to their pre-disaster condition. The program pays for 75 percent of the project cost leaving a remaining 25 percent non-federal share (Local Match). An additional 15 percent of the "Estimated PA Cost" is added in for resiliency efforts. Based on this data, the total infrastructure unmet need is \$6,004,521 (Local Match + Resiliency) in identified infrastructure damage eligible under FEMA-PA Categories C-G. DCA will continue to work with the communities to identify any remaining infrastructure unmet needs related to the January 2023 tornadoes.

Figure 33: Damaged Sites Cost by PA Category

PA Category	# Damaged Sites	Sum of Approximate PA Cost	Sum of Non-Federal Share (Local Match)	Sum of Federal Share	Sum of Resiliency	Total Unmet Need
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A - Debris	34	\$23,627,376	\$5,906,844	\$17,720,532	\$3,544,000	\$9,450,844
B - Emergency Measures	30	\$4,250,669	\$1,062,667	\$3,188,002	\$638,000	\$1,700,667
C- Roads and Bridges	8	\$1,045,497	\$261,374	\$784,122	\$157,000	\$418,374
D - Water Control Facilities	1	\$41,195	\$10,299	\$30,896	\$6,000	\$16,299
E - Building and Equipment	6	\$198,955	\$49,724	\$149,172	\$30,000	\$79,724
F - Utilities	16	\$13,724,498	\$3,431,124	\$10,293,374	\$2,059,000	\$5,490,124
G - Other	0	\$0	\$0	\$0	\$0	\$0
Total	95	\$42,888,190	\$10,722,032	\$32,166,098	\$6,434,000	\$17,156,032
Total Unmet Need (C-G Categories Only)						\$6,004,521

Data Source(s): FEMA PA Data

Infrastructure Allocation of Funds

Although there is demonstrated unmet need, DCA is currently not proposing a distribution of funds geared directly towards infrastructure under this allocation. Given the feedback provided by impacted counties, the limited availability of funds, and DCAs evaluation of the unmet needs assessment, funds for recovery efforts will be focused in the housing sector rather than in infrastructure. DCA may reconsider the feasibility of addressing infrastructure directly provided the emergence of additional funds and/or compelling evidence that suggests the need to shift or reevaluate priorities depending upon the unmet need.

Total Cost and Need by PA Category

PA Category	Estimated PA Cost	Local Match	Resiliency	Total Need (Match + Resiliency)
A - Debris	\$17,720,532.00	\$5,906,844.00	\$3,544,000.00	\$9,450,844.00
B - Emergency Measures	\$3,188,001.00	\$1,062,667.00	\$638,000.00	\$1,700,667.00
C - Roads and Bridges	\$784,122.00	\$261,374.00	\$157,000.00	\$418,374.00
D - Water Control Facilities	\$30,896.00	\$10,299.00	\$6,000.00	\$16,299.00
E - Building and Equipment	\$149,172.00	\$49,724.00	\$30,000.00	\$79,724.00
F - Utilities	\$10,293,374.00	\$3,431,124.00	\$2,059,000.00	\$5,490,124.00
G - Other	\$0.00	\$0.00	\$0.00	\$0.00
Total	\$32,166,097.00	\$10,722,032.00	\$6,434,000.00	\$17,156,032.00

Data Source(s): FEMA PA Data

Hazard Mitigation Needs per County or Known Project

Project	Cost	Funding Source	Unmet Need
None	\$0.00	N/A	\$0.00
Total			

Data Source(s): FEMA - application period for Hazard Mitigation projects is still open. No information regarding specific projects was available at time of publishing.

c. Economic Revitalization Unmet Need.

Disaster Damage and Impacts - Economic Revitalization.

The economic impact of the January tornadoes in 2023 was significant on both a local government and individual scale. The Congressional Research Service looked at the fiscal effects of disasters on governments at a local level, depicting decreased property and income tax revenue as a possible consequence. As history has illustrated, disaster related damages may reduce property assessments and in turn property tax revenue while business closures could lead to a reduction in income tax revenue due to employment loss. Other sectors could also be in jeopardy as adjusted budgets seeking to offset potential losses in local government tax revenue, reduce funding for other critical operating systems like schools.

Focusing through a closer lens highlights the economic drawback of disasters that directly impact individuals on a more palpable scale in terms of job losses as business operations suffer. With that comes food and shelter insecurity as household income also reaches a new level of vulnerability. As a consequence of the disaster, power outages led to food spoilage and some impacted families had to rely on community support from volunteers who provided meals and gift cards for groceries.

Conditions Pre-Disaster

All counties with the exception of Henry and Newton counties have a higher percentage of persons in poverty and a lower percentage of citizens in the labor force than the State of Georgia. This is relevant when noting the economic status of these counties prior to the disaster. According to the Government Accountability Office, research has demonstrated how poverty can negatively affect economic growth in terms of human capital which considers the education, work experience, training, and health of the workforce. Poverty increases the risks for poor health, crime, and social unrest which can lead to reduced participation in the labor market. This can even be seen in the table below as the counties with a higher percentage of poverty were also associated with a lower percentage in the labor force compared to the stats demonstrated at a state-level.

Figure 34: Business and Economy Trends Prior to Disaster

County	Total employer establishments, 2021 ¹	Total employment, 2021 ¹	In civilian labor force, total, percent of population age 16 years (2018-2022) ²	Persons in poverty ³
Butts County	410	5,681	51.4%	13.2%
Henry County	4,489	58,577	66.2%	8%
Jasper County	202	1,691	58.3%	12.9%
Meriwether County	319	3,008	51.2%	16.6%
Newton County	1,600	20,564	64.5%	12.3%
Spalding County	1,221	17,043	56.5%	19.3%
Troup County	1,676	33,289	60.0%	17.8%
State-wide	253,729	4,034,309	62.9%	12.7%

Data Source(s): ¹U.S. Census Bureau, County Business Patterns. Updated annually. [County Business Patterns \(CBP\)](#). Includes U.S., States, and Counties; includes Puerto Rico and Municipios (county-equivalents). ²U.S. Census Bureau, American Community Survey (ACS) and Puerto Rico Community Survey (PRCS), 5-Year Estimates. The PRCS is part of the Census Bureau's ACS, [customized for Puerto Rico](#). Both Surveys are updated every year. ³QuickFacts uses data from the following sources: National level - Current Population Survey, Annual Social and Economic Supplement (CPS ASEC); State level and Puerto Rico- American Community Survey (ACS) and [Puerto Rico Community Survey](#) (PRCS), 1-year estimates; County level (U.S.) - The Small Area Income and Poverty Insurance Estimates (SAIPE), 1-year estimates; County-equivalents (municipios) for Puerto Rico - [Puerto Rico Community Survey](#) (PRCS), 5-year estimates; Sub-county level: Cities, towns and census designated places (U.S.) - ACS, 5-year estimates; Puerto Rico sub-counties (zonas urbanas and comunidades) - [Puerto Rico Community Survey](#) (PRCS), 5-year estimates.

SBA Loan Analysis

Many businesses were impacted by the tornadoes that occurred in January 2023. Damages included damage to buildings, and the loss of inventory and/or equipment. Following the tornadoes, the Small Business Administration (SBA) made low-interest loans available through the Business Physical Disaster Loan program and the Economic Injury Disaster Loan (EIDL) program.

The Business Physical Disaster loan program is available to businesses of any size and most non-profit organizations. The EIDL is available to small businesses when SBA decides that the business would be unable to obtain credit elsewhere. These loans provide the necessary working capital to help these businesses meet obligations and pay ordinary, reasonable operating expenses. Businesses can qualify for both loans with a combined loan amount of up to \$2,000,000.

The tables below show a summary of the loans received and approved by the SBA. Approval for a loan does not indicate acceptance or place a requirement on a business to accept the loan. As shown below Spalding County had the most loan applications submitted and approved and received the largest amount of funds.

County	# of Business Physical Disaster Loan Applications Submitted	# of Business Physical Disaster Loan Applications Approved	# of EIDL Applications Submitted	# of EIDL Applications Approved
Butts County	10	0	0	0
Henry County	31	2	33	3
Jasper County	3	1	0	0
Meriwether County	3	0	2	0
Newton County	2	2	11	1
Spalding County	102	12	40	4
Troup County	19	3	9	0
Total	180	20	95	8

County	Business Physical Disaster	EIDL	Total
Butts County	\$0	\$0	\$0
Henry County	\$48,100	\$546,200	\$594,300
Jasper County	\$5,000	\$0	\$5,000
Meriwether County	\$0	\$0	\$0
Newton County	\$40,000	\$2,500	\$42,500
Spalding County	\$2,479,400	\$89,400	\$2,568,800
Troup County	\$234,000	\$0	\$234,000
Total	\$2,806,500	\$638,100	\$3,444,600

Using the number of denied and withdrawn SBA loans (Business Physical Disaster & EIDL) multiplied by the average loan amount provides an estimated \$29,391,294 in economic revitalization unmet need, as shown in the table below:

Business Physical Disaster Loans - denied or withdrawn	Average Loan Amount	EIDLs - denied or withdrawn	Average Loan Amount
160	\$140,325	87	\$79,762
Total Unmet Need (per type of loan)	\$22,452,000		\$6,939,294
Grand Total of Estimated Unmet Need	\$29,391,294		

Economic Revitalization Allocation of Funds

Although DCA would like to address every unmet need identified in its assessment, there is limited bandwidth by which CDBG-DR funds can propagate. As such, economic revitalization will not be addressed directly under this allocation. DCA will reevaluate this stance as needed in the event of differing circumstances such as a change in the availability of funds or other significant developments.

d. Mitigation Only Activities.

According to Georgia's Hazard Mitigation Strategy Plan, tornadoes have the top vulnerability ranking out of all 13 natural hazards with a score of 34 indicating a "high" priority level. Tornadoes also tied highest with "severe weather" for historical impact with a score of 10. Excluding Coastal Flooding, Drought, and Landslides for lack of available data, tornadoes made up 62 percent of total hazard-attributed injuries and fatalities, more than all the other hazards combined.

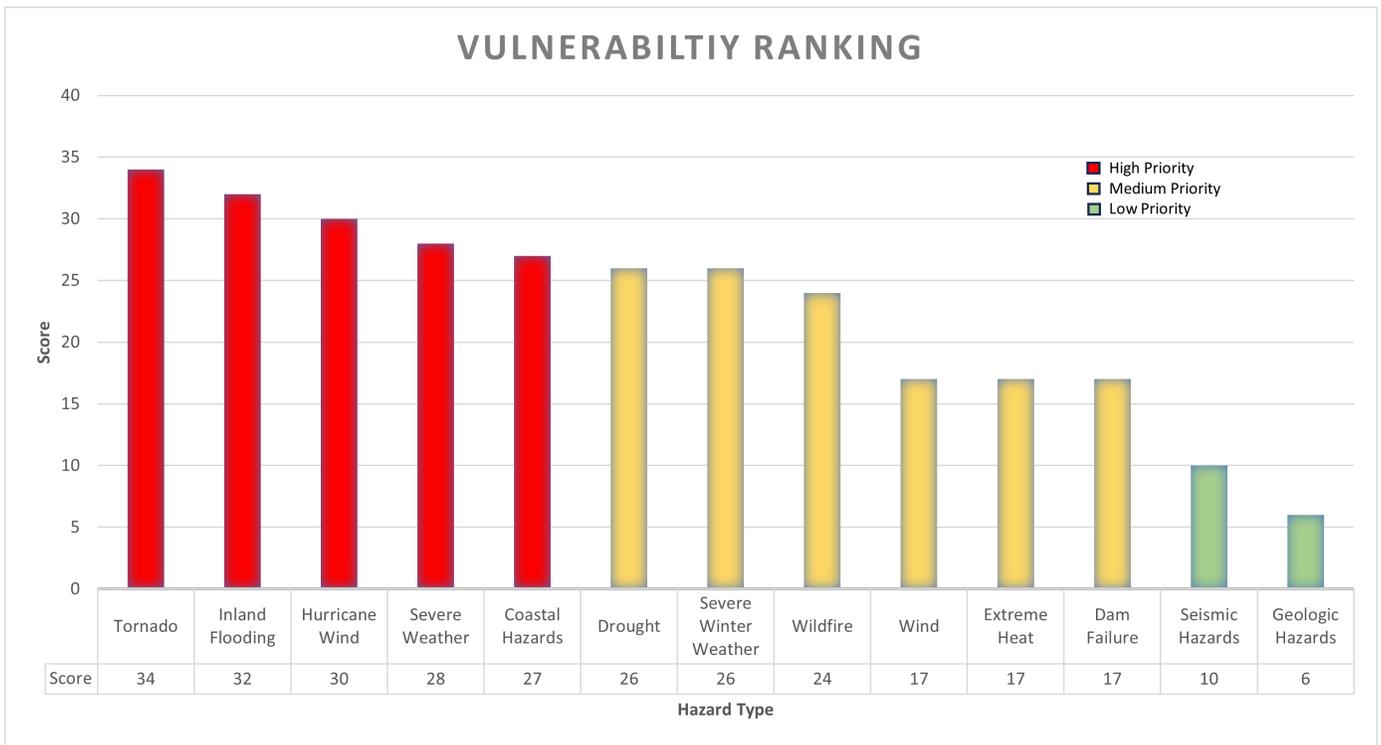


Figure 38

Tornadoes can be inherently unpredictable which in part adds to their threat. Not limited to a particular season or locality, tornadoes can occur anywhere in Georgia during anytime and with little warning. Its duration can range anywhere from a few minutes to a few hours, many occurring in a series rather than as a singular entity. As seen with this disaster, this often leads to an outbreak of tornadoes within a window of time with strong winds having the power to flatten trees and structures and cast objects hundreds of yards.

Per the Federal Register Notice, 15 percent of CDBG-DR funds awarded for this disaster are set aside for mitigation activities which amounts to \$1,643,000.

DCA will incorporate mitigation measures while implementing the proposed housing programs during the construction, reconstruction, or rehabilitation phases of projects. One example of this would be retrofitting existing structures to combat wind events. Georgia identified structural retrofits as one of their mitigation action items in the Hazard Mitigation Strategy Plan which DCA will adopt to improve resilience against wind related hazards. In this way, these eligible recovery activities have a direct tie-back to the disaster and act as mitigation activities for the purposes of fulfilling the Mitigation Set-Aside requirement. HUD defines mitigation activities as those that “increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.” This is DCA’s ultimate objective in creating these fortified housing structures in impacted counties as aforementioned.

3. General Requirements

a. Citizen Participation.

Outreach and Engagement.

In the development of this disaster recovery action plan, DCA consulted with disaster-affected citizens, stakeholders, local governments, public housing authorities, and other affected parties in the surrounding geographic area to ensure consistency of disaster impacts identified in the plan, and that the plan and planning process was comprehensive and inclusive. DCA initially met with key staff and elected officials of local governments, development authorities, and emergency management agencies.

DCA recognizes that affected stakeholders are the center of, and partners in, the development and implementation of this plan. Opportunities for citizen input were provided throughout the planning process through multiple communication outlets including a communal meeting where DCA invited all seven HUD and State identified MID communities. DCA staff presented at the Historic Griffin City Hall on February 7, 2024. Those communities that participated were encouraged to share any relevant information or sentiments pertaining to the January 2023 tornadoes with DCA. Contact information, including email and phone numbers, were also exchanged as a means to establish open lines of communication between DCA and the communities throughout this process. DCA regional representatives also took on a key role during this process in communicating with impacted communities throughout January and leading up to the initial meeting. These outreach efforts garnered pertinent information that helped further the establishment of this action plan.

In addition to the activities above, DCA has published this action plan on dca.ga.gov/community-economic-development/funding-programs/community-development-block-grant-disaster-recovery for a 30-day public comment period. Citizens were notified through DCA and/or MID area local governments utilizing electronic mailings, press releases on websites, and/or social media. DCA will ensure that all citizens have equal access to information, including persons with disabilities (vision and hearing impaired) and limited English proficiency (LEP). DCA also commits to following effective communication requirements as specified in 24 CFR 8.6 and other fair housing and civil requirements. Keeping in line with HUDs safe harbor threshold requirements for translation, written language assistance will be provided when the eligible LEP population within the market area has a language group that makes up:

- 1,000 or more of the eligible population
- More than 5% of the eligible population and more than 50 in number

In this regard, Butts, Henry, Newton, Spalding, and Troup County were among the disaster related areas that fell into at least one of the above categories. These languages were identified as Spanish, Other Indo European, Asian Pacific Island, and Other (not specified). In representation of these languages, DCA will rely on guidance from its Language Access Plan and translate the Action Plan to the following focus languages including Chinese, Korean, Vietnamese, and Spanish.

Those wishing to submit written public comments on the initial 2023 CDBG-DR Action Plan or subsequent substantial amendments to the plan may do so via email at CDBG-DR@dca.ga.gov or mail comments to the following address:

Georgia Department of Community Affairs

Attention: CDBG-DR

60 Executive Park South, NE Atlanta, Georgia 30329

A summary of citizen comments on this action plan, along with DCA responses, is in Appendix C of this document.

For more information, citizens can refer to DCA citizen participation plan that can be found at dca.ga.gov/node/9019.

Public hearings.

During the 30-day public comment period DCA will hold a public hearing available both virtually and in-person on the proposed action plan. The hearing will take place during two time-slotted sessions allowing participants to choose the better of either option. Each MID and State identified community will receive a reasonable amount of prior notice and a link with access to the virtual event via email. The purpose of the hearing is to provide an opportunity for public engagement on the allocation of funds for the January 2023 tornadoes in Georgia. Questions will be allowed in real time, with DCA responding directly with answers to all attendees. The Action Plan is available on DCAs public website where citizens can provide comment over a 30-day period after its posting.

DCA will take input from citizens during this public hearing and all comments (both written and oral) will be recorded and submitted in the action plan.

Although all comments will be considered, they may not ultimately affect programmatic decisions.

DCA is committed to providing all persons with equal access to its services, programs, activities, education, and employment regardless of race, color, national origin, religion, sex, familial status, disability, or age. Participants are informed to contact fairhousing@dca.ga.gov for reasonable accommodation, hearing impairment assistance, or language access assistance prior to the date of the public hearing.

Complaints.

Complaints alleging violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov). DCA will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures on dca.ga.gov to demonstrate adequate procedures are in place to prevent fraud, waste, and abuse.

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

Georgia Department of Community Affairs

Attention: CDBG-DR

60 Executive Park South, NE Atlanta, Georgia 30329

Any complaints received in writing, including through email, are considered formal complaints. Verbal complaints are considered informal and may not be subject to the same resolution procedures as outlined in this section. DCA's goal is to attempt to resolve all complaints, both formal and informal, in a manner that is both sensitive to the complainants' concerns and achieves a fair result. DCA will make every effort to provide a timely written response within 15 working days of the receipt of the complaint, where practicable and maintain a record of complaints filed and any processes followed, in accordance. An explanation will be provided if any additional time is taken for a response beyond the 15 days.

Some circumstances constitute an appeal, while others solicit a complaint. Generally, dissidence regarding a programmatic decision or stance made by DCA or the appointed responsible party, may be submitted in the form of an appeal. Alternatively, a complaint, in this regard, is a grievance one has and finds reason to report. During the course of administering a program activity, there may be instances when disputes arise. One may file an appeal if they believe there is just cause. DCA and its subrecipients do not have the authority to grant an appeal to a regulatory, statutory, or HUD-specified CDBG-DR requirement. Approved policies adopted by DCA are generally not subject to an appeal.

Applicants seeking further information can refer to the DCA program manuals applicable under this CDBG-DR allocation.

b. Public Website.

DCA will maintain a public website that provides information accounting for how all grant funds are used, managed, and administered, including links to all disaster recovery action plans, action plan amendments, program policies and procedures, performance reports, citizen participation requirements, and activity and program information described in this plan, and details of all contracts and ongoing procurement processes.

These items are made available through dca.ga.gov. Specifically, DCA will make the following items available: the action plan created using DRGR (including all amendments); each QPR (as created using the DRGR system); citizen participation plan; procurement policies and procedures; all executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts); and a summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals, etc.). Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted to a grantee's website.

In addition, DCA will maintain a comprehensive website regarding all disaster recovery activities assisted with these funds.

The website will be updated in a timely manner to reflect the most up-to date information about the use of funds and any changes in policies and procedures, as necessary. At a minimum, updates will be made quarterly.

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

Subrecipient and Partner Contact

DCA will enter a subrecipient agreement with Georgia Heirs Property Law Center to provide legal services to individual applicants participating in HRRP. Information regarding their services can be found below:

Georgia Heirs Contact Information	
Website:	gaheirsproperty.org
Address:	54 Ellis St NE, Atlanta, GA 30303
Phone:	(706)424-7557
Email:	INFO@GAHEIRSPROPERTY.ORG

Email Updates

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

Sign up for CDBG-DR updates!

Get news from CDBG-DR in your inbox.

* Email

* First Name

* Last Name

* Email Lists

- 2017 CDBG-DR Funding
- 2017 Financiamiento CDBG-DR (Español)

Screen Image - Email-Sign Up

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



Screen Image - Translated Webpage

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

Someone using assistive technology (such as a screen reader, Braille reader, etc.) are encouraged to contact CDBG-DR@dca.ga.gov if they have issues accessing information from the website. Supporting information such as the URL (web address) of the material needed for access and the individuals contact information should also be included.

c. Amendments.

Over time, recovery needs will change. Thus, DCA will amend the disaster recovery action plan as often as necessary to best address our long-term recovery needs and goals. This plan describes proposed programs and activities. As programs and activities develop overtime an amendment may not be triggered if the program or activity is consistent with the descriptions provided in this plan. As applicable, amendments will outline content that is being altered, a table reflecting any redistribution of funds, and a revised budget allocation table of all funds.

All changes are accentuated in the Action Plan using the following formatting:

Additions: **Highlighted in yellow**

Deletions: Text will be removed

Substantial Amendment.

A change to this action plan is considered to be a substantial amendment if it meets the following criteria:

- A change in program benefit or eligibility criteria,
- The addition or deletion of an activity, or
- The allocation or reallocation of \$3 million or more

When DCA pursues the substantial amendment process, the amendment will be posted here at dca.ga.gov/community-economic-development/funding-programs/community-development-block-grant-disaster-recovery for a 30-day public comment period. The amendment will be posted in adherence with ADA and LEP requirements. DCA will review and respond to all public comments received and submit to HUD for approval.

Non-Substantial Amendment.

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the plan and does not require posting for public comment. DCA will notify HUD five (5) business days before the change is effective.

All amendments will be numbered sequentially and posted to the website into one final, consolidated plan.

d. Displacement of Persons and Other Entities.

To minimize the displacement of persons and other entities that may be affected by the activities outlined in this action plan, DCA will coordinate with the applicable agencies and entities to minimize displacement. Should any proposed projects or activities cause the displacement of people, the following policy has been adopted to ensure the requirements of Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended are met.

DCA will utilize HUD's publication of [Planning and Budgeting Relocation Costs for HUD-Funded Projects](#) as a guide when establishing standards involving relocation activities for program activities proposed under this allocation. This includes instituting extensive planning initiatives that consider the likelihood of displacement before the commencement of the project and establishes a resolution to reduce any undue burden and associated costs in connection. Program budgets identified during the planning phase will account for any relocation activities deemed necessary and reasonable in the uptake of the project. Program activities shall be planned and carried out in a manner that minimizes hardships and displacement of both homeowners and tenants of disaster-damaged residences to be rehabilitated, elevated, replaced, or reconstructed.

CDBG-DR funds may not be used to support any Federal, state, or local projects that seek to use the power of eminent domain, unless eminent domain is employed only for a public use.

e. Protection of People and Property.

DCA has a responsibility to maintain the protection of people and property in its pursuit of fulfilling the obligations set forth by the grant requirements for CDBG-DR funds.

The housing assistance provided under the CDBG disaster recovery program will be built with emphasis on high quality, durable, sustainable, mold resistance, and energy efficient construction methods and materials. These include the following minimum standards:

- Construction standards will be based on Georgia's Construction Code Program and must meet or exceed applicable requirements.
- Construction will comply with a Green Building Standard for all new construction of residential buildings and for all repair of substantially damaged residential buildings. The state will require that all new construction or repair of substantially damaged residential buildings will meet an industry-recognized standard that has achieved certification under at least one of the programs listed in paragraph B.32.a of Section VI. (83 FR 5850 and 83 FR 5861).
- For rehabilitation of non-substantially damaged buildings (where the repair costs are less than 50% replacement cost, including standards for appliances and products when replaced as part of rehab), the state will follow the Green Building Retrofit Checklist. To note, this requirement does not apply when Energy star, Water-Sense Labeled, or FEMP-designated products do not exist. (83 FR 5850 and 83 FR 5861).
- DCA will provide a mechanism for homeowners to appeal the quality of the rehabilitation work. DCA will require a warranty period post-construction for housing with all work being performed by the contractor. Information about the complainant's rights and how to file a complaint or appeal regarding the quality of work will be printed on program applications and/or guidelines. Complaints should be submitted to the local government subrecipient and responded to in a timely manner. Records of each complaint will be kept on file.

In maintaining these standards, DCA seeks to protect people and property from harm by mitigating damage that may result from future disasters. This includes implementing measures to mitigate hazard risks as demonstrated in the oncoming sections with respect to elevation standards, flood insurance requirements, construction standards, contractors standards, preparedness, mitigation and resilience strategies, broadband infrastructure in housing, and the evaluation of cost-effectiveness.

Elevation standards.

For new construction, repair of substantially damaged, or substantial improvement structures principally for residential use and located in the 1 percent annual (or 100-year) floodplain must be elevated with the lowest flood, including the basement, at least two feet above the 1 percent annual floodplain elevation.

Mixed-use structures with no dwelling units and no residents must be elevated or floodproofed up to at least two feet above base flood elevation.

If a structure is located in a 500-year floodplain, the structure must be elevated three feet above the 100-year floodplain.

A cost feasibility analysis should be conducted to decide on the most cost effective and reasonable solution which could include elevation, acquisition, reconstructing or replacing the structure in a different location. If elevation is determined to be the most cost-effective option, the lowest finished floor must be raised two feet above the base flood elevation (BFE) level, all National Flood Insurance Program (NFIP) minimum requirements must be met, and all applicable building codes must be followed.

The cost to rehabilitate a property including any costs to elevate must not exceed \$160,000. If it is necessary to reconstruct a property, the cap remains the same and cannot exceed \$280,000 including elevation. The average cost of elevating a home can range from \$20,000 to \$100,000, depending on many different factors of the project. Taking these averages into consideration, elevations will be allowed up to \$60,000 and on a case-by-case basis, as to ensure the method is cost effective. DCA may re-evaluate the elevation costs caps during the implementation of a program, based on average costs associated with elevating homes and on a case-by-case basis as needed. When elevation occurs, the subrecipient must ensure the accessibility for persons with disabilities is preserved. Elevation standards will be required if the structure is substantially damaged or substantially improved.

Elevation may be achieved through a variety of methods including but not limited to elevating on continuous foundation walls and elevation and open foundation (piles, piers, or columns). Programs should ensure that contractors design foundations are depicted to properly address all loads and be appropriately connected to the floor structure above the foundation. Utilities should also be properly elevated. All elevation activities should take place prior to any rehabilitation, reconstruction or replacement and must meet all applicable state and local building codes. Any elevation information (including the expected cost) should be included in a work write-up. As previously mentioned in the "Mitigation Only Activities" section, homes will be designed to help withstand against high wind events.

Flood Insurance Requirements.

Assisted property owners must comply with all flood insurance requirements. HUD-assisted homeowners for a property located in a Special Flood Hazard Area must obtain and maintain flood insurance in the amount and duration prescribed by FEMA's National Flood Insurance Program (NFIP). DCA may not provide disaster assistance for the repair, replacement or restoration of a property to a person who has received Federal flood disaster assistance that was conditioned on obtaining flood insurance and then that person failed to obtain or allowed their flood insurance to lapse for the property. DCA is prohibited by HUD from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if:

- The combined household income is greater than 80% AMI or the national median,
- The property was located in a floodplain at the time of the disaster, and
- The property owner did not maintain flood insurance on the damaged property.

To ensure adequate recovery resources are available to LMI homeowners who reside in a floodplain but who are unlikely to be able to afford flood insurance may receive CDBG-DR assistance if:

- The homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs, or
- The household earns less than 120% AMI or the national median and has unmet recovery needs.

Property owners assisted through HRRP will be required to acquire and maintain flood insurance if their properties are located in a FEMA designated floodplain. This requirement is mandated to protect safety of residents and their property and the investment of federal dollars. The state will ensure adherence to Section 582 of the National Flood Insurance Reform Act regarding the responsibility to inform property owners receiving disaster assistance that triggers the flood insurance purchase requirement that they have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance, and that the transferring owner may be liable if he or she fails to do so. By achieving the goals within this Action Plan, initiating strong and energy efficient building codes, and requiring both residential and non-residential structures be built at least two feet above the new Advisory Base Flood Elevation (ABFE), the state guarantees a more successful long term disaster recovery, thus ensuring a strong, healthy environment and the safety and welfare of the citizens.

Construction Standards.

DCA will require quality inspections and code compliance inspections on all projects and places an emphasis on high-quality, durable, sustainable, and energy efficient construction methods and materials. Site inspections will be required on all projects to ensure quality and compliance with building codes.

All rehabilitation, reconstruction, or new construction must meet an industry-recognized standard that has achieved certification under at least one of the following programs:

- Energy STAR (Certified Homes or Multifamily High Risk)
- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance or Neighborhood Development)
- ICC- 700 National Green Building Standards
- EPA Indoor AirPlus
- Any other equivalent comprehensive green building standard program acceptable to HUD

DCA will use industry appropriate standards for the proposed programs or activities.

For rehabilitation of non-substantially damaged residential buildings, DCA will follow the guidelines to the extent applicable as specified in the [HUD CPD Green Building Retrofit Checklist](#). Substantial Damage is defined by 44 CFR 59.1 as: "Damage of any origin sustained by a structure whereby the cost of restoring the structure to its before damaged condition would equal or exceed 50 percent of the market value of the structure before the damage occurred." When older or obsolete products are replaced as part of rehabilitation work, the rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program (FEMP)-designed products and appliances.

For infrastructure projects, DCA will encourage, to the extent practicable, implementation of industry appropriate standards.

To ensure construction costs are reasonable and consistent with market costs at the time and location of construction, DCA or a contracted vendor will utilize cost-estimating software to create a list of common housing rehabilitation or reconstruction materials. To ensure the prices generated by the software are accurate, DCA or a contracted vendor will ask local contractors interested in becoming qualified vendors to prepare price estimates for those materials. DCA or a contracted vendor will not share the price list generated by the estimating software with the proposed bidders. DCA staff or a contracted vendor will review the differences between the two sets and set the standard for the costs.

Contractors Standards.

Contractors selected under *DCA* will make every effort to provide opportunities to low and very-low income persons by providing resources and information to notify Section 3 individuals and businesses of opportunities in the community. For more information on this HUD requirement, please see DCA's adopted Section 3 Policy at: dca.ga.gov/sites/default/files/sec_3_solicitation_package_june_2022.pdf. DCA will report Section 3 accomplishments in the Disaster Recovery Grant Reporting (DRGR) system.

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

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

Generally, the governing statutes can be found in the State Purchasing Act (O.C.G.A. Section 50-5-50 et seq.). These rules govern the purchasing activities of all Georgia state government entities. As DCA plans to administer state implemented programs, contracted vendors will also have to adhere to the State's procurement standards. The Georgia Department of Administrative Services, State Purchasing Division publishes the Georgia Procurement Manual that governs all solicitations made by state government entities. A copy of the Georgia Procurement Manual (GPM-V10-July 2022) is provided with the Financial Management and Grant Management Certification documentation.

In the event of a dispute between a homeowner and a contractor concerning rehabilitation contract work, a homeowner can file an appeal relating to substandard for unfinished work before signing a Certificate of Final Completion.

Contractors are required to warrant their work for a period of one year from the time of the final inspection. As part of the activity completion process, the DCA or a contracted vendor should send a letter to the homeowner reminding them of the warranty and should explicitly explain the beginning and ending period of the warranty and instructions on how to go about resolving a warranty issue.

Preparedness, Mitigation and Resilience.

Resilience is defined as a community's ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks.

Proactive mitigation policies and actions help reduce risk and create safer, more disaster-resilient communities. When a community is more resilient, it has the ability to adapt to changing conditions and prepare, withstand, and rapidly recover from a disaster. In the past, DCA has partnered with GEMA along with other relevant organizations and entities and will continue to do so in an effort to eliminate or reduce risk and vulnerability to natural hazards in the State of Georgia.

Moreover, the social vulnerability index synthesizes socioeconomic variables, which the research suggests contribute to a reduction in a community's ability to prepare for, respond to, and recover from hazards. SOVI data was used to help identify and strategically account for uneven capacity for preparedness and response. It also helped pinpoint where resources might be used most effectively to reduce the pre-existing vulnerability and encourage recovery where other market forces are less likely to be awarded other support.

DCA will encourage and support efforts in MID communities to update and strengthen local compliance codes to mitigate hazard risks due to sea level rise, high winds, storm surge, and flooding where applicable. CDBG-DR funds will be used towards programs and activities for necessary expenses related to community long-term recovery, preparedness, and resiliency against future disasters.

Broadband Infrastructure in Housing.

Any substantial rehabilitation or new construction of a building with more than four (4) rental units will include installation of broadband infrastructure, except when:

- The location of the new construction or substantial rehabilitation makes the broadband infrastructure infeasible,
- The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden, or
- The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

DCA will not operate programs or activities that consist of more than four (4) rental units as noted above.

Cost-Effectiveness.

Cost-effectiveness will be defined in the manual for each program offered with CDBG-DR funds.

Demonstrable Hardship and Exceptions

DCA has developed detailed program guidelines in the policies and procedures for HRRP and Affordable Multi-Family Rental Program, as well as exceptions to the policies and procedures to address situations not considered during the program design phase. The exception policies and procedures will consider changes to the maximum award amounts for applicants who demonstrate undue hardship as well as other exceptional situations. Demonstrable hardship may include but is not limited to prolonged job loss, substantial reduction of household income, death of a family member on whom the surviving household was financially dependent, illness, unexpected and extraordinary medical bills, disability, etc. DCA has defined “demonstrable hardship” and the exception policies in the program policies and procedures.

Not Suitable for Rehabilitation

DCA defines “not suitable for rehabilitation,” as one of the two following definitions:

- Residential properties that have experienced repetitive losses under FEMA’s National Flood Insurance Program (NFIP). A repetitive loss property is an insurable building for which two or more claims of more than \$1,000 were paid by the NFIP within any rolling 10-year period, since 1978.
- Dwellings that are considered substandard and do not meet the recovery program’s housing repair standards and/or federal, state, and local code requirements. The determination may be established based on the calculation that the cost of repair is close to or exceeds the cost to reconstruct.

After a damage assessment is conducted, it may be determined that the house is not structurally or economically feasible to rehabilitate. The activity may be approved for set-up as a reconstruction if one of the following conditions apply:

- The unit is unsuitable for rehabilitation both structurally and economically; and/or
- The damage assessor is unable to enter a home due to hazardous conditions.

If it is determined that reconstruction would be appropriate based on the above criteria, DCA approval is required and will be determined upon a review of the application in the systems of record.

Duplication of Benefits.

In accordance with the Robert T. Stafford Act, as amended, DCA will implement existing policies and procedures to ensure no individual receives a duplication of benefit for the same purpose and/or effect to recover from 2023 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. 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.

4. Grantee Proposed Use of Funds

Overview.

DCA is the lead agency and responsible entity for administering \$12,595,000 in CDBG-DR funds allocated for disaster recovery. These programs included Housing, Infrastructure, Economic Revitalization, Public Services, Mitigation, Administration, and Planning. As detailed in the Unmet Needs Assessment section, the January 2023 tornadoes resulted in lamentable loss and despite funds committed for emergency response and immediate recovery efforts, at least \$284,142,182 in unmet needs remain based on existing data. While the unmet needs far exceed the CDBG-DR allocation, DCA has allocated funds toward the programs that will serve as a framework for recovery. All programs proposed under this allocation will meet a National Objective with the exception of Planning and Administration. In addition, all activities are considered CDBG-DR eligible activities under title I of the Housing and Community Development Act of 1974 (HCDA).

a. Program Budget

Program Category	Program	Budget	HUD identified MID Budget	Grantee identified MID Budget	% of Allocation	Maximum Award	National Objective	Estimated Outcome
Housing	Rehab	\$8,572,250.00	\$6,857,800.00	\$1,714,450.00	68.06%	\$280,000.00	LMI/Urgent Need	50
	Buyout	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
	New Construction	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
	Other	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
Economic Revitalization	Workforce Training	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
	Business Grants	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
	Other	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
Infrastructure	Water/sewer Improvements	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
	Health Facilities	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
	Other	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
Public Services	Legal Services	\$750,000.00	\$600,000.00	\$150,000.00	5.95%	\$5,000.00	LMI/Urgent Need	150
	Housing Counseling	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
	Other	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
Mitigation	Mitigation	\$1,643,000.00	\$1,314,400.00	\$328,600.00	13.04%	\$0.00	N/A	N/A
Admin	Admin	\$629,750.00	\$503,800.00	\$125,950.00	5.00%	\$0.00	N/A	N/A
Planning	Planning	\$1,000,000.00	\$800,000.00	\$200,000.00	7.94%	\$1,000,000.00	N/A	7
Total		\$12,595,000.00	\$10,076,000.00	\$2,519,000.00	100.00%			

Data Source(s): Unmet needs assessment

Connection to Unmet Needs.

As required by the Federal Register, Vol. 88, No. 226, Monday, November 27, 2023, DCA will allocate at least 80 percent of the funds to address unmet needs with HUD-identified “most impacted and distressed” areas. The remaining 20 percent of the allocation may be used to address unmet needs that received a DR-4685 presidential major disaster declaration.

This action plan primarily considers and addresses housing initiatives while incorporating mitigation activities throughout the implementation of the program as housing was largely recognized as having the greatest unmet need.

Despite the unmet infrastructure and economic revitalization needs, priority will be placed on housing programs to ensure impacted communities receive the help that is most vital to their exigencies. Specifically, these programs are as previously mentioned, the Homeowner Rehabilitation and Reconstruction Program and the Affordable Rental Rehabilitation Program.

At least 70 percent of all program funds will benefit LMI persons or households.

Homeowner Rehabilitation and Reconstruction Program:

Low-and moderate-income benefit:

At a minimum, 70 percent of program funds will meet a low- and moderate-income national objective. Households with income higher than 120 percent of AMI will not be eligible for this program. Applicants will declare their income on the intake application, which will be verified by case managers. Applicants with incomes greater than 80 percent and less than 120 percent can be served under the Urgent Need objective.

Affordable Rental Rehabilitation Program:

Low-and moderate-income benefit:

100 percent of the Affordable Rental Rehabilitation Program units using CDBG-DR funds will be reserved for those individuals at or below 80 percent of AMI.

Planning

All programs will incorporate, where applicable, appropriate mitigation measures and floodplain management. The programs will promote sound, sustainable long-term recovery planning informed by a post disaster evaluation of hazard risk, especially construction standards and land-use decisions that reflect responsible floodplain and wetland management and consider continued sea level rise, when applicable; and coordinate with other local and regional planning efforts to ensure consistency.

The Georgia Emergency Management and Homeland Security Agency (GEMA/HS) has proposed an intergovernmental agreement (IGA) to assist the affected communities with development of Disaster Recovery and Redevelopment Plans (DRRP). Development of these plans will include HUD identified MID and grantee identified MID communities; local stakeholders and elected officials would actively participate in the creation of the plans to ensure the plans are effective for their communities.

Leveraging Funds.

DCA anticipates leveraging CDBG-DR funds with other funding sources such as FEMA and other state/local funds. DCA will maximize relationships with other federal and state agencies, corporations, foundations, not for profits, and other stakeholders to identify means of leveraging all viable sources of funding. In addition, DCA will continue to use inter-agency coordination in funding and activities.

The CDBG-DR funds will be used to address critical unmet needs that remain after other sources have been exhausted to prevent any duplication of benefits. The activities identified in this Action Plan were selected to be eligible CDBG-DR activities and provide a way to fill the gap that other funding sources left.

Program Partners.

Georgia Emergency Management and Homeland Security Agency (GEMA/HS) - GEMA/HS will utilize planning funds to assist communities with creating Disaster Recovery and Redevelopment Plans (DRRP). GEMA/HS has a solid history of working with communities in coastal Georgia and the 20-county area affected by Hurricane Michael (2018) to create and execute the DRRPs.

Georgia Heirs Property Law Center (GHPLC) - GHPLC will provide title search and title clearing assistance for the housing programs identified in this Action Plan. The Georgia Heirs Property Law Center (the "Center"), a 501(c)3 nonprofit law firm, increases generational wealth, economic value, and community stability by securing and preserving property rights of low- and moderate-income Georgians. Heirs property, a home or land that has no clear title holder, is an unstable form of ownership that prevents storm victims from accessing disaster relief assistance and thwarts the efforts of municipalities to revitalize neighborhoods. The Center helps heirs property owners, nonprofits, and municipalities remediate fractured title, increase equity, and transfer wealth to the next generation through title clearing, estate planning, asset education, and facilitating access to government, private sector, and nonprofit home improvement and land management programs.

Distribution of Funds.

The Distribution of Funds outlines the allocation of resources based on multiple layers of need and prioritization. HUD has provided the State of Georgia with \$12,595,000 in disaster recovery funds for unmet needs to assist in recovery efforts from the January 2023 tornadoes. CDBG-DR funds will be used for necessary expenses related to long-term recovery, restoration and revitalization within the impacted areas. Due to the critical housing needs, DCA proposes creating programs within the housing sector while integrating mitigation efforts. The funds will be allocated to the following programs: Homeowner Rehabilitation and Reconstruction (70%), Affordable Rental Rehabilitation Program (30%). These state-implemented programs will directly be carried out by DCA. In addition, the following activities will be undertaken: Planning (~8%), Administration Costs (5%), Mitigation (15%), and Public Services (~6%). DCA will administer "Public Services" programs through a subrecipient.

Eligible Communities

To prioritize limited funding in areas with the highest damage, HUD identified the zip code 30223 in Spalding County as Most Impacted and Distressed (MID).

It is required that a minimum of 80 percent of the allocation must address unmet needs within the county that contains the zip code. DCA is expanding as the HUD identified MID zip code to include the entirety of Spalding County. When the emergency declaration was issued for Georgia, an additional six counties were designated for 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. These six communities are eligible for the remaining 20 percent of CDBG-DR funding. These counties along with a map of eligible areas are shown below.

Figure 39: MID Areas	
HUD-Identified MID Area	State/Grantee-Identified MID Area

DCA has created HRRP and the Affordable Rental Rehabilitation Program to facilitate the overall recovery from the January 2023 tornadoes which supports housing recovery efforts. Specifically, undertaking mitigation activities such as: restoring, rebuilding, and constructing homes and rental properties provides a stable foundation that allows for housing recovery in impacted areas. These programs give residents the resources needed to resolve some of the long-term recovery objectives as it relates to the impacts from the disaster.

Additionally, DCA is currently consulting with the local governments within the MID areas to determine the extent of unmet rental housing needs.

Proposed Programs:

Homeowner Rehabilitation and Reconstruction Program

<p>National Objective: Benefit to low- and moderate-income persons and Urgent Need</p> <p>CDBG Eligible Activity: Rehabilitation, Construction of Housing</p> <p>CDBG-DR Allocation: \$6,072,250</p> <p>Projected Accomplishments: Estimated to serve 40 households</p> <p>Proposed Start Date: January 2025</p> <p>Proposed End Date: June 2028</p> <p>Maximum Award: Rehabilitation \$100,000 Reconstruction \$280,000</p> <p>Administering Entity: DCA will administer this program directly through a prime vendor</p>
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Program Summary:

This program is designed to meet housing needs identified in the unmet needs assessment. This program will provide safe, disaster resistant housing to assist the most vulnerable residents in their recovery efforts. This program is critical to the long-term recovery strategies of the eligible areas. The program consists of rehabilitation, reconstruction, or replacement of existing or destroyed housing units. In order to promote long-term recovery and limit damage from future disasters, this program may include mitigation measures, including elevation and home hardening. The program also includes Temporary Housing Assistance based on individual household needs and their participation in HRRP to be awarded on a case-by-case basis.

Eligible Areas:

80 percent of these funds will be available for the MID areas, 20 percent will be available for the 6-County area declared eligible for Individual and Public Assistance.

Competitive Applications:

Competitive applications will not be used for this activity. Questions should be directed to CDBG-DR program staff.

Contact information is listed below:

MAIL	EMAIL
<p>Georgia Department of Community Affairs Attention: CDBG-DR 60 Executive Park South, NE Atlanta, Georgia 30329</p>	<p>CDBG-DR@dca.ga.gov</p>

Applicant Criteria:

All applicant homeowners will be held to the following criteria as conditions of eligibility. This is not an exhaustive list. The exhaustive list will be provided in the program policies and procedures.

- Must be primary resident homeowner, no second homes allowed
- A control measure will be put in place in the policies and procedures to prevent the resale of rehabilitated homes solely for profit.
- Only homeowners who either maintain flood insurance or have incomes under 120 percent of the Average Median Income may qualify for assistance. However, to receive assistance and remain in the floodplain, flood insurance must be maintained.

Prioritization Criteria:

Due to limited time and resources, priority will be given to applications from households based on LMI status (household income equal to or less than 80% AMI) for the first 45 days of the application period. Secondary preference will be given to households under the Urgent Need National Objective (household income greater than 80% AMI but less than 120% of AMI) with the presence of household members over the age of 62, presence of household members with a disability, households with children (under 18), persons with alcohol or other drug addictions, or persons with HIV/AIDS and their families. All secondary preferences are weighted equally and will not be allowed overlap. Either an application is prioritized or it is not. Applications from non-prioritized households may be submitted, but will not be processed or awarded funds until after this initial 45-day period.

Affordable Rental Rehabilitation Program

<p>National Objective: Benefit to low- and moderate-income persons</p> <p>CDBG Eligible Activity: Rehabilitation</p> <p>CDBG-DR Allocation: \$2,500,000</p> <p>Projected Accomplishments: Estimated to serve 10 households</p> <p>Proposed Start Date: January 2025</p> <p>Proposed End Date: June 2028</p> <p>Maximum Award: No more than 4 individual rental units per owner</p> <p>Administering Entity: DCA will administer this program directly through a prime vendor</p>
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Program Summary:

Because rental units house a high percentage of underserved residents, DCA has allocated 30 percent of the CDBG-DR housing budget to serve rental rehabilitation. This program will serve a variety of needs and prevent greater homelessness in the communities most impacted by the disasters. The provision of safe, disaster resistant housing for residents impacted by the January 2023 tornadoes is critical to the long-term recovery strategies of the eligible areas. The program's eligible activities will include rehabilitation of existing rental housing units, which were impacted by the disaster.

Eligible Areas:

80 percent of these funds will be available for the MID areas, 20 percent will be available for the 6-County area declared eligible for Individual and Public Assistance.

Applicant Criteria:

HUD's income limits for 80 percent AMI will be used in the Affordable Rental Rehabilitation Program to determine low- and moderate- income status for tenants. DCA's goal is to promote housing for vulnerable populations. Vulnerable populations are those over 62 years of age, persons with disabilities, families with children (under the age of 18), persons with alcohol or drug addictions, persons with HIV/AIDS and their families and public housing residents.

Public Services

<p>National Objective: Benefit to low- and moderate-income persons and Urgent Need</p> <p>CDBG Eligible Activity: Public Services</p> <p>CDBG-DR Allocation: \$750,000</p> <p>Projected Accomplishments: Estimated to serve 150 households</p> <p>Proposed Start Date: January 2025</p> <p>Proposed End Date: January 2027</p> <p>Maximum Award: No project maximum</p> <p>Administering Entity: DCA will administer through a subrecipient</p>

Program Summary:

DCA hopes to leverage the broad network of community service and nonprofit organizations with well-established ties to the communities to help remove obstacles to applicant participation. DCA will enter into subrecipient agreements with a qualified non-profit agency to provide legal services to individual applicants for the Homeowner Rehabilitation and Reconstruction Program and the Affordable Rental Rehabilitation Program. Consideration will also be made for citizens with communication limitations, disabilities, those in need of mental health services, and general health services, and translation services as the need arises.

Planning

<p>CDBG Eligible Activity: Planning</p> <p>CDBG-DR Allocation: \$1,000,000</p> <p>Proposed Start Date: June 2025</p> <p>Proposed End Date: June 2028</p> <p>Administering Entity: DCA will partner with another governmental entity</p>
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Program Summary:

DCA encourages communities to consider post-disaster recovery planning, especially those in the Most Impacted and Distressed areas. This is an allowable expense under the planning allocation. This includes development, adoption, and enforcement of modern and/or resilient building codes and mitigation of hazard risk, including possible sea level rise, high winds, storm surge, and flooding.

Competitive Applications:

Competitive applications will not be used for this activity. Any questions should contact CDBG-DR Program Staff.

Contact information is listed below:

MAIL	EMAIL
Georgia Department of Community Affairs Attention: CDBG-DR 60 Executive Park South, NE Atlanta, Georgia 30329	CDBG-DR@dca.ga.gov

Administration

<p>CDBG-DR Allocation: \$629,750</p> <p>CDBG Eligible Activity: Program Administration Costs</p> <p>Proposed Start Date: October 2024</p> <p>Proposed End Date: June 2029</p> <p>Administering Entity: DCA will administer directly</p>
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Program Summary:

As stated in the Federal Register Notice, grantees can use up to 5 percent of the total grant award for grant administration. This allocation will cover DCA's administrative costs to run the program. Costs incurred by subrecipients to run the programs will be charged as Activity Delivery Costs.

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 are referenced. Any income received after the grant closeout, will be transferred to DCA's annual CDBG award.

Resale or Recapture.

Procedures to Prevent Duplication of Benefits

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

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

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

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

The DCA duplication of benefits review process currently includes program specific forms that each applicant will complete for all proposed CDBG-DR activities, prior to approval.

Additionally, DCA will have a subrogation clause in each applicant participation 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 DOB must be returned to DCA. Under this clause, should an applicant receive CDBG-DR funding to support an activity and subsequently receive outside funding that would represent a DOB, the duplicative CDBG-DR funds must be returned to the Community Finance Division of DCA. DCA may withhold payment on any project or outright suspend activities, if a duplication of benefits issue is not resolved in a timely manner. Furthermore, DCA will not initiate or complete contract close-out processing until any identified duplication of benefit issues are resolved to DCA's satisfaction.

b. Program Details.

Housing Program

Affordable Rental Rehabilitation Program

Grant Type	Grant Number	Proposed Budget	Proposed HUD-Identified MID Budget	Proposed Grantee-Identified MID Budget
Parent	B-23-DG-13-0001	\$2,500,000.00	\$2,000,000.00	\$500,000.00

Narratives

- **Program Description**

This program is designed to meet housing needs identified in the unmet needs assessment. This program will provide safe, disaster resistant housing to assist the most vulnerable residents in their recovery efforts. This program is critical to the long-term recovery strategies of the eligible areas. The program consists of rehabilitation, reconstruction, or replacement of existing or destroyed housing units. In order to promote long-term recovery and limit damage from future disasters, this program may include mitigation measures, including elevation and home hardening.

- **Program Tieback to Disaster/Unmet Needs**

The impact of the tornadoes on homes in the eligible areas is estimated to be over \$248,000,000. The housing stock suffered severe damage impacting both owner-occupied and renter-occupied housing units. This housing program will address the renter-occupied housing needs.

• **How Program will Promote Housing for Vulnerable Populations**

The Affordable Rental Rehabilitation Program will serve to increase affordable rental housing options for eligible citizens. All units assisted with CDBG-DR funds will be required to be rented to an LMI household for the duration of the affordability period.

• **Program Affordability Period (if applicable)**

The program affordability period is dependent upon the dollar amount of CDBG-DR funding utilized per housing unit:

Affordability Period per \$ amount	Minimum Affordability Period
< than %15,000	5 years
\$15,000 - \$40,000	10 years
> than \$40,000	15 years
New Construction	20 years

• **Program Definition of Second Home/Eligibility**

Second homes will not be eligible for the program.

• **Program National Objective(s)**

- LMI

• **Program Eligibility**

HUD Identified MID area:

Spalding County

Grantee Identified MID areas:

Butts, Henry, Jasper, Meriwether, Newton, and Troup counties

• **Program Responsible Entity**

Georgia Department of Community Affairs (DCA)

• **Program Maximum Assistance**

\$280,000 with case-by-case exceptions made as necessary.

• **Program Estimated Begin and End Dates**

January 2025 - June 2028

• **Other Program Details**

• **Program Competitive Application Overview (if applicable)**

N/A

• **Program Method of Distribution Description/Overview (if applicable)**

DCA will administer the program directly with the services of a procured vendor.

• **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)**

The Mitigation Set-Aside will be used for home hardening and will be defined further in program policies and procedures.

• **How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)**

Mitigation Set-Asides will be defined further in program policies and procedures.

Projection of Expenditures

Grant Number	Period	Quarterly Projection	Quarterly Actual	Cumulative Projection	Cumulative Actual
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Projection of Outcomes

Period	Performance Measure	Quarterly Projection	Quarterly Actual	Cumulative Projection	Cumulative Actual
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Homeowner Rehabilitation & Reconstruction Program

Grant Type	Grant Number	Proposed Budget	Proposed HUD-Identified MID Budget	Proposed Grantee-Identified MID Budget
Parent	B-23-DG-13-0001	\$6,072,250.00	\$4,875,800.00	\$1,196,450.00

Narratives

• Program Description

This program is designed to meet housing needs identified in the unmet needs assessment. This program will provide safe, disaster resistant housing to assist the most vulnerable residents in their recovery efforts. This program is critical to the long-term recovery strategies of the eligible areas. The program consists of rehabilitation, reconstruction, or replacement of existing or destroyed housing units. In order to promote long-term recovery and limit damage from future disasters, this program may include mitigation measures, including elevation and home hardening. The program also includes Temporary Relocation Assistance based on individual household needs and their participation in HRRP to be awarded on a case-by-case basis.

• Program Tieback to Disaster/Unmet Needs

The impact of the tornadoes on homes in eligible areas is estimated to be over \$248,000,000. The housing stock suffered severe damage impacting both owner-occupied and renter-occupied housing units. This housing program will address the owner-occupied housing needs.

• How Program will Promote Housing for Vulnerable Populations

Applications for the Homeowner Rehabilitation and Reconstruction Program (HRRP) will be prioritized according to specific factors:

For the first 45 days of the application period:

- LMI National Objective (household income equal to or less than 80% AMI)

Secondary preference (after initial 45-day application period):

- Urgent Need National Objective (household income greater than 80% AMI but less than 120% AMI) with one or more of the following:
 - Household member(s) over age 62
 - Household member(s) with a disability
 - Household with children under age 18
 - Households with a person with alcohol or other drug addiction
 - Household member(s) with HIV/AIDS

All secondary preferences are weighted equally and will not be allowed to overlap. Either an application is prioritized or it is not.

• Program Affordability Period (if applicable)

Assisted owner-occupied units will agree to a Deferred Payment Loan for the affordability period of 5-years. The applicant will agree to maintain ownership and primary residence of the home for 5-years after completion of the program. The Deferred Payment Loan will have a progressive forgivability of 20% annually.

• Program Definition of Second Home/Eligibility

Second homes are not eligible for inclusion in the program.

• **Program National Objective(s)**

- LMI
- Urgent Need

• **Program Eligibility**

HUD Identified MID area:

Spalding County

Grantee Identified MID areas:

Butts, Henry, Jasper, Meriwether, Newton, and Troup counties

Other eligibility criteria will be addressed in the program policies and procedures.

• **Program Responsible Entity**

Georgia Department of Community Affairs (DCA)

• **Program Maximum Assistance**

\$280,000 with case-by-case exceptions made as necessary.

• **Program Estimated Begin and End Dates**

January 2025-June 2028

• **Other Program Details**

• **Program Competitive Application Overview (if applicable)**

N/A

• **Program Method of Distribution Description/Overview (if applicable)**

DCA will administer the program directly with the services of a procured vendor.

• **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)**

The Mitigation Set-Aside will be used for home hardening and will be defined further in program policies and procedures.

• **How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)**

Mitigation Set-Asides will be defined further in program policies and procedures.

Projection of Expenditures

Grant Number	Period	Quarterly Projection	Quarterly Actual	Cumulative Projection	Cumulative Actual
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Projection of Outcomes

Period	Performance Measure	Quarterly Projection	Quarterly Actual	Cumulative Projection	Cumulative Actual
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Buyout Program

No Grantee Program(s)

Infrastructure Program

No Grantee Program(s)

Economic Revitalization Program

No Grantee Program(s)

Public Facilities Program

No Grantee Program(s)

Public Services Program

Public Services - Title Related Legal Assistance

Grant Type	Grant Number	Proposed Budget	Proposed HUD-Identified MID Budget	Proposed Grantee-Identified MID Budget
Parent	B-23-DG-13-0001	\$750,000.00	\$600,000.00	\$150,000.00

Narratives

- **Program Description**

DCA hopes to leverage the broad network of community service and nonprofit organizations with well-established ties to the communities to help remove obstacles to applicant participation. DCA will enter into subrecipient agreements with a qualified non-profit agency to provide legal services to individual applicants for the Homeowner Rehabilitation and Reconstruction Program and the Affordable Rental Rehabilitation Program. Title searches for all properties will be ordered and the non-profit agency will assist with title remediation services for those requiring those services to participate in the housing programs.

- **Program Tieback to Disaster/Unmet Needs**

Heirs property, a home or land that has no clear title holder, is an unstable form of ownership that prevents storm victims from accessing disaster relief assistance and thwarts the efforts of municipalities to revitalize neighborhoods.

- **Program National Objective(s)**

- LMI
- Urgent Need

- **Program Eligibility**

All applicants in the Homeowner Rehabilitation and Reconstruction Program (HRRP) and the Affordable Rental Rehabilitation Program (ARRP) will be eligible for services.

- **Program Responsible Entity**

Georgia Heirs Property Law Center through a subrecipient agreement with DCA.

- **Program Maximum Assistance**

N/A

- **Program Estimated Begin and End Dates**

January 2025 - January 2027

• **Other Program Details**

• **Program Competitive Application Overview (if applicable)**

N/A

• **Program Method of Distribution Description/Overview (if applicable)**

N/A

• **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)**

N/A

• **How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)**

N/A

Projection of Expenditures

Grant Number	Period	Quarterly Projection	Quarterly Actual	Cumulative Projection	Cumulative Actual
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Projection of Outcomes

Period	Performance Measure	Quarterly Projection	Quarterly Actual	Cumulative Projection	Cumulative Actual
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Mitigation Program

No Grantee Program(s)

5. Appendix

a. Certifications.

CERTIFICATIONS

a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan (RARAP) in connection with any activity assisted with CDBG—DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.

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, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.

d. The grantee certifies that activities to be undertaken with CDBG-DR funds are consistent with its Action Plan.

e. 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, as such requirements may be modified by waivers or alternative requirements.

f. 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 75.

g. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). 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 waivers and alternative requirements).

h. State grantee certifies that it has consulted with all disaster-affected local governments (including any CDBG entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state.

i. 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, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster 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.

b. Waivers (if applicable).

N/A

c. Summary and Response of Public Comments. The following provides a summary of public comments received for the *CDBG-Disaster Recovery Action Plan* in response to *Disaster* during the public comment period of *Month, Day, Year* through *Month, Day, Year*. *Grantee* received a total of *X* number of comments during the 30 calendar days.

d. Data Sources/Methodologies.

Data Sources:

- CDC/AYSDR Social Vulnerability Index Interactive Map 2020 Database
- City of Griffin, Georgia – Planning and Development Department & Housing Authority
- Federal Emergency Management Agency (FEMA) – Open FEMA Data Sets
- Georgia Balance of State Continuum of Care
- Georgia Department of Community Affairs – Housing Finance and Development Division
- Georgia Emergency Management and Homeland Security Agency (GEMA/HS)
- Georgia Housing Needs Assessment 2023
- Georgia Statewide Point in Time Homeless County 2022
- Georgia’s Hazard Mitigation Strategy Plan
- HUD Exchange – Fair Housing
- National Alliance to End Homelessness – 2022 HIC Counts
- National Centers for Environmental Information: National Oceanic and Atmospheric Administration – January 2023 Tornadoes Report
- National Weather Service: National Oceanic and Atmospheric Administration – January 12, 2023, Tornado Outbreak
- Small Business Administration (SBA) – Disaster Loan Statistics
- Spalding County, Georgia – Administration, Emergency Management, & Fire Departments
- S. Census Bureau American Community Survey (ACS) 5-Year dataset 2018-2022
- S. Census Bureau, County Business Patterns
- S. Department of Housing and Urban Development (HUD)
- Williams Institute – LGBT Stats

Methodologies are outlined throughout the document, where applicable.

e. Important Definitions and Terms.

ABFE: Advisory Base Flood Elevation

AMI: Area Median Income

ARRP: Affordable Rental Rehabilitation Program

CBP: County Business Patterns

CDBG-DR: Community Development Block Grant Disaster Recovery

CDC/ATSDR SVI: Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry Social Vulnerability Index

DCA: (Georgia) Department of Community Affairs

DOB: Duplication of Benefits

DRRP: Disaster Recovery and Redevelopment Plans

EIDL: (SBA) Economic Injury Disaster Loan

FEMA: Federal Emergency Management Agency

FEMP: Federal Emergency Management Program

FVL: FEMA Verified Loss

GEMA/HS: Georgia Emergency Management and Homeland Security Agency

GHPLC: Georgia Heirs Property Law Center

HA: (FEMA) Housing Assistance

HCDA: Housing and Community Development Action of 1974, as amended

HRRP: Homeowner Rehabilitation and Reconstruction Program

HUD: U.S. Department of Housing and Urban Development

IA: (FEMA) Individual Assistance

IHP: (FEMA) Individual and Household Program

LGBT: Lesbian, Gay, Bi-sexual, Transgender

LMI: Low-to-Moderate Income

MID: Most Impacted and Distressed

NFIP: National Flood Insurance Program

NOAA: National Oceanic and Atmospheric Administration

ON: (FEMA) Other Needs Assistance

PA: (FEMA) Public Assistance

PRCS: Puerto Rico Community Survey

R/ECAP: Racially and Ethnically Concentrated Areas of Poverty

SBA: Small Business Administration

URA: Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended

VOAD: Voluntary Organizations Active in Disaster

VOB: Verification of Benefits

f. Standard Form 424.

OMB Number: 4040-0004
Expiration Date: 11/30/2025

Application for Federal Assistance SF-424		
* 1. Type of Submission:		
<input type="checkbox"/> Preapplication		
<input type="checkbox"/> Application		
<input type="checkbox"/> Changed/Corrected Application		
* 2. Type of Application:		
<input type="checkbox"/> New		
<input type="checkbox"/> Continuation		
<input type="checkbox"/> Revision		
* If Revision, select appropriate letter(s):		
<input type="text"/>		
* Other (Specify):		
<input type="text"/>		
* 3. Date Received:		4. Applicant Identifier:
<input type="text"/> Completed by Grants.gov upon submission.		<input type="text"/>
5a. Federal Entity Identifier:		5b. Federal Award Identifier:
<input type="text"/>		<input type="text"/>
State Use Only:		
6. Date Received by State:		7. State Application Identifier:
<input type="text"/>		<input type="text"/>
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN):		* c. UEI:
<input type="text"/>		<input type="text"/>
d. Address:		
* Street1: <input type="text"/>		
Street2: <input type="text"/>		
* City: <input type="text"/>		
County/Parish: <input type="text"/>		
* State: <input type="text"/>		
Province: <input type="text"/>		
* Country: USA: UNITED STATES		
* Zip / Postal Code: <input type="text"/>		
e. Organizational Unit:		
Department Name:		Division Name:
<input type="text"/>		<input type="text"/>
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text"/>		* First Name: <input type="text"/>
Middle Name: <input type="text"/>		
* Last Name: <input type="text"/>		
Suffix: <input type="text"/>		
Title: <input type="text"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text"/>		Fax Number: <input type="text"/>
* Email: <input type="text"/>		