

SOUTH CAROLINA HURRICANE FLORENCE ACTION PLAN



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South Carolina Disaster Recovery Office, a division of the
South Carolina Department of Administration

SCDRO is accepting public comment on the Hurricane Florence Action Plan until August 24, 2020. Comments may be submitted via email (ContactSCDR@admin.sc.gov) or in writing (632 Rosewood Drive, Columbia, SC 29201).

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Introduction

In September 2018, South Carolina was impacted by hurricane storm surge, high winds, tornados and flash flooding from Hurricane Florence as it made landfall near Wrightsville Beach, North Carolina Sept. 14, 2018 as a Category 1 hurricane. After landfall, Florence stalled briefly and then began a slow southwestward track over South Carolina as it weakened to a tropical storm, bringing tropical storm force wind gusts and heavy rains to eastern parts of the state. Fortunately, South Carolina was well prepared for a massive hurricane evacuation, and most people were able to get out of harm's way. Four deaths were attributed to Hurricane Florence in South Carolina. Although many lives were spared because of proper planning and execution of hurricane plans, the state still saw significant flooding, winds, and coastal storm surges which caused damage to infrastructure, homes, and businesses.

Hurricane Florence's impacts to South Carolina occurred mostly east of Interstate 95 and north of Interstate 26. Though a paucity of river gauges exists in the inland areas of this region, more than 20 inches of rain inundated parts of Horry and Chesterfield Counties, with the city of Loris recording more than 23 inches of rain.¹ These counties also experienced Category 1 hurricane-force wind gusts and several tornados that caused extensive tree and roof damages.² The greatest storm tide measurements for Hurricane Florence in South Carolina topped 6 feet in parts of Georgetown County, with NOAA coastal tide gages and USGS storm tide sensors measuring an average storm surge of 2 to 4 feet north of Charleston to the North Carolina border.³ Though widespread coastal erosion was not observed, parts of Georgetown and Horry Counties experienced impacts and property damages from coastal flooding and erosion at Pawleys Island northward through Myrtle Beach.⁴ Horry County also experienced significant flooding and related agricultural losses, initially estimated at more than \$125 million and more than 30 percent of soy bean, cotton and peanut crop losses.⁵ Furthermore, the USDA Food and Nutrition Service granted food loss and SNAP benefit waivers to the more than 185,000 impacted households that faced power outages, flooding and other obstacles in 26 counties during September and October 2018.⁶ Free meals were prepared and given out to flood victims by volunteers. First responders as well as many residents were given discounts on needed services to ease financial hardship. Many automobiles were submerged in the flood water, and access to and from communities was brought to a standstill, further complicating recovery and response efforts.

As the State continues recovery efforts, a focus on restoring residents' homes to safe, sanitary and secure conditions consistent with program housing quality standards will be key. In Florence's wake, as in past disasters, South Carolinians continue the tradition of leading assistance to each. In the true Southern spirit of "neighbors helping neighbors," many of the most vulnerable and heavily impacted received help from friends, and there has been an outpouring of assistance for the elderly, disabled, or those families in

¹ https://www.nhc.noaa.gov/data/tcr/AL062018_Florence.pdf

² <https://www.weather.gov/ilm/HurricaneFlorence>

³ https://www.nhc.noaa.gov/data/tcr/AL062018_Florence.pdf

⁴ <https://www.usgs.gov/centers/spcmssc/science/hurricane-florence-forecast-and-documentation-coastal-change>

⁵ <https://www.scemd.org/news/gov-henry-mcmaster-requests-federal-disaster-declaration-in-advance-of-hurricane-florences-potential-impact-to-the-state/>

⁶ <https://www.usda.gov/media/press-releases/2018/09/20/usda-eases-program-rules-south-carolina-snap-participants-impacted>

greatest need. The State, local county authorities, and non-profits continue supporting individuals, through the One SC Fund, local governments, and volunteer organizations continue supporting individuals and families who require basic services and are working to address conditions of immediate need. State and local government agencies, as well as civic organizations and community leaders will continue to address the fiscal, social and environmental challenges of this event for years to come.

Background

Since 2001, Congress has occasioned the appropriation of Community Development Block Grant Disaster Recovery (CDBG-DR) funding around Presidential Disaster Declarations (PDD). In 2016, a Consolidated Appropriations Act (Public Law [PL] 114-113, approved Dec. 18, 2015) was enacted to appropriate federal funds for disaster relief. PL 114-113 provided monies to states or units of general local government (UGLGs) for disaster recovery efforts in areas affected by disaster in 2015 as evidenced by a PDD. Subsequently, Congress passed PL 114-254 and appropriated funds for recovery efforts for disasters occurring in 2016, which was then supplemented by PL 115-31. For disasters occurring in 2018, Congress allocated funds under PL 115-254 and PL 116-20. Generally, these funds are to be used to satisfy a portion of unmet needs that remain after other federal assistance such as the Federal Emergency Management Agency (FEMA), Small Business Administration (SBA) or private insurance has been allocated.

The U.S. Department of Housing and Urban Development (HUD) uses the “best available” data to identify and calculate unmet needs for disaster relief, long-term recovery, restoration of infrastructure, and housing and economic revitalization. **Based on these assessments, HUD notified the State of South Carolina that it will receive disaster recovery fund allocations noted in Table 1 to assist in recovery from 2015, 2016, and 2018 disaster events.**

Table 1. CDBG-DR funding announcements for 2015-2018 disasters affecting South Carolina.

| Disaster Year (Name) | Grantee | PL 114-113 81 FR 39687 | PL 114-254 82 FR 5591 | PL 115-31 82 FR 36812 | PL 115-254 PL 116-20 85 FR 4681 |
|-------------------------|-------------------------|---------------------------|--------------------------|--------------------------|---------------------------------------|
| 2015 (Joaquin) | Lexington County, SC | \$16,332,000 | | \$5,038,000 | |
| | Columbia, SC | \$19,989,000 | | \$6,166,000 | |
| | Richland County, SC | \$23,516,000 | | \$7,254,000 | |
| | State of South Carolina | \$96,827,000 | | \$29,871,000 | |
| 2016 (Matthew) | State of South Carolina | | \$65,305,000 | \$29,781,000 | |
| 2018 (Florence) | State of South Carolina | | | | \$72,075,000 |

The Disaster Relief Appropriations Act requires that the state or local government must expend the funds within six years of the signed agreement between HUD and the grantee unless an extension is granted by HUD. Notably, the 2019 Appropriations Act permits the interchangeable use of funds toward mitigation and recovery activities as prior acts that include the 2015 floods from Joaquin and Hurricane Matthew in 2016 under Public Laws 114-223, 114-254, and 115-31 as noted in Table 1. In order to ensure that the funds assist the most impacted areas, 80 percent of the combined total awarded to the State will go to the most impacted and distressed counties. As a grantee, the State of South Carolina may determine

where to expend the remaining 20 percent of the allocation, but the funds must be spent toward unmet needs in counties with a presidentially declared disaster. More generally, all the allocated funds must be used for eligible disaster-related activities. To ensure that fraud, waste and misuse of funds does not occur, effective controls must be in place and monitored for compliance.

As required by HUD, South Carolina submits this Action Plan to outline its unmet needs to develop the most impactful recovery program for the state. The Unmet Needs Assessment, which evaluates the three core aspects of recovery – housing, infrastructure and economic development, forms the basis for the decisions outlined in the Action Plan. This Unmet Needs Assessment was developed with the help of many state and local stakeholders as well as the public to target the most significant unmet need that can be addressed by these limited federal funds.

Community Profile: Summary of Impact and Presidentially Declared Counties

Hurricane Florence (Figure 1) was a triple threat in that it impacted South Carolinians with storm surges of 2 to 4 feet in some areas, damaging winds (Figure 2) across nearly the whole presidentially declared impact areas, and heavy rainfall (Figure 3) that caused widespread flooding. In some places these three hazards created a compound threat damaging homes and infrastructure.

More than 16,837 residents applied for Individual Assistance from FEMA, more than 8,000 residences had a real property FEMA Verified Property Loss as a result of this event, and more than 4,438 residents received Housing Assistance from FEMA.⁷ While damage from Hurricane Florence flooding is fairly easy to identify, there were many homes damaged by the combination of wind and rainfall. This has complicated the recovery process in that damage can not only be assessed from below, measuring flood damage, but must consider rain damage as well.

Large portions of the state saw high amounts of rainfall with several areas receiving more than 20 inches of rain in a 24-hour period. Figure 3, below, created by the Charleston Office of the National Weather Service, illustrates the extent and severity of the hurricane event and associated rainfall amounts. Inland areas rather than the immediate coastline that saw the largest amounts of rain and related flood damages. Due to the stalling and slow movement of Hurricane Florence over the eastern half of South Carolina, heavy rainfall from the mountains to the lowlands caused significant flooding. The four direct fatalities occurring as a result of Florence were caused by vehicular drowning incidents, and another five deaths were indirectly related to carbon monoxide poisoning and auto accidents. In Loris, where more than 23 inches of rain was observed, more than 100 people were rescued from flooded homes and cars, with more than 1,000 homes and businesses flooded in nearby Conway. More than 150 homes recently rebuilt after Hurricane Matthew in 2016 were severely flooded in Marlboro County, and flooding along the Lynches River in Florence County resulted in the evacuation of more than 2,500 residents.

The peak storm tide in South Carolina was 6.03 feet at Murrells Inlet in Georgetown County, corresponding with an estimated peak storm surge inundation of about 3.8 feet, as measured by the USGS and reported in the National Hurricane Center's Tropical Cyclone Report for Florence.⁸ Horry County's Surfside Beach had the second highest storm tide measurement of 5.55 feet and storm surge of 3.1 feet. Surveys and measurements obtained from the NOAA National Hurricane Center and U.S. Geological Survey indicate inundation (i.e., water depths above ground) was generally about 2-4 feet in most areas with locally higher amounts up to 3 to 4 feet, mainly in Georgetown and Horry Counties. Wind-derived damage was experienced mostly across the northeastern areas of South Carolina, causing power outages affecting farmers and combining with rainfall to produce heavy impacts in many places. These winds coupled with rainfall were enough to cause significant damage to homes and businesses.

⁷ FEMA FIDA – Individual Assistance Program Report

⁸ https://www.nhc.noaa.gov/data/tcr/AL062018_Florence.pdf

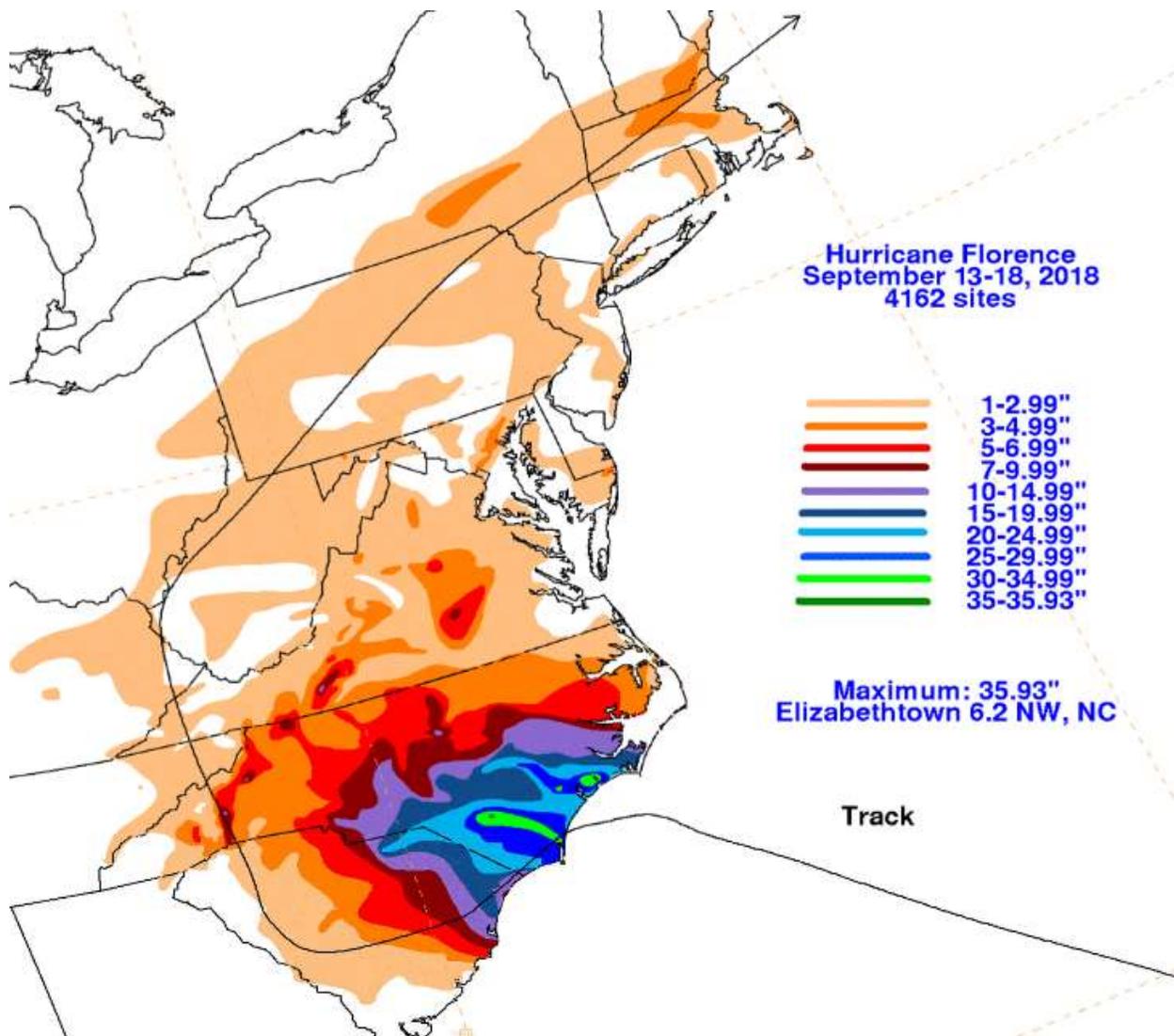


Figure 1: Hurricane Florence path and associated rainfall areas.⁹

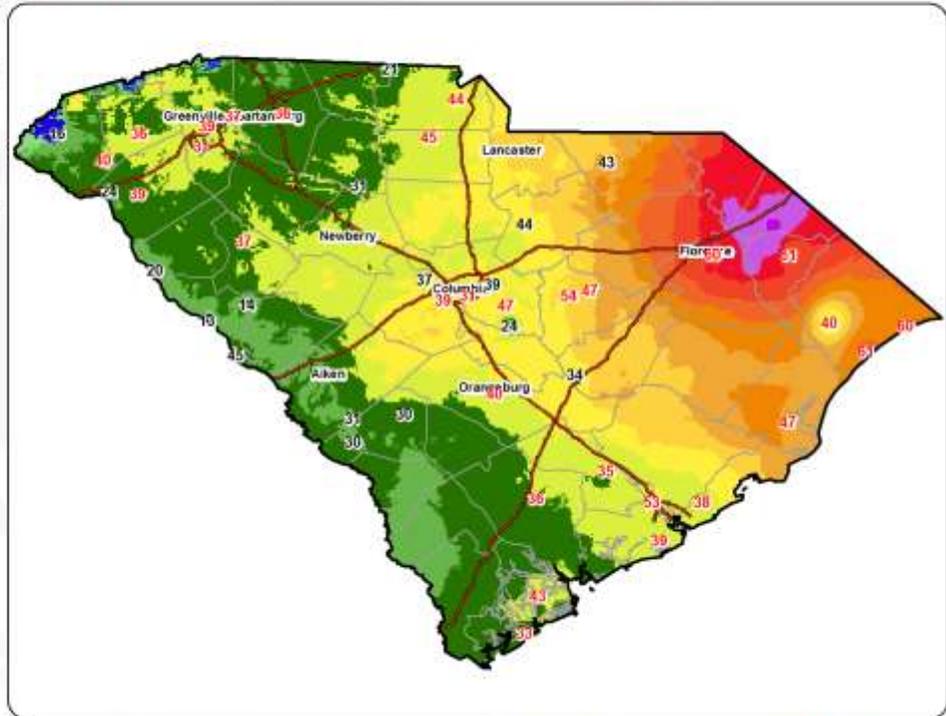
⁹ https://www.nhc.noaa.gov/data/tcr/AL062018_Florence.pdf



National Weather Service State of South Carolina



Maximum Max Wind Gust 8AM 09/13/2018 - 8AM 09/17/2018



This map is an interpolation of actual reported values, but should be considered an estimation only. Not all reports used in the analysis will be displayed due to space constraints. Reports are max wind gust through the above mentioned period.



Figure 2: Hurricane Florence peak wind gusts.¹⁰

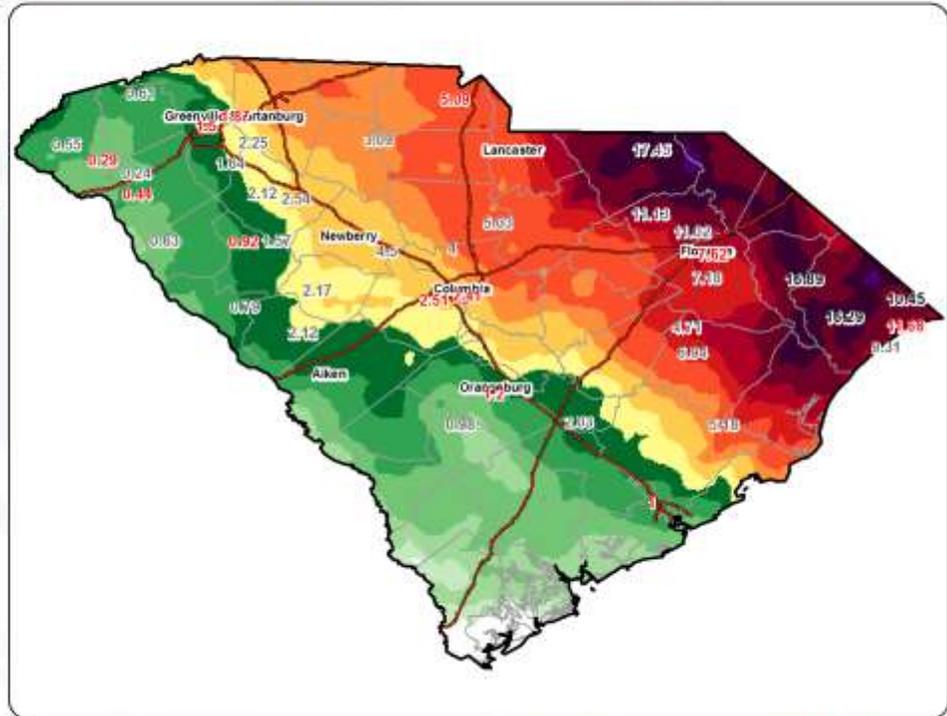
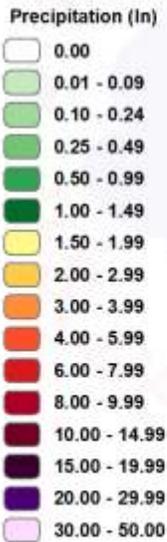
¹⁰ <https://www.weather.gov/chs/TropicalStormFlorence-Sept2018>



National Weather Service State of South Carolina



Precipitation Accumulation 8AM 09/13/2018 - 8AM 09/17/2018



This map is an interpolation of actual reported values, but should be considered an estimation only. Not all reports used in the analysis will be displayed due to space constraints. Reports are precipitation through the above mentioned period.

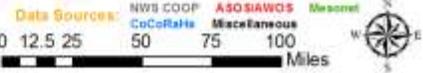


Figure 3: Hurricane Florence rainfall totals.¹¹

¹¹ <https://www.weather.gov/chs/TropicalStormFlorence-Sept2018>

A major disaster declaration was issued for the State of South Carolina on Sept. 16, 2018. The declaration for FEMA 4394 included the following counties:

| County | Individual Assistance | Public Assistance |
|---------------------|-----------------------|-------------------|
| <i>Berkeley</i> | | Declared |
| <i>Calhoun</i> | | Declared |
| <i>Charleston</i> | | Declared |
| <i>Chesterfield</i> | Declared | Declared |
| <i>Clarendon</i> | | Declared |
| <i>Colleton</i> | | Declared |
| <i>Darlington</i> | Declared | Declared |
| <i>Dillon</i> | Declared | Declared |
| <i>Dorchester</i> | | Declared |
| <i>Florence</i> | Declared | Declared |
| <i>Georgetown</i> | Declared | Declared |
| <i>Horry</i> | Declared | Declared |
| <i>Jasper</i> | | Declared |
| <i>Lancaster</i> | | Declared |
| <i>Marion</i> | Declared | Declared |
| <i>Marlboro</i> | Declared | Declared |
| <i>Orangeburg</i> | | Declared |
| <i>Sumter</i> | | Declared |
| <i>Williamsburg</i> | | Declared |
| Total | 8 | 19 |

Table 2. Declared County List for PDD 4394.

| County | Individual Assistance | Public Assistance |
|---------------------|-----------------------|-------------------|
| <i>Berkeley</i> | | Declared |
| <i>Calhoun</i> | | Declared |
| <i>Charleston</i> | | Declared |
| <i>Chesterfield</i> | Declared | Declared |
| <i>Clarendon</i> | | Declared |
| <i>Colleton</i> | | Declared |
| <i>Darlington</i> | Declared | Declared |
| <i>Dillon</i> | Declared | Declared |
| <i>Dorchester</i> | | Declared |
| <i>Florence</i> | Declared | Declared |
| <i>Georgetown</i> | Declared | Declared |
| <i>Horry</i> | Declared | Declared |
| <i>Jasper</i> | | Declared |
| <i>Lancaster</i> | | Declared |
| <i>Marion</i> | Declared | Declared |

| | | |
|---------------------|----------|-----------|
| <i>Marlboro</i> | Declared | Declared |
| <i>Orangeburg</i> | | Declared |
| <i>Sumter</i> | | Declared |
| <i>Williamsburg</i> | | Declared |
| Total | 8 | 19 |

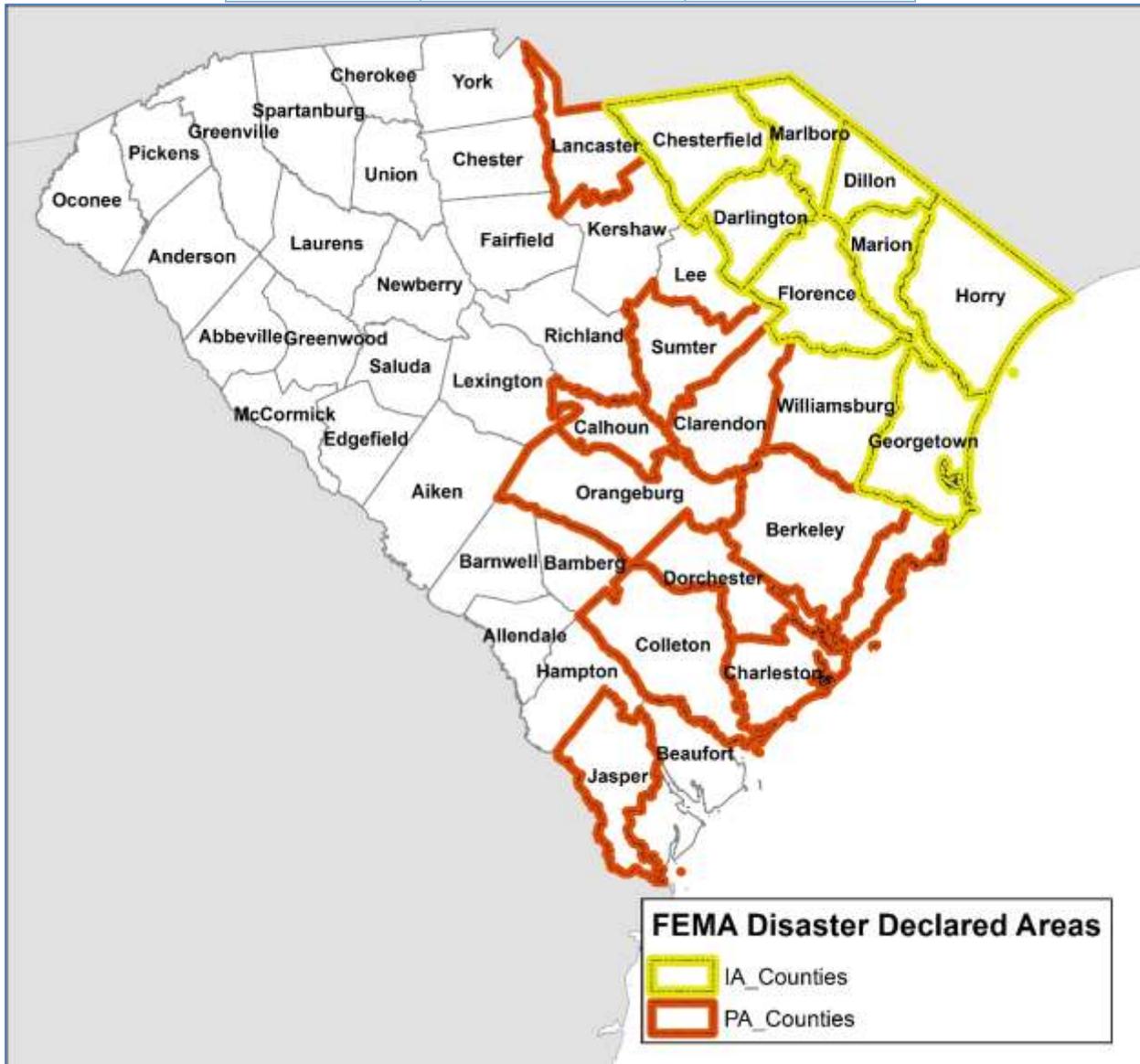


Figure 4. PDD 4394 Declared Counties.

Demographic and impact data for this report was largely generated using 2017 American Community Survey 5-Year Survey data, FEMA Individual Assistance (Sept. 19, 2019), and Small Business Administration Home Loan Program data (Aug. 15, 2019). A variety of data sources is used in determining Hurricane Florence’s impacts and unmet needs, including information from several state and federal government data sources (Table 3. Data sources utilized in this assessment.

Table 3. Data sources utilized in this assessment.

| Theme | Data | Source (and URL where available) |
|-------------------------|--|--|
| Impact Guidance | 83 FR 40314 | Housing and Urban Development - https://www.govinfo.gov/content/pkg/FR-2018-08-14/pdf/2018-17365.pdf |
| | 85 FR 4681 | https://www.govinfo.gov/content/pkg/FR-2020-01-27/pdf/2020-01204.pdf |
| | 81 FR 39687 | https://www.govinfo.gov/content/pkg/FR-2016-06-17/pdf/2016-14110.pdf |
| | 82 FR 36812 | https://www.govinfo.gov/content/pkg/FR-2017-08-07/pdf/2017-16411.pdf |
| | 82 FR 5591 | https://www.govinfo.gov/content/pkg/FR-2017-01-18/pdf/2017-01007.pdf |
| Demographics | United States Census Data | https://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t |
| | HUD Income Limit Data | https://www.huduser.gov/portal/datasets/il.html#2018 |
| | United States Census Households over 65 Living Alone | https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_S1101&prodType=table |
| | United States Census Median Family Income | https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_S1903&prodType=table |
| | United States Census Race | https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_B02001&prodType=table |
| | United States Census County Quick Facts | https://www.census.gov/quickfacts/fact/table/fl/HSG010217 |
| | Homelessness | South Carolina Coalition for the Homeless https://www.schomeless.org/media/1163/scich-report-731-final-draft-electronic.pdf |
| Economic Impacts | Small Business Administration Home Loan Report | Small Business Administration |
| | Small Business Administration Business Loan Report | Small Business Administration |
| | Hurricane Florence Insurance Payouts | https://doi.sc.gov/DocumentCenter/View/11376/2018-Status-Report-on-the-South-Carolina-Coastal-Property-Insurance-Market |
| Event Impacts | Shelter Needs | SCDHEC MHS Shelter Population data ¹² |
| | Hurricane Wind Speeds | ARA Windfield data https://www.designsafe-ci.org/data/browser/public/designsafe.storage.community//Recon%20Portal/Hurricane%20Florence%20Resources/ARA%20Windfield%20Data%20Day%207 |
| | Storm Survey Data | Federal Emergency Management Agency - https://www.fema.gov/hurricane-florence |
| | Presidential Disaster Declaration Areas | https://www.fema.gov/disaster/4394 |

¹² Received in personal communication from SCDRO Dec. 4, 2019.

| | | |
|-------------------------------|--|---|
| Housing Impacts | Low - Mod Income data | https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-block-groups-places/ |
| | FEMA Applicant Data - Homeowners | https://www.fema.gov/openfema-dataset-housing-assistance-data-owners-v1 |
| | FEMA Applicant Data - Renters | https://www.fema.gov/openfema-dataset-housing-assistance-data-renters-v1 |
| | FEMA Disaster Declaration Summaries | https://www.fema.gov/openfema-dataset-disaster-declarations-summaries-v1 |
| | FEMA FIDA 4394 | Federal Emergency Management Agency |
| Infrastructure Impacts | FEMA Dataset: Public Assistance Funded Project Details | https://www.fema.gov/openfema-dataset-public-assistance-funded-projects-details-v1 |

Targeting Priority Needs

The State partnered with the Disaster Metrics, LLC. and Dr. Christopher T. Emrich to identify those areas most impacted and most vulnerable across the state. Disaster Metrics utilized the Social Vulnerability Index to inform the recovery action plan development process by empirically delineating the most socially vulnerable census tracts within each IA designated county. **Residents in these high vulnerability areas generally have a lower ability to adequately prepare for, respond to, and rebound from environmental impacts (such as floods), shocks and stresses.** Vulnerable populations will often require additional resources and support in order to bounce back. Failure to support vulnerable populations during disaster recovery may ultimately lead to additional impacts and resource needs weeks, months and years later.

Utilizing social vulnerability information in concert with FEMA damage data provides a standardized, replicable and pragmatic process for understanding where scarce resources would be most helpful in driving successful disaster recovery. This procedure results in a visualization of loss/vulnerability for the state where places with high population such as Florence and Myrtle Beach are characterized by a general attenuation of impacts due to lower levels of social vulnerability. Conversely, populations residing in the swath from Dillion to Chesterfield Counties, although much less heavily populated, are characterized by generally higher levels of social vulnerability—parts of Marion and Horry Counties have very high levels of social vulnerability and very high FEMA losses. Targeting resources to these most heavily impacted and vulnerable areas will yield the most effective benefit because these areas will be much less able to bounce back without outside assistance. While there was some damage in coastal areas of Horry and Georgetown Counties, the damage (according to an extensive analysis of FEMA Verified Loss Data) in interior areas is more extensive, especially when compounded with an inability to bounce back (social vulnerability).

SCDRO obtained from FEMA a list of Individual Assistance (IA) applicants and identified those applicants with a FEMA verified real property (housing) loss. Combining FEMA damage data at the zip code level – the finest level available from this set of FEMA data¹³, provided a more nuanced view of damages across

¹³ Applicant address (point via latitude and longitude) level impact and support data is available from FEMA but was not provided to the state.

the state. FEMA verified losses were overlaid with social vulnerability information to identify areas that were both heavily impacted and had a lower capacity to absorb such losses (Figure 5).

This geographic overlay, combining areas of highest vulnerability with the areas containing significant numbers of damaged homes, shown in the map below, clearly indicates that the counties in the Eastern part of the state (from Dillon southeast to the coast) **not only contain the highest rate of damaged homes but often also have the highest social vulnerability (Figure 5). Targeting support to these areas in the immediate and long-term recovery phases of the flood disaster will yield the best outcomes for those with the highest need.** The comprehensive analysis of Unmet Needs is discussed in detail in the Unmet Needs Assessment section.

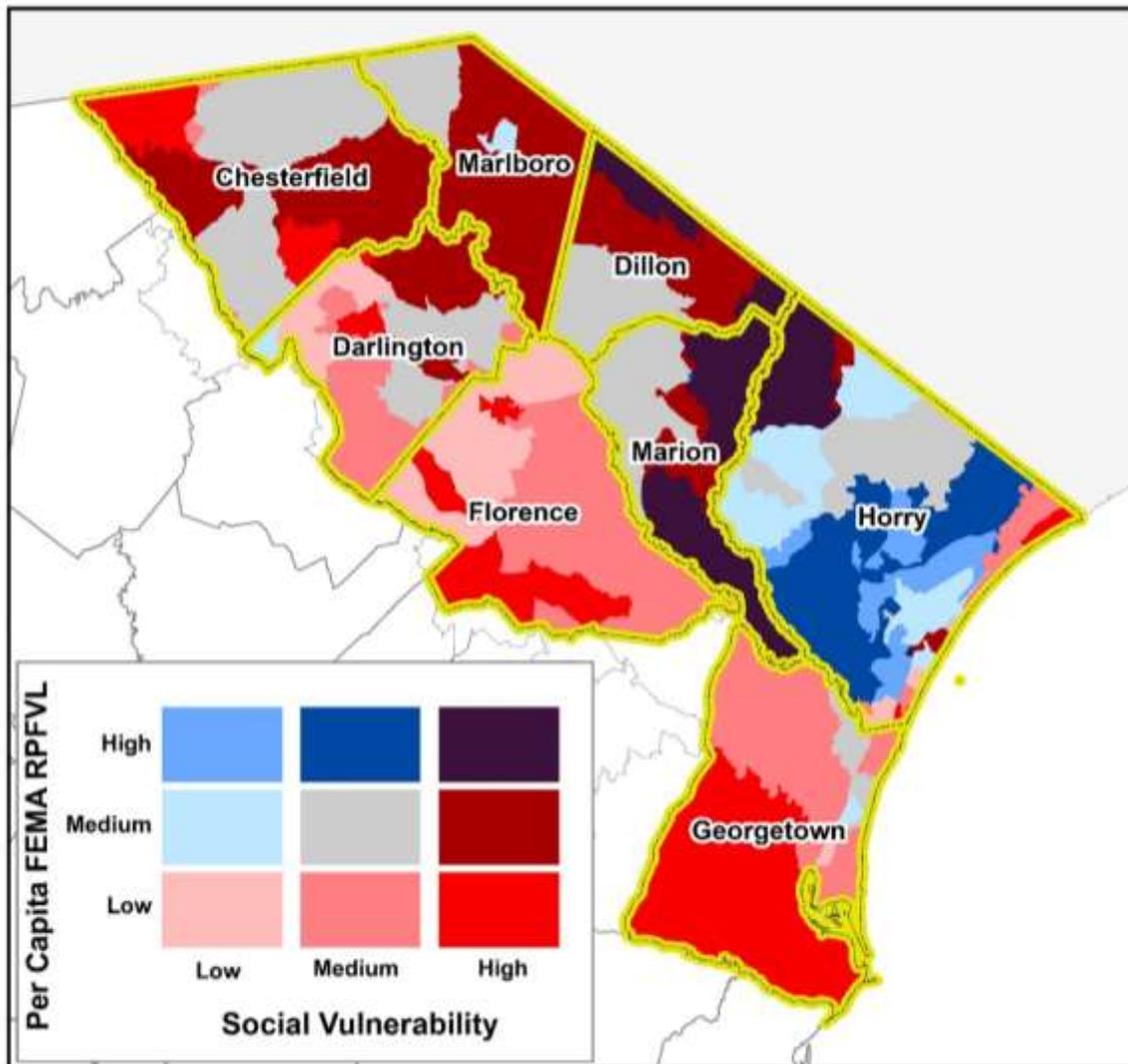


Figure 5. Bivariate Overlay of Damaged Housing Units and Social Vulnerability.

Unmet Needs Assessment

Demographic Profile of the Impacted Area

Table 4, below shows a breakdown of socioeconomics and demographics for the Hurricane Florence impacted counties of South Carolina. While many community characteristics across the impact area are similar to state trends and percentages, there are a few specific socio-demographic differences that should be addressed as a fuller discussion of unmet needs is created. **Less than 15 % of the South Carolina population resides in the impacted area covered in this assessment.** The population in the impacted area differs from the statewide population in several key areas.

First, the Florence impacted area has a much higher percentage of people living in poverty (22.64%) than the state (15.36%). This poverty is a primary indicator of places that might see greater impacts from disasters because of a general lack of ability to prepare for shocks and stresses. Additionally, the impact area has higher percentage of residents over the age of 65, a much lower degree of residents with a bachelor's degree, a higher percentage of individuals with disabilities, and a higher percentage of individuals without health insurance and an African American population of 39.63% compared to the statewide average of 27.1%. Furthermore, these areas have lower labor force participation, lower median value of housing units, and lower median rent values. This indicates that when compared to the state as a whole, there is a higher relative concentration of individuals with vulnerabilities that influence how they respond to disaster events and will decrease their speed of recovery.

Table 4. Demographic Profile Information - American Community Survey Data, 2018 Release.

| <i>People</i> | Hurricane Florence Counties | South Carolina - Statewide |
|---|-----------------------------------|----------------------------------|
| <i>Population estimates, July 1, 2018</i> | 745,147 | 5,084,127 |
| <i>Persons under 5 years, percent, July 1, 2018</i> | 5.53 | 5.8 |
| <i>Persons 65 years and over, percent, July 1, 2018</i> | 20.09 | 17.7 |
| <i>White alone, percent, July 1, 2018</i> | 56.5 | 68.5 |
| <i>Black or African American alone, percent, July 1, 2018</i> | 39.63 | 27.1 |
| <i>American Indian and Alaska Native alone, percent, July 1, 2018</i> | 1.38 | 0.5 |
| <i>Asian alone, percent, July 1, 2018</i> | 0.8 | 1.8 |
| <i>Two or More Races, percent, July 1, 2018</i> | 1.65 | 1.9 |
| <i>Hispanic or Latino, percent, July 1, 2018</i> | 3.44 | 5.8 |
| <i>Foreign born persons, percent, 2013-2017</i> | 3.04 | 4.9 |
| <i>Housing units, July 1, 2018</i> | 400,997 | 2,318,271 |
| <i>Owner-occupied housing unit rate, 2013-2017</i> | 69.23 | 68.6 |
| <i>Median value of owner-occupied housing units, 2013-2017</i> | \$105,375 | \$148,600 |
| <i>Median gross rent, 2013-2017</i> | \$675 | \$836 |
| <i>Building permits, 2018</i> | 5,641 | 35,487 |
| <i>Households, 2013-2017</i> | 279,823 | 1,871,307 |
| <i>Persons per household, 2013-2017</i> | 2.55 | 2.54 |
| <i>Language other than English spoken at home, Percent 5 years+, 2013-2017</i> | 4.14 | 6.9 |
| <i>High school graduate or higher, percent of persons age 25 years+, 2013-2017</i> | 80.51 | 86.5 |
| <i>Bachelor's degree or higher, percent of persons age 25 years+, 2013-2017</i> | 17.28 | 27 |
| <i>With a disability, under age 65 years, percent, 2013-2017</i> | 13.36 | 10.5 |
| <i>Persons without health insurance, under age 65 years, percent</i> | 14.14 | 12.7 |
| <i>Per Capita health care and social assistance receipts/revenue, 2017 (\$1,000)</i> | 5.18 | 4.51 |
| <i>In civilian labor force, total, percent of population age 16 years+, 2013-2017</i> | 54.95 | 59.9 |
| <i>Median household income (in 2015 dollars), 2013-2017</i> | \$38,419 | \$48,781 |
| <i>Per capita income in past 12 months (in 2015 dollars), 2013-2017</i> | \$21,262 | \$26,645 |
| <i>Persons in poverty, percent</i> | 22.64 | 15.3 |

Note: Cells highlighted in blue indicate an important difference between the statewide data and the subset area impacted by the floods and covered by the CBDG-DR SC Florence allocation.

Impact on Low-and-Moderate-Income Populations

All programs supported by HUD Community Development Block Grant (CDBG) assistance must demonstrate benefit to individuals and communities by meeting one of the program’s three National Objectives for all money spent on projects. These are: (1) benefiting low-and moderate- income (LMI) persons, (2) aiding in the prevention or elimination of slums or blight, or (3) meeting a need having particular urgency (urgent need)¹⁴ - Table 5.

Low-to-moderate income households are defined as households that do not exceed 80% of the median income for their area, as determined by HUD. These income categories are grouped into the following classifications:¹⁵

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

For the purpose of CDBG-Disaster Recovery programs, grantees apply the below terminology consistent with the original language of the Housing Act and reporting designations in the HUD Disaster Recovery Grant Reporting (DRGR) system.¹⁶

Table 5. HUD LMI Classifications.

| Household Area Median Income | Classification/ Terminology | Reporting Designation in DRGR |
|------------------------------|-----------------------------|-------------------------------|
| 0%-30% | Very Low Income | Low Income |
| 31%-50% | Low Income | Low Income |
| 51%-80% | Moderate Income | Moderate Income |
| 81% or Higher | Above LMI | Urgent Need |

Please refer to Appendix for 2019 Area Median Income Limits by Family Size and County, and **Error! Reference source not found.** for HUD Income Limits for income categories in the declared counties.

¹⁴ The HUD National objectives are established under the statutory authority of 42 U.S.C. §3531 and 42 U.S.C §5301.

¹⁵ The term “Low-and-Moderate Income” is defined in the Housing and Community Development Act of 1974 as: The terms "persons of low and moderate income" and "low- and moderate-income persons" mean families and individuals whose incomes do not exceed 80 percent of the median income of the area involved, as determined by the Secretary with adjustments for smaller and larger families. The term "persons of low income" means families and individuals whose incomes do not exceed 50 percent of the median income of the area involved, as determined by the Secretary with adjustments for smaller and larger families. The term "persons of moderate income" means families and individuals whose incomes exceed 50 percent, but do not exceed 80 percent, of the median income of the area involved, as determined by the Secretary with adjustments for smaller and larger families.

¹⁶ HUD Program Income Limits are published annually for use across all HUD funded program and contain incongruous terminology to the Housing Act. Terminology published in the annual income limits is applied to other HUD funded formula allocation programs to support individual income group targets within the LMI category: <https://www.huduser.gov/portal/datasets/il.html>

Many of the counties in the impacted area have relatively high rates of low-and-moderate income (LMI) populations (Figure 6). Overall, the average LMI rate for counties across the state-impacted area was approximately 46.01%. Every presidentially declared IA county except Florence County is above the state average (42%) for LMI populations.

Table 6 illustrates the average LMI percentage across all block groups in any county and the maximum LMI of any single block group within that county. What becomes clear when looking at the maximum LMI values is that every county has at least one area characterized by very low-income levels. When block group populations are examined, additional LMI concentrations within each county become apparent, as illustrated in the map above. Detailed LMI maps of each presidentially declared Individual Assistance county with heavy impacts are show in (Figure 7 - Figure 14) below.

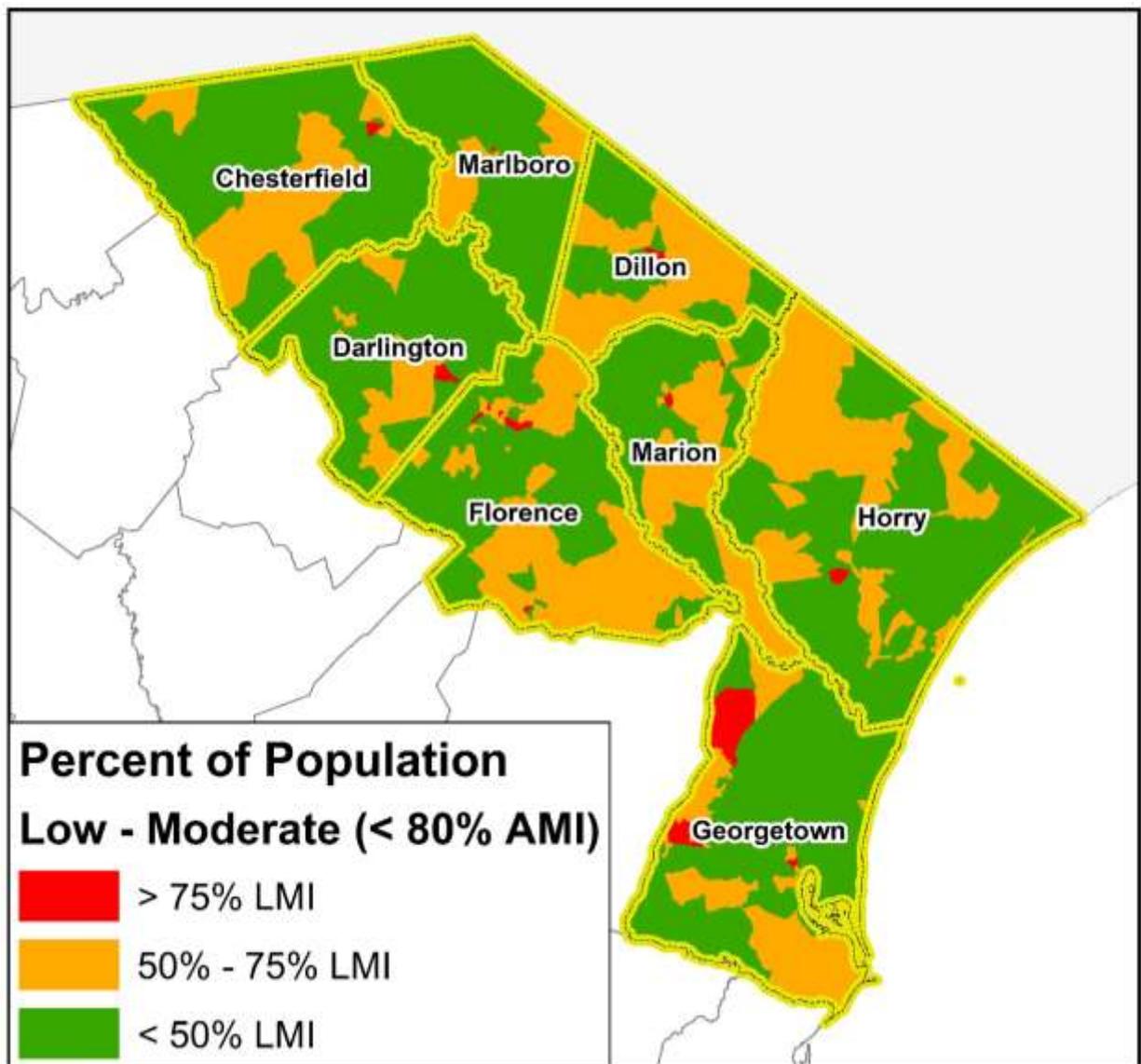


Figure 6. Low to Moderate Income by Block Group for IA Declared Counties.

Table 6. Low to Moderate Income Summary for Florence Impacted Counties.

| County | Number of Block Groups | Minimum LMI % | Average LMI % | Maximum LMI % |
|---------------------|------------------------|---------------|---------------|---------------|
| <i>Chesterfield</i> | 33 | 8.36% | 46.63% | 83.92% |
| <i>Darlington</i> | 55 | 2.17% | 42.85% | 76.36% |
| <i>Dillon</i> | 28 | 11.54% | 51.74% | 83.92% |
| <i>Florence</i> | 107 | 0.00% | 43.45% | 84.66% |
| <i>Georgetown</i> | 46 | 0.00% | 44.37% | 94.74% |
| <i>Horry</i> | 149 | 0.00% | 41.22% | 79.74% |
| <i>Marion</i> | 31 | 15.23% | 49.63% | 91.67% |
| <i>Marlboro</i> | 24 | 24.28% | 48.19% | 91.82% |

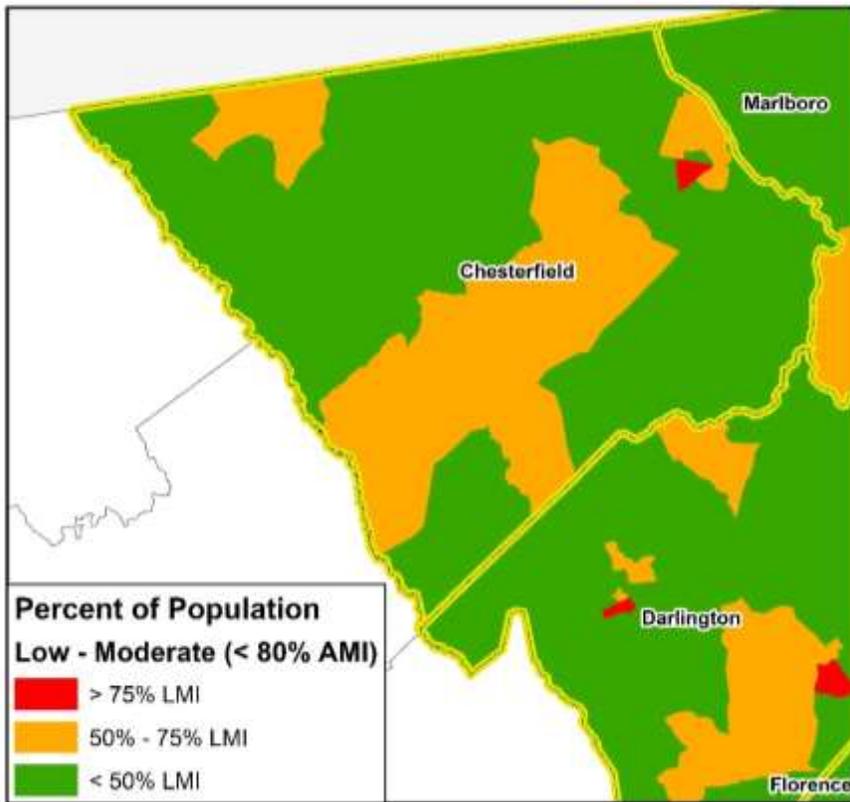


Figure 7. Low to Moderate Income by Block Group – Chesterfield County.

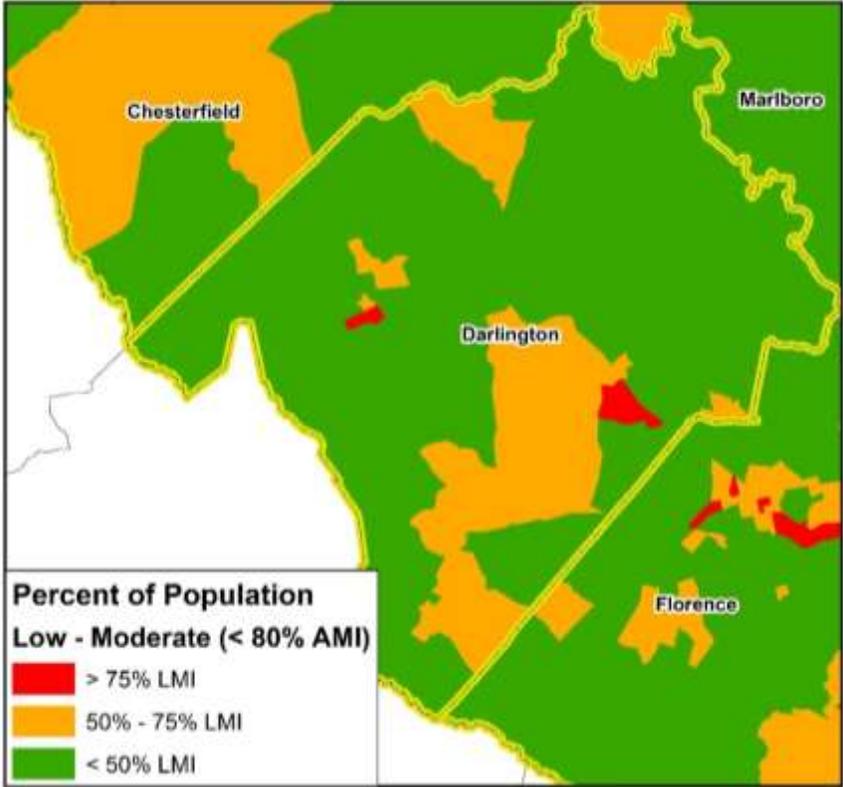


Figure 8. Low to Moderate Income by Block Group – Darlington County.

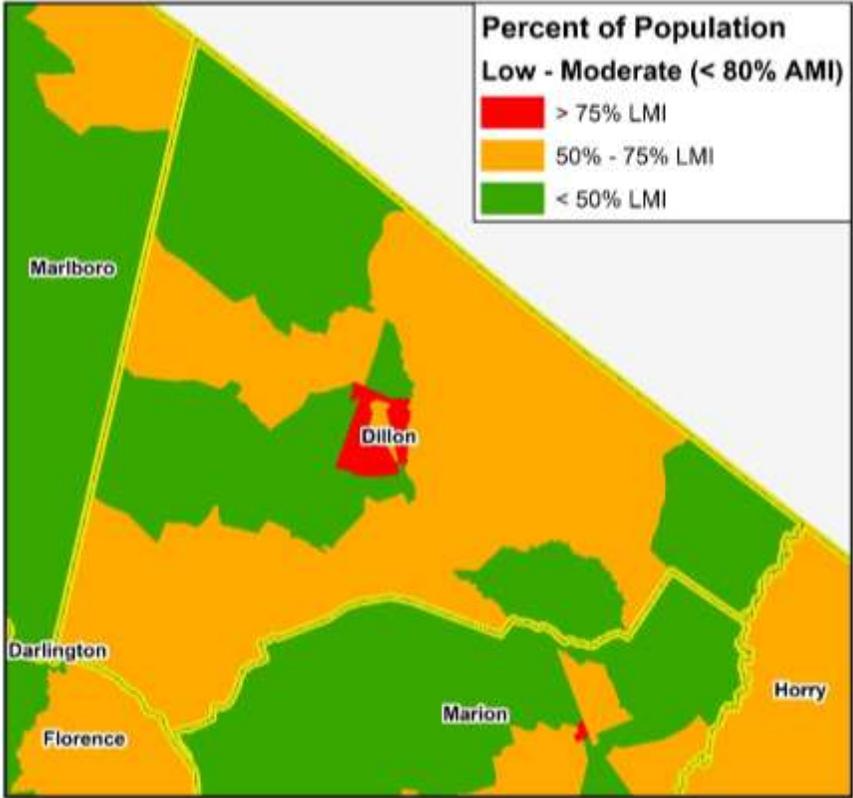


Figure 9. Low to Moderate Income by Block Group – Dillon County.

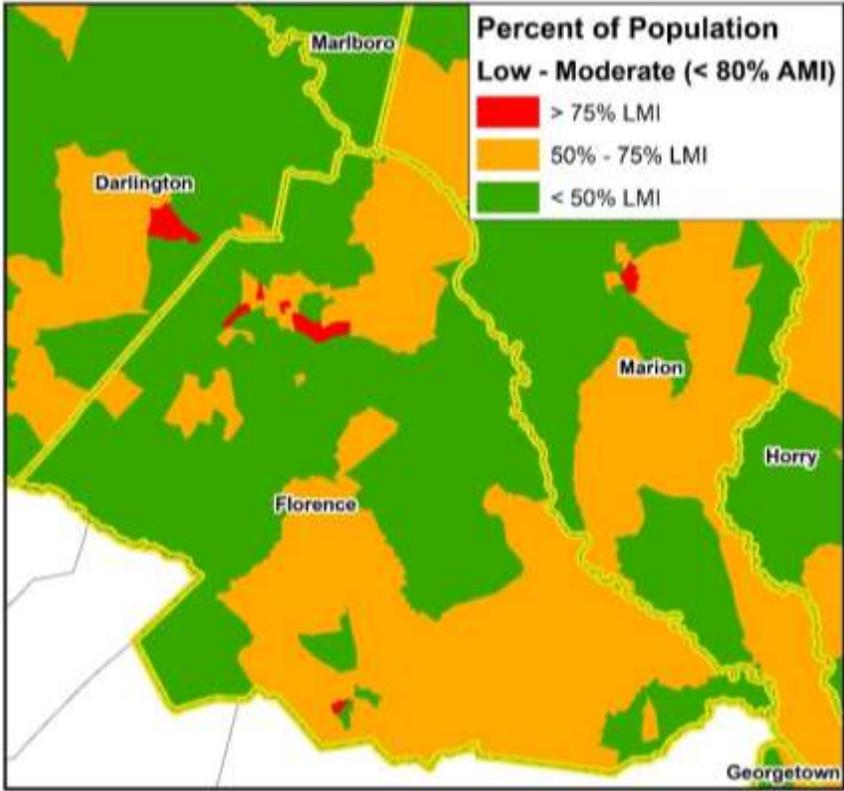


Figure 10. Low to Moderate Income by Block Group – Florence County.

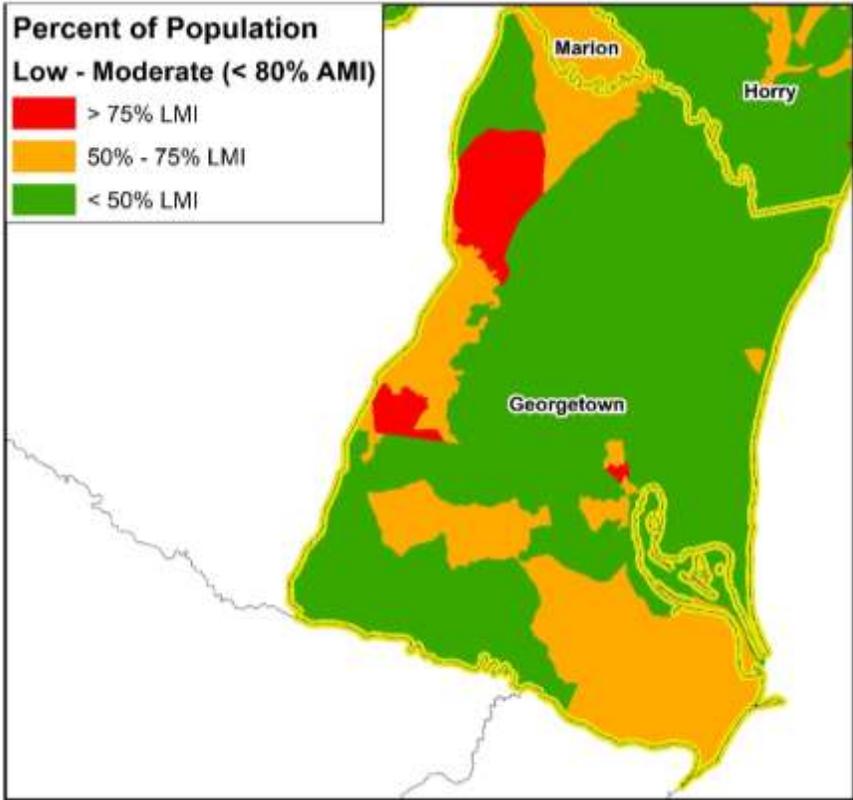


Figure 11. Low to Moderate Income by Block Group – Georgetown County.

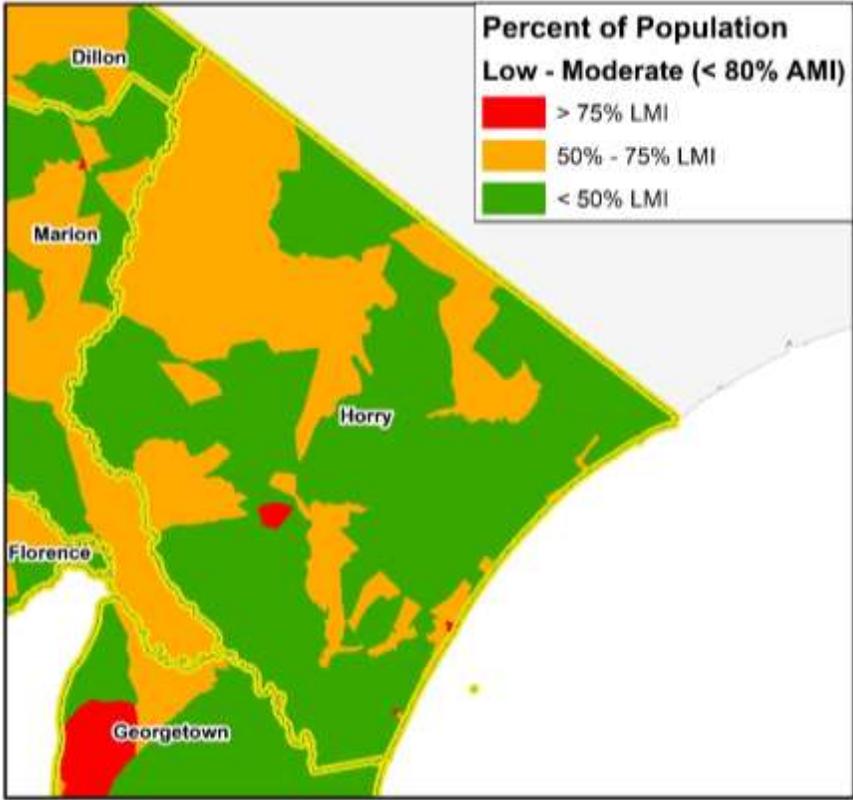


Figure 12. Low to Moderate Income by Block Group – Horry County.

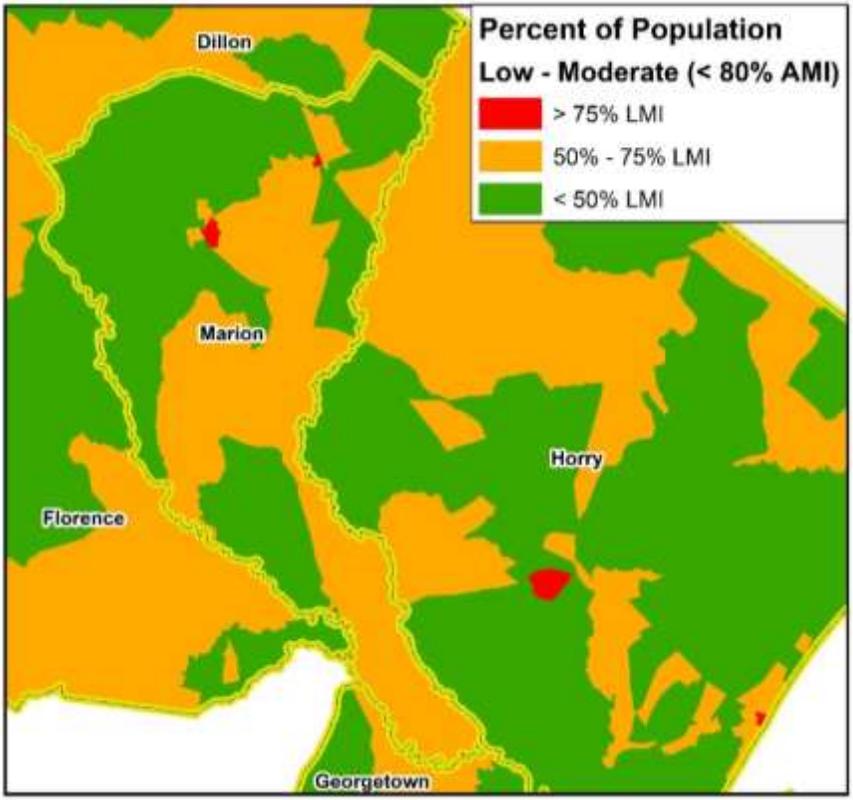


Figure 13. Low to Moderate Income by Block Group – Horry County.

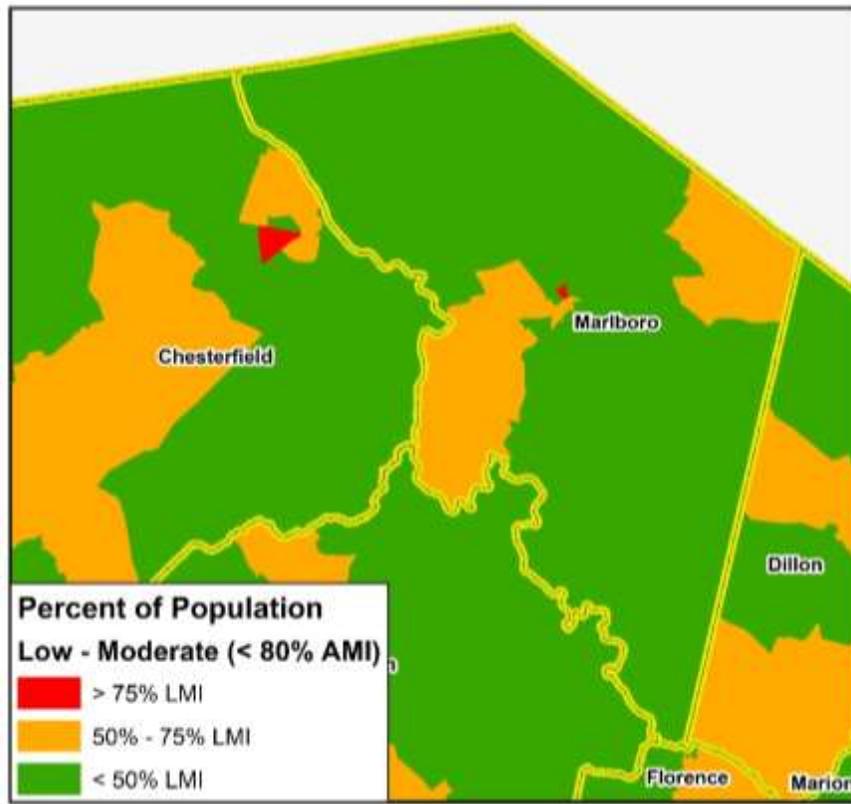


Figure 14. Low to Moderate Income by Block Group – Marlboro County.

Impact on Special Needs Populations

Individuals with access and functional needs will require assistance with accessing and/or receiving disaster resources. These individuals could be children, older adults, pregnant women, from diverse cultures, transportation disadvantaged, homeless, have chronic medical disorders, and/or a pharmacological dependency. They could have disabilities, live in institutions, have limited English proficiency or altogether non-English speaking.¹⁷

Specialized resources may include, but are not limited to social services, accommodations, information, transportation, or medications to maintain health. Regardless of the nature of the need, care must be taken to ensure that all individuals are able to access disaster recovery resources.

According to U.S. Census data, approximately 4.14% of the population in the impacted counties speaks a language other than English at home and does not understand English well, with Chesterfield (4.1%), Dillon (4.5%), Horry (7.5%), and Marlboro (4.1%) counties having the highest relative percent of the population speaking different languages and not understanding English well.¹⁸ Outreach for the Action

¹⁷ US Dept. of Health and Human Services, Office of the Assistant Secretary for Preparedness and Response, “Public Health Emergency” – <http://www.phe.gov/Preparedness/planning/abc/Pages/atrisk.aspx>

¹⁸ Source: U.S. Census Bureau, 2010-2015 American Community Survey 5-Year Estimates, Table 16001. County-level percent calculations by the South Carolina Department of Revenue and Fiscal Affairs - Health and Demographics Section.

Plan and for applicant intake will take careful consideration of the language needs of these populations (see the sections on Outreach and Citizen Participation for more information).

The map below shows concentrations of limited English by census tract (Figure 15), followed by a (Table 7) that shows the number of residents who speak only English or who speak Spanish or other languages, by county.

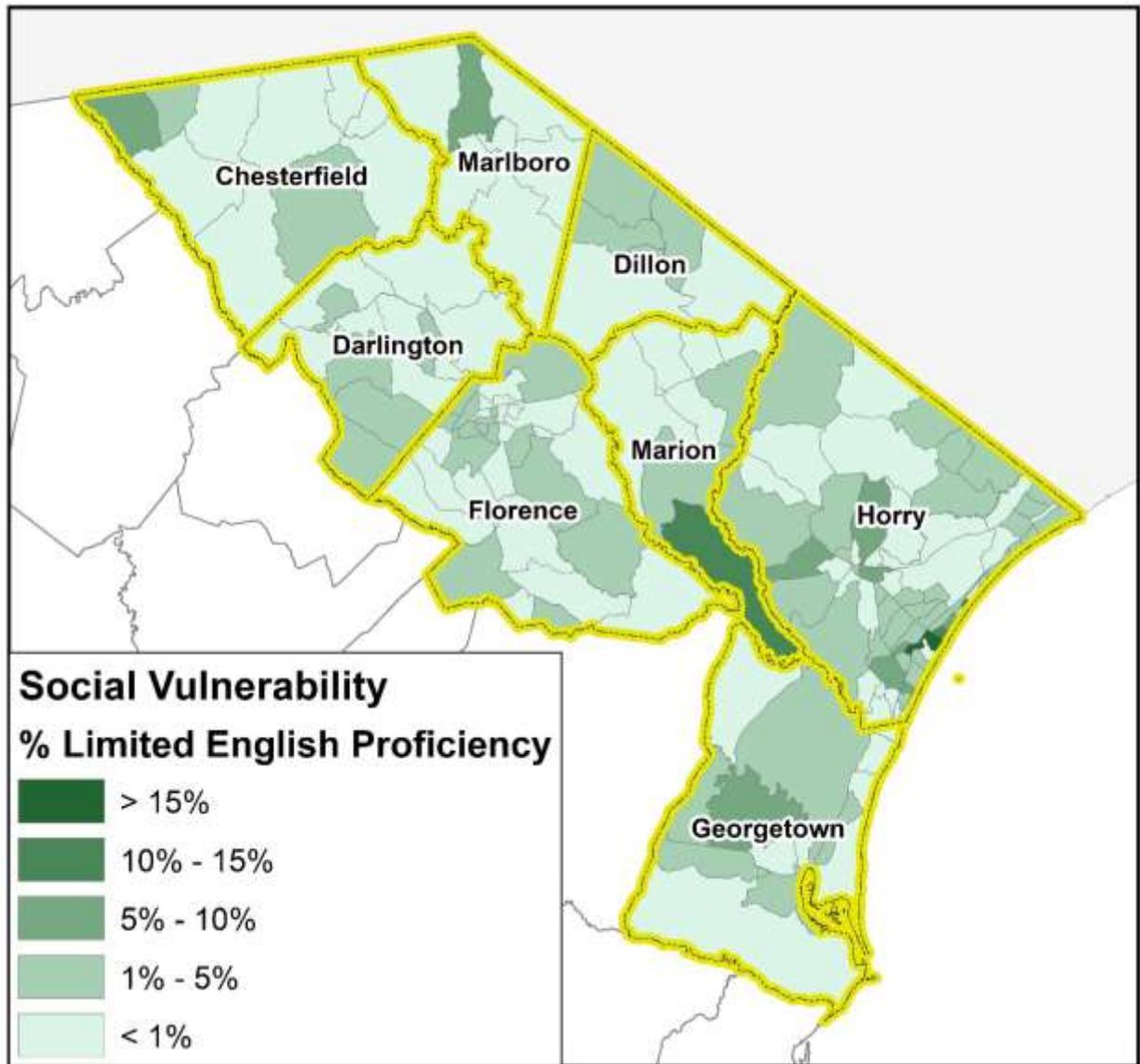


Figure 15. Percent population speaking English "not well" or not at all by census tract.

Table 7. Language Spoken at Home and Ability to Speak English for Persons 5 Years and Over in S.C. (2014-2017).

| County | Total | Speaking English Only or English Very Well | | Speak Spanish | | Speak Indo-European Language(s) | | Speak Asia-Pacific Languages | | Speak Other Language | |
|---------------------|---------|--|-------|---------------|------|---------------------------------|------|------------------------------|------|----------------------|------|
| | | Total | % | Total | % | Total | % | Total | % | Total | % |
| <i>Chesterfield</i> | 43,502 | 41,720 | 95.9% | 1,560 | 3.6% | 118 | 0.3% | 59 | 0.1% | 45 | 0.1% |
| <i>Darlington</i> | 63,626 | 62,268 | 97.9% | 862 | 1.4% | 381 | 0.6% | 64 | 0.1% | 51 | 0.1% |
| <i>Dillon</i> | 28,930 | 27,628 | 95.5% | 731 | 2.5% | 106 | 0.4% | 20 | 0.1% | 445 | 1.5% |
| <i>Florence</i> | 129,715 | 125,040 | 96.4% | 2,544 | 2.0% | 1,309 | 1.0% | 758 | 0.6% | 64 | 0.0% |
| <i>Georgetown</i> | 58,137 | 56,129 | 96.5% | 1,425 | 2.5% | 400 | 0.7% | 183 | 0.3% | - | 0.0% |
| <i>Horry</i> | 294,436 | 272,422 | 92.5% | 13,346 | 4.5% | 4,666 | 1.6% | 2,537 | 0.9% | 1,465 | 0.5% |
| <i>Marion</i> | 29,808 | 28,704 | 96.3% | 827 | 2.8% | 173 | 0.6% | 104 | 0.3% | - | 0.0% |
| <i>Marlboro</i> | 26,045 | 24,990 | 95.9% | 886 | 3.4% | 109 | 0.4% | 19 | 0.1% | 41 | 0.2% |

Being over the age of 65 or having children under the age of five contributes to the potential vulnerability of a household. The map below (Figure 16) shows concentrations of households with age dependent populations, by census tract. Concentrations of age dependent populations are noticeable in Florence, Georgetown and Horry Counties.

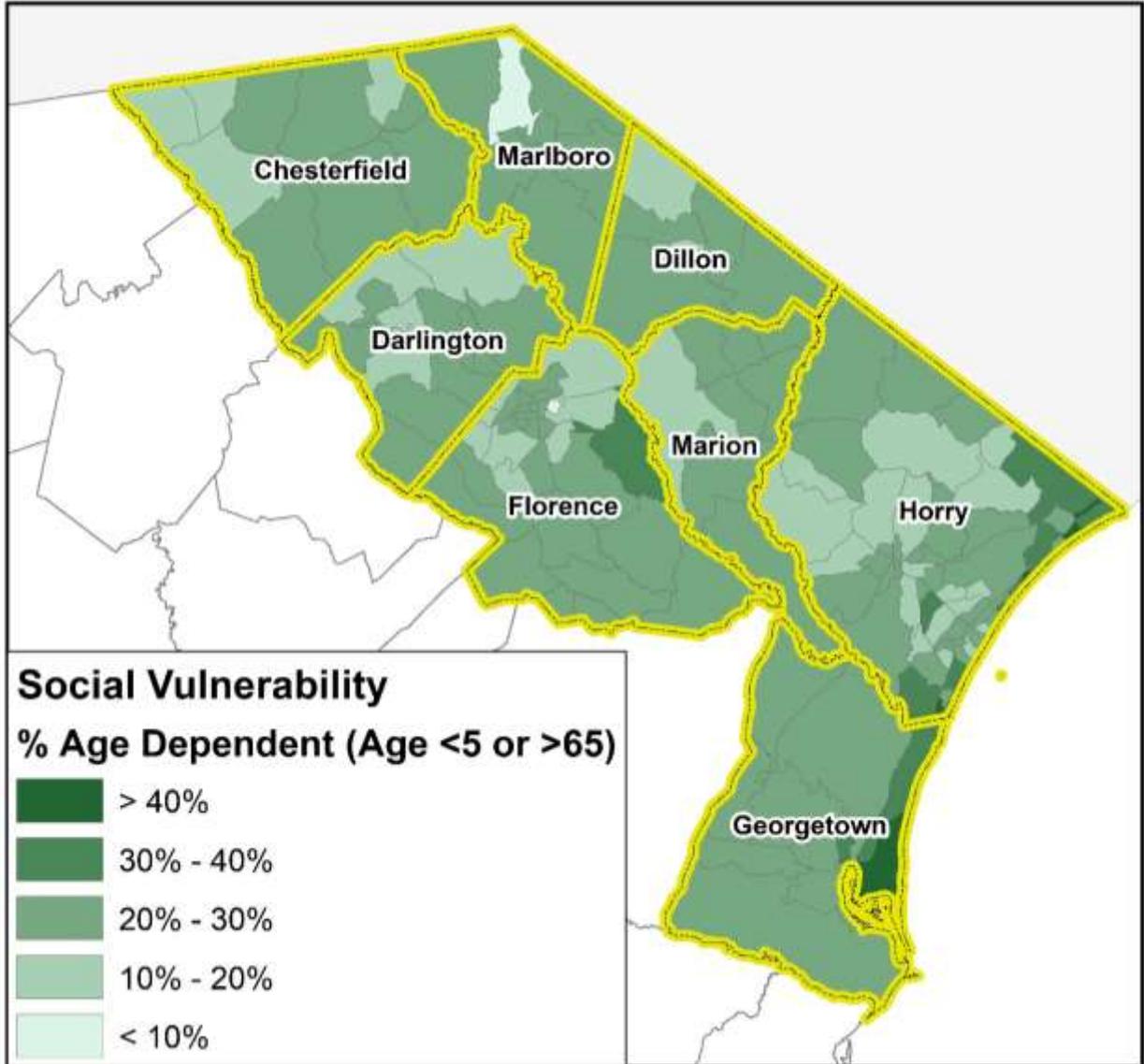


Figure 16. Percent population characterized as “age dependent” (Age < 5 or > 65) by census tract.

Additionally, Social Vulnerability considers the percentage of the population living below poverty level. The map below (Figure 17) shows relative concentrations of poverty in the northeast half of the state, followed by a map of larger concentrations of unemployment across the region (Figure 18).

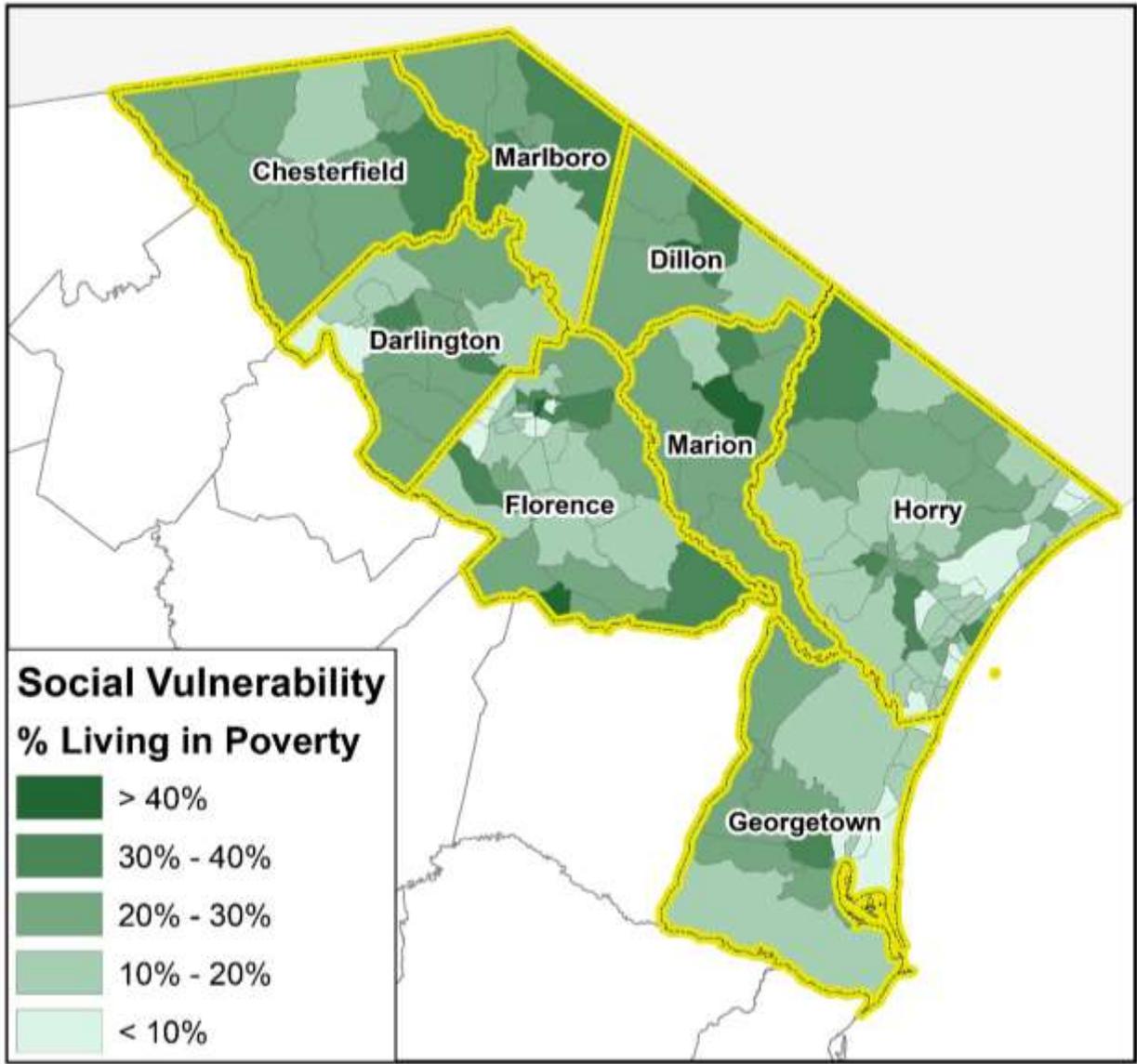


Figure 17. Percent persons living in poverty by census tract.

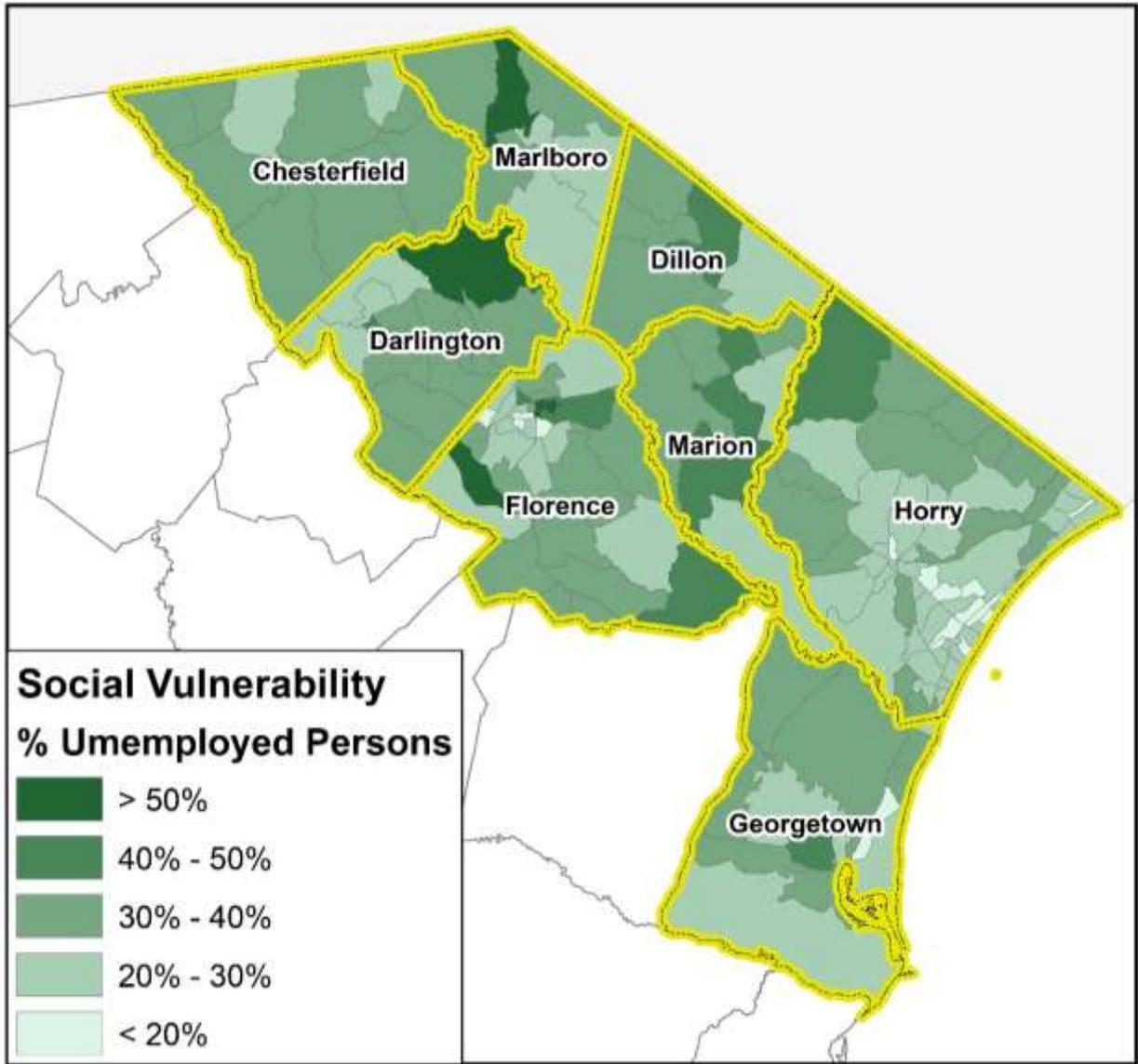


Figure 18. Percent of unemployed persons by census tract.

Transitional Housing/Homelessness

Hurricane Florence's triple threat of wind, rain and flooding impacted community members across all walks of life. While some may lose homes, others affected may be without homes both prior and following an event of such magnitude. In fact, homeless persons may be faced with even more adversity as others become displaced and shelters become more overcrowded. According to a 2019 Point-In-Time report from the South Carolina Coalition for the Homeless (and federally mandated by HUD), on any given night of January 2019 there were 4,172 homeless people in the state of South Carolina, a 6% increase from 2018 and caused entirely by a rise in unsheltered count. Approximately 41% of the homeless are considered to be unsheltered.¹⁹

The report referenced was funded by the Emergency Services Grant: a HUD program that aims to help homeless families and persons by improving the amount and quality of emergency shelters available, re-housing the homeless, and preventing more individuals and families from encountering homelessness. Clients with HIV/AIDS impacted by Hurricane Florence continue to receive services through normal operations of the state's Housing Opportunities for Persons with HIV/AIDS (HOPWA).²⁰

Emergency Shelters

The massive evacuation ordered for coastal South Carolina in the days preceding Florence emptied the coasts and filled hotels, motels, homes of friends and families, as well as public shelters across the state. Four healthcare facilities were evacuated to ensure that potentially flood-impacted facilities were safe and secure.²¹ The State, along with various churches, charitable groups and schools, stepped up quickly to help their fellow South Carolinians. Shelters opened up across the state to provide those in need with a place to stay and to receive necessities and nourishment. The state opened shelters on Sept. 8 and ordered a mandatory evacuation of coastal counties. In total, 130 shelters in 33 counties housed an average of 775 people per night and a maximum of 6,148 people in any one night (Table 8).

¹⁹ <https://www.schomeless.org/media/1163/scich-report-731-final-draft-electronic.pdf>

²⁰ Confirmed with South Carolina Department of Health and Environmental Control, HOPWA program Dec. 16, 2019.

²¹ <https://scdhec.gov/disaster-preparedness/hurricane-florence-2018/hurricane-florence-update-09-27-2018>

Table 8. Shelter occupancy by county.

| County | Number of Shelters Open | Number of Nights Open | Total Sheltered | Average Sheltered per night | Max Sheltered (any single night) |
|---------------------|-------------------------|-----------------------|-----------------|-----------------------------|----------------------------------|
| <i>Aiken</i> | 8 | 2 | - | - | - |
| <i>Allendale</i> | 1 | 2 | - | - | - |
| <i>Bamberg</i> | 3 | 2 | 15 | 8 | 11 |
| <i>Barnwell</i> | 1 | 2 | 1 | 1 | 1 |
| <i>Berkeley</i> | 7 | 5 | 2,214 | 443 | 726 |
| <i>Calhoun</i> | 1 | 4 | 50 | 13 | 23 |
| <i>Charleston</i> | 1 | 1 | 37 | 37 | 37 |
| <i>Chester</i> | 2 | 3 | 88 | 29 | 63 |
| <i>Chesterfield</i> | 3 | 2 | - | - | - |
| <i>Clarendon</i> | 5 | 5 | 830 | 166 | 347 |
| <i>Colleton</i> | 1 | 5 | 231 | 46 | 72 |
| <i>Darlington</i> | 6 | 7 | 359 | 51 | 187 |
| <i>Dillon</i> | 3 | 10 | 1,171 | 117 | 327 |
| <i>Dorchester</i> | 8 | 5 | 533 | 107 | 209 |
| <i>Edgefield</i> | 1 | - | - | - | - |
| <i>Fairfield</i> | 1 | 2 | 12 | 6 | 10 |
| <i>Florence</i> | 13 | 9 | 1,771 | 197 | 638 |
| <i>Georgetown</i> | 5 | 10 | 602 | 60 | 219 |
| <i>Hampton</i> | 3 | - | - | - | - |
| <i>Horry</i> | 19 | 32 | 11,355 | 355 | 2,263 |
| <i>Jasper</i> | 1 | 3 | 123 | 41 | 64 |
| <i>Kershaw</i> | 1 | 3 | 78 | 26 | 54 |
| <i>Lancaster</i> | 1 | 2 | 17 | 9 | 13 |
| <i>Lee</i> | 2 | 7 | 114 | 16 | 61 |
| <i>Lexington</i> | 1 | - | - | - | - |
| <i>Marion</i> | 6 | 25 | 2,268 | 91 | 351 |
| <i>Marlboro</i> | 3 | 8 | 828 | 104 | 467 |
| <i>Orangeburg</i> | 8 | 5 | 453 | 91 | 227 |
| <i>Richland</i> | 3 | 5 | 353 | 71 | 111 |
| <i>Saluda</i> | 1 | 2 | 8 | 4 | 8 |
| <i>Spartanburg</i> | 1 | 3 | 28 | 9 | 15 |
| <i>Sumter</i> | 2 | 5 | 420 | 84 | 210 |
| <i>Williamsburg</i> | 5 | 7 | 790 | 113 | 301 |
| <i>York</i> | 3 | 2 | 53 | 27 | 31 |
| <i>Grand Total</i> | 130 | 185 | 24,802 | 775 | 6,148 |

Enhanced Focus on Vulnerable Populations

South Carolina has taken a cutting-edge approach to its disaster recovery process by assessing social vulnerability as part of its recovery strategy. A social vulnerability index utilizing the most recent census data (2013-2017) measures the social vulnerability of all census tracts with population in the PDD 4394 area of interest. The index is a comparative metric facilitating examination of differences in social vulnerability across census tracts, the building blocks of counties. It graphically illustrates the variation in social vulnerability across the Hurricane Florence impact area, shows where there is 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. Utilizing social vulnerability is also useful as an indicator in determining the differential recovery from disasters.

The social vulnerability index synthesizes socioeconomic variables, which the research literature suggests contributes to reduction in a community's ability to prepare for, respond to and recover from hazards. An outline of the variables influential in vulnerability for Hurricane Florence Individual Assistance declared counties is shown in Table 9.

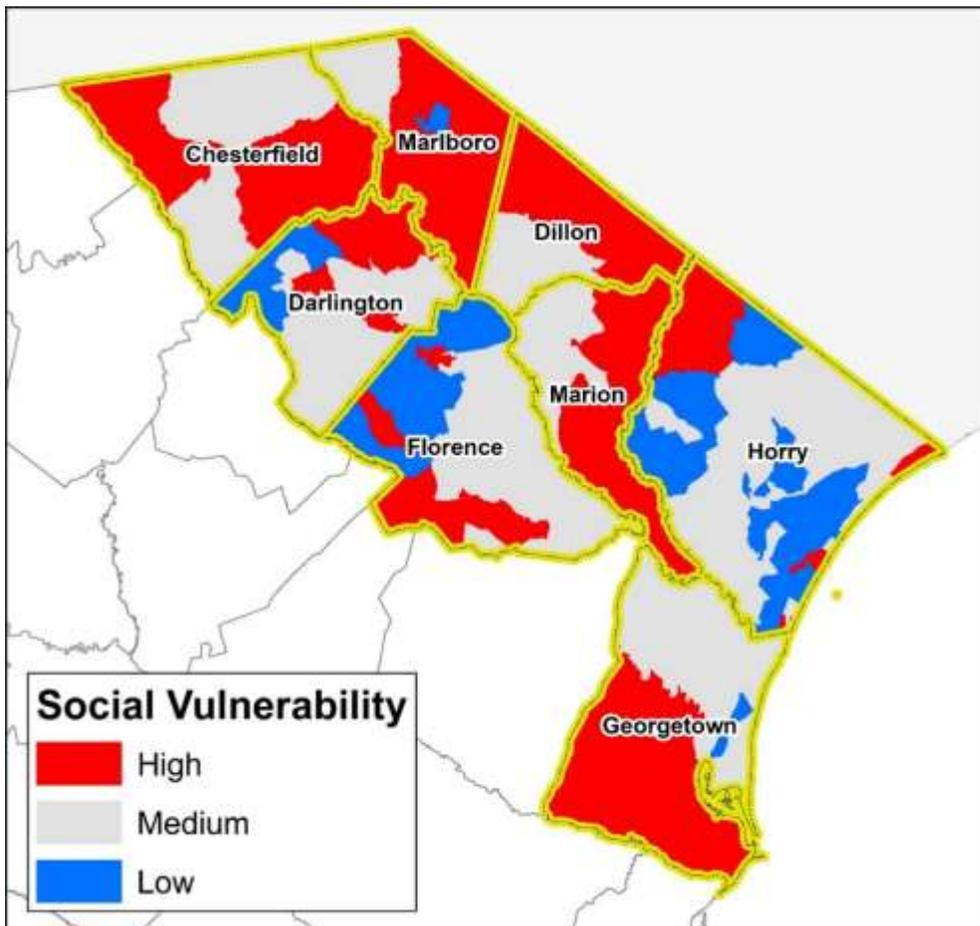


Figure 19. Tract level 3-Class Social Vulnerability Index (SoVI) for PDD 4394 IA Declared Counties.

Table 9. Social Vulnerability for Hurricane Florence IA Counties.²²

| PDD 4394 - South Carolina Tract Level 2013 - 2017 Social Vulnerability Component Summary | | | | | |
|--|-------------|--|----------------------|--|-------------------------------|
| Component | Cardinality | Description | % Variance Explained | Dominant Variables | Variable Loading on Component |
| 1 | + | Class and Race (Black) | 14.687 | Higher %Female Headed Households | 0.852 |
| | | | | Higher % Black | 0.767 |
| | | | | Higher % Poverty | 0.696 |
| | | | | Higher % Female Labor Force | 0.692 |
| | | | | Higher % Service Sector Employment | 0.526 |
| | | | | Higher % < 12th Grade Education | 0.505 |
| | | | | Lower % Children in 2 parent families | -0.552 |
| | | | | Lower Per Capita Income | -0.593 |
| 2 | + | Age (Old) | 13.647 | Higher % Age Dependent Population | 0.884 |
| | | | | Higher Median Age | 0.856 |
| | | | | Higher % Social Security Beneficiaries | 0.854 |
| | | | | Higher % Unoccupied Housing Units | 0.703 |
| | | | | Lower number of people per unit | -0.571 |
| 3 | - | Wealth and Race (Asian) | 12.589 | Higher % Wealthy | 0.746 |
| | | | | Higher House Values | 0.683 |
| | | | | Higher % Asian Populations | 0.665 |
| | | | | Higher Per Capita Income | 0.636 |
| | | | | Lower % < 12th Grade Education | -0.530 |
| | | | | Lower % Mobile Homes | -0.719 |
| 4 | + | Ethnicity (Hispanic) and Lack of Healthcare | 10.665 | QESL | 0.911 |
| | | | | QHISP | 0.881 |
| | | | | QNOHLTH | 0.792 |
| 5 | + | Employment (Service Sector) and Gender (Female) | 10.402 | QNOAUTO | 0.912 |
| | | | | QFEMALE | 0.743 |
| | | | | QCVLUN | 0.624 |
| | | | | QFAM | -0.599 |
| 6 | + | Race (Native American) and Employment (Primary Sector) | 6.504 | QNATAM | 0.670 |
| | | | | QEXTRCT | 0.524 |
| | | | | QRENTBURDEN | -0.605 |
| 7 | + | Special Needs | 5.650 | QNRRES | 0.754 |
| | | | | MDGRENT | -0.542 |
| Cummulative Variance Explained | | | 74.142 | | |
| 29 variables, tracts with 0 populations and 0 housing units excluded | | | | | |

²² Component scores and composite social vulnerability scores in the accompanying maps are relative and comparable across the state of South Carolina. The cardinalities of components in the accompanying shapefile have been adjusted as indicated above. The social vulnerability composite score is obtained by summing all component scores. Input data are derived from the Five-Year American Community Survey, 2013-17.

The Social Vulnerability Index has high utility as a decision-support tool for emergency management. The social vulnerability index metric turns historical disaster impact measures into actionable information for emergency managers, recovery planners and decision makers. It empirically measures and visually depicts a population's (in)ability to adequately prepare for, respond to and rebound from disaster events. Operationally, Social vulnerability assessment is now part of FEMA's Geospatial Framework, the set of spatial products delivered automatically by FEMA upon Presidential Disaster Declaration. Figure 19 and Figure 20 (below) depict social vulnerability for the Hurricane Florence counties in PDD 4394.

We utilize the social vulnerability index here for one main reason, namely its past success at providing actionable and useful information to decision makers. Social vulnerability data was instrumental in targeting resources to those who were in most need during recovery and rebuilding operations in South Carolina following the catastrophic flooding of 2015. The October 2015 flooding in South Carolina was the first implementation of a methodology to understand pre-event social conditions across the impact area in a post-event recovery context. Social vulnerability was utilized by the state disaster recovery office to identify target areas across the states that would require outside assistance to rebound from this disaster. Here, social vulnerability scores were coupled with FEMA, National Flood Insurance Program (NFIP), and SBA support to rapidly highlight areas with greatest need for additional recovery resources and more importantly to determine unmet needs. Utilizing empirically based measures of community social vulnerability provided an "apolitical" approach for distributing scarce disaster recovery dollars and rebuilding resources for the most benefit to the places that were worst impacted and least able to bounce back on their own from this disaster. Social vulnerability information also provided an academic tool to graphically illustrate and assist VOADs in prioritizing their recovery efforts. In other words, South Carolina expedited recovery by using data-driven assessment tools to guide actionable, effective relief to the most vulnerable populations.

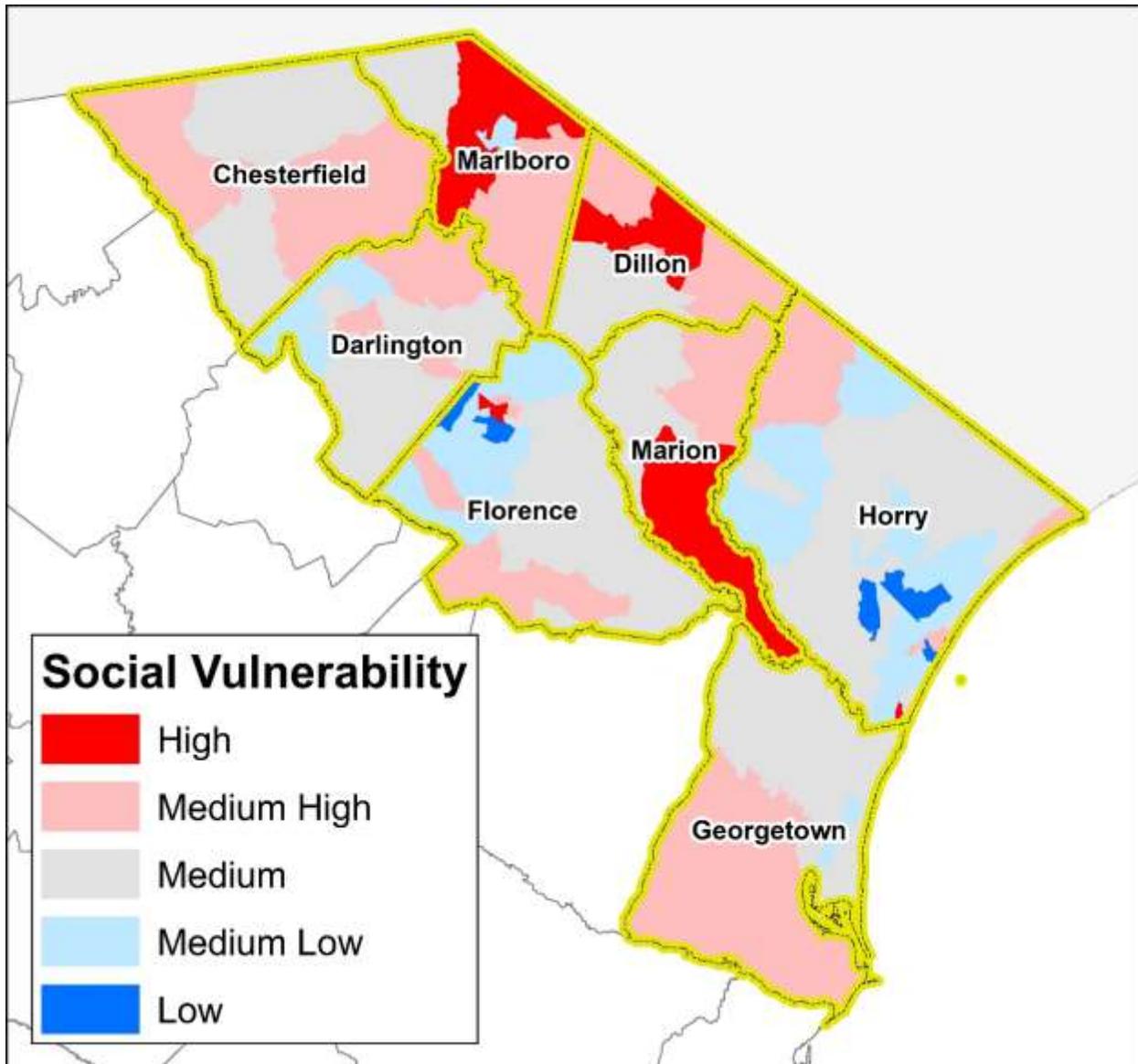


Figure 20. Tract level 3-Class Social Vulnerability Index (SoVI) for PDD 4394 IA Declared Counties.

Civic Engagement

Voluntary Organizations Active in Disasters (VOAD), philanthropic organizations, and faith-based organizations are often the first line of defense when it comes to community recovery. Following the devastating flooding in early October of 2015, the citizens of South Carolina pulled together to embark on the recovery process. Instead of waiting for government assistance, volunteers led the charge to assist individuals and communities with recovery efforts. Hurricane Florence recovery has been no different. Volunteer Organizations Active in Disaster (VOADs), many still onsite and working to help rebuilding efforts from the 2015 floods, ramped up operations for Hurricane Florence relief. Even today, the South

Carolina VOAD community continues to coordinate relief efforts across 18 organizations, multiple state agencies and federal government officials as available.²³

To assist these organizations, the One SC Fund, established by the Central Carolina Community Foundation and endorsed by Governor Nikki Haley, continues to support recovery across the state. The Central Carolina Community Foundation began the fund with an initial amount of \$50,000 and has continued to raise funds from various donors from across the state of South Carolina and the country. This fund aims to help fill the gaps that the government has not yet addressed. The Foundation supports various federally recognized VOAD non-profit organizations providing relief and recovery to impacted areas and gives individuals the opportunity to support those in need through private donations. However, specific to Hurricane Florence, the One SC Fund Grants Committee granted \$1,055,000 across four waves of awards in support of relief and recovery projects across the state.^{24,25,26,27}

These organizations, as well as countless individuals, have been dedicated to providing relief services to those affected. Projects include mold remediation that will not only allow individuals to safely remain in their homes but will also allow for the completion of home rehabilitation.

Summary of Impact and Unmet Need

The Unmet Needs Assessment must evaluate the three core aspects of recovery – housing, infrastructure, and economic development. It must approximate unmet need by estimating the portion of need likely to be addressed by insurance proceeds, other federal assistance, or any other funding source by using the most recent available data.

The preliminary estimated impact from Hurricane Florence in South Carolina is \$911,226,169 across the housing, economy and infrastructure sectors combined. The figures provided in this assessment are based on best available data at this time and may be adjusted in the future as additional data becomes available. After considering the funds already made available through insurance, state and other federal assistance and other funds totaling more than \$238 million, the remaining overall unmet need is approximately \$674 million. **The federal allocation of \$72 million will allow the State to address about 11% of the remaining unmet need.**

When examining the relative need by sector (Figure 21 and Table 10), housing represents the greatest need with \$577,535,240 (85.66% of total) in unmet need, followed by the economic sector with \$86,276,633 (12.8%) of total in unmet need, followed by the infrastructure sector with 10,376,724 (1.54% of total) unmet need. Each of these three sectors will be addressed in greater detail in the following sections.

²³ <http://scemd.org/recovery-section/donations-and-volunteers>

²⁴ <https://yourfoundation.org/one-sc-fund-awards-165000-for-hurricane-florence-relief/>

²⁵ <https://yourfoundation.org/one-sc-fund-awards-275000-for-hurricane-florence-relief/>

²⁶ <https://yourfoundation.org/one-sc-fund-awards-250000-for-hurricane-florence-relief/>

²⁷ <https://yourfoundation.org/one-sc-fund-awards-365000-for-hurricane-florence-relief/>

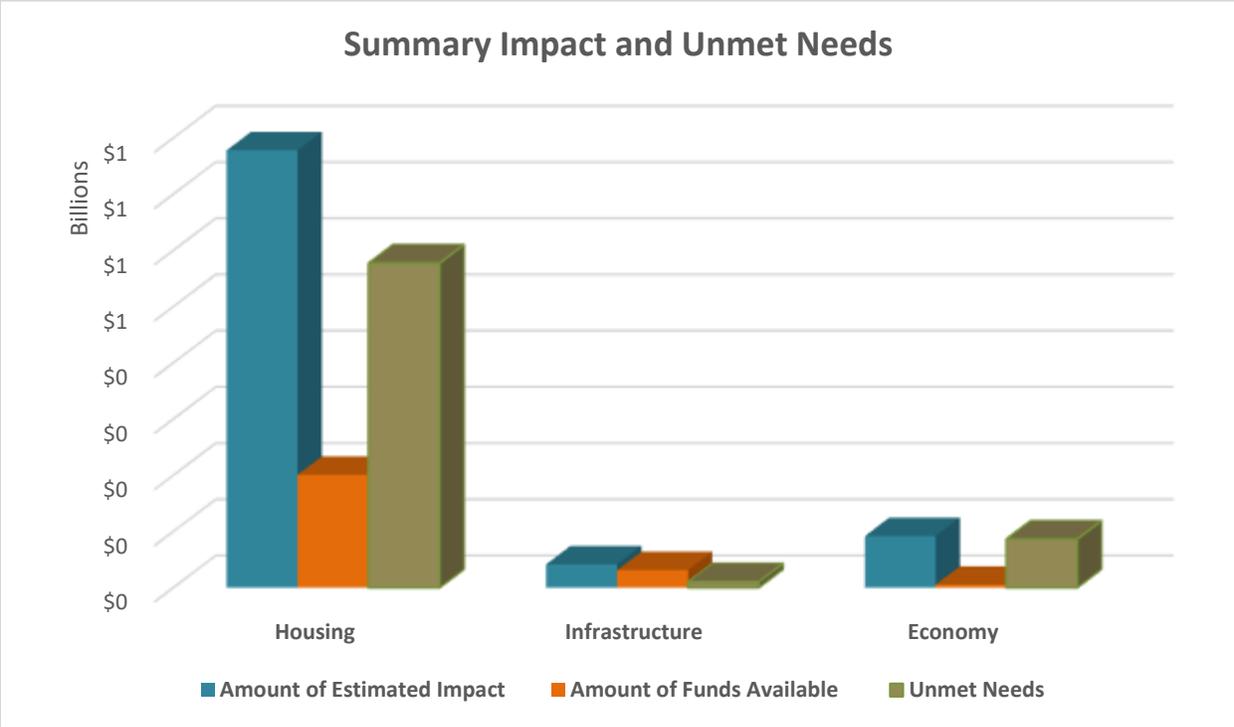


Figure 21. Unmet Need Summary.

Table 10. Summary of Impacts/Support by Sector.

| Summary of Impacts/Support | Housing | Infrastructure | Economy | Total |
|-----------------------------------|---------------|----------------|--------------|---------------|
| <i>Amount of Estimated Impact</i> | \$778,100,041 | \$41,506,895 | \$91,619,233 | \$911,226,169 |
| <i>Amount of Funds Available</i> | \$200,809,611 | \$31,130,172 | \$5,342,600 | \$237,282,383 |
| <i>Unmet Needs</i> | \$577,290,430 | \$10,376,724 | \$86,276,633 | \$673,943,786 |
| <i>Percent of Total</i> | 85.66% | 1.54% | 12.80% | |

Housing Impact

The impacts to housing from Hurricane Florence and subsequent flooding were widespread. Single family homeowners in stick-built homes, single family homeowners in mobile homes, and renters in various housing types of housing stock were affected. Table 11 and Table 12, below, show the FEMA Full Verified Loss (FVL) determinations in the Florence impacted counties by owner and renter.

Table 11. Hurricane Florence FEMA IA Owner Applicant Summary by County.²⁸

| County | # of Applicants | Number Inspected | % Inspected | Total with FEMA Full Verified Loss (FVL) | % With FEMA Full Verified Loss | FEMA Full Verified Loss Total | Average FEMA Full Verified Loss (per damaged unit) |
|---------------------|-----------------|------------------|-------------|--|--------------------------------|-------------------------------|--|
| <i>Chesterfield</i> | 1,172 | 949 | 80.97% | 774 | 81.56% | \$803,451 | \$1,038 |
| <i>Darlington</i> | 567 | 481 | 84.83% | 381 | 79.21% | \$474,557 | \$1,246 |
| <i>Dillon</i> | 1,607 | 1,358 | 84.51% | 1,205 | 88.73% | \$2,580,760 | \$2,142 |
| <i>Florence</i> | 347 | 295 | 85.01% | 239 | 81.02% | \$156,932 | \$657 |
| <i>Georgetown</i> | 387 | 323 | 83.46% | 211 | 65.33% | \$236,672 | \$1,122 |
| <i>Horry</i> | 4,870 | 3,855 | 79.16% | 3,194 | 82.85% | \$23,087,027 | \$7,228 |
| <i>Marion</i> | 1,568 | 1,380 | 88.01% | 1,151 | 83.41% | \$5,880,813 | \$5,109 |
| <i>Marlboro</i> | 1,366 | 1,136 | 83.16% | 953 | 83.89% | \$1,493,569 | \$1,567 |

Table 12. Hurricane Florence FEMA IA Renter Applicant Summary by County.²⁹

| County | # of Applicants | Number Inspected | % Inspected | % Inspected with Damage | % Inspected with No Damage | Total with Moderate Damage | Total with Major Damage | Total with Substantial Damage |
|---------------------|-----------------|------------------|-------------|-------------------------|----------------------------|----------------------------|-------------------------|-------------------------------|
| <i>Chesterfield</i> | 188 | 148 | 78.72% | 12.16% | 87.84% | 18 | 0 | 0 |
| <i>Darlington</i> | 91 | 73 | 80.22% | 23.29% | 76.71% | 16 | 1 | 0 |
| <i>Dillon</i> | 729 | 600 | 82.30% | 27.50% | 72.50% | 161 | 4 | 0 |
| <i>Florence</i> | 113 | 78 | 69.03% | 8.97% | 91.03% | 7 | 0 | 0 |
| <i>Georgetown</i> | 123 | 68 | 55.28% | 22.06% | 77.94% | 15 | 0 | 0 |
| <i>Horry</i> | 2111 | 1297 | 61.44% | 27.37% | 72.63% | 330 | 25 | 0 |
| <i>Marion</i> | 509 | 411 | 80.75% | 26.52% | 73.48% | 98 | 11 | 0 |
| <i>Marlboro</i> | 335 | 269 | 80.30% | 20.07% | 79.93% | 52 | 2 | 0 |

Housing Types Affected

More than 16,000 applicants filed for FEMA (IA) Individual Assistance statewide as a result of Hurricane Florence. Of those who specified housing unit type, about 76% are home owners, including single family

²⁸ <https://www.fema.gov/openfema-dataset-housing-assistance-data-owners-v1>

²⁹ <https://www.fema.gov/openfema-dataset-housing-assistance-data-renters-v1>

homes, duplex units, mobile homes and other housing types (Table 13). The remaining 24% are renters, including renters of single-family homes, mobile homes, apartment units and other housing types (Table 14).

Table 13. FEMA IA Applicants: Statewide.³⁰

| Housing Unit Type | Count of Applicants |
|--------------------------------------|---------------------|
| <i>House/Duplex</i> | 4,723 |
| <i>Owner</i> | 4,337 |
| <i>Renter</i> | 386 |
| <i>Mobile Home or Travel Trailer</i> | 3,923 |
| <i>Owner</i> | 3,679 |
| <i>Renter</i> | 244 |
| <i>Other*</i> | 7,712 |
| <i>Not Specified</i> | 158 |
| <i>Owner</i> | 3,955 |
| <i>Renter</i> | 3,599 |
| <i>Grand Total</i> | 16,358 |

**Includes: Apartment, Assisted Living, Boat, College Dorm, Condo, Correctional Facility, Military Housing, Other, Townhouse, Travel Trailer. This table includes all IA counties*

Table 14. FEMA IA Applicants – Other Ownership Type.

| Residence Type | Not Specified | Owner | Renter | Grand Total |
|--------------------|---------------|-------|--------|-------------|
| <i>Apartment</i> | | 1 | 101 | 102 |
| <i>Boat</i> | | 2 | | 2 |
| <i>Condo</i> | | 37 | 21 | 58 |
| <i>Other</i> | | 1 | 5 | 6 |
| <i>Townhouse</i> | | 12 | 9 | 21 |
| <i>(blank)</i> | 148 | 3,473 | 3,182 | 6,803 |
| <i>Grand Total</i> | 148 | 3,526 | 3,318 | 6,992 |

³⁰ Source: FEMA FIDA Data

Single Family

Median housing values range from over \$250,000 to well below \$50,000 in different regions of the state. Higher value homes are concentrated along the coast and in Florence (Figure 22).

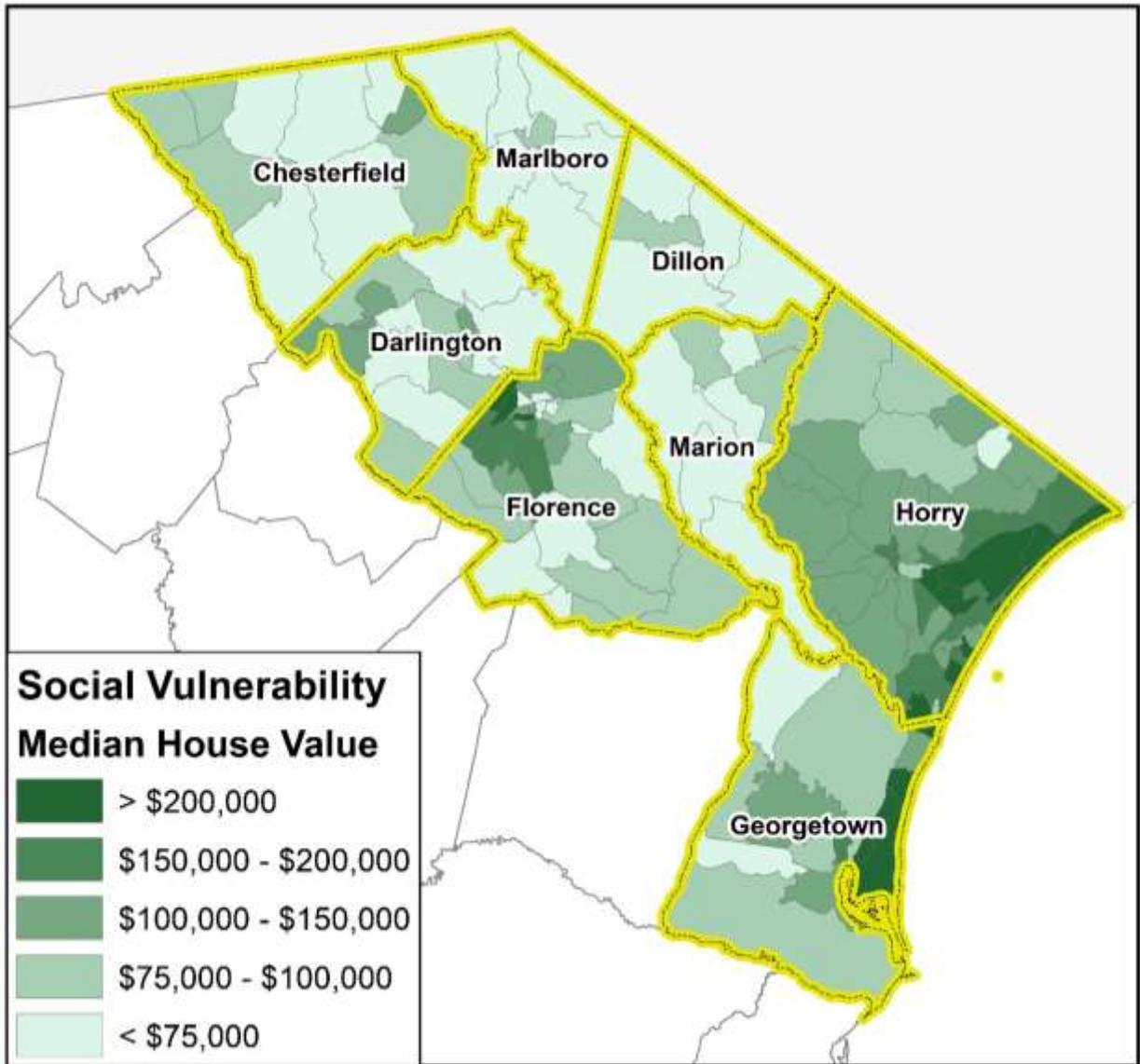


Figure 22. Median house value by census tract.

There are around 385,402 housing units in the entire impacted area, more than 75% of which were built before 1999, and most of which are owner-occupied units, as shown in the map below (Figure 23). With much of the housing stock in the 30-year range (Table 15), key systems such as electrical, roofing, water heaters and furnaces may have already cycled through a replacement life-span in many homes.

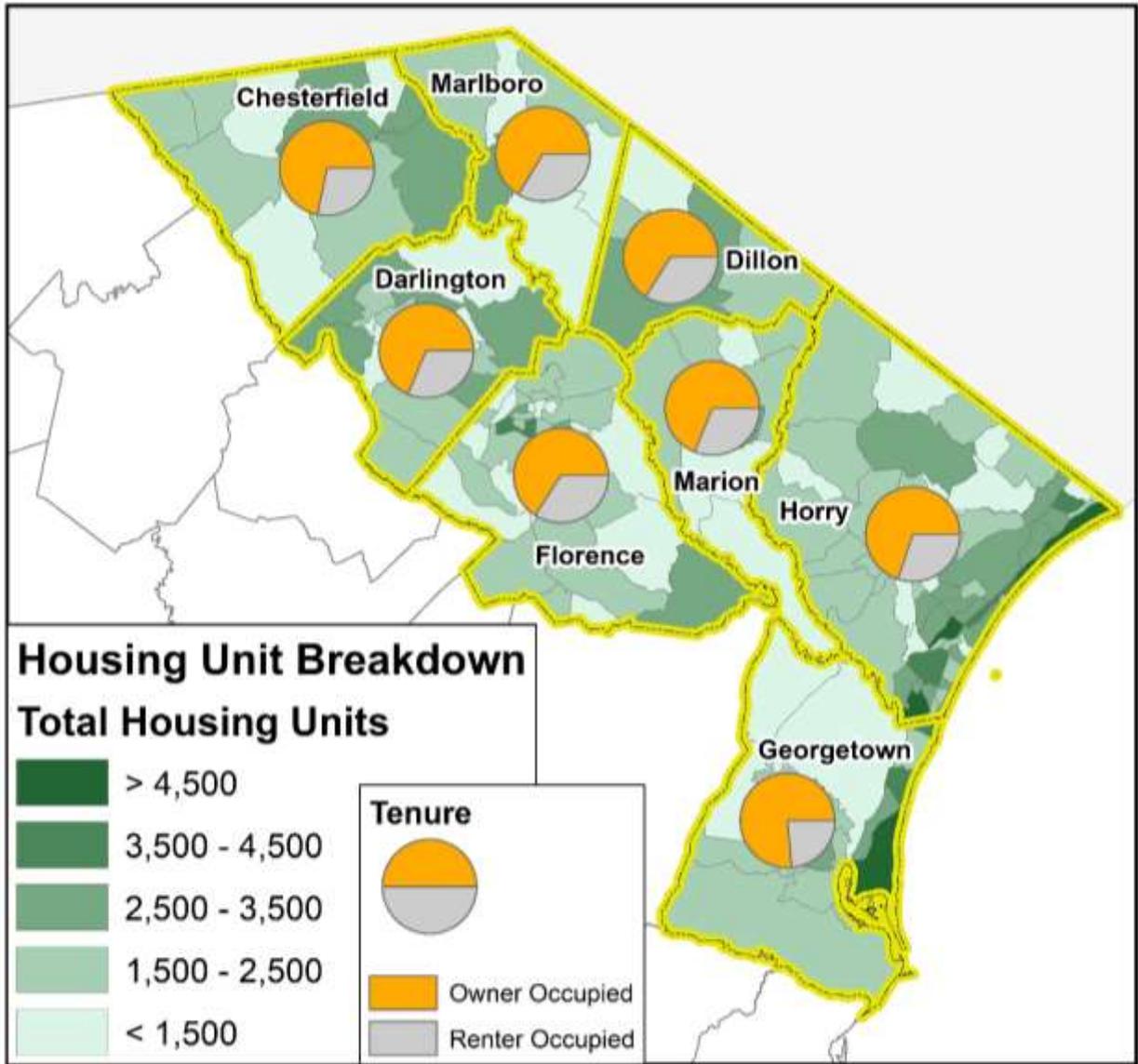


Figure 23. Housing stock count by tenure.³¹

³¹

https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_B25003&prodType=table

Table 15. Age of Housing Stock: Percentage of Units by Year Built, by County.³²

| County | Total Housing Units | Percentage of Units by Year Built | | | | | |
|---------------------|---------------------|-----------------------------------|-----------|-----------|-----------|-----------|----------|
| | | 2010 or Newer | 2000-2009 | 1980-1999 | 1960-1979 | 1940-1959 | Pre 1940 |
| <i>Chesterfield</i> | 21,531 | 2.12% | 13.73% | 37.06% | 27.63% | 11.21% | 8.25% |
| <i>Darlington</i> | 30,631 | 2.02% | 8.80% | 37.81% | 30.50% | 12.88% | 7.99% |
| <i>Dillon</i> | 13,733 | 1.92% | 9.40% | 39.49% | 30.39% | 14.63% | 4.17% |
| <i>Florence</i> | 59,722 | 2.47% | 13.65% | 36.49% | 32.31% | 11.33% | 3.76% |
| <i>Georgetown</i> | 34,628 | 2.80% | 19.79% | 43.48% | 22.34% | 7.94% | 3.66% |
| <i>Horry</i> | 198,229 | 5.30% | 28.88% | 45.79% | 15.28% | 3.74% | 1.01% |
| <i>Marion</i> | 14,907 | 2.90% | 6.88% | 40.11% | 33.92% | 13.12% | 3.07% |
| <i>Marlboro</i> | 12,021 | 1.83% | 8.56% | 34.75% | 32.73% | 11.50% | 10.62% |
| <i>Total</i> | 385,402 | 3.88% | 21.08% | 42.23% | 22.26% | 7.43% | 3.12% |

Rental Housing

Rental housing is an important component of affordable housing for impacted area. Much of the rental housing (approximately 84%) in South Carolina was built prior to 1999.³³ The older building code and in some cases, the lack of regular maintenance adds to the vacancy rate and therefore the rental housing needs.

The rental vacancy rate for South Carolina was 16% according to the Census, American Community Survey (2014-2018).³⁴ The median rent for the state is \$868 monthly. Of the FEMA applicants to the IA program for the state-assessed area, more than 4,356 live in rental housing; 3,442 of whom declared an income less than \$30,000.

As indicated by the map below (Figure 24), rental units in the non-urban counties are primarily single family and mobile home units, with the majority of renters in those unit types as opposed to multi-family complexes. This is due to the rural nature of the communities.

³²

https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_B25034&prodType=table

³³ SCI WAY – SC Housing Statistics Website

³⁴ <https://data.census.gov/cedsci/table?id=ACS%205-Year%20Estimates%20Data%20Profiles&table=DP04&tid=ACSDP5Y2018.DP04&g=0400000US45>

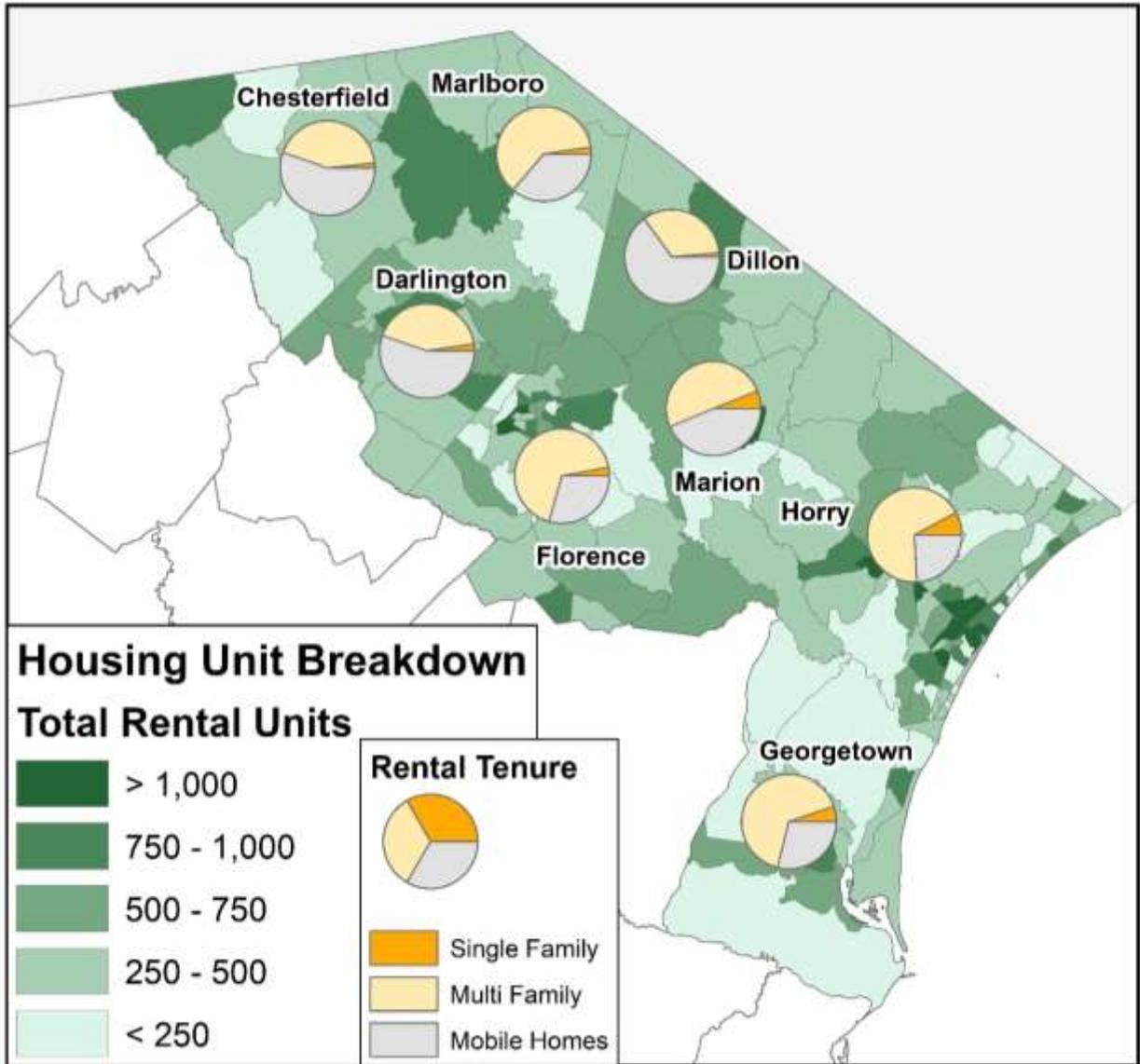


Figure 24. Rental housing unit breakdown by county and tenure.³⁵

Mobile Homes

Mobile homes (Figure 25) are part of the housing fabric of South Carolina. Their affordability and ease of general maintenance provides housing independence and housing choice to residents across the state. However, wind, rain, and flooding damage to mobile homes is often difficult to repair, due to the integrated nature of the building components. In addition, when considering whether or not a structure is repairable, the cost of making those repairs may be disproportionately high when considering the overall value of the structure.

³⁵

https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_B25032&prodType=table

Often, the full extent of mobile home damage is not always realized in the early months after an event and can go unreported in the initial damage inspection. Damage such as water saturation of the particle board material that makes up the floor framing and decking can cause unsafe deterioration over time. The potential for mold and mildew in the home’s structure or insulation can develop over time as well. Limited assistance funds portioned out through fragmented assistance programs can lead to piecemeal repairs that add up in cost, without adequately addressing restoration of the home’s structural integrity to a decent, safe and sanitary standard. Of the FEMA IA applicants in the state-assessed areas, approximately 3,847 of them reside in mobile home units.

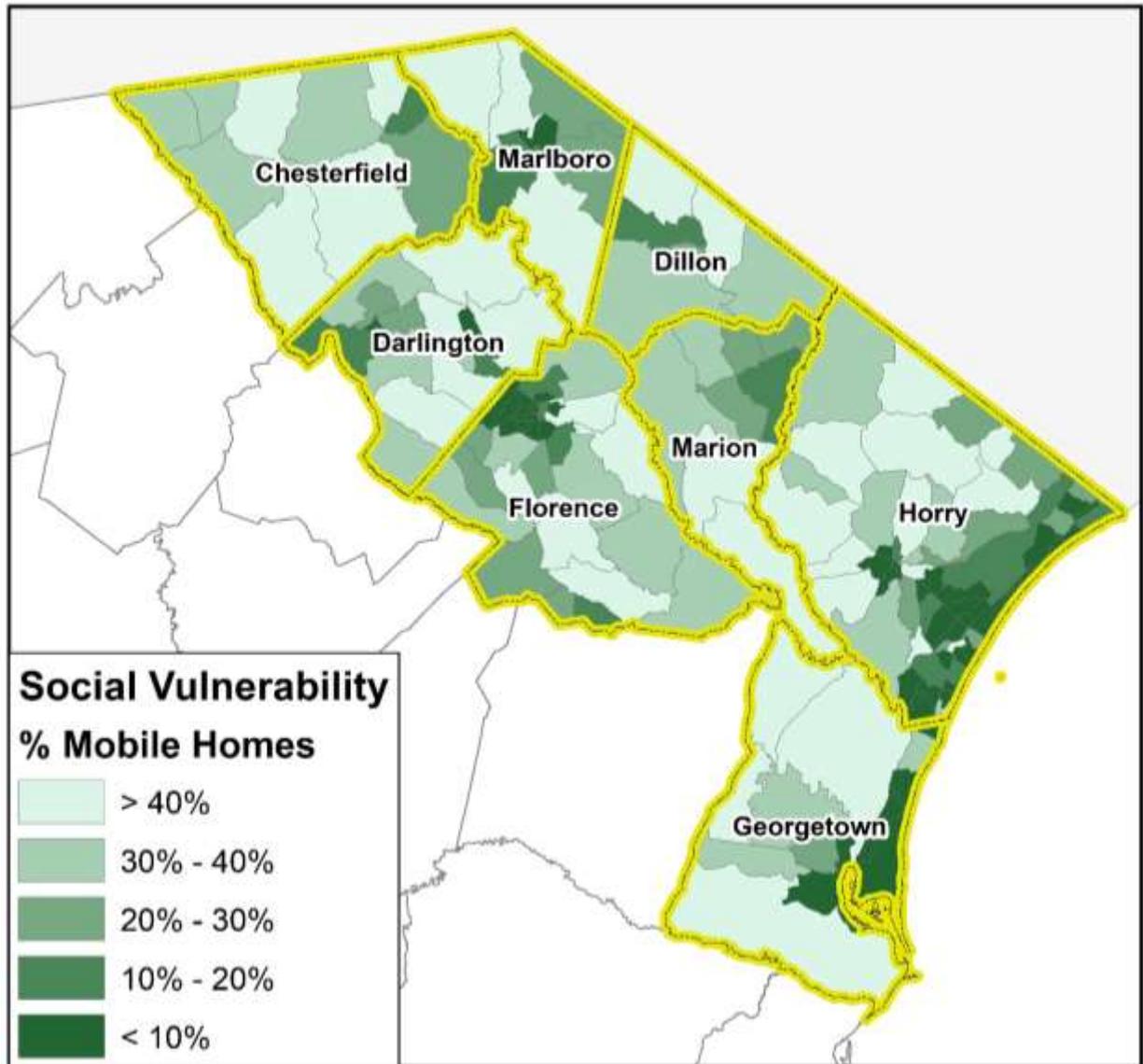


Figure 25. Mobile home percentages by census tract.

Mobile homes and damage to these vulnerable structures was also concentrated in rural, non-urban areas, as illustrated in the map above. Mobile homes damaged in Horry, Dillon and Marion Counties

combine to account for nearly 65% of the total mobile homes damaged across the state. Across the state there were 3,627 mobile homes with a FEMA Real Property Verified Losses (Table 16).

Table 16. Mobile homes with FEMA Verified Losses from Florence.

| County | Mobile Homes Applicants | Mobile Homes with Real Property FEMA Verified Loss |
|---------------------|-------------------------|--|
| <i>Chesterfield</i> | 317 | 310 |
| <i>Darlington</i> | 215 | 207 |
| <i>Dillon</i> | 692 | 660 |
| <i>Florence</i> | 292 | 267 |
| <i>Georgetown</i> | 123 | 116 |
| <i>Horry</i> | 1,308 | 1,207 |
| <i>Marion</i> | 508 | 487 |
| <i>Marlboro</i> | 392 | 373 |
| Total: | 3,847 | 3,627 |

Summary Tables

When looking at the FEMA IA applicant population, many of the applicants either reside in high vulnerability areas, as defined by High social vulnerability scores, or Medium-High social vulnerability areas. Of these residents, there are subsets of populations over the age of 65, and additionally, who are over 65 and have access and functional needs (AFN). These applicants, and those who are low-income, often have the fewest means of assistance available to them. The tables below (Table 17) provide breakouts of FEMA IA applicants into categories considering ownership versus rental, age, and access and functional needs.

Table 17: Applicant breakdowns by access and function needs and age.

| County | Tenure | Number of Applicants Meeting Each Criteria | | |
|--------------|---------|--|---------------|--|
| | | With Access and Functional Needs | Over 65 Years | Over 65 with Access and Functional Needs |
| Chesterfield | Owner | 15 | 377 | 7 |
| | Renter | 5 | 19 | |
| | Unknown | | 4 | |
| Darlington | Owner | 11 | 182 | 4 |
| | Renter | 1 | 11 | |
| | Unknown | | 1 | |
| Dillon | Owner | 28 | 391 | 11 |
| | Renter | 20 | 75 | 3 |
| | Unknown | 1 | 4 | 1 |
| Florence | Owner | 17 | 318 | 5 |
| | Renter | 13 | 23 | 1 |
| | Unknown | | 2 | |
| Georgetown | Owner | 10 | 115 | 3 |
| | Renter | 4 | 5 | |
| | Unknown | | 1 | |
| Horry | Owner | 79 | 1,153 | 25 |
| | Renter | 65 | 114 | 8 |
| | Unknown | | 14 | |
| Marion | Owner | 21 | 442 | 10 |
| | Renter | 19 | 34 | 1 |
| | Unknown | | 7 | |
| Marlboro | Owner | 22 | 449 | 10 |
| | Renter | 9 | 25 | 2 |
| | Unknown | | 6 | |
| Total | | 340 | 3,772 | 91 |

Public Housing

Public Housing is an integral piece of the State's housing resources for low-income persons. Statewide, there are approximately 32 section 8 participants who were in some way impacted by Hurricane

Florence.³⁶ Table 18 shows the number of impacted households by county. Fortunately, all of these units were repaired in June/July 2019 and all residents were invited to re-inhabit units.

Table 18: Section 8 participants impacted by Florence.

| County | # of Section 8 Participants |
|---------------|-----------------------------|
| Chesterfield | 0 |
| Darlington | 0 |
| Dillon | 32 |
| Florence | 0 |
| Georgetown | 0 |
| Horry | 0 |
| Marion | 0 |
| Marlboro | 0 |
| Total: | 32 |

Fair Housing

The State's Analysis of Impediments to Fair Housing, conducted in 2018, was conducted in conjunction with the 2016-2020 Consolidated Plan³⁷ and will be refreshed in accordance with the new Consolidated Plan being submitted this year.

The State, including multiple stakeholders such as the South Carolina Human Affairs Commission (HAC), the South Carolina Department of Consumer Affairs (DCA), and the South Carolina State Housing Finance Development Authority (SHFDA), has conducted Fair Housing Surveys on a regular and ongoing basis, and has also undertaken public awareness activities, such as fair housing fairs and roundtable discussions. The State's fair housing efforts related to HUD funding have been detailed each year in the State's Consolidated Annual Performance and Evaluation Report, as required by HUD.

The State's 2018 Consolidated Plan notes that:

"The continued availability of federal and state funding is perhaps the single most important factor affecting whether and how well the state can implement its strategies for fair housing and removal of impediments. Federal dollars, which were shrinking in prior years, are now severely threatened as the national budget shortfall worsens. The future remains uncertain, particularly as new discussions emerge over whether to increase the federal debt limit and ways to balance the federal budget."³⁸

Addressing the housing needs of the impacted residents is a priority to ensure housing stock is maintained and housing quality is improved. This will in turn create the foundation for livable, resilient communities.

³⁶ Personal communication with SCDRO on 2/24/2020

³⁷ <https://www.scdhec.gov/sites/default/files/docs/Health/docs/stdhiv/HCD-ActionPlanDraft.pdf>

³⁸ <https://www.cdbgsc.com/wp-content/uploads/2018/10/2018-South-Carolina-AI-Update-3-2018.pdf> (p. 47)

The State of South Carolina has created this Unmet Needs Assessment and Action Plan to address a general program design that targets assistance funding to citizens with the most recovery need as determined by geographic concentration of damage, financial impact and social vulnerability indicators. These criteria cover a broad spectrum of characteristics, none of which will be considered in isolation. The state will remain highly agile throughout the planning and implementation process to ensure program design is consistent with need as identified through public engagement.

South Carolina has conducted comprehensive resilience planning that considers regional drivers of short- and long-term resilience and fair housing practices to the smallest possible geographic level. The state will execute resilience planning methods that incorporate data analyzed via social vulnerability as well as public involvement. Resilience planning will incorporate measures to strategically align resources in a way that emboldens drivers of resilience, especially those that provide protection for the most vulnerable, consistent with HUD’s direction to Affirmatively Further Fair Housing.

Housing Funds Made Available

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

Of the eight counties declared eligible to receive Individual Assistance funding through FEMA in the Florence area of interest, there were 16,837 applicants.

Of these, 8,094 had a FEMA Property Loss (FVL) assessment; however, this does not mean that the applicant actually received funding. Of the applicants with an FVL, 3,588 received housing assistance (HA). An estimated \$20,059,622 in damage was assessed for the applicants with an FVL. This, coupled with housing assistance for applicants with no FVL, has resulted in \$21,647,384 in housing assistance to date (

Table 19).

Table 19: Applicants by FEMA Verified Losses and FEMA Housing Assistance Support

| Florence Impacted Counties | FEMA IA Applicants | Percentage of Applicants | Amount of Housing Assistance | Average Housing Assistance |
|------------------------------------|--------------------|--------------------------|------------------------------|----------------------------|
| <i>Universe (All Counties)</i> | 16,837 | | | |
| <i>Had FEMA Real Property Loss</i> | 8,094 | 48.07% | | |
| <i> Received HA</i> | 3,588 | 21.31% | \$20,059,622 | \$5,591 |
| <i> Received No HA</i> | 4,506 | 26.76% | \$0 | \$0 |
| <i>No FEMA Real Property Loss</i> | 8,743 | 51.93% | | |
| <i> Received HA</i> | 850 | 5.05% | \$1,587,762 | \$1,868 |
| <i> Received No HA</i> | 7,893 | 46.88% | \$0 | \$0 |

FEMA Individual Assistance (IA)

The FEMA Individual Assistance program (IA) consists of a multitude of services for individuals in disaster declared counties. Specifically, housing funds are for bridging the gap from sheltering to the return to permanent housing. These funds can be used for limited basic home repairs and replacement of essential

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

National Flood Insurance Program (NFIP) Coverage

Major flooding disasters continue to be rare events for South Carolina, and Hurricane Florence was unique in that the state saw storm surges, wind and rain followed by riverine flooding in the eastern portion of the state as flood waters made their way south from North Carolina to the coast through all of the declared counties in South Carolina.³⁹ Unfortunately, most of the state lacks any form of flood insurance. According to FEMA’s OPEN NFIP data⁴⁰, only 37,911 policies were in force in 2018 meaning that of the 2,318,271 housing units across the state, only 1.6% percent of South Carolina’s housing units were covered by NFIP policies at the end of 2018.⁴¹ This low level of insurance uptake can be the result of properties being “heirship” (deeded down from parents or grandparents) or lien-free because the home no longer has a mortgage associated with it. Without a bank note, an owner may not be aware of the home’s location in the floodplain, or they may choose to forego flood insurance since it is not mandated.

Error! Reference source not found. indicates an uptick in NFIP policies in 2016, following the 2015 floods, and a larger number of policies year over year generally. Although flood insurance coverage tends to jump slightly after a major disaster event and South Carolina proved this to be true in the short run. However, Table 20 shows a significant decrease in homes carrying flood insurance just two short years after 2015’s major flood disaster. South Carolina had only 37,911 policies in place at the end of 2018 compared to more than 87,000 in 2016.

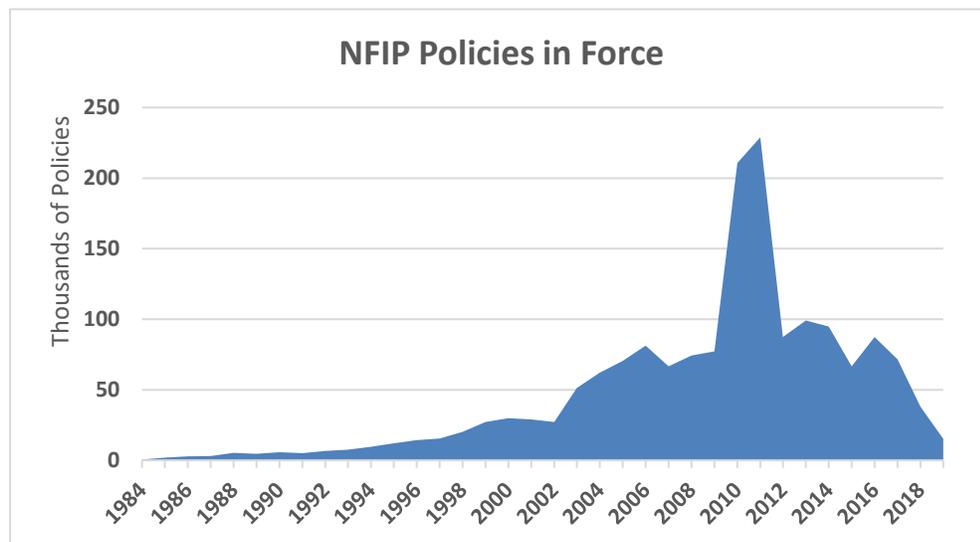


Figure 26. National Flood Insurance Policies by year for South Carolina.⁴²

³⁹ <https://www.cbsnews.com/news/hurricane-florence-aftermath-flooding-envelops-south-carolina-homes-death-toll-rises-2018-09-26/>

⁴⁰ <https://www.fema.gov/news-release/2019/06/11/fema-publishes-nfip-claims-and-policy-data>

⁴¹ <https://www.census.gov/quickfacts/SC>

⁴² The Open NFIP data documents many more policies in 2010 and 2011 than the surrounding years possibly indicating erroneous data.

Table 20: NFIP Policies by Year for South Carolina.

| Year | Policies | Year | Policies |
|-------|----------|------|----------|
| 1984 | 451 | 2002 | 27,132 |
| 1985 | 1,905 | 2003 | 51,356 |
| 1986 | 2,887 | 2004 | 62,101 |
| 1987 | 3,105 | 2005 | 70,519 |
| 1988 | 5,294 | 2006 | 81,270 |
| 1989* | 4,595 | 2007 | 66,651 |
| 1990 | 5,679 | 2008 | 74,344 |
| 1991 | 5,068 | 2009 | 77,235 |
| 1992 | 6,533 | 2010 | 210,684 |
| 1993 | 7,599 | 2011 | 228,899 |
| 1994 | 9,617 | 2012 | 87,446 |
| 1995 | 11,963 | 2013 | 99,091 |
| 1996 | 14,223 | 2014 | 94,734 |
| 1997 | 15,477 | 2015 | 66,712 |
| 1998 | 20,240 | 2016 | 87,406 |
| 1999 | 27,121 | 2017 | 71,594 |
| 2000 | 29,802 | 2018 | 37,911 |
| 2001 | 28,922 | 2019 | 15,183 |

Small Business Administration (SBA) Home Loans

The SBA has made \$27,426,837 in assistance available to 1,067 homeowner applicants in the Hurricane Florence impact area for residential repairs, rebuilding or relocations (Table 21). The low-interest loans are made available for the purposes of home repair and personal property loss. The average loan for this disaster event was \$25,705. It is important to note that the average SBA loan is nearly five times more than the average FEMA HA payment of \$5,591. This important difference will be discussed more in this section.

Table 21. SBA Home Loan Summary.

| SBA Rebuild/Repair Loan Type | Number of Loans | Total Loan | Average Loan |
|------------------------------|-----------------|--------------|--------------|
| <i>Reconstruction</i> | 8 | \$806,900 | \$100,863 |
| <i>Relocation</i> | 14 | \$1,073,200 | \$76,657 |
| <i>Repair</i> | 823 | \$21,195,337 | \$25,754 |
| <i>Manufactured Home</i> | 222 | \$4,351,400 | \$19,601 |
| <i>Across All Programs</i> | 1067 | \$27,426,837 | \$25,705 |

Housing Unmet Need

Approximately 10,409 FEMA Individual Assistance applicants (61.8%) in the state-assessed area have not been deemed eligible to receive housing assistance to date. There are a variety of reasons why an applicant may be deemed ineligible for assistance. According to FEMA, a few of these reasons are:

- *“Sometimes a first ineligibility determination is simply a clerical error, such as a name is misspelled, an address doesn’t match or a signature has been left out.*
- *If more than one person from the same home address registered, the applications will be flagged until the head of household can be determined.*
- *The applicant has insurance, and more information about the policy is needed. FEMA cannot duplicate benefits. However, once you receive insurance payment, FEMA may be able to assist with uninsured losses.*
- *Proof of occupancy is required. Whether a homeowner or renter, the damaged dwelling must be a primary residence where the applicant lived at the time of the disaster.*
- *Identity verification is needed. Sometimes an applicant simply needs to submit documentation—such as a passport or military issued ID—so a social security number can be verified. If an applicant was recently married, a marriage certificate or license may be required to verify any name change.”⁴³*

Importantly, however, an applicant may be determined to be ineligible because a FEMA damage inspector attributes damage claimed by the applicant as flood/storm-related to have been caused by pre-disaster conditions, or deferred maintenance. In other words, the inspector may determine that rain damage to the ceiling was due to the applicant having a poorly maintained roof in place before the storm, and not because the storm itself caused the damage. While there are likely many cases where an applicant is unable to identify uniquely storm-related damage to their home, in many cases, the older homes that lower-income and vulnerable applicants may live in can complicate the rapid inspections conducted by FEMA field officers.

The insurance-defined differences between flood damage and water damage are technical in nature and can be misunderstood by residents and damage inspectors alike. Damage from a flood occurs when water rises on land that is usually dry. However, water damage occurs when the water strikes the home prior to making contact with the ground. In many cases, a resident may not have the protection of flood insurance if they rent, live in a home with no mortgage, and/or live in a moderate-to-low -risk flood hazard area.⁴⁴ Many homeowners as well as renters may not realize that flood damage is not covered by a standard homeowner/rental insurance policy. Damage inspectors, expecting to see flood damage, may overlook water damage caused by rain. These complications can result in hardship and frustration after a disaster if residents are unable to receive assistance to repair their damaged home.

⁴³ <http://www.fema.gov/news-release/2013/05/21/ineligible-fema-may-just-need-more-information>

⁴⁴ Fast Home Help: <http://www.fasthomehelp.com/blog/2013/03/26/flood-damage-versus-water-damage-123804>

This issue has been brought to light in previous disasters. In Texas, fair housing advocates note:

“Following Hurricane Ike, FEMA denied at least 85% of the more than 578,000 applications for housing assistance. The most common denial code used by FEMA (in over 100,000 cases) was “insufficient damage.” Many low-income applicants were told informally by FEMA that their “insufficient damage” denials were actually based on “deferred maintenance.” FEMA alleged that the homes had been in poor condition before the storm and therefore damage could not be attributed to the hurricane. Because low-income households are more likely to have “deferred maintenance,” these denials had a disproportionate impact on low-income households, particularly in minority neighborhoods. Non-profit groups in Houston reported that entire neighborhoods, generally low income and minority concentrated, of damaged homes were deemed to have “insufficient damage.” FEMA similarly denied half of all applications for housing assistance following Hurricane Dolly. Based on a suit by Texas homeowners, a Federal District Court held that FEMA could not rely on this unpublished rule.”⁴⁵

The chart below shows the percent of people who applied to FEMA IA who have received an award, by county, as well as the number of applicants receiving funds. On average, the award rate is approximately 27.11% for the impacted counties. This number will continue to fluctuate as applicants move through the review pipeline, but it will not go up or down significantly from this low level of support (Figure 27).

⁴⁵ Written Testimony of Texas Appleseed for the Texas Senate Committee on Intergovernmental Relations Wednesday, December 2, 2015. https://www.texasappleseed.org/sites/default/files/12-2-15%20Testimony%20of%20Texas%20Appleseed%20-%20IGR%20Charge%203_0.pdf

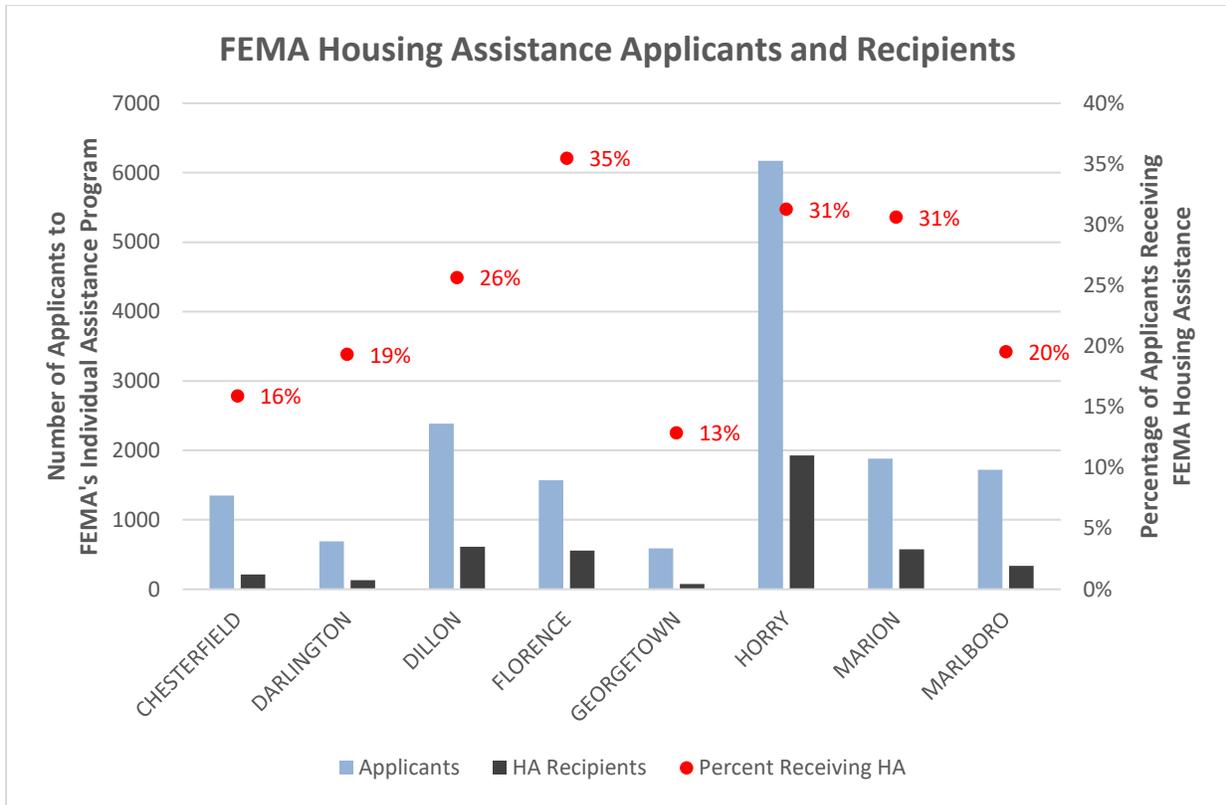


Figure 27. FEMA HA Funds Allocations by County.

For this event, just as in the October 2015 flooding disaster, an overwhelming majority of *ineligible* FEMA IA applicants are living at or below federal poverty standards. Across the Florence impact areas, 71% (7,360) of applicants have a stating income less than \$30,000 (Table 22 and

Table 23). Figure 28 graphically depicts this breakdown where we can see that most ineligible applicants make well below \$60,000 and more than half have incomes less than \$30,000.

Table 22. Ineligible applicants by income category and county.

| County | \$0 or Not Reported | < \$10,000 | \$10,001 - \$30,000 | \$30,001 - \$60,000 | > \$60,001 | Total Applicants |
|---------------------|---------------------|------------|---------------------|---------------------|------------|------------------|
| <i>Chesterfield</i> | 62 | 140 | 495 | 246 | 128 | 1,071 |
| <i>Darlington</i> | 25 | 96 | 279 | 117 | 31 | 548 |
| <i>Dillon</i> | 102 | 307 | 875 | 298 | 108 | 1,690 |
| <i>Florence</i> | 70 | 110 | 326 | 175 | 97 | 778 |
| <i>Georgetown</i> | 30 | 69 | 174 | 64 | 31 | 368 |
| <i>Horry</i> | 318 | 480 | 1,464 | 727 | 358 | 3,347 |
| <i>Marion</i> | 76 | 239 | 654 | 211 | 52 | 1,232 |
| <i>Marlboro</i> | 80 | 217 | 672 | 224 | 79 | 1,272 |
| <i>Total</i> | 763 | 1,658 | 4,939 | 2,062 | 884 | 10,306 |

Table 23: Percentage of ineligible applicants by income category and county.

| County | \$0 or Not Reported | < \$10,000 | \$10,001 - \$30,000 | \$30,001 - \$60,000 | > \$60,001 | Total Applicants |
|---------------------|---------------------|------------|---------------------|---------------------|------------|------------------|
| <i>Chesterfield</i> | 5.79% | 13.07% | 46.22% | 22.97% | 11.95% | 1,071 |
| <i>Darlington</i> | 4.56% | 17.52% | 50.91% | 21.35% | 5.66% | 548 |
| <i>Dillon</i> | 6.04% | 18.17% | 51.78% | 17.63% | 6.39% | 1,690 |
| <i>Florence</i> | 9.00% | 14.14% | 41.90% | 22.49% | 12.47% | 778 |
| <i>Georgetown</i> | 8.15% | 18.75% | 47.28% | 17.39% | 8.42% | 368 |
| <i>Horry</i> | 9.50% | 14.34% | 43.74% | 21.72% | 10.70% | 3,347 |
| <i>Marion</i> | 6.17% | 19.40% | 53.08% | 17.13% | 4.22% | 1,232 |
| <i>Marlboro</i> | 6.29% | 17.06% | 52.83% | 17.61% | 6.21% | 1,272 |
| <i>Total</i> | 7.40% | 16.09% | 47.92% | 20.01% | 8.58% | 9,235 |

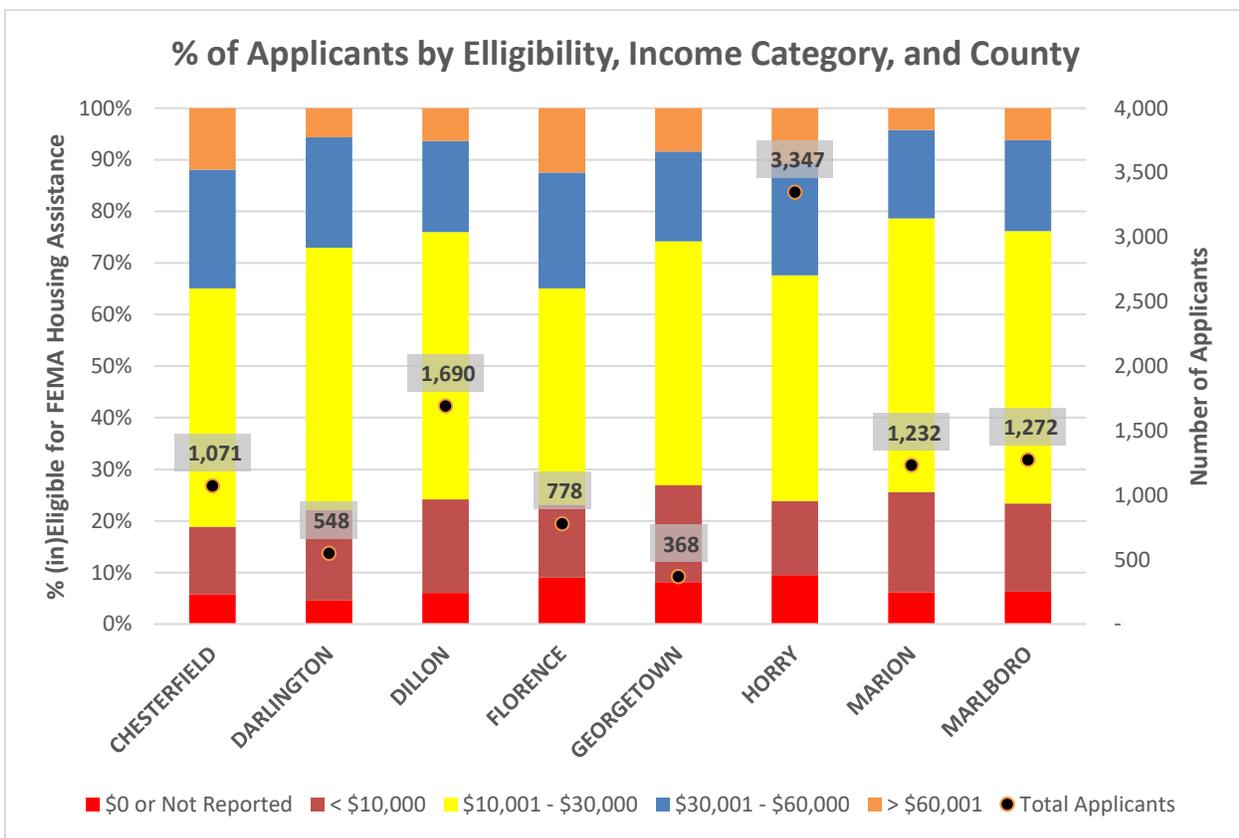


Figure 28. Applicant Summary by Eligibility, Income Category, and County.

This significant skew in ineligibility identifies a need to focus on the large population of vulnerable individuals that may need focused outreach and intake assistance to review their eligibility for the CDBG-DR program, especially in areas where FEMA IA assistance was applied for but not provided.

The map below (Figure 29) shows that while FEMA IA ineligible applicants are disbursed across the state, there are concentrations of ineligible applicants in areas of high social vulnerability. Areas in southeast Chesterfield, central Darlington, north and central Dillon, south Georgetown, northeast Marlboro, and northeast Marion all have high numbers of ineligible applicants in high social vulnerability areas. Most

ineligible recipients saw the same impacts as those found eligible and will likely have a slower recovery because they likely experienced very similar impacts as those felt by FEMA eligible victims. For this reason, ineligible applicants must be considered in any overall housing unmet need calculation.

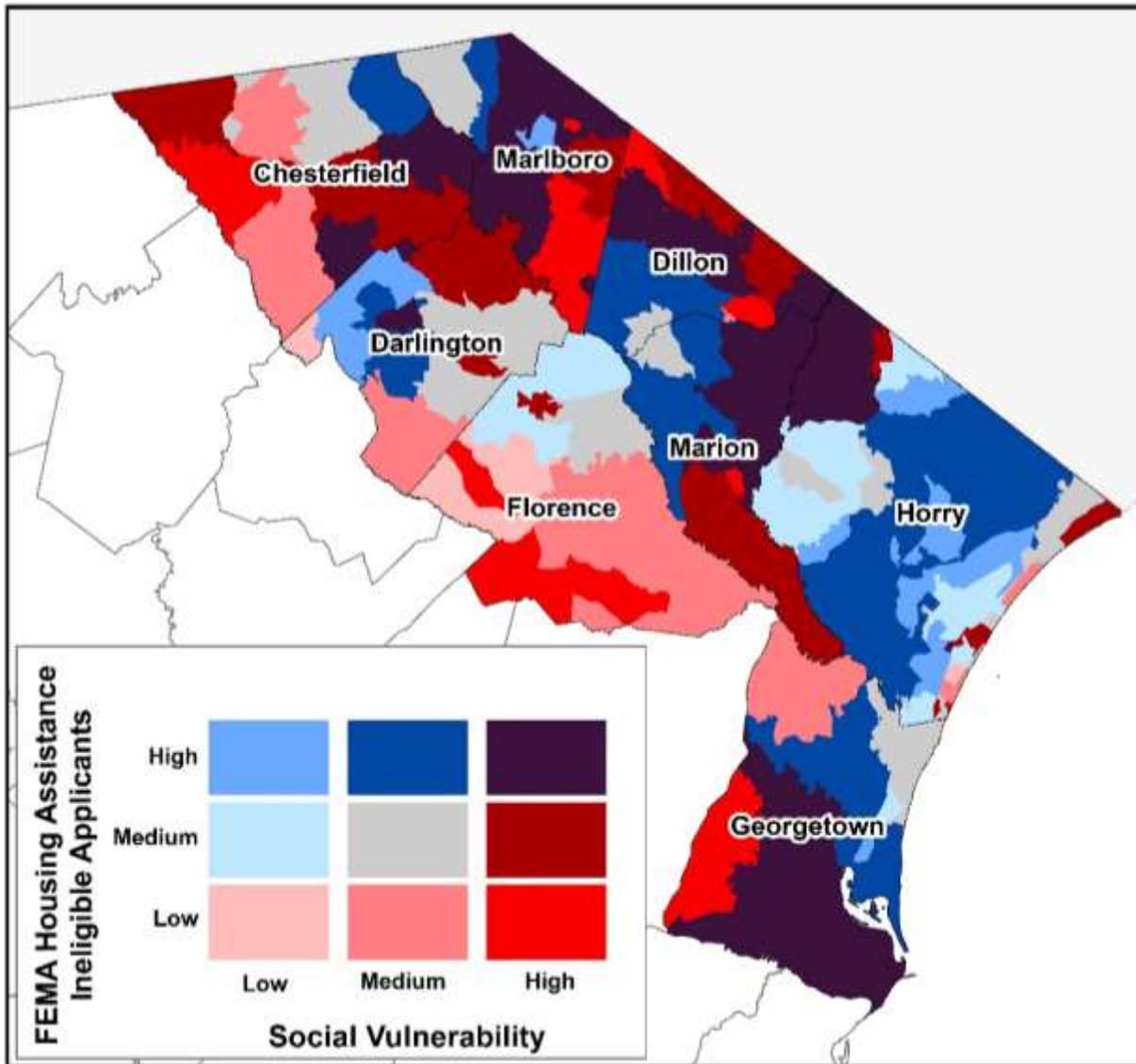


Figure 29. FEMA IA Ineligible Applicants in Relation to the Social Vulnerability Index.

Housing Impact Methodology

Utilizing best available data, the current unmet need for housing in South Carolina following Hurricane Florence has been calculated by accounting for losses from multiple datasets, including FEMA’s applicant data and SBA’s home loan data. FEMA’s Individuals and Households Program provides assistance for repairs and replacements that will make a home “habitable,” whereas SBA awards loan funding for the full cost to restore a home. This difference between programs is important because it highlights a need to move beyond FEMA’s initial and large-scale assessment and include specifics on housing losses only available from SBA.

HUD calculates “unmet housing needs” as the number of housing units with unmet needs times the estimated cost to repair those units minus repair funds already provided. However, because complete data sources are often difficult to obtain after a major disaster event, HUD has stated that empirically justified calculations may be used to determine the average cost to fully repair a home. Recent unmet needs assessments have used “the average real property damage repair costs determined by the Small Business Administration for its disaster loan program for the subset of homes inspected by both SBA and FEMA. Because SBA is inspecting for full repair costs, it is presumed to reflect the full cost to repair the home, which is generally more than the FEMA estimates on the cost to make the home habitable.”⁴⁶

Multiple recently approved impact assessment methodologies have utilized the SBA estimates of damage and repair needs, FEMA IA Housing Assistance data, and National Flood Insurance (NFIP) data in combination with each other to triangulate the real need as opposed to relying only on FEMA verified losses alone.⁴⁷ Historically, SBA verified disaster-damaged property through on-site inspections by construction analysts who estimated the cost to restore property to its pre-disaster condition; however, since 2017, SBA has used a desktop loss verification process to improve processing times for disaster loan applications.⁴⁸ The desktop loss verification process uses an initial loss verification followed by a post desktop review, wherein total damage estimates use a FEMA on-site inspection report for loans under \$25,000; for loans greater than \$25,000, SBA deploys loss verifiers for site inspections to confirm property loss estimates and to capture a more comprehensive cost of repair/replacement in comparison to FEMA’s focus essential living areas.⁴⁹ Thus, SBA damage estimates provide a more comprehensive look at recovery than simply looking at FEMA inspected damage. Also, this assessment further accounts for under-representation of impacted populations stemming from FEMA ineligible applicants and provides a more accurate accounting of overall housing impact across a study area.

⁴⁶ Federal Register Vol. 78, No. 43 /Tuesday, March 5, 2013

⁴⁷[http://www.cdbg-dr.pr.gov/wp-content/uploads/ponencias/Puerto Rico Action Plan Public for Comment.pdf](http://www.cdbg-dr.pr.gov/wp-content/uploads/ponencias/Puerto_Rico_Action_Plan_Public_for_Comment.pdf), <http://www.floridajobs.org/docs/default-source/2015-community-development/community-revitalization/dr/hcpafloridaactionplanhudapproved.pdf?sfvrsn=2>, <http://www.floridajobs.org/docs/default-source/community-development-files/2018-state-of-florida-cdbg-dr-action-plan-draft.pdf?sfvrsn=2>, <https://www.scdr.sc.gov/wp-content/uploads/2017/12/SC-Severe-Storm-Amendment-4-1-1-18-.pdf>, <https://www.scdr.sc.gov/wp-content/uploads/2017/12/SC-Hurricane-Matthew-Action-Plan-Amendment-2.pdf>

⁴⁸ <https://www.sba.gov/sites/default/files/oig/SBA-OIG-Report-19-23.pdf>

⁴⁹ <https://www.fema.gov/news-release/2012/12/18/fema-housing-assistance-based-damage-essential-living-areas>

Specifically, for South Carolina, FEMA real property loss estimates are significantly lower than SBA property loss estimates across the Hurricane Florence impact area. The average FEMA real property loss for Florence (

Table 24) was \$3,792 based on 8,094 applicants with FEMA verified losses. SBA average verified losses per household were valued at \$39,378 based on 1,560 applicants and represent a 10.4 times higher verified loss amount than FEMA. SBA median loss value of \$25,501 is 38.8 times higher than FEMA’s value of \$658. SBA’s average verified personal property losses of \$15,482 per applicant are 8.7 times higher than FEMA’s Other Needs Assistance (ONA) payouts of \$1,774 per applicant.

Table 24: FEMA and SBA Damage Estimates

| Program | Property Loss (FEMA) (FEMA – Real Property Verified Loss; SBA – Verified Real Estate Damage) | | | | Personal Property Loss (FEMA - Other Needs Assistance; SBA – Verified Contents Damage) | | | |
|--------------------------------|---|--------------|----------|----------|---|--------------|----------|---------|
| | Count | Total | Average | Median | Count | Total | Average | Median |
| FEMA Individual Assistance | 8,094 | \$30,689,629 | \$3,792 | \$658 | 1,704 | \$3,023,513 | \$1,774 | 634 |
| SBA Disaster Home Loan Program | 1,560 | \$61,429,359 | \$39,378 | \$25,501 | 1,181 | \$18,284,268 | \$15,482 | \$9,520 |

Furthermore, matching FEMA’s applicant data with SBA’s loan data on FEMA registrant numbers for more than 8,500 applicants highlighted two other important facts utilized in identifying housing unmet needs. First, FEMA underestimates the number (count) of owner-occupied housing units with real property losses. Specifically, 3.2% of matching records (disaster victims) had \$0 FEMA real property losses but greater than \$0 SBA verified property losses. Second, FEMA underestimates and under supports the number (count) of rental-occupied housing units with personal property losses. Specifically, 6.7% of matching records had \$0 FEMA other needs assistance but greater than \$0 SBA verified contents losses.

Several considerations are factored in to arrive at a more comprehensive picture for this estimated unmet need. First, applying the average SBA verified loss amount (\$39,378) of all SBA applicants with real property losses (1,560) to those who were disqualified or turned down for SBA loan assistance and those for whom a FEMA loss was established would push the full extent of housing impact caused by Hurricane Florence to more than \$1.5 Billion (before accounting for an increase in rebuilding for resilience or deductions for funds already provided). Utilizing the median SBA real property damage amount of \$25,501 accounts for outliers in the SBA data (a few very high and very low damage amounts) driving the average SBA loss up. Applying the median SBA property loss amount of \$25,501 to the total number of SBA applicants who did not have a verified loss estimated, in conjunction with the Florence-specific rebuilding cost, outlined in federal register language,⁵⁰ provides a more complete estimate of unmet housing needs for those without a determined real property loss, provides a more conservative and realistic view of

⁵⁰https://files.hudexchange.info/resources/documents/FR-6182-N-01-Allocation-Notice-CDBG-DR-Grantees.pdf?utm_source=HUD+Exchange+Mailing+List&utm_campaign=01e5f52f10-EMAIL_CAMPAIGN_2020_01_17_10_30&utm_medium=email&utm_term=0_f32b935a5f-01e5f52f10-19420561

losses to residential property across the Florence impact area. Utilizing the unmet needs values from HUD discussed below, and FEMA data about the number of applicants (more than 16,000) results in an unadjusted housing impact of nearly \$600,000,000. Methods for creating housing impacts and unmet needs are discussed below.

Housing impacts for this needs assessment were calculated using SBA data in conjunction with FEMA applicant information. We begin (Table 25) by utilizing the known real property (repair) losses from SBA for the 1,560 applicants for which this value is determined (A). Included here are also an estimate (B) of losses for those SBA applicants without an SBA real estate verified loss. Combined, these SBA derived losses are more than \$266 million (C).

Table 25. SBA Verified Losses

| Id | Line Item | Count | Value |
|----|---|-------|---------------|
| A | SBA applicants with a real estate verified loss | 1,560 | \$61,429,359 |
| B | SBA applicants without a real estate verified Loss (Estimate) | 8,043 | \$205,104,543 |
| C | Total verified loss of SBA Applicants (Estimate) | 9,603 | \$266,533,902 |

A more nuanced approach is required to account for FEMA non-renter (owner or “not specified”) applicants who are not represented by SBA data alone. Here, “not specified,” non-renter populations are those who have neither indicated ownership nor renter status when applying for FEMA Individual Assistance support. First, all FEMA applicant real property losses were categorized based on HUD’s definitions of damage levels (Minor-Low to Severe) shown in

Table 26. Utilizing loss value cutoffs and rebuild cost estimates provided in the federal register can provide a clearer understanding of losses across the Presidentially declared individual assistance counties.⁵¹

Table 26: HUD defined damage categories based on real property losses

| Damage Category | Associated Real Property Losses |
|-------------------|--|
| <i>Minor-Low</i> | Less than \$3,000 of FEMA inspected real property damage. |
| <i>Minor-High</i> | \$3,000 to \$7,999 of FEMA inspected real property damage. |
| <i>Major-Low</i> | \$8,000 to \$14,999 of FEMA inspected real property damage and/or 1 to 4 feet of flooding on the first floor. |
| <i>Major-High</i> | \$15,000 to \$28,800 of FEMA inspected real property damage and/or 4 to 6 feet of flooding on the first floor. |

⁵¹ https://files.hudexchange.info/resources/documents/FR-6182-N-01-Allocation-Notice-CDBG-DR-Grantees.pdf?utm_source=HUD+Exchange+Mailing+List&utm_campaign=01e5f52f10-EMAIL_CAMPAIGN_2020_01_17_10_30&utm_medium=email&utm_term=0_f32b935a5f-01e5f52f10-19420561

| | |
|---------------|--|
| <i>Severe</i> | Greater than \$28,800 of FEMA inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor. |
|---------------|--|

Table 27 shows the breakdown of estimated losses to those not accounted for in SBA’s loan dataset. Rows (A – E) represent owner losses by HUD classified Minor-Low to Severe damage level categories for those owner applicants with FEMA personal property verified losses but without FEMA real property verified losses. Here, FEMA real property verified losses were classified into updated HUD designated unmet needs categories outlined in the federal register (

Table 26).⁵² HUD guidance outlines the process of determining repair costs by damage category as:

“The average cost to fully repair a home for a specific disaster to code within each of the damage categories noted above is calculated using the median real property damage repair costs determined by the SBA for its disaster loan program for the subset of homes inspected by both SBA and FEMA for each eligible disaster.”⁵³

Following this guidance, total damage estimates for each federal register specified damage category was derived by combining FEMA and SBA data based on FEMA registrant ID and identifying SBA’s median home loan for rebuild/replace/relocate (

Table 28). An estimate of additional potential un-met needs populations (J) was generated by first multiplying the sum total of owner applicants without a real property loss (F) by 3.2% (accounting for FEMA’s missing real property losses compared to SBA’s) and summing the result with the number of SBA applicants without a FEMA registrant number (G). This potential unmet need applicant count (H) is then multiplied by the median SBA property loss value (\$25,501) (I) to create an estimated loss for all homeowner applicants (J). Estimated total losses of \$480 Million (K) to homeowners is derived by summing this value (J) with losses from SBA data alone and including additional costs associated with increased resilience of 30% (

Table 26, Line E).

Table 27: Estimated Damage to Owner Applicant Dwellings

| Id | Line Item | Count | Value |
|----|---|-------|--------------|
| A | FEMA “owner” or “non-specified” applicants in HUD <i>Minor-Low</i> damage category | 6,066 | \$96,861,888 |
| B | FEMA “owner” or “non-specified” applicants in HUD <i>Minor-High</i> damage category | 679 | \$21,365,075 |

⁵² <https://www.gpo.gov/fdsys/pkg/FR-2018-08-14/pdf/2018-17365.pdf>

⁵³ https://files.hudexchange.info/resources/documents/FR-6182-N-01-Allocation-Notice-CDBG-DR-Grantees.pdf?utm_source=HUD+Exchange+Mailing+List&utm_campaign=01e5f52f10-EMAIL_CAMPAIGN_2020_01_17_10_30&utm_medium=email&utm_term=0_f32b935a5f-01e5f52f10-19420561_Page_35

| | | | |
|---|---|-------|---------------|
| C | FEMA “owner” or “non-specified” applicants in HUD <i>Major-Low</i> damage category | 616 | \$31,896,480 |
| D | FEMA “owner” or “non-specified” applicants in HUD <i>Major-High</i> damage category | 586 | \$43,448,091 |
| E | FEMA “owner” or “non-specified” applicants in HUD <i>Severe</i> damage category | 129 | \$12,586,917 |
| F | Total owner or “not specified” applicants without a FEMA Verified Property Loss | 4,405 | |
| G | Number (count) of SBA Applicants without a FEMA Registrant ID | 160 | |
| H | Potential additional unmet need population | 301 | \$7,682,365 |
| I | Median verified loss | | \$25,501 |
| J | Losses of FEMA applicants not represented by SBA data (Estimate) | 8,377 | \$213,840,815 |
| K | Total verified loss of all homeowner applicants across FEMA and SBA (Estimate) | | \$480,374,717 |

Table 28: HUD and estimated unmet needs based on real property derived damage category

| Category of Real Property Damage | Count of Owner or “Other” Applicants with FEMA verified Real Property Losses | Count of Renter Applicants with FEMA verified Personal Property Losses | SBA Derived Repair Costs (HUD Method) |
|----------------------------------|--|--|---------------------------------------|
| <i>Minor Low</i> | 6,066 | 438 | \$15,968 |
| <i>Minor High</i> | 679 | 57 | \$31,466 |
| <i>Major Low</i> | 616 | 57 | \$51,780 |
| <i>Major High</i> | 586 | 76 | \$74,144 |
| <i>Severe</i> | 129 | 7 | \$97,573 |
| <i>No Damage Indicated</i> | 4,405 | 3,721 | \$16,383 |

A similar method as above was utilized to capture impacts to affected renter applicants (

Table 30). Damage categories for renter occupied units were derived using a similar method applied only to personal property impacts as determined by receipt of FEMA Other Needs Assistance (ONA) (Table 29). Impacts and support for personal property are used in the case of renter applicants because FEMA does not inspect rental units for real property damage.⁵⁴ Lines A-E represent a break-down of renter losses by HUD classified Minor-Low to Severe damage levels for those applicants who have received FEMA ONA but without FEMA real property verified losses. Here, FEMA Other Needs Assistance values were classified into HUD designated categories based on federal registry classifications. Damage estimates were derived by multiplying counts of applicants (by damage category) by HUD provided estimates (Table 28). An estimate of potential unmet needs populations (H) was generated by multiplying the total renter applicants without either personal property loss (F) by 6.77% (accounting for FEMA’s \$0 ONA compared to SBA’s > \$0 contents losses) and subtracting a count of SBA applicants who received funds to support

⁵⁴ Counts of damaged units are likely conservative because applicant level flood depth information was not utilized in this assessment.

rental repair (G). This potential unmet need applicant count is then multiplied by the median SBA property loss value (I) and summed with values (A-E) to create an estimated loss for all home renter applicants (J).

Table 29: Renter-Occupied Personal Property Damage Categories and Values

| Damage Category | Associated Real Property Losses |
|-------------------|---|
| <i>Minor-Low</i> | Less than \$1,000 of FEMA inspected personal property damage. |
| <i>Minor-High</i> | \$1,000 to \$1,999 of FEMA inspected personal property damage. |
| <i>Major-Low</i> | \$2,000 to \$3,499 of FEMA inspected personal property damage or 1 to 4 feet of flooding on the first floor. |
| <i>Major-High</i> | \$3,500 to \$7,499 of FEMA inspected personal property damage or 4 to 6 feet of flooding on the first floor. |
| <i>Severe</i> | Greater than \$7,500 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor. |

Table 30: Estimated Damage to Renter Applicant Dwellings

| <i>Id</i> | Line Item | Count | Value |
|-----------|--|-------|--------------|
| <i>A</i> | FEMA “Renter” applicants in HUD <i>Minor-Low</i> damage category (SBA Multiplier) | 438 | \$6,993,984 |
| <i>B</i> | FEMA “Renter” applicants in HUD <i>Minor-High</i> damage category (SBA Multiplier) | 57 | \$1,793,534 |
| <i>C</i> | FEMA “Renter” applicants in HUD <i>Major-Low</i> damage category (SBA Multiplier) | 57 | \$2,961,460 |
| <i>D</i> | FEMA “Renter” applicants in HUD <i>Major-High</i> damage category (SBA Multiplier) | 76 | \$5,634,906 |
| <i>E</i> | FEMA “Renter” applicants in HUD <i>Severe</i> damage category (SBA Multiplier) | 7 | \$683,011 |
| <i>F</i> | Total renter applicants without a FEMA Verified Personal Property (Contents) Loss | 3,721 | |
| <i>G</i> | Total SBA business applicants with verified repair, reconstruction, or relocation losses (rental NAICS code) | 48 | \$1,758,467 |
| <i>H</i> | Potential additional unmet need population | 204 | \$5,202,204 |
| <i>I</i> | Average verified loss | | \$25,501 |
| <i>J</i> | Total verified loss of rental property (Estimated) | | \$25,017,566 |

Next, damages cataloged by other sources outside of SBA and FEMA are accounted for in

Table 31. Included here are preliminary public housing damage estimates⁵⁵ (A), insured residential damages (B), and private flood insurance damages (C) from the South Carolina Department of Insurance.⁵⁶

Table 31: Other Housing Damages

| Id | Line Item | Count | Value |
|----|--|--------|--------------|
| A | Real estate damage to public housing | 32 | \$ 816,032 |
| B | Insured Damage - Domestic and Foreign Residential Property | 19,205 | \$71,626,171 |
| C | Insured Damage - Private Flood | 190 | \$21,520,039 |

Totaling across all areas reveals total housing losses of at least \$598.5 million. Accounting for 30% in additional costs associated with necessary resilience measures such as more stringent building codes, cost of compliance measures, elevations or freeboard requirements, increases the total estimate of damages to more than \$779 Million (Table 32).

Table 32: Total Estimated Losses

| | |
|--|-----------------------|
| Total Housing Verified Loss | \$ 599,354,525 |
| <i>Accounting for 30% resilience costs</i> | \$ 779,160,883 |

Accounting for insurance, loans and other recovery resources, Table 33 depicts the total benefit provided to Hurricane Florence victims to date. Here, more than \$201 million across federal, state and local resources have been provided. Unfortunately, recovery funds provided to date still leave a large unmet housing need of greater than \$577 Million (Table 34).

Table 33: Sources and amounts of recovery funds (to date)

| Id | Service | Count | Value |
|----|---|--------|--------------|
| A | FEMA housing assistance payments | 4,438 | \$21,647,384 |
| B | SBA home loan current manufactured housing payments | 222 | \$4,351,400 |
| C | SBA home loan current real estate repair payments | 823 | \$21,195,337 |
| D | SBA home loan current relocation payments | 14 | \$1,073,200 |
| E | SBA home loan current reconstruction payments | 8 | \$806,900 |
| F | SBA business loan payments to landlords | 25 | \$817,300 |
| G | NFIP building payments | 1,240 | \$88,991,477 |
| H | Public housing funds | 32 | 816,032 |
| I | Insurance Payment (Residential) | 10,237 | \$47,169,493 |
| J | Private Insurance Flood Payments | 71 | \$13,702,120 |
| K | ONE SC Philanthropic Fund | | 1,055,000 |

⁵⁵ Note: The public housing damage estimates are in the initial phases and are likely to rise as the formal loss assessments are completed.

⁵⁶ <https://doi.sc.gov/DocumentCenter/View/11376/2018-Status-Report-on-the-South-Carolina-Coastal-Property-Insurance-Market>

| | | | |
|---|---------------|--|---------------|
| L | Total Benefit | | \$201,625,643 |
|---|---------------|--|---------------|

Table 34: Unmet Housing need for South Carolina

| | |
|--|----------------------|
| Total Unmet Housing Need to Pre-Storm Standards | \$397,728,882 |
| <i>Accounting for 30% resilience costs</i> | \$577,290,430 |

Infrastructure Impact

Infrastructure systems affected by Hurricane Florence included damage to dams, roadways, bridges, wastewater treatment systems, drinking water treatment and collection systems, as well as the State’s beaches, parks, and other recreational areas. The immediate recovery efforts were well-documented by the RSS and by the initial project worksheets being submitted for Public Assistance.

Dams

The South Carolina Department of Health and Environmental Control (SCDHEC) and U.S. Army Corps of Engineers conducted more than 264 post-storm assessments and confirmed that 11 dams in five counties had severe storm damage from Hurricane Florence.^{57,58} Many of these dams were constructed prior to any standards and permitting review, and now they need to be replaced with structures that will meet modern standards. However, many of the dams were privately owned and may be required to pass stringent threshold requirements for federal assistance. None of the 11 dams required emergency repairs following inspection.

Roads and Bridges

Widespread severe flooding and debris damage from Hurricane Florence caused a peak closure of about 233 roads and bridges throughout the state by Sept. 17, 2018, including the temporary closure of Interstate 95 and suspension of Amtrak rail service (Figure 30).⁵⁹ As floodwaters continued to rise, a peak of 56 bridges were closed by Sept. 21, 2018, with more than 90% of closed roads and bridges reopened by Oct. 31, 2018. By SCDOT’s final event report Dec. 13, 2018, 234 repairs to transportation infrastructure were completed and another 39 were expected to be completed within 90 days; however, nine projects were expected to be completed in greater than 90 days, with most state-maintained roads functional.

⁵⁷ <https://www.scdhec.gov/sites/default/files/media/document/Post-Florence%202018%20-%20Dam%20Assessment.pdf>

⁵⁸ <https://scdhec.gov/disaster-preparedness/hurricane-florence-2018/hurricane-florence-update-09-27-2018>

⁵⁹ [http://info2.scdot.org/StormReports/Storm%20Reports/Hurricane%20Florence%20Report%20\(26-Sep-18%201600\).pdf](http://info2.scdot.org/StormReports/Storm%20Reports/Hurricane%20Florence%20Report%20(26-Sep-18%201600).pdf)

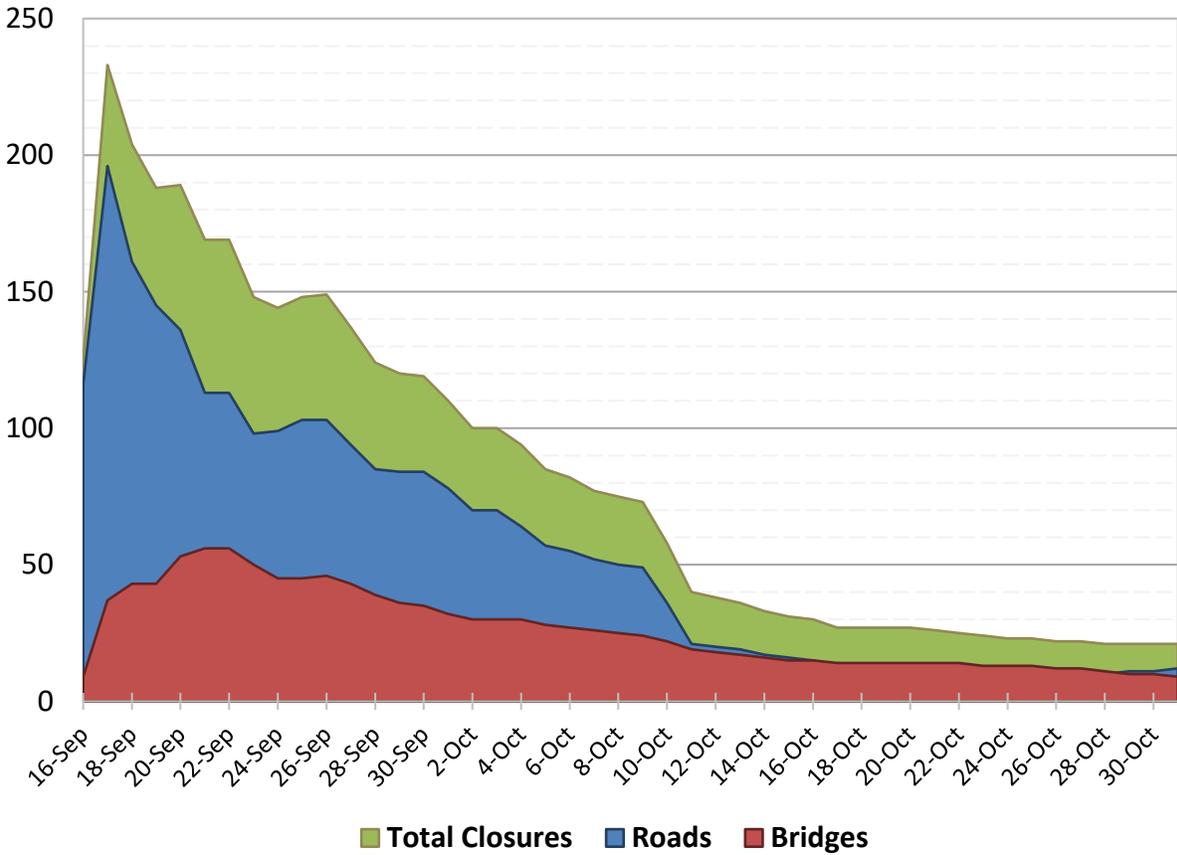


Figure 30. Daily road and bridge closures for South Carolina during and after Hurricane Florence.

Water and Wastewater Systems

Of the five water/wastewater treatment systems that experienced damage (electrical, roof damage, influent pump stations) there were no lengthy closures.⁶⁰ However, the Waccamaw River crested at more than 3 feet higher than it did during Hurricane Matthew in 2016, and the Conway Wastewater Treatment Plant was flooded and caused a discharge of untreated effluent into a tributary of the Waccamaw, leading the Department of Health and Environmental Control to issue a warning advising residents to avoid contact with the facility and its downstream waters.⁶¹ Though the Santee Cooper Grainger Station coal ash pit avoided damages, floodwaters came within inches of overtopping the temporary dam installed on levees for protection.⁶² Many drinking water systems were impacted when breaks to their distribution systems occurred. All systems were rapidly restored and remain operational. The State may address hurricane/flood damage actions for some plants through mitigation projects.

⁶⁰ FEMA OPEN Public Assistance Project Details report - <https://www.fema.gov/openfema-dataset-public-assistance-funded-projects-details-v1>

⁶¹ <https://scdhec.gov/disaster-preparedness/hurricane-florence-2018/hurricane-florence-update-09-27-2018>

⁶² <https://scdhec.gov/disaster-preparedness/hurricane-florence-2018/hurricane-florence-update-09-27-2018>

Public Assistance

The FEMA Public Assistance (FEMA-PA) Program is designed to provide immediate assistance to impacted jurisdictions for emergency protective measures and permanent repairs to infrastructure and community facilities. The Federal share of assistance is generally not less than 75% of the eligible project cost, requiring the State to contribute the remaining 25% in cost share.

The Public Assistance Program for FEMA 4394 identified \$4,917,729 and \$56,958,153 in public assistance for Category A (Debris removal) and Category B (Emergency protective measures), respectively (Table 35).

Additionally, the state has identified \$41,506,895 in public assistance need for Categories C-G (permanent repair) to date in the state-assessed counties (Table 36). These categories include:

- Category C: Roads and Bridges
- Category D: Water Control Facilities
- Category E: Buildings and Equipment
- Category F: Utilities
- Category G: Parks, Recreational Facilities, and Other Facilities

Based on this data, and because applicants must prove where the 25% cost share will be covered from before any application is approved, the State should have no unmet need for public assistance projects. For the sake of understanding a potential, unprecedented worst-case scenario, if the counties were to have zero (\$0) matching funds for these projects, the residual between total project amount and federal share obligated would represent a potential unmet need of \$10,376,724 for identified infrastructure damage eligible under FEMA-PA Categories C-G (

Table 37).

Table 35. Public Assistance Category A and B totals by county.⁶³

| County | Category A | | Category B | | Total (Category A & B) | |
|---------------------|--------------------|------------------|--------------------|------------------|------------------------|------------------|
| | Number of Projects | Cost of Projects | Number of Projects | Cost of Projects | Number of Projects | Cost of Projects |
| <i>Chesterfield</i> | 5 | \$310,274 | 8 | \$300,659 | 13 | \$610,933 |
| <i>Colleton</i> | 1 | \$31,536 | 4 | \$208,689 | 5 | \$240,225 |
| <i>Darlington</i> | 3 | \$120,680 | 10 | \$390,926 | 13 | \$511,606 |
| <i>Dillon</i> | 4 | \$390,404 | 7 | \$789,905 | 11 | \$1,180,310 |
| <i>Georgetown</i> | 1 | \$11,077 | 10 | \$1,154,193 | 11 | \$1,165,270 |
| <i>Horry</i> | 11 | \$1,556,282 | 27 | \$7,847,677 | 38 | \$9,403,959 |
| <i>Lancaster</i> | 1 | \$26,577 | 1 | \$29,489 | 2 | \$56,066 |
| <i>Marion</i> | 4 | \$392,421 | 8 | \$1,001,032 | 12 | \$1,393,452 |
| <i>Marlboro</i> | 3 | \$373,732 | 4 | \$82,922 | 7 | \$456,653 |
| <i>Williamsburg</i> | 5 | \$1,700,583 | 24 | \$44,531,447 | 29 | \$46,232,029 |
| <i>Statewide</i> | 1 | \$4,163 | 2 | \$621,214 | 3 | \$625,377 |

⁶³ <https://www.fema.gov/openfema-dataset-public-assistance-funded-projects-details-v1>

| | | | | | | |
|--------------------|-----------|--------------------|------------|---------------------|------------|---------------------|
| Grand Total | 39 | \$4,917,729 | 105 | \$56,958,152 | 144 | \$61,875,881 |
|--------------------|-----------|--------------------|------------|---------------------|------------|---------------------|

Table 36. Public Assistance Categories C-G totals by county.⁶⁴

| County | C - Roads and Bridges | D - Water Control Facilities | E - Public Buildings | F - Public Utilities | G - Recreational or Other | Grand Total |
|---------------------|-----------------------|------------------------------|----------------------|----------------------|---------------------------|---------------------|
| <i>Berkeley</i> | | \$16,774 | \$189,414 | \$5,441,919 | | \$5,648,107 |
| <i>Chesterfield</i> | \$1,514,555 | \$59,850 | \$56,583 | \$1,844,525 | | \$3,475,514 |
| <i>Darlington</i> | \$48,111 | \$59,761 | \$59,859 | \$1,348,718 | | \$1,516,449 |
| <i>Dillon</i> | \$147,350 | | \$164,015 | \$155,664 | | \$467,030 |
| <i>Florence</i> | \$21,257 | | \$198,505 | | | \$219,762 |
| <i>Georgetown</i> | \$212,440 | | \$381,035 | \$27,485 | \$67,837 | \$688,797 |
| <i>Horry</i> | \$619,331 | | \$4,159,121 | \$5,962,552 | \$5,361,192 | \$16,102,196 |
| <i>Lancaster</i> | \$49,480 | | | | \$17,043 | \$66,523 |
| <i>Marion</i> | \$4,399,897 | \$145,470 | \$168,407 | | \$308,763 | \$5,022,537 |
| <i>Marlboro</i> | \$379,943 | | \$56,166 | \$1,329,037 | \$140,833 | \$1,905,979 |
| <i>Statewide</i> | \$4,322,676 | | \$419,185 | \$1,411,521 | \$148,428 | \$6,301,811 |
| <i>Williamsburg</i> | \$92,190 | | | | | \$92,190 |
| Total | \$11,807,231 | \$281,855 | \$5,852,290 | \$17,521,424 | \$6,044,096 | \$41,506,895 |

Table 37. Potential infrastructure unmet need

| County | Grand Total | Total Federal Obligation | Residual (Potential Unmet Need) |
|---------------------|---------------------|--------------------------|---------------------------------|
| <i>Berkeley</i> | \$5,648,107 | \$4,236,080 | \$1,412,027 |
| <i>Chesterfield</i> | \$3,475,514 | \$2,606,635 | \$868,878 |
| <i>Darlington</i> | \$1,516,449 | \$1,137,337 | \$379,112 |
| <i>Dillon</i> | \$467,030 | \$350,272 | \$116,757 |
| <i>Florence</i> | \$219,762 | \$164,822 | \$54,941 |
| <i>Georgetown</i> | \$688,797 | \$516,598 | \$172,199 |
| <i>Horry</i> | \$16,102,196 | \$12,076,647 | \$4,025,549 |
| <i>Lancaster</i> | \$66,523 | \$49,892 | \$16,631 |
| <i>Marion</i> | \$5,022,537 | \$3,766,903 | \$1,255,634 |
| <i>Marlboro</i> | \$1,905,979 | \$1,429,484 | \$476,495 |
| <i>Statewide</i> | \$6,301,811 | \$4,726,358 | \$1,575,453 |
| <i>Williamsburg</i> | \$92,190 | \$69,143 | \$23,048 |
| Total | \$41,506,895 | \$31,130,172 | \$10,376,724 |

⁶⁴ <https://www.fema.gov/openfema-dataset-public-assistance-funded-projects-details-v1>

HMGP and Resilience

The Hazard Mitigation Grant Program (HMGP) will be a critical part of long-term resilience improvements for infrastructure in the impacted area. According to FEMA,

“Federal funding under the HMGP is available following a major disaster declaration if requested by the Governor. HMGP funding is allocated using a “sliding scale” formula based on the percentage of funds spent on Public and Individual Assistance for each Presidentially declared disaster. For States with a FEMA-approved Standard State Mitigation Plan, the formula provides for up to 15% of the first \$2 billion of estimated aggregate amounts of disaster assistance, up to 10% for amounts between \$2 billion and \$10 billion, and 7.5% for amounts between \$10 billion and \$35.333 billion. For States with a FEMA-approved Enhanced Mitigation Plan, up to 20% of the total of Public and Individual Assistance funds authorized for the disaster (up to \$35.333 billion of such assistance) are available.⁶⁵

Because South Carolina currently has a FEMA-approved Standard State Hazard Mitigation Plan, the percentage of available HMGP funding should be calculated at 15% of the total amount of IA and PA allocated to a disaster event. As of Feb. 2, 2020, FEMA has allocated \$24,520,254.20 in Individual Assistance and \$88,981,747.80 in Public Assistance.⁶⁶ Therefore, the amount available for mitigation and resilience activities statewide will likely be between \$17 and \$18 million.

Then, calculating that HMGP assistance to any jurisdiction is capped at 75% of the identified need (the remaining 25% being a required local match), it can be assumed that jurisdictions will be required to provide between \$4M-\$5M in local match, representing an unmet need for resilience improvements. The HMGP process is in its initial stages at this time and will be rolled out over the coming months.

Existing Efforts by South Carolina CDBG Non-Entitlement Program

The State of South Carolina's Community Development Block Grant (CDBG) Program, operated by the South Carolina Department of Commerce, is expected to receive an annual allocation of \$16,924,508 from HUD in 2020. Over \$11,724,508 million of this was dedicated to community infrastructure activities such as water, sewer, roads, drainage or other activities. The other program funds (excluding planning and administrative costs) were \$3,000,000 for Community Enrichment, \$1,000,000 for Neighborhood Revitalization, \$600,000 for Special Projects, \$600,000 Ready-to-Go and \$ 2,000,000 for Business Development.

Economic Impact

Business and Employment

HUD describes methods for determining serious unmet economic revitalization needs using a count of businesses falling within each of several damage categories (Table 38). The HUD method requires first, a calculation of damage to real-estate (repair, rebuild, relocate) and contents (machinery, furniture,

⁶⁵ https://www.fema.gov/media-library-data/1521210872717-2a5eb11ea35808dc1f0a4965b1e3944f/Hazard_Mitigation_Grant_Program_Pamphlet.pdf

⁶⁶ <https://www.fema.gov/disaster/4394>

inventory). Each SBA application is then classified into one of five categories based on this estimate of damage and the median damage for each category is produced from these groupings.

Table 38. Summary of SBA applicants based on Federal Register serious unmet economic needs.

| HUD Cat | Damage | Count of all SBA Applicants | Median Damage | Percentage of All Businesses |
|-------------|----------------------|-----------------------------|---------------|------------------------------|
| Category 1 | < \$12,000 | 40 | \$6,026 | 2.40% |
| Category 2 | \$12,000 - \$29,999 | 39 | \$20,023 | 2.34% |
| Category 3 | \$30,000 - \$64,999 | 34 | \$41,276 | 2.04% |
| Category 4 | \$65,000 - \$149,999 | 12 | \$85,130 | 0.72% |
| Category 5 | >= 150000 | 18 | \$234,944 | 1.08% |
| No Category | | 1,527 | | 91.44% |

Then, a count of those SBA applicants who were either declined loan assistance or had applications in process at the time of the data collection⁶⁷ represents the unmet needs for the business community. These counts are multiplied by the median damage to gain perspective on possible unmet needs (Table 39). According to this method, serious unmet business needs for Hurricane Florence amount to \$2.1 million.

Table 39. Estimate of SBA applicants either denied a loan or in process based on Federal Register serious unmet economic needs.

| HUD Cat | Damage | Count of all SBA Applicants | Median Loss | Federal Register Estimate of Unmet Need |
|------------------------------------|----------------------|-----------------------------|-------------|---|
| Category 1 | < \$12,000 | 12 | \$6,026 | \$72,312 |
| Category 2 | \$12,000 - \$29,999 | 17 | \$20,023 | \$340,391 |
| Category 3 | \$30,000 - \$64,999 | 7 | \$41,276 | \$288,932 |
| Category 4 | \$65,000 - \$149,999 | 6 | \$85,130 | \$510,780 |
| Category 5 | >= 150000 | 4 | \$234,944 | \$939,776 |
| No Category | | 199 | | |
| Total Estimated Losses (FR Method) | | | | \$2,152,191 |

Hurricane Florence impacts and unmet needs in business are greatly underestimated using this method as it fails to account for the possibility that people/businesses have been impacted and have not recovered but are choosing not to shoulder debt for this recovery. For this reason, we take a modified approach to understand, more completely, impacts, support and unmet needs for the business community.

As of Aug. 15, 2019, the Small Business Administration (SBA) issued \$3.5 million in Business and Economic Injury Disaster Loans (EIDL) to the state impacted area covered in this assessment.⁶⁸ Five counties (Chesterfield, Dillon, Horry, Marion, and Marlboro) had more than 100 SBA business loan applications, while Darlington, Florence, and Georgetown counties had 55 or fewer each (Table 40). Entities such as small businesses, small agricultural cooperatives, and most private nonprofit organizations

⁶⁷ Aug. 15, 2019

⁶⁸ SBA Business Application Report, Aug. 15, 2019

in disaster impacted areas may apply for low-interest EIDL loans to assist with operating expenses and working capital. The Business Physical Disaster Loss loans are available for machinery, equipment and other real-property damages.

Utilizing all SBA business data rather than a sub-set of declined businesses to understand the financial impact to livelihoods provides a more comprehensive understanding of impacts and recovery across the state. The Small Business Administration makes low cost disaster loans available to qualified businesses. A summary of SBA applicants (Table 40) shows that a majority of applications were never returned (1,275), were either withdrawn (93), declined (112) or were in process (153) for a business loan. Only 123 business loans had been approved as of the creation of this assessment. According to SBA business loan information, approximately 109 applicants had a verified property loss of \$6,267,050. The average verified loss for all applicants was \$57,496 and the median loss was \$28,137. Utilizing the general methodology put forth for the housing impact and unmet needs enables us to identify the true impact and possible extra estimated impacts for businesses who did not qualify for loans.

Table 40. Small Business Administration Applicants by County.

| County | Number of SBA Applicants | Approved | Declined | In Process | Issued | Withdrawn |
|--------------|--------------------------|----------|----------|------------|--------|-----------|
| Chesterfield | 131 | 9 | 5 | 6 | 104 | 7 |
| Darlington | 47 | 2 | 11 | 3 | 30 | 1 |
| Dillon | 232 | 19 | 13 | 15 | 170 | 15 |
| Florence | 31 | 1 | 4 | 1 | 23 | 2 |
| Georgetown | 55 | 1 | 3 | 5 | 41 | 5 |
| Horry | 938 | 81 | 55 | 98 | 653 | 51 |
| Marion | 178 | 3 | 15 | 10 | 142 | 8 |
| Marlboro | 144 | 7 | 6 | 15 | 112 | 4 |
| Total | 1,756 ⁶⁹ | 123 | 112 | 153 | 1,275 | 93 |

Table 41 outlines the impacts, estimated impacts and support provided by the SBA to business owners across the impacted counties. Here, we capture the total real property loss of \$50,222,860 by summing verified repair losses (A) with verified reconstruction losses (C) and estimated repair (B) and reconstruction losses (D). Here, estimated repair losses are calculated by multiplying the median repair cost by the number of applicants who did not have an SBA verified loss. Estimated reconstruction losses are calculated as the product of the median reconstruction loss and the estimated number of applicants who would fall into this category (the product of the ratio of applicants within a category and those with no damage estimate). In this case, 1 applicant with reconstruction loss out of 109 applicants with any loss = .009 multiplied by the total applicants without a loss estimate (1,560).

⁶⁹ There are 1,669 unique applicants to the SBA program

Next we use the same method to sum the verified and estimated losses to furniture (F and G), machinery (H and I), inventory (J and K) and business operating expenses (L and M) resulting in a total estimated operational loss to \$26,329,515 to businesses. According to this method, total business impacts from Florence was \$76,552,375. When accounting for resilience requirements (30% increase in rebuilding but not operations) the total impact to businesses in South Carolina was \$91,619,233. SBA payouts to businesses totaled \$5,342,600 for these lines of loss, leaving a potential unmet need of **\$86,276,663**.

Table 41. SBA Derived Impact and Unmet needs for businesses.

| Small Business Administration Verified Business Property Loss of All SBA Applicants | | | |
|---|--|-------|--------------|
| | | Count | Value |
| A | SBA applicants with a real estate verified loss (Repairs) | 109 | \$6,267,050 |
| B | SBA applicants without a real estate verified loss (Repair Estimate) | 1,560 | \$43,893,720 |
| C | SBA verified reconstruction loss (Rebuild) | 1 | \$4,055 |
| D | Estimated reconstruction loss (Rebuild) | | \$58,035 |
| E | Total real estate losses for businesses referred to SBA (Estimate) | | \$50,222,860 |
| Small Business Administration Verified (and Estimated) Business Operating Loss of All SBA Applicants | | | |
| F | Verified furniture loss | 44 | \$561,142 |
| G | Furniture Loss (Estimate) | 630 | \$2,752,212 |
| H | Verified machinery loss | 61 | \$1,464,053 |
| I | Machinery loss (Estimate) | 873 | \$3,897,195 |
| J | Verified inventory loss | 31 | \$1,666,348 |
| K | Inventory Loss (Estimate) | 444 | \$2,440,183 |
| L | Verified EIDL Loss | 53 | \$2,170,400 |
| M | EIDL Loss (Estimate) | 759 | \$11,377,982 |
| N | Sum of operational losses | | \$26,329,515 |
| O | Total verified loss for all businesses (Estimate) | | \$76,552,375 |
| P | Accounting for 30% resilience addition | | \$91,619,233 |
| Duplication of Benefits | | | |
| Q | SBA repair payments | 42 | \$2,575,200 |
| R | SBA furniture payments | 14 | \$162,700 |
| S | SBA machinery payments | 21 | \$274,200 |
| T | SBA inventory payments | 14 | \$160,100 |
| U | SBA EIDL payments | 53 | \$2,170,400 |
| V | Total Benefit | | \$5,342,600 |
| Overall Business Unmet Needs | | | |
| W | Total unmet business repair/replace estimate | | \$47,647,660 |

| | | | |
|---|---|--|--------------|
| X | Total unmet business operation estimate | | \$23,562,115 |
| Y | Total unmet business needs estimate | | \$71,209,775 |
| Z | Accounting for 30% resilience addition | | \$86,276,633 |

Disaster Unemployment Assistance

Disaster Unemployment Assistance (DUA) is managed by the South Carolina Department of Employment and Workforce (DEW). DEW explains that “The DUA program makes funds available to assist people who became unemployed as a direct result of Hurricane Florence.”⁷⁰ Applications for DUA assistance must have been filed by Nov. 24, 2018, depending on county (within 30 days after the available assistance was announced). The following (Table 42) shows the number of weeks and amount of DUA claims paid out for each county area.

Table 42. Disaster Unemployment Assistance Provided by Florence Impacted Counties.

| County | Total Weeks Paid by County | Total Amount Paid by County | Average Amount Paid by County |
|---------------|---------------------------------------|--|--|
| Chesterfield | 3 | \$439.00 | \$146.33 |
| Darlington | 1 | \$206.00 | \$206.00 |
| Dillon | 88 | \$12,225.00 | \$138.92 |
| Florence | 58 | \$9399.00 | \$162.05 |
| Georgetown | 124 | \$21,664.00 | \$174.71 |
| Horry | 1,461 | \$242,751.00 | \$166.15 |
| Marion | 139 | \$22,092.00 | \$158.94 |
| Marlboro | 17 | \$2460.00 | \$144.71 |
| Total | 1,891 | \$311,236 | \$164.59 |

⁷⁰ <https://dew.sc.gov/news-details-page/2018/09/25/disaster-unemployment-assistance-available-for-four-counties-affected-by-hurricane-florence>

Unmet Needs Summary

Damages and unmet needs from hurricane Florence to housing, infrastructure and economy were identified in this assessment with housing impacts and associated unmet needs standing out among these three categories. Hurricane Florence’s substantial damage to housing across the impacted counties (\$779 million) accounts for 85% of total estimated losses in comparison to the economic sector (\$92 million) or 10% of estimated total losses and the infrastructure sector (\$42 million) or 10% of total losses (Figure 31A). After accounting for available recovery resources, housing sector overall percentage of unmet need increases slightly in comparison to the infrastructure and economic sectors (Figure 31B).

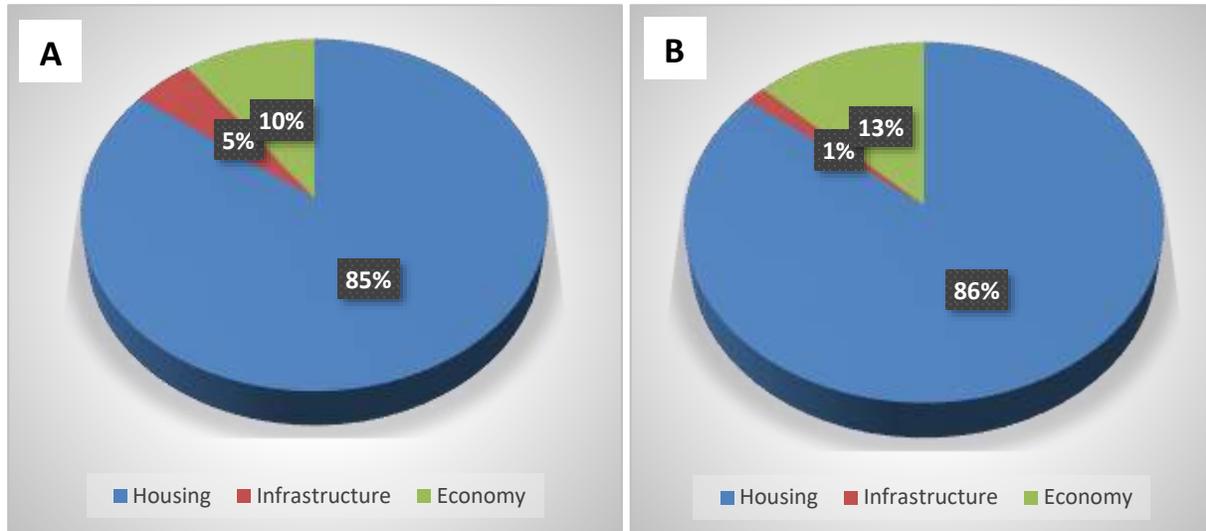


Figure 31. A: Estimated losses by sector as a percentage of total losses, and B: Estimated unmet need.

Total housing unmet needs are \$577 million, while unmet business needs were just over \$85 million and estimated infrastructure unmet needs are just over \$10 million. Within the housing impacted populations are both a high number of single-family residential units and a sizeable renter population. Recovery programs aimed at these two groups should have high return and lead to substantial progress in overall recovery from the storm. Additionally, a continued focus on home buyouts aimed at managed retreat from hazard zones will pay dividends into the future. Specifically, removing at risk structures from flood zones will help residents be more resilient in future flood disasters.

ACTION PLAN

Funding Priorities

When the emergency declaration was issued for South Carolina, 19 counties were designated for Federal Emergency Management Agency (FEMA) Public Assistance and eight counties were designated for FEMA Individual Assistance. Public Assistance provided grants to governmental units for emergency infrastructure repairs and debris removal⁷¹. Individual Assistance provided emergency funding to individuals for immediate housing and safety needs⁷². The declaration for Hurricane Florence in South Carolina, designated as FEMA DR-4394, included the following counties:

| County | Individual Assistance | Public Assistance |
|---------------------|-----------------------|-------------------|
| <i>Berkeley</i> | | Declared |
| <i>Calhoun</i> | | Declared |
| <i>Charleston</i> | | Declared |
| <i>Chesterfield</i> | Declared | Declared |
| <i>Clarendon</i> | | Declared |
| <i>Colleton</i> | | Declared |
| <i>Darlington</i> | Declared | Declared |
| <i>Dillon</i> | Declared | Declared |
| <i>Dorchester</i> | | Declared |
| <i>Florence</i> | Declared | Declared |
| <i>Georgetown</i> | Declared | Declared |
| <i>Horry</i> | Declared | Declared |
| <i>Jasper</i> | | Declared |
| <i>Lancaster</i> | | Declared |
| <i>Marion</i> | Declared | Declared |
| <i>Marlboro</i> | Declared | Declared |
| <i>Orangeburg</i> | | Declared |
| <i>Sumter</i> | | Declared |
| <i>Williamsburg</i> | | Declared |
| Total | 8 | 19 |

Counties Eligible for Assistance

The South Carolina Disaster Recovery Office (SCDRO), administered by the State of South Carolina through the Department of Administration, will provide assistance to eligible applicants in the following **8 Individual Assistance declared counties only**:

Chesterfield
Georgetown

Darlington
Horry

Dillon
Marion

Florence
Marlboro

⁷¹ For details on the FEMA PA program see: <https://www.fema.gov/media-library-data/1465341338231-1ae3d3ccc360573d965b70090ca01033/FactSheetPA2016.pdf>

⁷² For details on the FEMA IA program see: https://www.fema.gov/media-library-data/1461689021638-cfcfd7f6c263635802fa7a76a19e00ea/FS001_What_is_Individual_Assistance_508.pdf

HUD has provided the State of South Carolina with \$72,075,000 in disaster recovery funds to assist in recovery from the Hurricane. HUD has further stipulated that 80% of the efforts must address unmet needs of Marion and Horry Counties and zip code 29536 in Dillon County.

The State partnered with Disaster Metrics to assess the unmet needs of South Carolina as a result of Hurricane Florence.

Disaster Metrics performed a comprehensive Unmet Needs Assessment, identifying the needs across three sectors: housing, the economy and infrastructure. When comparing these three sectors, it becomes clear that the greatest unmet need exists in the housing sector. As a result of this analysis, Governor Henry McMaster directed SCDRO to focus exclusively on addressing the unmet housing needs of the most vulnerable homeowners of South Carolina who were affected by Hurricane Florence. SCDRO will accomplish this goal through the housing programs focusing on single family home repair and replacement and strategic buyouts. SCDRO will not provide funding for public services, emergency shelters, multifamily, market rate rentals, or housing to meet the needs of pre-disaster homeless persons. No funds will be expended on the transitional housing, permanent supportive housing, and permanent housing needs of individuals and families that are homeless and at-risk of homelessness, or the special needs of persons who are not homeless but require supportive housing (e.g., elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents). Limited rental repair funds will be available for the Most Impacted and Distressed Counties as designated by HUD.

By analyzing a number of social vulnerability factors, Disaster Metrics was able to empirically identify the most socially vulnerable census tracts within each FEMA Individual Assistance designated county. **Residents in these high vulnerability areas generally have a lower ability to adequately prepare for, respond to, and rebound from environmental impacts (such as hurricanes), shocks and stresses.**

Utilizing social vulnerability information combined with FEMA damage data provides a standardized, replicable, and pragmatic process for finding and understanding people and places where scarce resources would be most helpful in driving successful disaster recovery.

The State uses the FEMA verified loss information and social vulnerability analysis as an assessment and targeting tool. It allows the State to find the most vulnerable citizens. These are the citizens who are the least likely or able to run away from a disaster. They are the citizens who are the least likely to have the ability to recover without help. These tools allow the State to focus the recovery efforts. The State will use this information as part of a holistic recovery approach. This approach will allow the State to direct the implementation vendor to locations where intake centers can have the greatest chance of assisting large populations of impacted citizens. Targeting support to these areas in the immediate and long-term recovery phases of the disaster will yield the best outcomes for those with the highest need, particularly focused on areas of racial, ethnic and low-income concentrations.

Method of Distribution

CDBG-DR Program National Objectives

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

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

- 1) Benefitting LMI Persons;
- 2) Preventing or Eliminating Slum or Blight; or
- 3) Meeting Urgent Needs.

Assistance will be made to eligible applicants in the impacted area, as funds are available, with priority given to applicants with verified household income at 80% or below the AMI for the region in which they reside. HUD directed the State to spend at least 70% of the funds on LMI households. The State will use an analysis of social vulnerability factors to focus efforts to locate eligible citizens. Hurricane Florence assistance programs will begin by January 2021 and be completed by January 2027.

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

While the development of a hazard mitigation plan is an allowable use for CDBG-DR funds, the SCDRO will not pursue this. The South Carolina Emergency Management Division has developed a comprehensive hazard mitigation plan. The plan is available at: <https://www.scecmd.org/em-professionals/plans/hazard-mitigation-plan/>

Program Budget

The State will allocate all program dollars for housing recovery activities. The following is a table of budgeted categories:

| Program | Initial Allocation |
|-------------------------------|---------------------|
| Single Family Housing Program | \$56,000,000 |
| Buyout Program | \$10,000,000 |
| Rental Repair Program | \$1,000,000 |
| Planning | \$1,471,250 |
| Program Administration | \$3,603,750 |
| TOTAL | \$72,075,000 |

Program funds administered by the State will be made available to applicants residing in the eight counties that were eligible for FEMA Individual Assistance funds. The eligible counties are:

| | | | |
|--------------|------------|--------|----------|
| Chesterfield | Darlington | Dillon | Florence |
| Georgetown | Horry | Marion | Marlboro |

HUD has further stipulated that at least 80% of the efforts must address unmet needs within the Most Impacted and Distressed (MID) areas of Marion and Horry Counties and the 29536 Zip Code of Dillon County. As allowed by the federal register notice, South Carolina will extend the MID designation to all of Dillon County for the purpose of the MID spending requirement.

Leveraging of Funds

The State has worked with HUD, FEMA, SBA, other federal agencies and State-funded agencies to identify and catalog available sources of assistance for recovery from Hurricane Florence. The State will ensure that CDBG-DR funds are only used to address funding needs not satisfied by other funding sources, many of which are already providing disaster relief, including, but not limited to:

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

Any funds received from these sources must be leveraged as a component of the repair or replacement unless they were already spent for their intended use.

Housing Programs

Disaster Recovery funds are divided into three umbrella categories of eligible activity: Housing, Infrastructure and Economic Recovery. Based on analysis of the State's unmet needs and the limited amount of recovery funds made available, South Carolina will target the recovery funds toward the most evident need in the area of housing recovery.

To assist the most vulnerable families in their recovery efforts, the State has developed a housing program to meet the housing needs as identified through the unmet needs assessment to include:

1. Repair/Rehabilitation of existing housing units;
2. Replacement of damaged Manufactured Housing Units (MHUs) deemed unrepairable through a feasibility review;
3. Reconstruction of disaster-damaged stick-built homes;
4. Consideration of limited relocation assistance on a case by case basis;
5. Affordable rental repair;
6. Buyouts; and
7. Inclusion, during the execution of these activities, as needed and appropriate, identification of opportunities for mitigation enhancement measures, improvement of resilience, ancillary improvements such as elevation and access ramps, and assistance to applicants in completing program applications.

South Carolina will implement construction methods that emphasize quality, durability, energy efficiency, sustainability and mold resistance. All rehabilitation, reconstruction, and new construction will be designed to incorporate principles of sustainability, including water and energy efficiency, resilience and mitigation against the impact of future disasters.

In South Carolina, all counties and some localities require permits. All counties and the localities with such requirements have standing offices to process the required permits. There are currently no known local capacity issues which would prevent the needed permits from being processed and issued.

Where feasible, the State will follow best practices such as those provided by the U.S. Department of Energy's Guidelines for Home Energy Professionals.

For all new construction or for substantially rehabilitated structures, the State will require construction to meet ENERGY STAR certification standards.

To the most practical extent feasible, the State will follow the HUD CPD Green Building Retrofit Checklist guidelines and apply them to rehabilitation work undertaken to include the use of mold resistant products when replacing surfaces such as drywall. When older or obsolete products are replaced as part of rehabilitation work, the State will use products and appliances with ENERGY STAR labels, Water Sense labels or Federal Energy Management Program (FEMP) designations.

South Carolina will implement and monitor construction results to ensure the safety of residents and the quality of homes assisted through the program. All single family, rental and mobile homes repaired must

comply with the current HUD Housing Quality Standards (HQS). In addition, SCDRO has coordinated with DHEC to ensure applicants are aware of the risks associated with mold and take steps to limit the impact of any mold issues that may arise.

To prevent duplication of benefits, the State will require that all sources (federal, State, local, private) and amounts of disaster housing assistance received or reasonably anticipated to be received are documented with submission of an application for CDBG-DR funding. Duplication of benefits for housing assistance will only consider other sources of funding pertaining to structural damage caused by the hurricane. Assistance for contents and personal items will not be considered duplication.

Prior to program-related construction, applicant awardees must submit any additional funds received for housing damage caused by the presidentially declared hurricane disaster to the State to avoid duplication of benefits. CDBG-DR funding must be the funding of last resort. Any additional funds paid to applicant awardees for the same purpose as the housing assistance award after the State has completed the repair, rehabilitation, or replacement of the applicant's housing units must be returned to the State of South Carolina.

Providing a home that is safe, sanitary and secure is the goal of the State's Housing Programs.

Due to the difficulty, expense and long-term ineffectiveness of mobile home repair, SCDRO will perform a repair feasibility analysis and replace damaged mobile homes that cannot reasonably be repaired. SCDRO will implement resilient practices to ensure the viability, durability and accessibility of replacement mobile homes.

- Although some local building codes allow installation of Wind Zone I rated mobile homes, SCDRO will only utilize mobile homes with a minimum wind rating of HUD Wind Zone II or higher (able to withstand winds up to 100 MPH).
- SCDRO will adopt the 5'7" rule, prohibiting the installation of mobile homes elevated 5'7" above grade without appropriate structural reinforcement.

Single Family Housing Program

Applicants applying for assistance must have suffered documented damage to their housing units as a result of the September 2018 presidentially declared hurricane disaster. Such documentation may include an inspection report conducted by FEMA, SBA and/or a privately contracted inspector. The primary responsibility is on the citizen to prove that damage was caused by Hurricane Florence. In cases of demonstrable hardship or circumstances, the State may consider utilizing the implementation contractor to conduct an inspection to determine if the housing unit was damaged as a result of the September 2018 hurricane disaster. If the State does not believe the damage was a result of the hurricane disaster, the citizen may be referred to a volunteer organization active in the disaster (VOAD) for assistance and resource coordination.

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

- Applicant must own and have occupied a single-family home or MHU located within the eight counties for which FEMA Individual Assistance was approved for the September 2018 presidentially declared hurricane disaster area.
- The property must have documented damage as a result of the declared disaster.
- Applicant must provide evidence of primary residence at the location in which the applicant currently lives or lived at the time of the event and for which they are seeking assistance. Households are allowed alternative ways to document proof of primary residency. They can do so by one of the following options:
 - a. Any one of the following:
 - i. Proof of FEMA IA assistance;
 - ii. Federal income tax return showing their permanent home address;
 - iii. Government-issued identification issued prior to and expiring after impacted period; or
 - iv. Property tax homestead exemption.
 - b. By providing any two of the following:
 - i. Utility bills mailed to the property address;
 - ii. Vehicle registration or renewal at the address in the impacted period;
 - iii. Proof of government benefits received at least one month prior and one month after the impacted period; and
 - iv. Property insurance documents indicating the insured property as primary residence.
 - c. SCDRO may require an affidavit of primary residency under penalty of civil and criminal perjury which may be considered along with any other fact relating to primary residency.
- One person on the application with an ownership interest in part or in whole on the property must be able to demonstrate U.S. Citizenship or Lawful Permanent Residence.
- The homeowner must agree to own the home and use the home as their primary residence for a period of three years after construction as secured through a forgivable promissory note and lien.
- If located in a flood plain, the applicant must acquire flood insurance and comply with obligations to notify future owners of flood-insurance requirements.

In order to assist the most vulnerable populations with this disaster recovery funding, South Carolina intends to prioritize assistance for all housing programs based on the following criteria:

- **Individuals who are in the extremely low and very low income brackets;⁷³**
- **Persons with documented disabilities; and**
- **Age-dependent household members at the time of disaster or at the end of the application intake period (aged 65 or older, or 5 or below).**

⁷³ Applicants may review income limits for their household size by reviewing the table of income limits by county, available in the Appendix.

Priorities will be addressed as follows:

| | HOUSEHOLD'S AREA MEDIAN INCOME (AMI) CATEGORY | | | |
|--|---|--------------------|--------------------|---------------------|
| | 30% AMI or BELOW | 31% AMI to 50% AMI | 51% AMI to 80% AMI | 81% AMI to 120% AMI |
| Applicant's Household Includes <i>Both</i> Age Dependent (65 or older, 5 or younger) & Disabled, or Multiple Disabled Individuals | 1st Priority | 3rd Priority | 7th Priority | 10th Priority |
| Applicant's Household Includes <i>Either</i> Age Dependent (65 or older, 5 or younger) or Disabled | 2nd Priority | 4th Priority | 8th Priority | 11th Priority |
| Applicant's Household Includes <i>Neither</i> Age Dependent (65 or older, 5 or younger) or Disabled | 5th Priority | 6th Priority | 9th Priority | 12th Priority |

80% of the Hurricane Florence recovery efforts will be targeted to Dillon, Marion and Horry Counties since those counties have been designated by HUD as Most Impacted and Distressed (MID). Lower priority applicants in those counties may be served before higher priority applicants in other counties. For example, a fifth priority applicant in Marion County may be served before a first priority applicant that resides in Georgetown County, because a much larger portion of the program activities must go towards most impacted and distressed counties based on HUD requirements.

Basis for Calculating Housing Assistance Awards

If eligible and awarded, housing assistance award calculations are based on the following factors:

1. Damage/scope of project work needed;
2. Pre-disaster housing unit value;
3. A review of funding from all sources to ensure no Duplication of Benefits (DOB); and
4. DOB funds, if any, for use in the project.

Housing assistance awards will be determined after factoring in the inputs listed above, subtracting any unaccounted-for DOB, and then factoring in the pre-determined program assistance maximums that apply to the particular housing assistance activities to be used. Funds qualified as DOB may be required to be placed in escrow while assistance is provided. This process will follow guidance provided by: 21. Duplication of Benefits, pages 54 – 55 of 81 FR 39702 (2016).

If a determination is made during the process that the assistance awardee has a duplication of benefits, and the award is still on hand, the assistance awardee will be required to sign an escrow agreement with the Implementation Contractor. This agreement will require the assistance awardee to transfer all duplication of benefits funds to SCDRO. SCDRO will hold those funds until the construction is complete. Once construction is satisfactorily completed, SCDRO will give the applicant's DOB funds to the Implementation Contractor.

The State of South Carolina will not provide funds to individual citizens. The purpose of the State's program is to repair or replace housing stock throughout the disaster affected area. To that end, the State

will coordinate all construction activity being funded by the State's CDBG-DR allocation through the State's Implementation Contractor. The award maximums for each type of housing assistance are listed below:

- Single Family Housing unit (stick-built) repair/rehabilitation assistance awards: **up to \$50,000 in Housing Recovery Services;**
- **Manufactured Housing Unit (MHU) repair assistance awards – up to \$15,000 in Housing Recovery Services;**
- Single-wide Manufactured Housing Unit (MHU) replacement assistance awards – **up to \$68,000 in Housing Recovery Services;**
 - Exceptions to the cap for manufactured housing unit replacement are wheelchair-accessible units which will be approved at the cost of a standard unit plus an additional \$9,000 and septic system replacements;
- Double-wide Manufactured Housing Unit (MHU) replacement assistance awards – **up to \$95,000 in Housing Recovery Services;**
 - Exceptions to the cap for manufactured housing unit replacement are wheelchair-accessible units which will be approved at the cost of a standard unit plus an additional \$9,000 and septic system replacements;
- Modular or Stick-built Housing Unit replacement/substitution assistance awards – **up to \$135,000 in Housing Recovery Services;**
 - Exceptions to the cap for the reconstruction of a stick-built or modular home are wheelchair-accessible homes that will be approved at an additional cost of \$9,000 per home and septic system replacements; and
- Extremely limited temporary relocation assistance (case-by-case basis) for applicants in either single family stick-built or manufactured housing units– **up to \$5,000.**

The State's Implementation Contractor will conduct all construction activities. All construction work will be performed by contractors licensed by the State of South Carolina. All work must be completed to standards that meet applicable building codes. SCDRO defines "not suitable for rehabilitation" as an estimated rehabilitation cost that exceeds the replacement cost for that structure type.

Housing Recovery funds may be combined with in-kind assistance, such as labor and materials provided by VOADs. The total amount of assistance when considering in-kind and private assistance shall not be limited by the corresponding cap on Housing Recovery funds, as the caps are related to SCDRO program funds only.

In cases of severe demonstrable hardship, the State may consider funding difficult or unexpected repairs above and beyond the maximum awards. The State will use a Special Case Panel with members appointed by the SCDRO Program Management Director to evaluate and authorize projects that exceed the stated program limits.

Awards may include expenses for additional related costs such as elevation, insurance, ADA modifications or emergency repair of water or sewer connections. The State will address the access and functional needs

of individual citizens in all phases of the recovery process especially in the intake and housing repair or replacement phases.

Consideration will be made for citizens with communication limitations, disabilities, who are elderly, or have chronic medical disorders. Cost effective energy measures and improvements that meet Housing Quality Standards, especially those improvements which add enhanced resilience, such as elevation of major electrical components, roof-strapping, enhanced tie-downs and other items are also eligible. Lead-based paint abatement, asbestos abatement or other remediation components shall also be eligible.

A grantee of the State may choose to use pre-disaster value if the methodology is equitably applied. In addition, the State of South Carolina will allow any household to appeal its property valuation and provide rationale for why the valuation should be changed, should that household have reason to believe the valuation is incorrectly calculated because of historical inequity and/or other grounds.

VOAD Construction Activities

The State of South Carolina will procure an implementation contractor to execute the State's housing programs. To expedite the delivery of assistance, the implementation contractor will be required to supplement construction activities using Volunteer Organizations Active in the Disaster (VOADs) at every possible opportunity. All VOADs that meet insurance and licensing requirements will be provided with the opportunity to complete housing projects that match their capabilities.

The implementation contractor will provide VOADs with a list of construction-ready projects within the operation area served by the VOAD. The VOAD will have the option to select a project that best matches their capabilities without penalty for declining any projects. All projects that are completed by VOADs are required to meet all the same standards and quality requirements as all other projects completed by the implementation contractor.

Construction Warranties and Quality Appeals

South Carolina will provide assisted homeowners with a one-year warranty on the work performed and funded by the Single Family Housing Program. Applicants will have access to a quality appeals process to address any construction quality concerns identified by the homeowner during the construction process. Construction quality appeals will be verified by inspection and decided by SCDRO.

Flood Insurance and Elevation

South Carolina will implement resilient home construction standards based on sound, sustainable long-term recovery planning. South Carolina will follow HUD guidance to ensure all structures, defined at 44 CFR 59.1, designed principally for residential use and located in the 1 % annual (or 100-year) floodplain that receive assistance for new construction, repair of substantial damage, or substantial improvement, as defined at 24 CFR 55.2(b)(10), must be elevated with the lowest floor, including the basement, at least two feet above the 1 % annual floodplain elevation utilizing the advisory base flood elevation.

Property owners assisted through the recovery program will be required to acquire and maintain flood insurance if their properties are in a FEMA designated floodplain. This requirement is mandated to protect safety of residents and their property and the investment of federal dollars. The elevation height of a house can significantly reduce the cost of flood insurance. South Carolina will implement procedures and mechanisms to ensure that assisted property owners comply with all flood insurance requirements, including the purchase and notification requirements described below, prior to providing assistance.

South Carolina will ensure adherence to Section 582 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.

As a rule, the State will not provide assistance for flood insurance. In cases of hardship, the State may provide limited, temporary assistance for the provision of flood insurance in order to properly secure the federal investment in the property.

Elevation costs will be reviewed on case-by-case basis by the Special Case Panel to ensure that the cost of elevating a home during the rehabilitation is reasonable.

Demonstrable Hardship

South Carolina may consider exceptions to program policies for applicants who demonstrate undue hardship. Applicants in this situation will be reviewed to determine whether denial of program assistance further perpetuates circumstance attributing to such hardship. Demonstrable hardship may include but is not limited to prolonged job loss, substantial reduction to household income, death of a family member, unexpected and extraordinary medical bills, disability, etc.

Buyout Program (MID Only)

Applicants applying for assistance must have suffered documented damage to their housing units as a result of the September 2018 presidentially declared hurricane disaster. Such documentation may include an inspection report conducted by FEMA, SBA and/or a privately contracted inspector. The primary responsibility is on the citizen to prove that damage was caused by Hurricane Florence. In cases of demonstrable hardship or circumstances, the State may consider utilizing the implementation contractor to conduct an inspection to determine if the housing unit was damaged as a result of the September 2018 hurricane disaster. If the State does not believe the damage was a result of the hurricane disaster, the citizen may be referred to a volunteer organization active in the disaster (VOAD) for assistance and resource coordination.

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

- Applicant must own and have occupied real property located within the Dillon, Horry, or Marion counties for which FEMA Individual Assistance was approved for the September 2018 presidentially declared hurricane disaster area.
- The property must have documented damage as a result of the declared disaster.
- Applicant must provide evidence of primary residence at the location in which the applicant currently lives or lived at the time of the event and for which they are seeking assistance. Households are allowed alternative ways to document proof of primary residency. They can do so by one of the following options:
 - a. Any one of the following:
 - i. Proof of FEMA IA assistance;
 - ii. Federal income tax return showing their permanent home address,
 - iii. Government-issued identification issued prior to and expiring after impacted period; or
 - iv. Property tax homestead exemption.
 - b. By providing any two of the following:
 - v. Utility bills mailed to the property address;
 - vi. Vehicle registration or renewal at the address in the impacted period;
 - vii. Proof of government benefits received at least one month prior and one month after the impacted period; or
 - viii. Property insurance documents indicating the insured property as primary residence.
 - c. SCDRO may require an affidavit of primary residency under penalty of civil and criminal perjury which may be considered along with any other fact relating to primary residency.
- One person on the application with an ownership interest in part or in whole on the property must be able to demonstrate U.S. Citizenship or Lawful Permanent Residence.
- The property must be located within the FEMA-designated 100-year floodplain.

In order to assist the most vulnerable populations with this disaster recovery funding, South Carolina intends to prioritize assistance for the buyout program based on the following criteria:

- Individuals who are in the extremely low and very low income brackets;⁷⁴
- Persons with documented disabilities; and
- Age-dependent household members at the time of disaster or at the end of the application intake period (aged 65 or older, or 5 or below).

Priorities will be addressed as follows:

| HOUSEHOLD'S (AMI) AREA MEDIAN INCOME CATEGORY | | | | |
|---|------------------|--------------------|--------------------|---------------------|
| | 30% AMI or BELOW | 31% AMI to 50% AMI | 51% AMI to 80% AMI | 81% AMI to 120% AMI |
| Applicant's Household Includes Both Age Dependent & Disabled, or Multiple Disabled Individuals | 1st Priority | 3rd Priority | 7th Priority | 10th Priority |
| Applicant's Household Includes <i>Either</i> Age Dependent or Disabled | 2nd Priority | 4th Priority | 8th Priority | 11th Priority |
| Applicant's Household Includes Neither Age Dependent or Disabled | 5th Priority | 6th Priority | 9th Priority | 12th Priority |

Applicants participating in the buyout program will be identified during the Tier II environmental review conducted for the Single-Family Housing Program.

Maximum Assistance Amount

The maximum amount of CDBG-DR funding available for any single buyout is capped at \$250,000, including any additional incentives. Using CDBG-DR funds, the program provides property owners the pre-disaster fair market value of their home and may also include an incentive payment to encourage relocation to an area of reduced flood risk.

Eligible costs included in the buyout maximum assistance amount include the buyout purchase price, moving incentive up to \$5,000, and an LMI incentive up to \$25,000.

Exceptions

Buyouts that exceed the maximum award due to the appraised pre-disaster fair market value will be reviewed on a case-by-case basis and may be considered for an exception. Applicants may include their own appraisal to request an exception. These requests will be reviewed by the Special Case Panel (SCP), and the extenuating circumstances will be documented and approved on an as needed basis.

⁷⁴ Applicants may review income limits for their household size by reviewing the table of income limits by county, available in the Appendix.

Affordable Rental Program

The SCDRO will allocate \$1 million in funding for an Affordable Rental Program to repair and restore the availability of affordable rental stock in the disaster-declared counties. The program will provide up to \$50,000 in construction services to rental property owners for eligible activities including the rehabilitation and associated improvements, such as energy efficiency and resilience activities, of single-family stick-built rental properties.

Benefit to Low and Moderate Income (LMI) persons is the only National Objective that is approved for the Rental Program. In order to receive assistance, the property owner must agree to a five-year affordability requirement. The affordability requirement requires the property owner to lease the units to LMI households earning 80% or less of the AMI and to lease the units at affordable rents. Rents must comply with the maximum HUD HOME rent limits. The maximum HUD HOME rents are the lesser of⁷⁵:

- The fair market rent for existing housing for comparable units in the area as established by HUD under 24 CFR 888.111; or
- A rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65% of the AMI, as determined by HUD, with adjustments for number of bedrooms in the unit. The HOME rent limits provided by HUD will include average occupancy per unit and adjusted income assumptions.

The Affordable Rental Program will repair up to two units per rental property owner, with a \$50,000 cap each. SCDRO may consider repairs beyond the \$50,000 cap on a case-by-case basis.

Anti-displacement

The State plans to minimize displacement of persons or entities and assist persons or entities displaced as a result of implementing a project with CDBG-DR funds. This is not intended to limit the ability of the State to conduct buyouts or acquisitions for destroyed and extensively damaged units or units in a floodplain.

The State will ensure that the assistance and protections afforded to persons or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), and Section 104(d) of the Housing and Community Development Act of 1974 are available. The URA provides that a displaced person is eligible to receive a rental assistance payment that covers a period of 42 months. The State accepts the HUD waiver of the Section 104(d) requirements which assures uniform and equitable treatment by setting the URA and its implementing regulations as the sole standard for relocation assistance under FR-6182-N-01. The State will designate a URA specialist to ensure compliance with the Uniform Relocation Act (URA), where applicable.

⁷⁵ More information on HOME rents may be found at: <https://www.hudexchange.info/manage-a-program/home-rent-limits/>

Program Administration

Citizen Participation Plan

The State values citizen and stakeholder engagement. South Carolina has developed a Citizen Participation Plan in compliance with § 24 CFR 91.115 and applicable HUD requirements to set forth the policies and procedures applicable to citizen participation. This plan is intended to maximize the opportunity for citizen involvement in the planning and development of the South Carolina CDBG-DR recovery program.

In order to facilitate citizen involvement, South Carolina has laid out target actions to encourage participation and allow equal access to information about the program by all citizens. South Carolina intends to focus outreach efforts to facilitate participation from individuals of low and moderate income, those living in slum and blighted areas, those living in areas identified for recovery through CDBG-DR, non-English speaking persons, and other disadvantaged populations. SCDRO has consulted with local governments, public housing authorities, nongovernmental organizations, the private sector, and other stakeholders and affected parties in the disaster-impacted area to ensure this plan is consistent with regional redevelopment plans.

The State will publish its Action Plan in Spanish as well as English. In addition to citizen involvement, South Carolina encourages the participation of regional and State-wide institutions, especially Volunteer Organizations Active in the Disaster (VOADs).

South Carolina will consider any comments received in writing, via email, or via telephone. Additionally, to permit public examination and public accountability, South Carolina will make the above information available to citizens, VOADs, public agencies, and other interested parties upon request.

Public Outreach

Typically, South Carolina holds public hearings during Action Plan development to collect early input from citizens impacted by the disaster. Given the current COVID-19 pandemic, SCDRO has modified the approach to collecting public input and notifying the public about proposed activities. SCDRO has developed a presentation which outlines the programs and activities identified in the action plan. This presentation is available on the SCDRO website. Additionally, SCDRO will host telephonic conferences with any interested parties to discuss the plan prior to submission to HUD for approval. South Carolina has considered any comments or views of citizens received in writing and the responses to those comments are in the Appendix.

Individuals who required auxiliary aids or special assistance to view the presentation should contact the SCDRO (803-896-4068 or ContactSCDR@scdcr.sc.gov). Citizens with hearing impairment can call Relay South Carolina at 7-1-1 for assistance.

Public Notice and Comment Period

Notice of public comment period will be provided by publication on the South Carolina Disaster Recovery Office website. South Carolina will open the citizen comment period for the following timeframes:

- Comment period for the original Action Plan will take place for 30 days after the publication of the Action Plan to the SCDRO website.
- Comment period for Substantial Amendments will take place for 14 days after the publication of the Substantial Amendment to the SCDRO website.

Action Plan

The Action Plan defines how South Carolina will effectively use all available funding to support a data-driven recovery based on the calculation of unmet need across South Carolina. The Action Plan describes the State’s proposed allocation by activity and lays out program design for each area of assistance, as well as identifying the beginning and end dates for each disaster recovery activity, and performance and expenditure schedules.

Before South Carolina adopts the disaster recovery Action Plan, the State will seek public input on program design issues including the amount of assistance South Carolina expects to receive, the range of activities that may be undertaken, the estimated amount that will benefit persons of low-to-moderate income and plans to mitigate displacement.

A summary of all comments received will be included in the final Action Plan submitted to HUD for approval. The final Action Plan approved by HUD will be posted to the SCDRO website.

Amendments to the Action Plan

South Carolina will engage citizens throughout the program lifecycle to maximize the opportunity for input on proposed program changes that result in a Substantial Amendment. Program changes result in a Substantial Amendment when there is:

- An addition or deletion of any allowable activity described in the approved application;
- An allocation or re-allocation of more than \$5 million; or
- A change in planned beneficiaries.

Citizens will be provided with no less than 14 days to review and provide comment on proposed substantial changes. A summary of all comments received will be included in the final Substantial Amendment submitted to HUD for approval. Final Substantial Amendments approved by HUD will be posted to the Disaster Recovery website.

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

Performance Reporting

In accordance with HUD requirements, South Carolina will submit a Quarterly Performance Report (QPR) through the HUD Disaster Recovery Grant Reporting (DRGR) system no later than 30 days following the end of each calendar quarter. Within three days of submission to HUD, South Carolina will post each QPR on the SC Disaster Recovery Office website (<https://www.admin.sc.gov/SCDRO>). Program QPR’s will be posted on a quarterly basis until all funds have been expended and all expenditures have been reported.

Limited English Proficiency

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

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

As a result of initial population analysis, the Action Plan, any ensuing amendments, outreach materials and the application and related guidance materials will be published in both English and Spanish. When needed, the State will use an "I speak" visual chart containing a wide range of language samples for applicants to point to in request for specialized translation services.

Technical Assistance

Upon request, limited technical assistance will be provided by SCDRO program staff. Requests should be made in a timely manner and within the time parameters of the appropriate program design. The State may contract with a Technical Assistance Provider(s) should sufficient demand for technical assistance warrant. The State does not anticipate a significant demand for technical assistance because programs will be administered directly by the State, with no subrecipients or sub-grantees.

Citizen Complaint Procedures

The State of South Carolina will handle citizen complaints through a Constituent Services Team, which will act as the program's "Ombudsman." All complaints received by the State, its CDBG-DR Contractor, and/or other program sources, will be reviewed by the Constituent Services Team for investigation as necessary. The Constituent Services Team will ensure complaints are resolved, escalated to appropriate personnel if needed, and any necessary follow-up actions are completed.

The aim of the State will be to always attempt to resolve complaints in a manner that is both sensitive to the complainant's concerns and that achieves a fair result.

The goal of the State and its Constituent Services Team is to provide an opportunity to resolve complaints in a timely manner, usually within 15 business days, as expected by HUD, if practicable, and to provide the right to participate in the process and appeal a decision when there is reason for an applicant to believe their application was not handled according to program policies. All applications, guidelines, and websites will include details on the right to file a complaint or appeal, and the process for filing a complaint or beginning an appeal.

During the program's operations, decisions will be made on housing assistance applications and/or housing unit projects to be delivered. These decisions will be made based on applicable statutes, codes of federal regulation, State and local codes and ordinances, and program operational procedures, as each is interpreted by the State of South Carolina. During these activities, it is possible that citizens may decide they have a legitimate reason to appeal a decision. Applicants can appeal program decisions related to one of the following activities:

1. A program eligibility and/or priority determination;
2. A program assistance award calculation; and
3. A program decision concerning housing unit damage and the resulting program outcome.

Citizens may file a written complaint or appeal through the Disaster Recovery email (ContactSCDR@admin.sc.gov) or submit by postal mail to the following address:

Attention: Constituent Services
South Carolina Disaster Recovery Office, 632 Rosewood Drive, Columbia, SC 29201

South Carolina will make every effort to provide a timely written response within 15 working days of the receipt of complaint, where practicable. If the complainant is not satisfied by the Constituent Services' response, the complainant may file a written appeal by following the instructions issued in the letter of response. If at the conclusion of the appeals process the complainant has not been satisfied with the response, a formal complaint may then be addressed directly to the regional U.S. Department of Housing and Urban Development (HUD) at:

U.S. Department of Housing and Urban Development
1835 Assembly Street, 13th Floor, Columbia, SC 29201

State Outreach

During the development of this Action Plan, the State will conduct meetings with key regional stakeholders as well as the general public. The State has conducted meetings with county administrators, key legislators, public representatives and the VOADs throughout the development of the unmet needs assessment, projected budget, recovery activities and program administration as set forth in this Action Plan. In addition, the State's outreach efforts have been heavily informed by the socially vulnerable areas identified in the Unmet Needs Assessment. Outreach activities will be targeted towards this audience in order to ensure the most vulnerable populations receive enhanced focus.

Program Intake

An applicant intake center will be established in Marion County within 30 days of the implementation contractor and the State executing a contract for the Hurricane Florence CDBG-DR program. This intake center will accept applications for program participation for no less than 90 days. Additional outreach and application acceptance will be conducted through mobile intake centers throughout the Hurricane-affected area. All intake locations will have the capability to service citizens who have limited English speaking capabilities or require sign language.

Program Income

The State does not intend to implement any programs that generate income as described in 24 CFR 570.489. If program income is generated, income received prior to the grant closeout will be utilized as additional CDBG-DR funds in the same manner as other CDBG-DR funds referenced. Any income received after the grant closeout will be transferred to South Carolina's annual CDBG award. If program income is generated, SCDRO will input the amount of program income into DRGR on a quarterly basis. With the input of program income, the Project Budgets and Activity Budgets will also be updated. After the adjustments in DRGR have been made to account for program income, SCDRO will resubmit the DRGR Action Plan for HUD approval.

Pre-agreement Activities

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

The South Carolina Department of Administration (Admin) incurred pre-award costs and is seeking reimbursement for these costs that are reasonable and allowable under this regulation. Admin intends to recover the pre award costs consistent with the authority cited in this section. These costs include the cost for salary, employer fringe benefits, and direct operating cost for each employee based on their individual percentage of time spent on the planning of the CDBG-DR program, and the costs associated with the completion of the unmet needs assessment by a Disaster Metrics, LLC. The total pre-award costs accumulated by the SCDRO were \$72,407 as of July 1, 2020.

Certifications

The State of South Carolina hereby certifies that it currently has the capacity to carry out disaster recovery activities in a timely manner and the following:

- a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.
- b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. The grantee certifies that the Action Plan for Disaster Recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this Notice. The grantee certifies that activities to be administered with funds under this Notice are consistent with its Action Plan.
- d. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for in this Notice.
- e. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- f. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each local government receiving assistance from a State grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).
- g. Each State receiving a direct award under this Notice certifies that it has consulted with affected local governments in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including method of distribution of funding, or activities carried out directly by the State.
- h. The grantee certifies that it is complying with each of the following criteria:
 - (1) Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2018 and 2019 pursuant to the Robert T. Stafford Disaster Relief and emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).

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

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

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

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

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

(1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and

(2) A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

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

l. The grantee will not use grant funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the State, local, or tribal government or delineated as a special flood hazard area (or 100-year floodplain) in FEMA’s most recent flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the State,

local and tribal government land use regulations and hazard mitigation plan and the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

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

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

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

Appendix

2019 HUD Area Median Income Limits by County

| 2019 HUD Area Median Income Limits for South Carolina | | | | | | | | | | |
|---|------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| County Name | County AMI | % of AMI | 1 Person | 2 Person | 3 Person | 4 Person | 5 Person | 6 Person | 7 Person | 8 Person |
| Chesterfield County | 46,700 | 30% AMI | 12,490 | 16,910 | 21,330 | 25,750 | 28,250 | 30,350 | 32,450 | 34,550 |
| | | 50% AMI | 18,350 | 20,950 | 23,550 | 26,150 | 28,250 | 30,350 | 32,450 | 34,550 |
| | | 80% AMI | 29,300 | 33,500 | 37,700 | 41,850 | 45,200 | 48,550 | 51,900 | 55,250 |
| | | 120% AMI | 43,950 | 50,250 | 56,550 | 62,775 | 67,800 | 72,825 | 77,850 | 82,875 |
| Darlington County | 54,600 | 30% AMI | 12,490 | 16,910 | 21,330 | 25,750 | 29,200 | 31,350 | 33,500 | 35,650 |
| | | 50% AMI | 18,900 | 21,600 | 24,300 | 27,000 | 29,200 | 31,350 | 33,500 | 35,650 |
| | | 80% AMI | 30,250 | 34,600 | 38,900 | 43,200 | 46,700 | 50,150 | 53,600 | 57,050 |
| | | 120% AMI | 45,375 | 51,900 | 58,350 | 64,800 | 70,050 | 75,225 | 80,400 | 85,575 |
| Dillon County | 41,500 | 30% AMI | 12,490 | 16,910 | 21,330 | 25,750 | 28,250 | 30,350 | 32,450 | 34,550 |
| | | 50% AMI | 18,350 | 20,950 | 23,550 | 26,150 | 28,250 | 30,350 | 32,450 | 34,550 |
| | | 80% AMI | 29,300 | 33,500 | 37,700 | 41,850 | 45,200 | 48,550 | 51,900 | 55,250 |
| | | 120% AMI | 43,950 | 50,250 | 56,550 | 62,775 | 67,800 | 72,825 | 77,850 | 82,875 |
| Florence County | 62,000 | 30% AMI | 12,750 | 16,910 | 21,330 | 25,750 | 30,170 | 34,590 | 37,650 | 40,100 |
| | | 50% AMI | 21,250 | 24,300 | 27,350 | 30,350 | 32,800 | 35,250 | 37,650 | 40,100 |
| | | 80% AMI | 34,000 | 38,850 | 43,700 | 48,550 | 52,450 | 56,350 | 60,250 | 64,100 |
| | | 120% AMI | 51,000 | 58,275 | 65,550 | 72,825 | 78,675 | 84,525 | 90,375 | 96,150 |
| Georgetown County | 59,400 | 30% AMI | 12,500 | 16,910 | 21,330 | 25,750 | 30,170 | 34,500 | 36,850 | 39,250 |
| | | 50% AMI | 20,800 | 23,800 | 26,750 | 29,700 | 32,100 | 34,500 | 36,850 | 39,250 |
| | | 80% AMI | 33,250 | 38,000 | 42,750 | 47,500 | 51,300 | 55,100 | 58,900 | 62,700 |
| | | 120% AMI | 49,875 | 57,000 | 64,125 | 71,250 | 76,950 | 82,650 | 88,350 | 94,050 |

| County Name | County AMI | % of AMI | 1 Person | 2 Person | 3 Person | 4 Person | 5 Person | 6 Person | 7 Person | 8 Person |
|-----------------|------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| Horry County | 61,200 | 30% AMI | 12,850 | 16,910 | 21,330 | 25,750 | 30,170 | 34,590 | 37,950 | 40,400 |
| | | 50% AMI | 21,450 | 24,500 | 27,550 | 30,600 | 33,050 | 35,500 | 37,950 | 40,400 |
| | | 80% AMI | 34,300 | 39,200 | 44,100 | 48,950 | 52,900 | 56,800 | 60,700 | 64,650 |
| | | 120% AMI | 51,450 | 58,800 | 66,150 | 73,425 | 79,350 | 85,200 | 91,050 | 96,975 |
| Marion County | 41,600 | 30% AMI | 12,490 | 16,910 | 21,330 | 25,750 | 28,250 | 30,350 | 32,450 | 34,550 |
| | | 50% AMI | 18,350 | 20,950 | 23,550 | 26,150 | 28,250 | 30,350 | 32,450 | 34,550 |
| | | 80% AMI | 29,300 | 33,500 | 37,700 | 41,850 | 45,200 | 48,550 | 51,900 | 55,250 |
| | | 120% AMI | 43,950 | 50,250 | 56,550 | 62,775 | 67,800 | 72,825 | 77,850 | 82,875 |
| Marlboro County | 41,600 | 30% AMI | 12,490 | 16,910 | 21,330 | 25,750 | 28,250 | 30,350 | 32,450 | 34,550 |
| | | 50% AMI | 18,350 | 20,950 | 23,550 | 26,150 | 28,250 | 30,350 | 32,450 | 34,550 |
| | | 80% AMI | 29,300 | 33,500 | 37,700 | 41,850 | 45,200 | 48,550 | 51,900 | 55,250 |
| | | 120% AMI | 43,950 | 50,250 | 56,550 | 62,775 | 67,800 | 72,825 | 77,850 | 82,875 |

Milestones

| Program | QPR 1 | | QPR 2 | | QPR 3 | |
|-------------------------------|---------------------|-------------|---------------------|-------------|---------------------|-------------|
| | Oct-Nov-Dec 2020 | | Jan-Feb-Mar 2021 | | Apr-May-Jun 2021 | |
| | Projected | Actual | Projected | Actual | Projected | Actual |
| Single Family Housing Program | \$ 1,000,000 | | \$ 1,000,000 | | \$ 7,500,000 | |
| Buyout Program | \$ - | | \$ 2,000,000 | | \$ 1,000,000 | |
| Rental Repair Program | \$ - | | \$ - | | \$ - | |
| Planning | \$ 171,250 | | \$ - | | \$ - | |
| Program Administration | \$ 180,187 | | \$ 180,187 | | \$ 180,187 | |
| TOTAL | \$ 1,351,437 | \$ - | \$ 3,180,187 | \$ - | \$ 8,680,187 | \$ - |

| Program | QPR 4 | | QPR 5 | | QPR 6 | |
|-------------------------------|---------------------|-------------|---------------------|-------------|---------------------|-------------|
| | Jul-Aug-Sep 2021 | | Oct-Nov-Dec 2021 | | Jan-Feb-Mar 2022 | |
| | Projected | Actual | Projected | Actual | Projected | Actual |
| Single Family Housing Program | \$ 7,500,000 | | \$ 7,500,000 | | \$ 7,500,000 | |
| Buyout Program | \$ 1,000,000 | | \$ 1,000,000 | | \$ 2,000,000 | |
| Rental Repair Program | \$ 500,000 | | \$ 500,000 | | \$ - | |
| Planning | \$ 100,000 | | \$ - | | \$ - | |
| Program Administration | \$ 180,187 | | \$ 180,187 | | \$ 180,187 | |
| TOTAL | \$ 9,280,187 | \$ - | \$ 9,180,187 | \$ - | \$ 9,680,187 | \$ - |

| Program | QPR 7 | | QPR 8 | | QPR 9 | |
|-------------------------------|---------------------|-------------|---------------------|-------------|---------------------|-------------|
| | Apr-May-Jun 2022 | | Jul-Aug-Sep 2022 | | Oct-Nov-Dec 2022 | |
| | Projected | Actual | Projected | Actual | Projected | Actual |
| Single Family Housing Program | \$ 7,500,000 | | \$ 7,500,000 | | \$ 2,000,000 | |
| Buyout Program | \$ 2,000,000 | | \$ 1,000,000 | | \$ - | |
| Rental Repair Program | \$ - | | \$ - | | \$ - | |
| Planning | \$ 100,000 | | \$ - | | \$ - | |
| Program Administration | \$ 180,187 | | \$ 180,187 | | \$ 180,187 | |
| TOTAL | \$ 9,780,187 | \$ - | \$ 8,680,187 | \$ - | \$ 2,180,187 | \$ - |

| Program | QPR 10 | | QPR 11 | | QPR 12 | |
|-------------------------------|---------------------|-------------|---------------------|-------------|---------------------|-------------|
| | Jan-Feb-Mar 2023 | | Apr-May-Jun 2023 | | Jul-Aug-Sep 2023 | |
| | Projected | Actual | Projected | Actual | Projected | Actual |
| Single Family Housing Program | \$ 2,000,000 | | \$ 1,000,000 | | \$ 1,000,000 | |
| Buyout Program | \$ - | | \$ - | | \$ - | |
| Rental Repair Program | \$ - | | \$ - | | \$ - | |
| Planning | \$ 200,000 | | \$ - | | \$ 100,000 | |
| Program Administration | \$ 180,187 | | \$ 180,187 | | \$ 180,187 | |
| TOTAL | \$ 2,380,187 | \$ - | \$ 1,180,187 | \$ - | \$ 1,280,187 | \$ - |

| Program | QPR 13 | | QPR 14 | | QPR 15 | |
|-------------------------------|---------------------|-------------|---------------------|-------------|-------------------|-------------|
| | Oct-Nov-Dec 2023 | | Jan-Feb-Mar 2024 | | Apr-May-Jun 2024 | |
| | Projected | Actual | Projected | Actual | Projected | Actual |
| Single Family Housing Program | \$ 1,000,000 | | \$ 1,000,000 | | \$ 500,000 | |
| Buyout Program | \$ - | | \$ - | | \$ - | |
| Rental Repair Program | \$ - | | \$ - | | \$ - | |
| Planning | \$ - | | \$ 200,000 | | \$ 200,000 | |
| Program Administration | \$ 180,187 | | \$ 180,187 | | \$ 180,187 | |
| TOTAL | \$ 1,180,187 | \$ - | \$ 1,380,187 | \$ - | \$ 880,187 | \$ - |

| Program | QPR 16 | | QPR 17 | | QPR 18 | |
|-------------------------------|-------------------|-------------|-------------------|-------------|-------------------|-------------|
| | Jul-Aug-Sep 2024 | | Oct-Nov-Dec 2024 | | Jul-Aug-Sep 2025 | |
| | Projected | Actual | Projected | Actual | Projected | Actual |
| Single Family Housing Program | \$ 500,000 | | \$ - | | \$ - | |
| Buyout Program | \$ - | | \$ - | | \$ - | |
| Rental Repair Program | \$ - | | \$ - | | \$ - | |
| Planning | \$ 100,000 | | \$ 100,000 | | \$ 100,000 | |
| Program Administration | \$ 180,187 | | \$ 180,187 | | \$ 180,187 | |
| TOTAL | \$ 780,187 | \$ - | \$ 280,187 | \$ - | \$ 280,187 | \$ - |

| Program | QPR 19 | | QPR 20 | | Total |
|-------------------------------|-------------------|-------------|-------------------|-------------|---------------------|
| | Oct-Nov-Dec 2025 | | Jul-Aug-Sep 2026 | | |
| | Projected | Actual | Projected | Actual | |
| Single Family Housing Program | \$ - | | \$ - | | \$56,000,000 |
| Buyout Program | \$ - | | \$ - | | \$10,000,000 |
| Rental Repair Program | \$ - | | \$ - | | \$1,000,000 |
| Planning | \$ 100,000 | | \$ - | | \$1,471,250 |
| Program Administration | \$ 180,187 | | \$ 180,197 | | \$3,603,750 |
| TOTAL | \$ 280,187 | \$ - | \$ 180,197 | \$ - | \$72,075,000 |

SBA Loans by NAICS Code

| | NAICS Category | Loans for Structure and Operations | |
|--|--|------------------------------------|---------------|
| | | Total Approved | Total Awarded |
| | #N/A | \$81,500 | \$74,700 |
| | <i>All Other Professional, Scientific, and Technical Services</i> | \$3,300 | \$3,300 |
| | <i>Barber Shops</i> | \$2,300 | \$2,300 |
| | <i>Beauty Salons</i> | \$43,900 | \$57,800 |
| | <i>Claims Adjusting</i> | \$8,900 | \$8,900 |
| | <i>Convenience Stores</i> | \$25,000 | \$25,000 |
| | <i>Fitness and Recreational Sports Centers</i> | \$181,100 | \$166,000 |
| | <i>Flooring Contractors</i> | \$191,300 | \$150,000 |
| | <i>Flower, Nursery Stock, and Florists' Supplies Merchant Wholesalers</i> | \$6,600 | \$8,100 |
| | <i>Furniture Stores</i> | \$42,100 | \$42,100 |
| | <i>General Automotive Repair</i> | \$9,900 | \$9,900 |
| | <i>Hotels (except Casino Hotels) and Motels</i> | \$38,600 | \$38,600 |
| | <i>Landscaping Services</i> | \$189,500 | \$109,300 |
| | <i>Lessors of Nonresidential Buildings (except Mini-warehouses)</i> | \$56,200 | \$47,100 |
| | <i>Lessors of Residential Buildings and Dwellings</i> | \$921,600 | \$833,400 |
| | <i>Offices of Dentists</i> | \$47,900 | \$47,900 |
| | <i>Offices of Real Estate Agents and Brokers</i> | \$48,800 | \$48,800 |
| | <i>Other Building Equipment Contractors</i> | \$8,400 | \$8,400 |
| | <i>Other Direct Selling Establishments</i> | \$2,900 | \$2,800 |
| | <i>Other Similar Organizations (except Business, Professional, Labor, and Political Organizations)</i> | \$244,900 | \$244,900 |
| | <i>Religious Organizations</i> | \$1,266,800 | \$1,144,700 |
| | <i>Residential Remodelers</i> | \$25,600 | \$25,600 |
| | <i>Used Car Dealers</i> | \$112,500 | |
| | <i>Women's Clothing Stores</i> | \$3,500 | \$3,500 |
| | <i>Janitorial Services</i> | | \$69,100 |
| | <i>Total</i> | \$3,563,100 | \$3,172,200 |