

RICHLAND COUNTY

Community Development Block Grant Mitigation (CDBG-MIT)



Action Plan

PUBLISHED 2020



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SECTION 1. INTRODUCTION

On September 27, 2015, Hurricane Joaquin (Joaquin) developed over the Atlantic Ocean and strengthened into a Category 4 hurricane over the following several days. One of the largest storms to ever strike South Carolina, Joaquin brought historical rainfall and freshwater flooding throughout Richland County before dissipating on October 7, 2015. Unprecedented rainfall and the resulting 1,000 year flood event created major public safety threats and wrought considerable damage throughout the County including the destruction of homes, businesses, infrastructure, public facilities, and the impairment of the local and regional economy. On October 5, 2015, in response to these impacts, the President issued a major disaster declaration under the authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 United States Code (U.S.C.) 5121 et seq. (the “Stafford Act”).

\$21 million in CDBG-MIT Funding has been awarded to Richland County, South Carolina to

“...increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters”

In the wake of this historical flood event, Richland County immediately began the long and arduous process of rebuilding. Over the weeks and months that followed, Richland County departments, with support from numerous organizations and volunteers, undertook a series of critical emergency response and recovery efforts. Vast quantities of debris were removed from roads, streams, and property throughout the County while essential infrastructure including roads, utilities, and municipal facilities were repaired. Concurrently, public health and safety issues were identified and addressed including emergency sheltering, temporary housing, medical attention, provision of household necessities, drinking water protection, housing repairs, and counselling among many others. Despite these efforts, many of the storm’s impacts remained unaddressed throughout the County.

In response to the magnitude of remaining recovery needs, The U.S. Department of Housing and Urban Development (HUD) Secretary Julián Castro announced on February 29, 2016, that \$157 million in Community Development Block Grant Disaster Recovery (CDBG-DR) funds would be provided to South Carolina communities, including \$23.5 million to Richland County. These resources provided a critically important opportunity to continue recovery efforts in Richland County, and were intended to help to meet remaining unmet housing, economic development, and infrastructure needs that resulted from thousands of homes and small businesses being damaged or destroyed. While the road to long-term recovery continues, apprehension and concern looms over Richland County because of the uncertainty and unpredictability of impacts from future storms and flooding events caused by climate change that could ultimately reverse these recovery efforts.

Hurricane Irma in 2017, Hurricane Michael in 2018, and Hurricane Dorian in 2019 represent recent examples of storms that created uncertainty within Richland County as the State of South Carolina incurred significant expense for evacuation efforts and debris removal operations while neighboring states sustained major damages. While Richland County received mild rain, others were severely impacted multiple times. Even after the storm, Richland County along with other communities faced uncertainty about the possibility of severe flooding as the deluge of water made its way to the Atlantic Ocean. Thus, to a large extent, the greatest impact of these declared storms were their destabilizing effects and unpredictability. Despite advances in meteorology, the destructive path of a storm and the associated damage left in its wake are oftentimes indeterminable due its volatility and instability until the aftermath has already occurred.

However, stability can be achieved through mitigating future storm damage. While it remains difficult to predict when or where a storm will occur, Richland County does know which areas are likely to experience the most



damage. With the appropriate funds, Richland County can target these areas for mitigation projects that will improve resiliency for individual households, neighborhoods, and communities.

In February 2018, Congress passed Public Law 115-123 to address resiliency by enabling the Department of Housing and Urban Development (HUD) to administer and award no less than \$12 billion in mitigation grants to previous CDBG-DR grant recipients impacted by disasters from 2015, 2016, and 2017. Subsequently, in August 2019, HUD allocated \$6.875 billion in Community Development Block Grant Mitigation (CDBG-MIT) funds, including \$21,864,000 in CDBG-MIT funds for Richland County intended to

“... increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.”

Richland County, South Carolina has prepared this Action Plan as required by HUD to guide the expenditure of \$21,864,000 in CDBG-MIT funding and establish how the County will allocate its funds through its mitigation programs. This includes the proposed use of funds, criteria for eligibility, and how funds will address long-term mitigation throughout the County. The Mitigation Needs Assessment, which evaluates the risk profiles of the Richland County and HUD-defined Most Impacted and Distressed areas, the critical lifelines potentially at risk in those areas, and the social vulnerability of the target area, forms the basis for the decisions outlined in the Method of Distribution. This Action Plan was developed with the help of many state and local stakeholders as well as the public to target the greatest mitigation needs that can be addressed by these limited federal funds.

Planning, Coordination, and Consistency

Richland County developed this Action Plan with the participation and support of several County departments, and community and stakeholder organizations, as well as coordination with relevant federal, state, and local entities, such as the University of South Carolina Hazards and Vulnerability Research Institute, the State of South Carolina Disaster Recovery Office, City of Columbia, and Lexington County. While Richland County is the primary entity responsible for management of CDBG-MIT funding, these participating organizations were essential partners and provided information throughout the planning process and also helped ensure consistency with other local and regional planning efforts. The programs and activities outlined within this Action Plan have been designed to be consistent with key planning documents including:

- Richland County Comprehensive Plan
- Richland County CDBG Consolidated Plan
- Richland County CDBG-DR Action Plan
- Richland County 25-Year Roadmap and Stormwater Management Plan
- Richland County Capital Improvement Plan
- State of South Carolina Hazard Mitigation Plan



Richland County worked with two key groups throughout the development of this Action Plan, including the Richland County Mitigation Working Group (Working Group), and the Blue Ribbon Advisory Committee (Advisory Committee). These groups brought a wealth of local knowledge and resources to the process and assisted with the development of the most effective mitigation programs. These groups fostered collaboration, ensured regional consistency, and promoted stakeholder engagement throughout the development of this Action Plan. Coordination with each of these groups also allowed Richland County to establish open communication channels and relationships that will support implementation of mitigation activities. Each group is described below.

Richland County Disaster Recovery Working Group

The Richland County Disaster Recovery Working Group (Working Group) provided oversight and strategic direction throughout the preparation of this Action Plan. The Working Group consisted of representatives of the following County departments:

- Richland County Administration
- Richland County Clerk of Council
- Richland County Legal Department
- Richland County Emergency Services Department
- Richland County Community Planning and Development Department
- Richland County Finance Department
- Richland County Public Works Department
- Richland County Procurement Department
- Richland County Public Information Office

The Working Group participated in meetings on at least a bi-weekly basis during the plan development and were responsible for helping to provide historical and local context to the disaster and any related data and information relevant to their areas of responsibility. The Working Group offered guidance related to their field of expertise, assistance with public outreach, and participation in the development of programs and projects funded through the CDBG-MIT program.

The Working Group also provided assistance to ensure that mitigation activities are feasible and consistent with other local and regional efforts. When establishing goals and identifying mitigation programs and projects, the Richland County Work Group verified consistency with other planning and related departmental efforts.

Richland County Blue Ribbon Advisory Committee

The Blue Ribbon Advisory Committee (Advisory Committee) consists of local stakeholders who form a diverse and knowledgeable representation of the County and its local communities. The Advisory Committee operated in an advisory capacity for the Working Group and County Council. The Advisory Committee included representatives from several stakeholder groups including:

- Richland County Government Officials
- Richland County municipalities
- Gills Creek Watershed Association
- Sustainable Midlands
- Conservation Commission
- United Way of the Midlands
- South Carolina Disaster Recovery Office
- Lower Richland County
- Underserved Populations



SECTION 2. MITIGATION NEEDS ASSESSMENT

Community Profile and Impact Overview

The October 2015 severe storm and flooding disaster (DR-4241) is the county's most significant hazard event since 2000. Richland County received \$23.5 million in HUD CDBG-DR funds to assist in longer-term recovery. The county estimated a total of \$194.1 million in unmet housing needs based on its CDBG-DR Action Plan. Many of the housing structures were outside of designated floodplains and lacked flood insurance, many residents received only minimal federal assistance or were denied completely, and some of the storm-related impacts were discovered after assistance deadlines had passed.¹

The entire county qualifies as a most impacted and distressed county according to the HUD CDBG-MIT guidelines as published in the Federal Register Notice.² Within Richland County, there are 118 census block groups (48% of the total) where the number of LMI individuals are more than 50% of the total population in that block group. The LMI areas are concentrated in the city of Columbia, in and around the municipality of Irmo, and in the southern third of the county (Lower Richland). According to the CDBG-DR Action Plan, 67% of the total losses in floodplains occurred in the LMI areas, while around 38% of the damaged homes in floodplains were in areas with primarily LMI households, the majority of which were single-family homes (81%).³

Profile Updates

South Carolina is vulnerable to a wide range of both natural and non-natural hazards of varying likelihoods and consequences. Among the hazards that affect South Carolina, wildfire is the most frequently experienced natural hazard in the state and landslides the least.⁴ The state is diverse with regional and county variability in social, economic, and infrastructural conditions. This means that given the same event magnitude, some areas may experience greater impacts based on their risks and vulnerabilities than other counties. For example, from 2000-2018, South Carolina accumulated more than \$1.7 billion in hazard event losses, and Richland County accounted for 2.5% of the state's losses, or more than \$44 million.⁵ The total losses for the state were primarily from hurricanes and flooding, followed by tornadoes and wildfires, while Richland County's losses were mostly from flooding. Statewide, the per capita property losses since 2000 are \$73.61, while in Richland it is about \$1.80.⁶ In

¹ Richland County, 2016. *Community Development Block Grant Disaster Recovery (CDBG-DR) Action Plan*. Accessed on February 7, 2020.

http://www.richlandcountysc.gov/Portals/0/Departments/PublicInformationOffice/Flood%20Recovery%20Webpage/Richland%20Cty_CDBG_DR_Initial%20Action%20Plan_Approved.pdf

² Department of Housing and Urban Development, 2019. Allocations, Common Application, Waivers, and Alternative Requirements for community Development Block Grant Mitigation Grantees, Docket No. FR-6109-N-02, *Federal Register Notice* 84, no. 169, August 30, 2019: 45838. Accessed February 8, 2020. <https://www.govinfo.gov/content/pkg/FR-2019-08-30/pdf/2019-18607.pdf>

³ Richland County, *pandoraNote 1*, page 15.

⁴ State of South Carolina, 2018. *South Carolina Hazard Mitigation Plan, October 2018 Update*. Accessed on February 7, 2020. <https://www.scemd.org/media/1391/sc-hazard-mitigation-plan-2018-update.pdf>

⁵ Hazards & Vulnerability Research Institute, 2020. Computed property and crop losses from 2000-2018 from Spatial Hazard Events and Loss Database (SHELDUS) v. 18.1. Accessed on February 7, 2020, <https://sheldus.org>

⁶ Ibid.



other words, the overall impact of natural hazard losses in the county is significantly less than the state average over the same period. However, a single flood event (the 2015 flooding) accounted for \$32 million in losses, representing 74% of the total property losses from natural hazards for the county since 2000.⁷

County Hazard Risk Scores

The county hazard risk scores are from the annual probabilities for each hazard for each county as identified in the South Carolina Hazard Mitigation Plan 2018.⁸ For each hazard, the county with the highest annual likelihood for that hazard received a score of 1.00 and the county with the lowest received a score of 0.00. The remaining counties scaled accordingly depending on where their values were relative to the highest and lowest counties.

The hazard scores originally appearing in the State Hazard Mitigation Plan, October 2018 Update were adjusted to include the likelihood of flooding, flash flooding, and liquefaction potential, and exclude hazmat scores. Relative to the other counties in the state, Richland County, with a hazard risk score of 7.58, ranks 6th in highest total hazard scores based on future annual probability, after Berkeley (9.61), Charleston (8.86), Orangeburg (8.81), Dorchester (7.85), and Horry (7.77) counties (Table 1). The greatest hazards in Richland County compared with the rest of the state are from flash flooding, extreme heat, fog, severe storms, droughts, and tornados.

Table 1 Hazard Risk Scores modified from South Carolina Hazard Mitigation Plan, 2018*

HAZARD SCORE BASED ON FUTURE ANNUAL PROBABILITY OF HAZARD BY COUNTY (Values Min-Max Normalized)																	
County	Hazard Risk Score	Drought	Earthquake	Extreme Cold	Extreme Heat	Flash Flood	Flood	Fog	Hail	Lightning	Liquefaction	Severe Storm	Tornado	Tropical Cyclones	Wildfire	Wind	Winter Weather
Richland	7.58	0.71	0.07	0.58	0.92	0.94	0.07	0.81	0.44	0.42	0.09	0.71	0.70	0.25	0.22	0.52	0.13
Abbeville	4.30	0.97	0.05	0.42	0.15	0.38	0.07	0.41	0.12	0.04	0.00	0.61	0.35	0.05	0.12	0.15	0.40
Aiken	7.48	0.82	0.07	0.27	1.00	0.40	0.08	0.79	0.38	0.61	0.13	0.37	0.87	0.25	0.57	0.43	0.45
Allendale	5.66	0.78	0.00	0.27	0.91	0.27	0.15	0.99	0.00	0.12	0.24	0.63	0.35	0.25	0.00	0.39	0.30
Anderson	6.08	0.85	0.00	0.56	0.10	0.79	0.08	0.48	0.47	0.15	0.00	0.91	0.78	0.05	0.08	0.22	0.56
Bamberg	5.50	0.67	0.00	0.21	0.75	0.30	0.11	0.89	0.10	0.15	0.19	0.90	0.52	0.25	0.07	0.41	0.00
Barnwell	5.88	0.80	0.07	0.30	0.97	0.16	0.06	0.85	0.09	0.28	0.18	0.63	0.30	0.25	0.08	0.41	0.45
Beaufort	6.84	0.35	0.02	0.08	0.34	0.28	1.00	0.99	0.24	0.33	0.96	0.78	0.52	0.40	0.17	0.33	0.04

⁷ Ibid.

⁸ State of South Carolina, Note 4, Table 4.T.4 page 201.



Berkeley	9.61	0.26	0.20	0.14	0.48	0.70	0.29	1.00	0.75	1.00	0.50	0.90	0.87	0.70	0.89	0.50	0.43
Calhoun	5.05	0.65	0.00	0.22	0.86	0.24	0.10	0.82	0.11	0.13	0.16	0.57	0.22	0.30	0.09	0.50	0.09
Charleston	8.86	0.19	0.07	0.00	0.13	0.99	0.93	1.00	0.64	0.62	0.98	0.77	0.70	0.80	0.23	0.46	0.35
Cherokee	4.36	0.87	0.00	0.92	0.01	0.62	0.06	0.19	0.22	0.00	0.00	0.68	0.13	0.05	0.09	0.09	0.43
Chester	4.82	0.86	0.02	0.75	0.22	0.50	0.06	0.34	0.16	0.10	0.00	0.80	0.30	0.15	0.06	0.17	0.31
Chesterfield	6.17	0.50	0.00	0.51	0.68	0.35	0.10	0.81	0.18	0.41	0.12	0.63	0.26	0.25	0.38	0.78	0.21
Clarendon	6.83	0.32	0.00	0.30	0.72	0.21	0.26	0.91	0.23	0.44	0.15	0.70	0.61	0.35	0.54	0.67	0.43
Colleton	6.93	0.54	0.00	0.07	0.64	0.28	0.38	0.96	0.26	0.59	0.41	0.90	0.35	0.50	0.64	0.41	0.01
Darlington	6.29	0.38	0.02	0.43	0.65	0.58	0.10	0.81	0.20	0.28	0.27	0.43	0.48	0.35	0.35	0.89	0.06
Dillon	4.92	0.20	0.02	0.36	0.31	0.54	0.25	0.72	0.10	0.10	0.26	0.00	0.22	0.50	0.15	1.00	0.18
Dorchester	7.85	0.45	1.00	0.05	0.47	0.62	0.26	0.91	0.37	0.36	0.55	1.00	0.30	0.45	0.31	0.43	0.32
Edgefield	4.40	0.87	0.07	0.27	0.79	0.34	0.00	0.68	0.07	0.10	0.02	0.13	0.30	0.20	0.03	0.28	0.27
Fairfield	5.80	0.87	0.09	0.61	0.64	0.18	0.08	0.56	0.13	0.22	0.00	0.80	0.78	0.20	0.15	0.35	0.15
Florence	7.18	0.26	0.00	0.27	0.51	0.66	0.16	0.78	0.32	0.47	0.21	0.47	0.52	0.60	0.64	0.89	0.41
Georgetown	7.13	0.00	0.00	0.15	0.23	0.00	0.61	0.98	0.16	0.62	1.00	0.65	0.43	0.95	0.33	0.72	0.29
Greenville	7.20	0.85	0.07	0.89	0.00	1.00	0.04	0.28	1.00	0.25	0.00	0.95	0.35	0.05	0.09	0.37	1.00
Greenwood	4.47	0.94	0.02	0.43	0.43	0.60	0.05	0.56	0.20	0.02	0.00	0.39	0.22	0.15	0.14	0.13	0.19
Hampton	5.11	0.63	0.00	0.08	0.64	0.24	0.25	1.00	0.02	0.27	0.32	0.62	0.13	0.30	0.22	0.39	0.00
Horry	7.77	0.08	0.00	0.17	0.03	0.56	0.29	0.92	0.86	0.84	0.96	0.04	0.39	1.00	0.48	0.96	0.21
Jasper	6.30	0.56	0.00	0.02	0.48	0.31	0.62	0.99	0.03	0.44	0.80	0.78	0.09	0.35	0.48	0.35	0.00
Kershaw	6.26	0.66	0.02	0.45	0.80	0.25	0.22	0.84	0.24	0.33	0.19	0.57	0.48	0.25	0.31	0.63	0.03
Lancaster	5.40	0.66	0.02	0.45	0.45	0.63	0.11	0.72	0.17	0.11	0.00	0.78	0.13	0.20	0.07	0.46	0.44
Laurens	5.39	0.90	0.02	0.66	0.41	0.45	0.05	0.49	0.30	0.14	0.00	0.91	0.30	0.10	0.09	0.17	0.40
Lee	4.70	0.38	0.00	0.28	0.66	0.26	0.13	0.86	0.07	0.13	0.17	0.43	0.09	0.25	0.20	0.76	0.05
Lexington	7.23	0.70	0.00	0.34	0.79	0.60	0.19	0.68	0.57	0.35	0.08	0.59	0.61	0.25	0.64	0.50	0.34
Marion	5.15	0.16	0.00	0.19	0.21	0.39	0.47	0.92	0.10	0.20	0.52	0.10	0.00	0.70	0.06	0.93	0.20
Marlboro	5.84	0.34	0.05	0.52	0.65	0.51	0.22	0.77	0.08	0.19	0.26	0.45	0.13	0.45	0.19	0.98	0.10



McCormick	4.01	1.00	0.07	0.38	0.62	0.26	0.19	0.49	0.02	0.00	0.00	0.13	0.30	0.15	0.02	0.17	0.21
Newberry	5.64	0.87	0.07	0.57	0.57	0.40	0.09	0.61	0.12	0.11	0.00	0.61	0.74	0.20	0.04	0.28	0.34
Oconee	5.08	0.73	0.09	0.98	0.04	0.38	0.12	0.46	0.45	0.13	0.00	0.41	0.74	0.00	0.06	0.33	0.16
Orangeburg	8.81	0.69	0.02	0.25	0.79	0.51	0.16	0.92	0.42	0.82	0.20	1.00	1.00	0.35	0.74	0.50	0.43
Pickens	5.52	0.72	0.02	1.00	0.04	0.61	0.02	0.43	0.33	0.05	0.00	0.80	0.48	0.05	0.10	0.35	0.53
Saluda	4.57	0.85	0.00	0.38	0.66	0.56	0.06	0.68	0.10	0.04	0.00	0.22	0.13	0.25	0.04	0.28	0.33
Spartanburg	6.85	0.87	0.07	0.93	0.27	0.86	0.02	0.41	0.78	0.27	0.00	0.95	0.43	0.05	0.10	0.26	0.57
Sumter	6.55	0.46	0.00	0.30	0.84	0.63	0.21	0.87	0.24	0.37	0.19	0.56	0.43	0.30	0.39	0.70	0.05
Union	4.67	0.87	0.00	0.82	0.31	0.46	0.04	0.33	0.17	0.04	0.00	0.62	0.43	0.20	0.05	0.09	0.24
Williamsburg	6.90	0.11	0.00	0.31	0.53	0.20	0.21	0.96	0.15	0.63	0.23	0.69	0.17	0.55	1.00	0.72	0.44
York	4.61	0.85	0.00	0.91	0.06	0.74	0.08	0.00	0.35	0.13	0.00	0.56	0.30	0.10	0.05	0.00	0.47

Identified Hazards in County Mitigation Plan

There are nine significant hazards identified in Richland County's Hazard Mitigation Plan (Table 2). Severe weather (thunderstorms including lightning, wind, hail, and heavy rain) and associated flooding (flash flooding and riverine flooding) are the major hazards of concern. Localized heavy precipitation (flooding smaller creeks and tributaries to the Broad, Saluda, and Congaree Rivers) and flash flooding (due to inadequate drainage) affect most of the county. Small pond dam failures (brought to light in the 2015 flooding where 16 dams in the county failed) also pose serious flooding risks, especially given the poor maintenance and structural deficiencies on the existing dams which have not been addressed since the 2015 floods (there are roughly 113 privately owned small pond or recreational dams). As noted in the mitigation plan with reference to future climate change, "... the frequency and possible damage from thunderstorms and other meteorological and hydrological hazards is very likely to increase."⁹

Table 2 Hazards Identified in Richland County in the State Hazard Mitigation Plan

County	Flood	Hurricanes and Coastal Storms	Severe Storms, Tornadoes and Lightning	Wildfire	Drought/Extreme Heat	Winter Storms and Freezes	Hail	Erosion	Dam/Levee Failure	Earthquake	Tsunami	Other Hazards*
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⁹ Central Midlands Council of Governments, 2016. *An All Natural Hazard Risk Assessment and Hazard Mitigation Plan for the Central Midlands Region of South Carolina, 2016 Update*. Quote from p. 343. Accessed February 9, 2020, <http://www.centralmidlands.org/pdf/CMHMP%202016%20-%20Final.pdf>



Richland	X	X	X	X	X	X	X		X	X		X
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*Fog, wind

Source: South Carolina Hazard Mitigation Plan 2018 Update

Social Vulnerability

Following South Carolina’s Hazard Mitigation Plan and South Carolina’s Recovery Action Plan, we used the Social Vulnerability Index (or SoVI®) to define the most vulnerable populations within the county. SoVI® is a well-established and oft-cited metric used to highlight the geographic differences in relative vulnerability to environmental hazards at census tract to county scales.¹⁰ SoVI® synthesizes 29 socioeconomic variables that decades of research suggest contribute to a community’s ability (or uneven capacity) to prepare for, respond to, and recover from hazards. When examined in conjunction with specific hazards, it helps to identify the areas with the greatest physical impact from hazards, and those containing the most vulnerable populations.

The SoVI® was updated from the 2010-14 version used in the State Mitigation Plan. The SoVI® 2017 produced for the HUD CDBG-MIT plan includes the most recent five-year data from the U.S. Census American Community Survey (2013-17) for the entire state and then mapped to show the county (Figure 1 left). The panel on the right shows the changes in social vulnerability from 2010-14 to 2017 highlighting areas that have become more vulnerable. The Fort Jackson census tract is not included because of poor quality census data for some of the variables.

¹⁰ See <http://sovi.org> for information about the construction of SoVI® and its use in practice and in research.

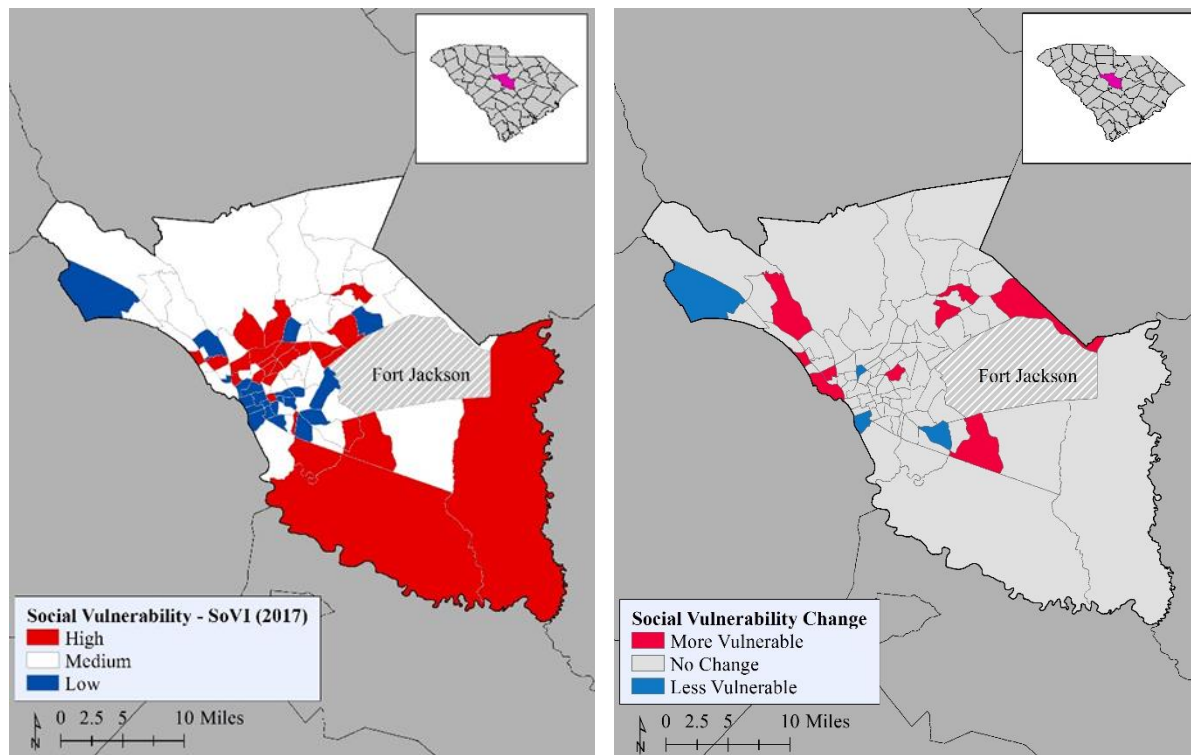


Figure 1 Social Vulnerability for the Richland county (by Census Tracts) (left) and changes in vulnerability from the 2010-14 to the 2017 SoVI® (right)

The majority of census tracts are in the medium vulnerability category, which also contain most of the county's population and housing units (Table 3). However, there are roughly 96,000 residents in tracts defined as highly socially vulnerable and these are concentrated in the rural southern portions of the county and in the more urbanized tracts north of downtown Columbia.

Table 3 - Social Vulnerability Category (SoVI 2017) – Without Ft. Jackson (Census Tract 9801)

	High	Medium	Low
Number of Tracts	26	40	22
Population	95532	224259	84840
Housing Units	40395	91141	30114

Another indicator of vulnerable populations in the county beyond its social vulnerability is the at-risk electricity-dependent population among Medicare beneficiaries who require life-dependent medical and durable medical equipment such as ventilators and oxygen concentrators. Such populations are severely at risk during prolonged power outages caused by severe weather, flooding, and tropical storms and hurricanes, as recent studies and disasters have shown.¹¹ The emPower Program of the Assistant Secretary for Preparedness and Response (ASPR)

¹¹ C. Dominianni et al., 2018. Power outage preparedness and concern among vulnerable New York City residents, *J. Urban Health* 95(5): 716-726; A. Issa, 2018. Deaths related to Hurricane Irma-Florida, Georgia, and North Carolina, September 4-



at Health and Human Services (HHS) provides geospatial data on such beneficiaries to assist in preparedness, response, and recovery in emergencies at the local level.¹² Within the county, there are 59,026 Medicare beneficiaries, with 2,233 designated as electricity-dependent. These populations are concentrated in the northern half of the county (Table 4) and highlight a different type of vulnerable population.

Table 4 At-risk Medicare beneficiaries based on electricity-dependent medical equipment need

Zipcode	Beneficiaries	Electricity Dependent	Percentage Electricity Dependent
29016	3,609	105	4.0
29044	1,241	55	4.4
29052	491	14	2.8
29061	2,642	126	4.8
29063	5,142	181	3.5
29201	2,325	62	2.7
29203	7,607	342	4.5
29204	3,628	162	4.5
29205	3,342	115	3.4
29206	3,530	118	3.3
29207	22	0	0
29208	11	0	0
29209	5,666	195	3.4
29210	5,044	213	4.2
29223	8,765	318	3.6
29229	5,961	227	3.8

Mapping Hazard Zones and Vulnerability

The hazard zones for Richland County depicted in the map series below also include a short summary for each. The hazards data are from the South Carolina Hazard Mitigation Plan 2018—the most recent available. Where appropriate, and depending on the hazard type, the geographic variability in the hazard exposure is shown by hexagon grids of equal size to reduce the visual impact of the different sized census block groups and tracts as shown in the State’s Hazard Mitigation Plan. However, in order to merge the vulnerability data and calculate risk scores for each census tract (the unit of analysis for CDBG-MIT), hazards were summarized by taking the average of hexagon grid values within each census tract. In order to compare across diverse hazards using the same data classification values, we defined our mapping categories using standard deviations from the mean so that we could preserve the underlying distribution of the data.¹³ The color shading from light to dark hues represents low, medium, and high risk for each of the hazards.

October 10, 2017, *Morbidity and Mortality Weekly Report (MMWR)* 67(30): 829-832
(<https://www.cdc.gov/mmwr/volumes/67/wr/mm6730a5.htm>)

¹² See <https://empowermap.hhs.gov/>

¹³ The hazard risk was classified using 0.5 standard deviations from the mean (the mid-point in the distribution). The lighter shading represents cases that are less than the average (<-0.5 std. dev or 33% of the cases), while the darker shading on the



The bi-variate maps illustrate where the hazard risk scores intersect with social vulnerability. The areas with high social vulnerability and high hazard risk scores are shaded red. Areas with low risk scores and low social vulnerability are shaded in light blue.

The bi-variate maps illustrate where the hazard risk scores intersect with the social vulnerability. Those areas with high social vulnerability and high-risk scores are shaded red. Areas with low risk scores and low social vulnerability are shaded in light blue.

Major Hazards of Concern

Given the recent disaster experience in South Carolina and in Richland County, we highlight the climate-sensitive hazards related to flooding, severe storms, and hurricane/tropical storm systems, beginning with flood risk. All of the data are from the State Hazard Mitigation Plan 2018 Update –the most recent available.

Flood Risk (Riverine)

According to the South Carolina State Hazard Mitigation Plan 2018,¹⁴ about 75% of presidential disaster declarations in the state relate to hurricanes and flooding. The most significant of the presidential declared disasters to affect Richland County since Hurricane Hugo was the 2015 severe storms and flooding directed related to Hurricane Joaquin. Riverine flooding is described in this section, followed by a section on flash floods, due to the difference in the nature of the flooding hazard itself. The riverine flooding events typically occur in floodplains, delineated by the frequency of the floodwaters that would cover the area. The delineations for the 100-year and 500-year flood define the exposure to the flooding risk. The inundation from the 2015 floods was added to the map, as it exceeded the 500-year flood delineation in many areas.¹⁵

Figure 2 illustrates the riverine flood risk in the county based on designated flood zones and the inundation in 2015. When combined they show an overall flood risk. Further, when the social vulnerability of the population is added, the map shows where the flood risk and most socially vulnerable populations intersect (bottom panel).

map represents cases greater than the average (>0.5 std. dev or 33% of the cases). Approximately 34% of the cases are between the mean and 0.5 std. dev on either side of it (-0.5 to $+0.5$ std. dev).

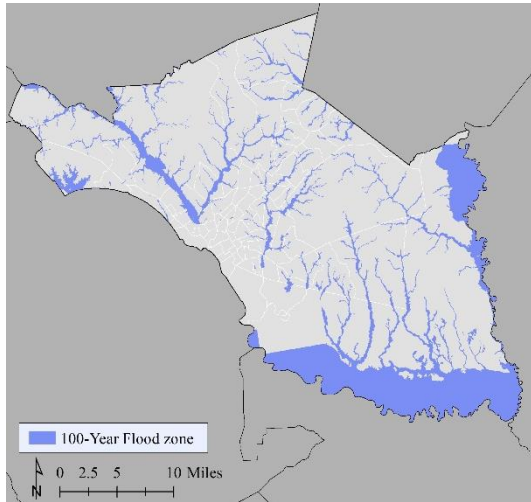
¹⁴ State of South Carolina, Note 4.

¹⁵ Musser, J.W., Watson, K.M., Painter, J.A., and Gotvald, A.J., 2016, *Flood-inundation maps of selected areas affected by the flood of October 2015 in central and coastal South Carolina*: U.S. Geological Survey Open-File Report 2016–1019, 81 p., <http://dx.doi.org/10.3133/ofr20161019>.

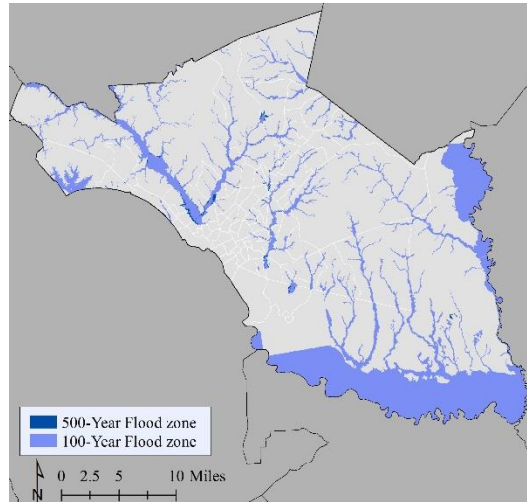


Flood Risk (Riverine)

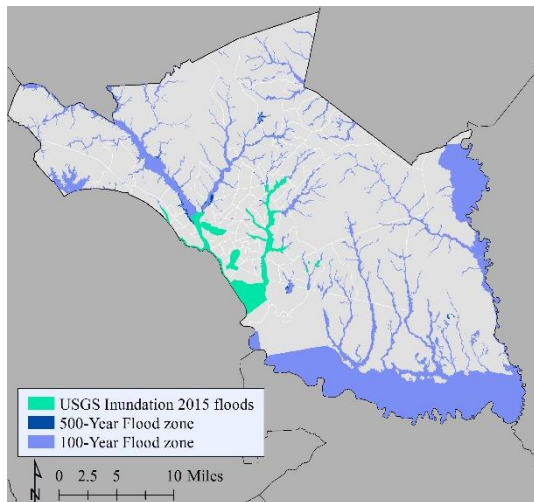
100-year flood



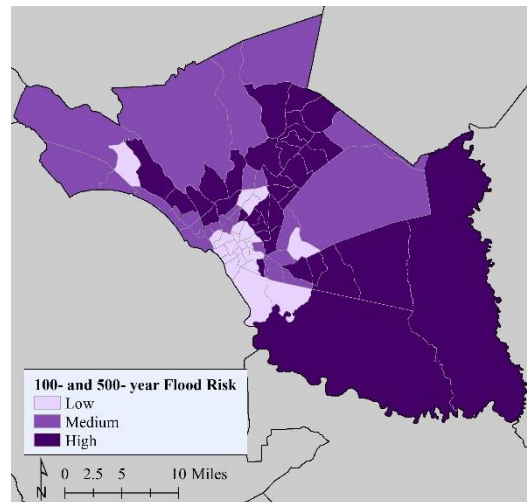
100 and 500-year flood



2015 floods



2015 floods, 100 and 500-year flood





Flood Risk (Riverine)

Flood risk (Riverine) (bivariate map)

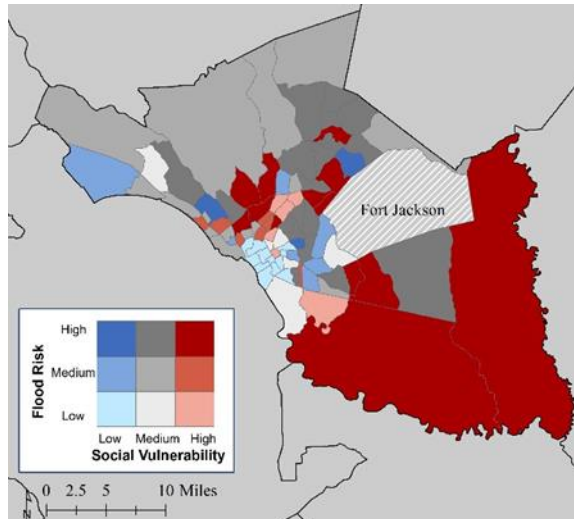


Figure 2 Flood Risk (Riverine) and Vulnerability

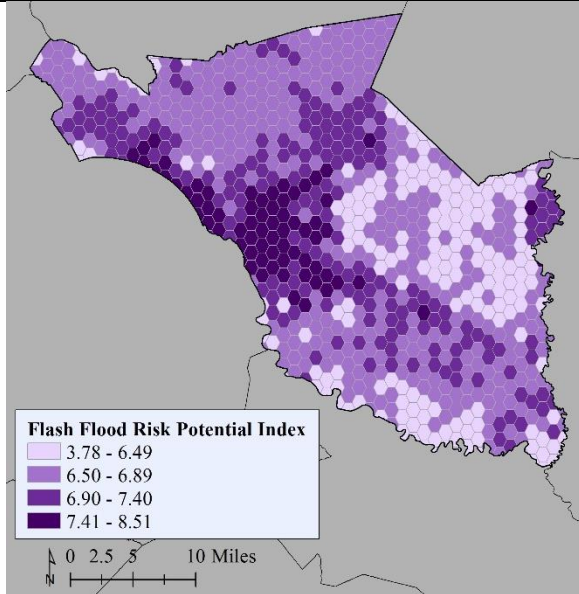
Flash Flood Risk

Flash floods result from locally heavy rains in areas with rapid water run-off. They are described here using the flash flood potential index. The flash flooding hazard is higher in urban areas because of impervious surfaces that causes rapid run-off. The flash flood risk is greatest in the most urbanized areas of the county (including the cities of Columbia, Irmo, and Forest Acres) as well the urbanized Gills Creek Watershed.

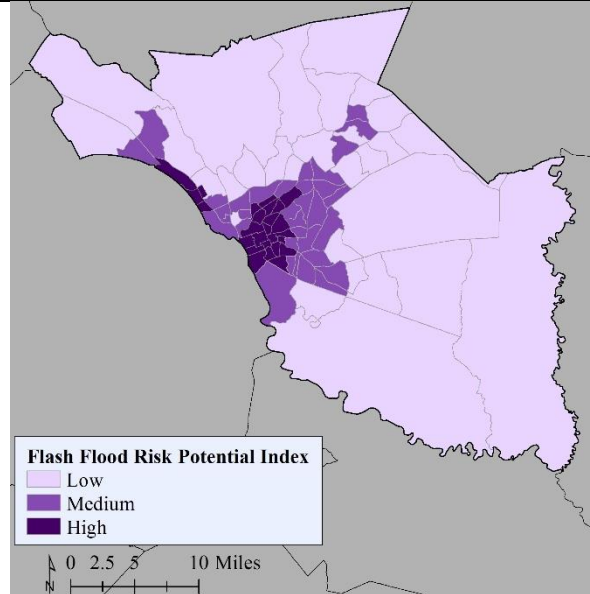


Flash Flood Risk

Flash flood potential index (in hexagon grids)



Flash flood potential index (by census tracts)



Flash flood risk (bivariate map)

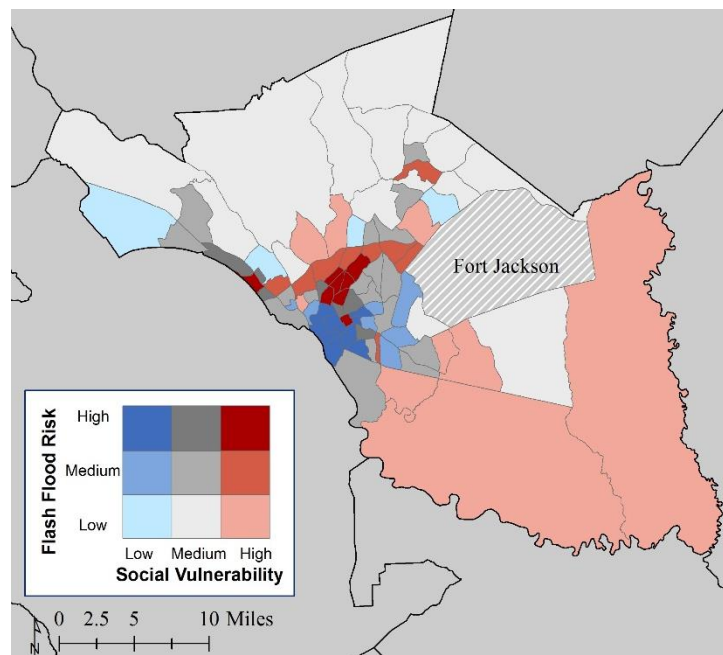
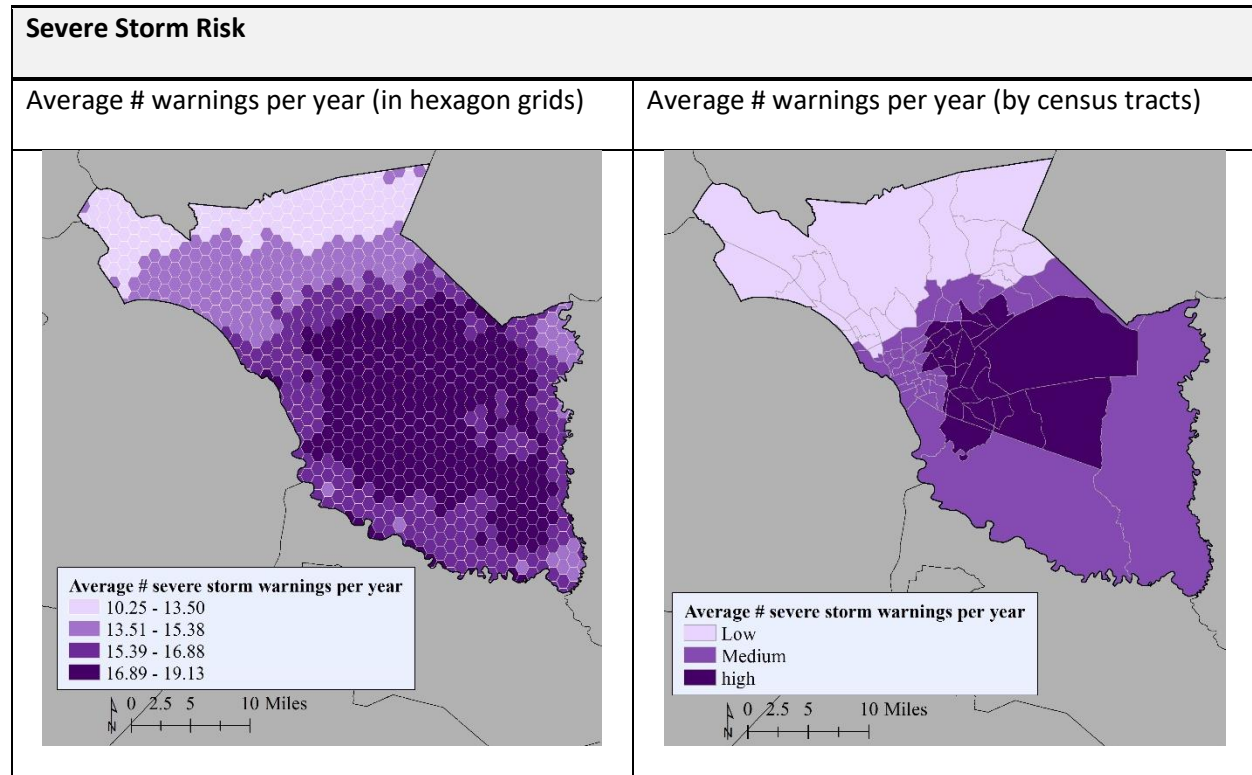


Figure 3 Flash Flood Risk and Vulnerability



Severe Storm Risk

The hazard classification for severe storm exposure is based on the average number of severe storm warnings issued per year by the National Weather Service.



Severe storm risk (bivariate map)

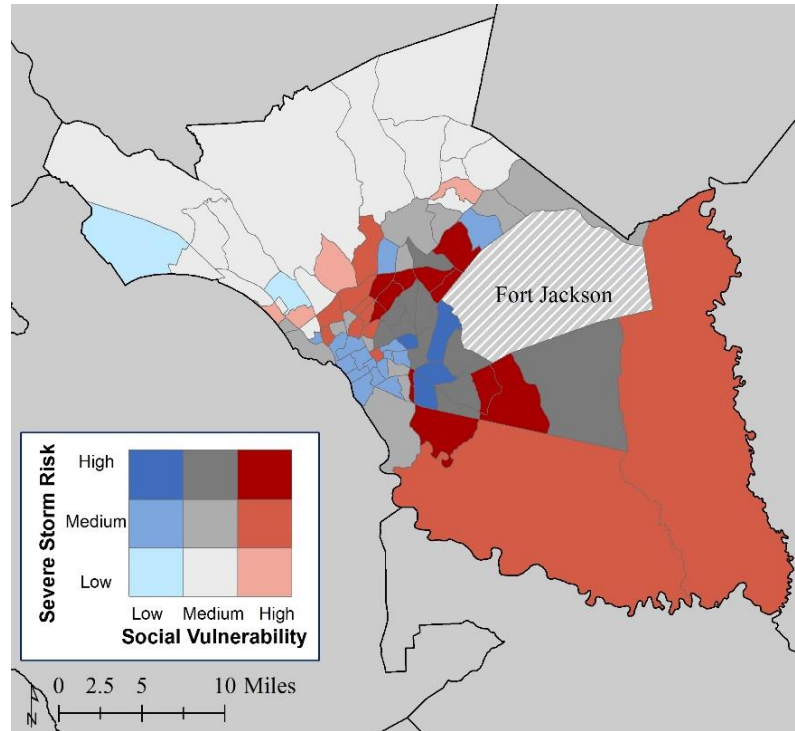


Figure 4 Severe Storm Risk and Vulnerability

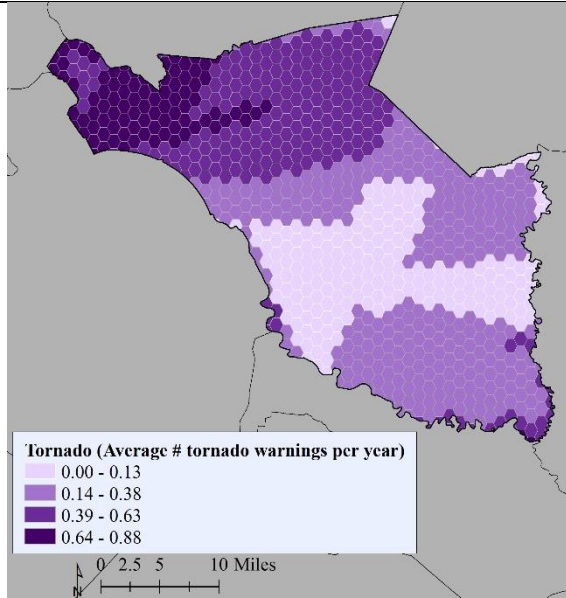
Tornado Risk

A tornado, characterized as a violent windstorm with a twisting, funnel-shaped cloud extending to the ground generated by severe thunderstorm activity or by land-falling tropical storms and hurricanes. The hazard classification for tornado exposure uses the average number of warnings per year issued for the county by the National Weather Service.

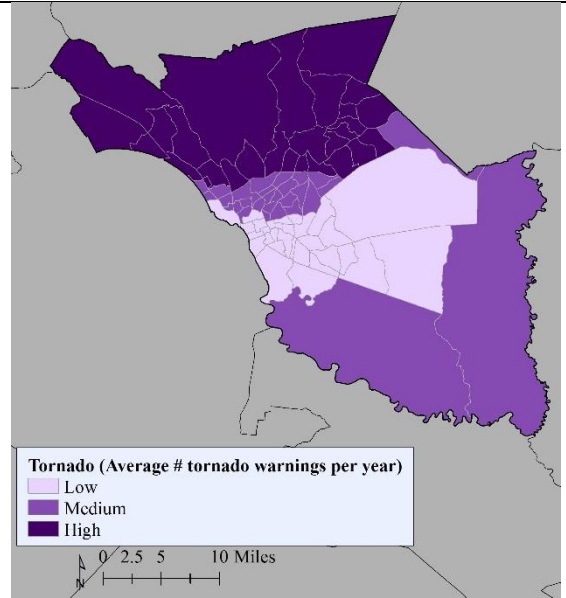


Tornado Risk

Average # warnings per year (in hexagon grids)



Average # warnings per year (by census tracts)



Tornado risk (bivariate map)

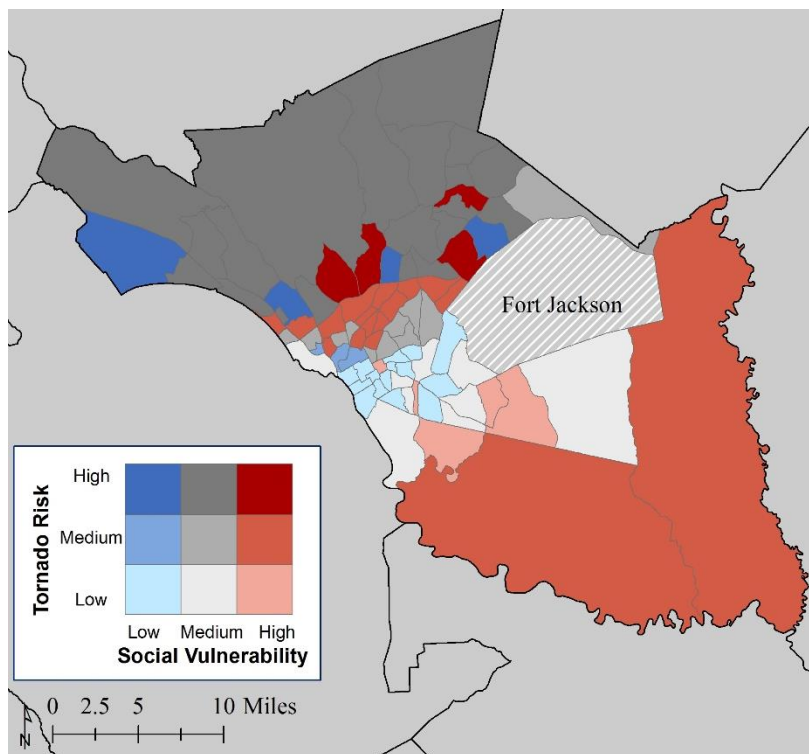
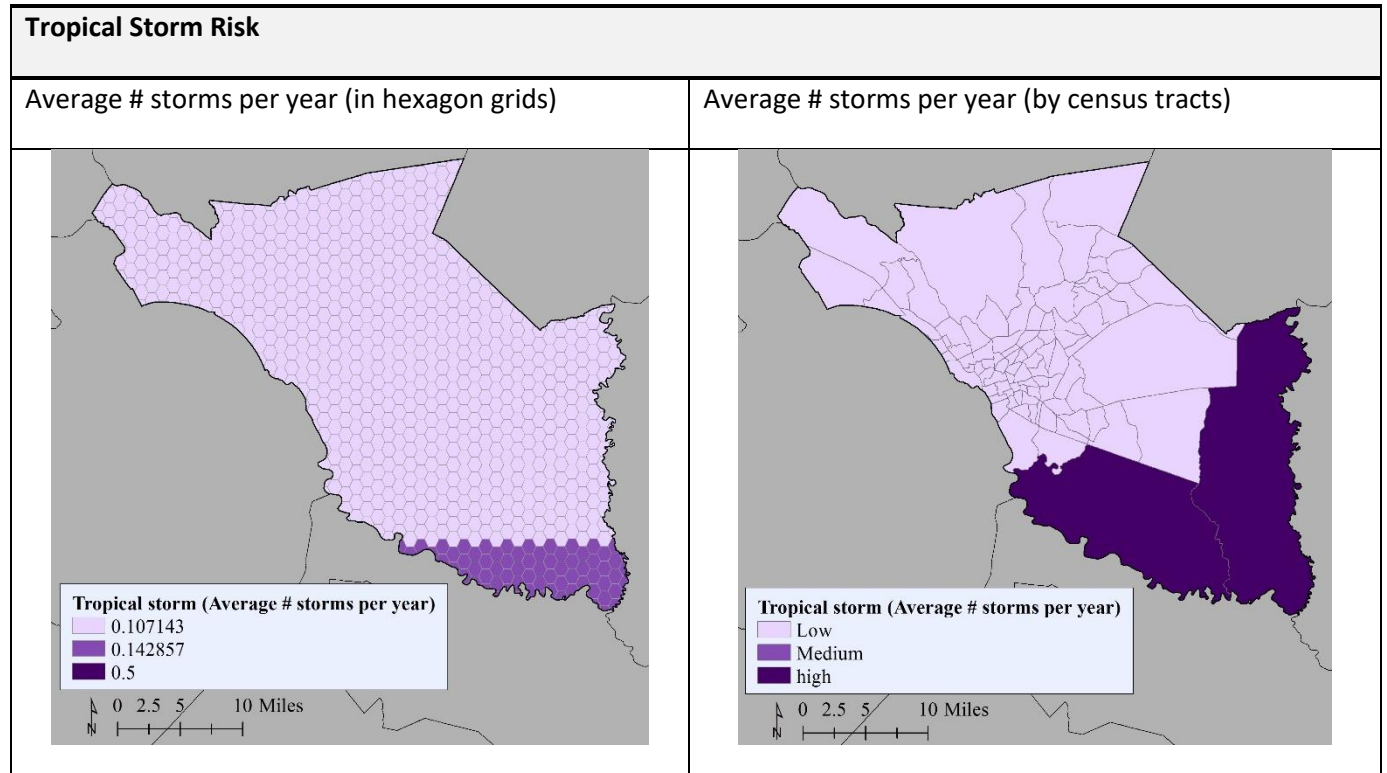




Figure 5 Tornado Risk and Vulnerability

Tropical Storm (Wind Risk)

In the Atlantic Ocean, wind speeds differentiate tropical systems into tropical storms or one of the five categories of hurricanes. Tropical storm risk is the average number of days per year that tropical storm force winds (39-74 mph) were recorded from known hurricane/tropical storm tracks crossing the state.





Tropical storm risk (bivariate map)

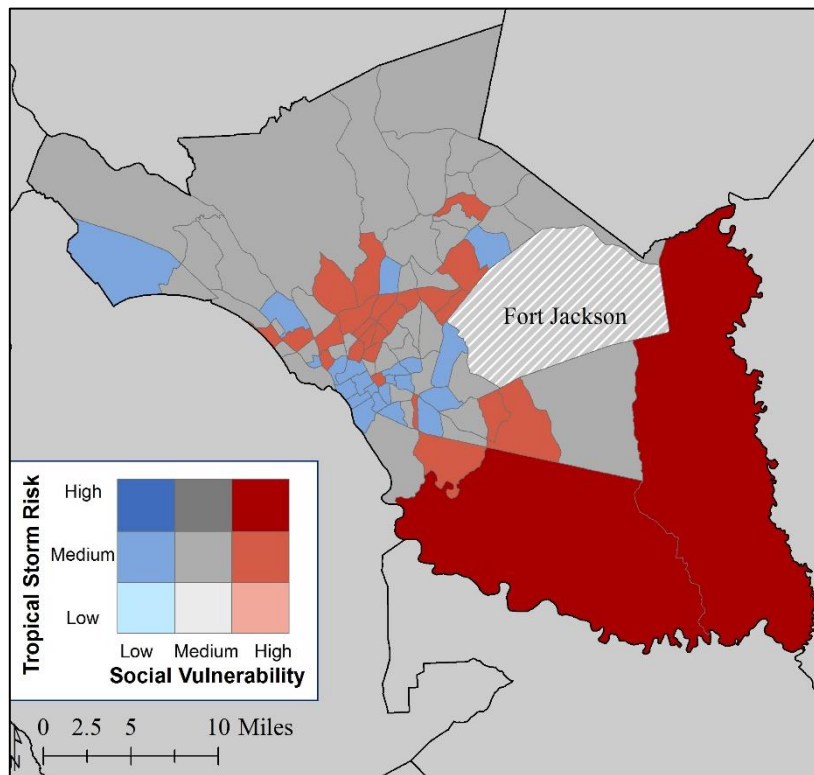


Figure 6 Tropical Storm Risk and Vulnerability

Other Hazards Affecting South Carolina

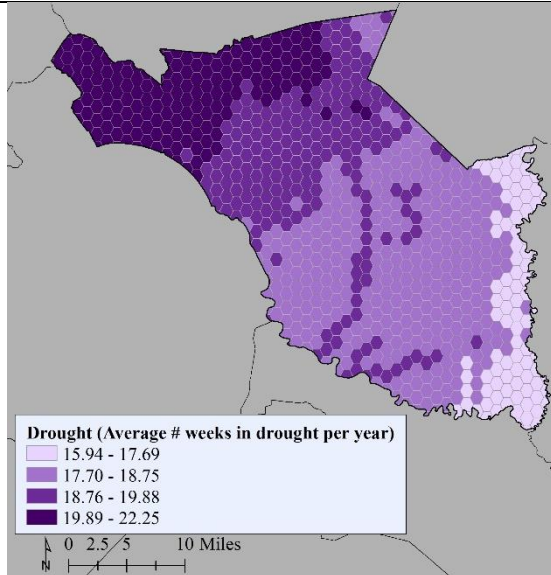
Drought Risk

Droughts are slow-onset events compared to some other hazards and take longer for their impacts to appear. The classification of drought hazard is defined as the average number of weeks in drought per year (severity of D1 or greater on the U.S. Drought Monitor) since 2000, based on historical occurrences of past droughts and probabilities of future occurrences.

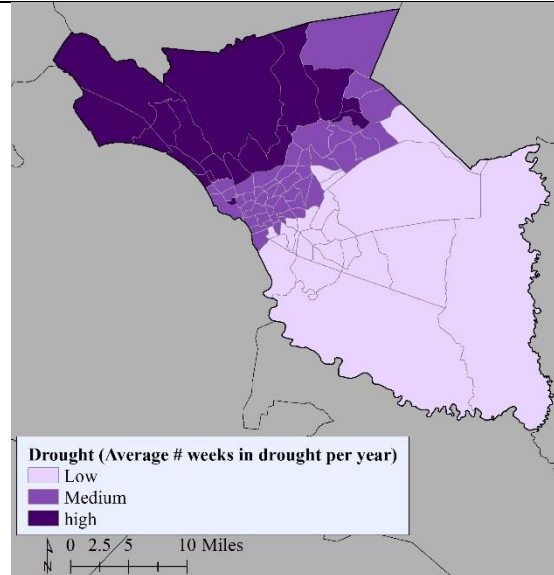


Drought Risk

Average # weeks in drought (in hexagon grids)



Average # weeks in drought (by census tracts)



Drought risk (bivariate map)

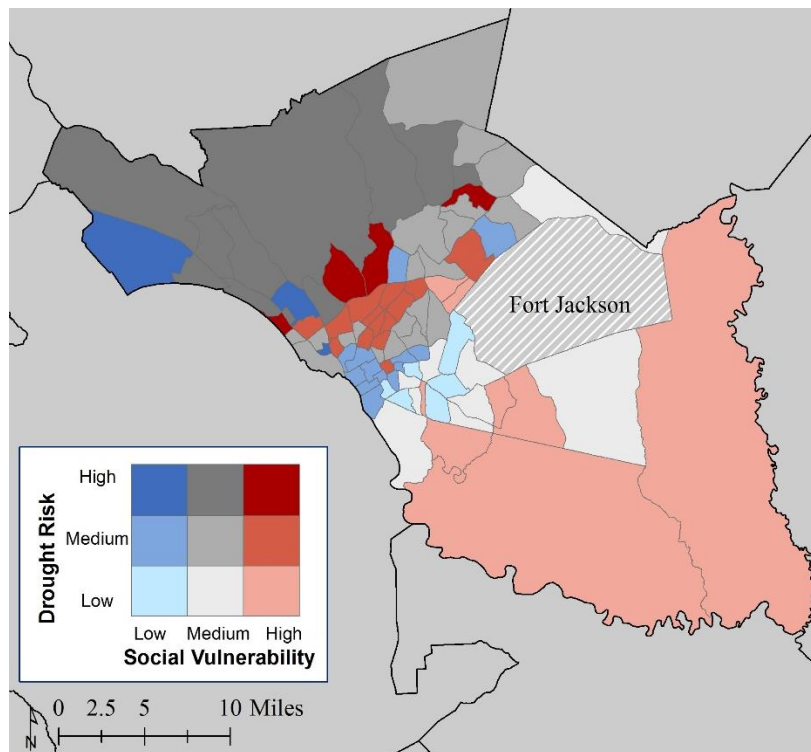


Figure 7 Drought Risk and Vulnerability



Earthquake Risk

While there are 10 to 15 earthquakes recorded annually in South Carolina, Richland County has only recorded six earthquakes since 2006, all of which were low-magnitude events (less than 2.9M). The peak ground acceleration (PGA) with 2% probability of exceedance in 50 years depicts the exposure to the earthquake hazard, which is greatest in the southern third of the county.

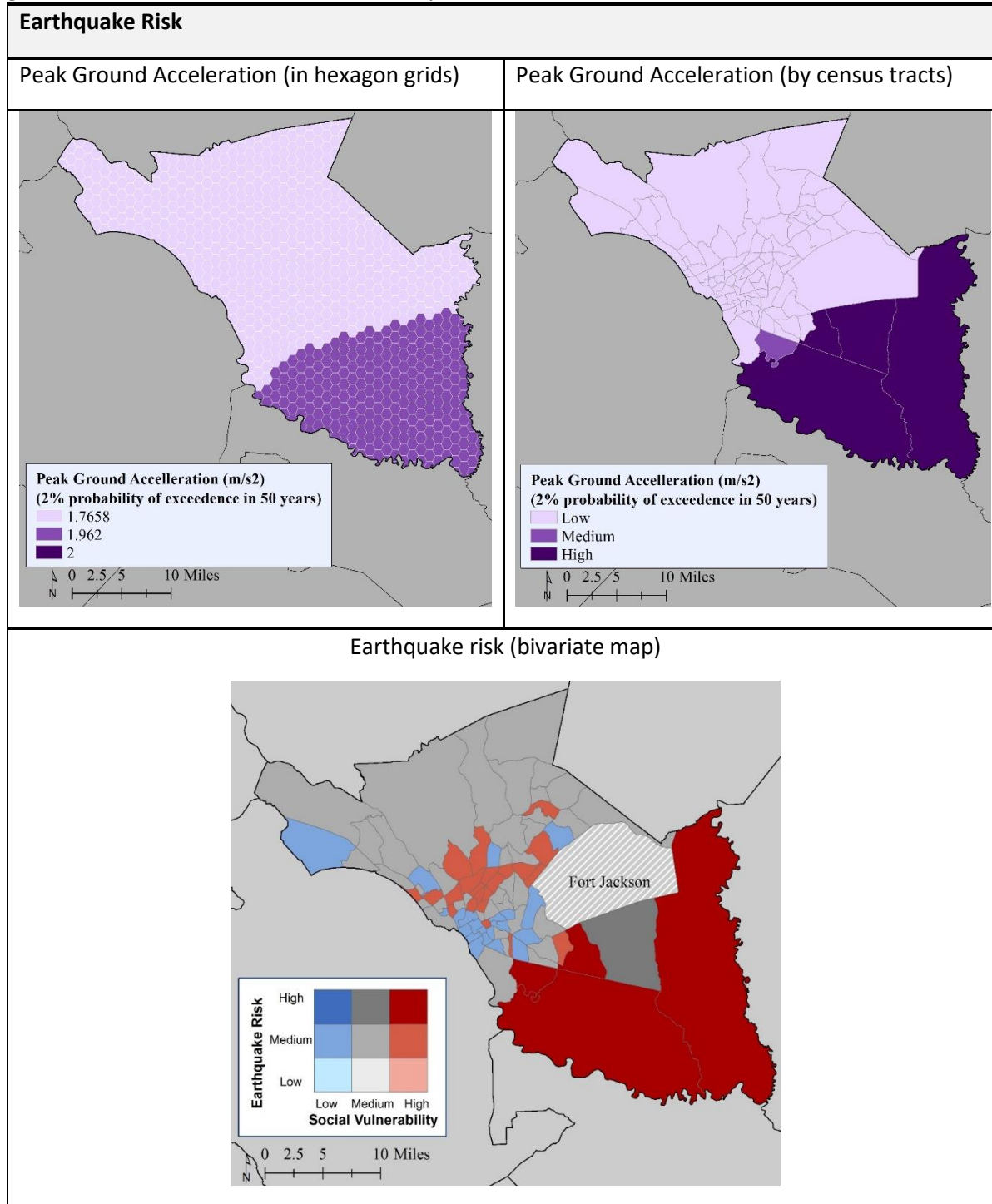
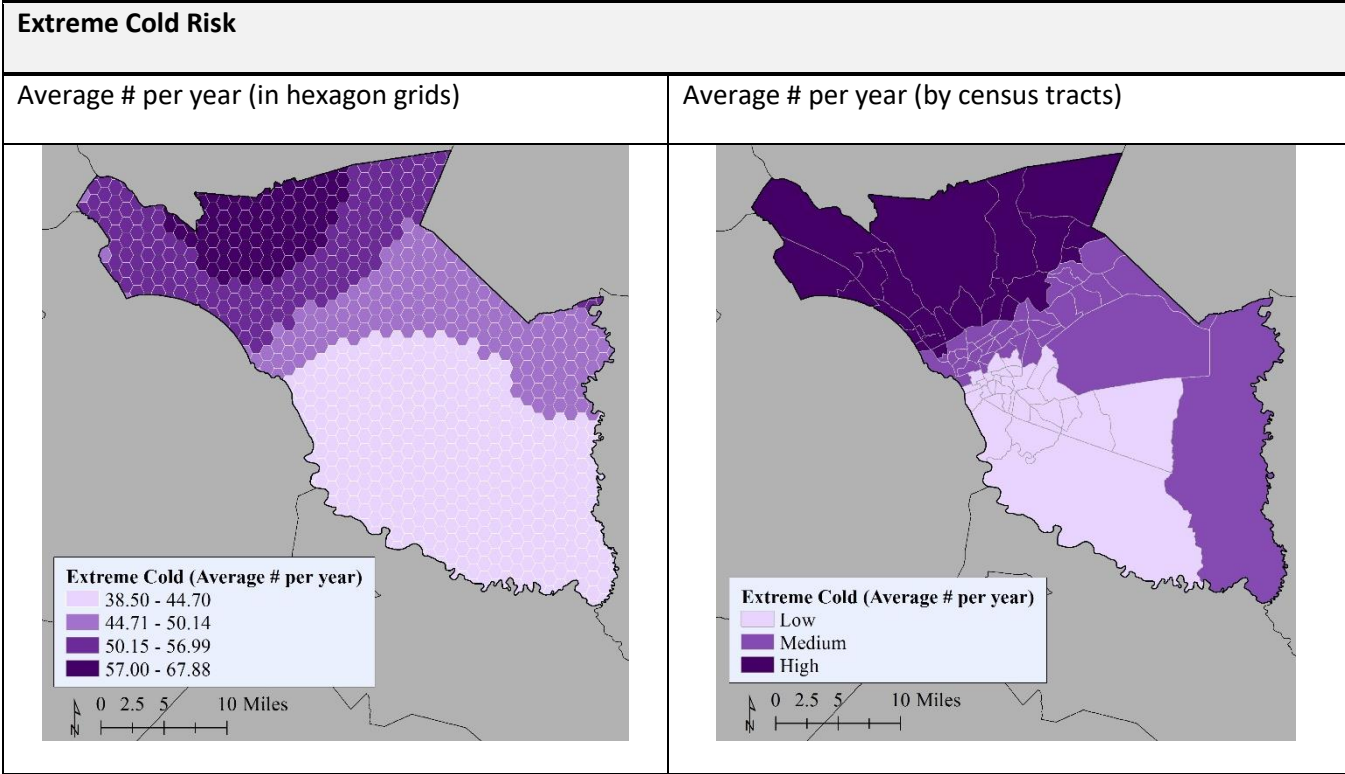


Figure 8 Earthquake Risk and Vulnerability



Extreme Cold Risk

The hazard classification for extreme cold exposure is based on the average number of days per year that the temperature is below freezing (less than 32 degrees Fahrenheit).





Extreme cold risk (bivariate map)

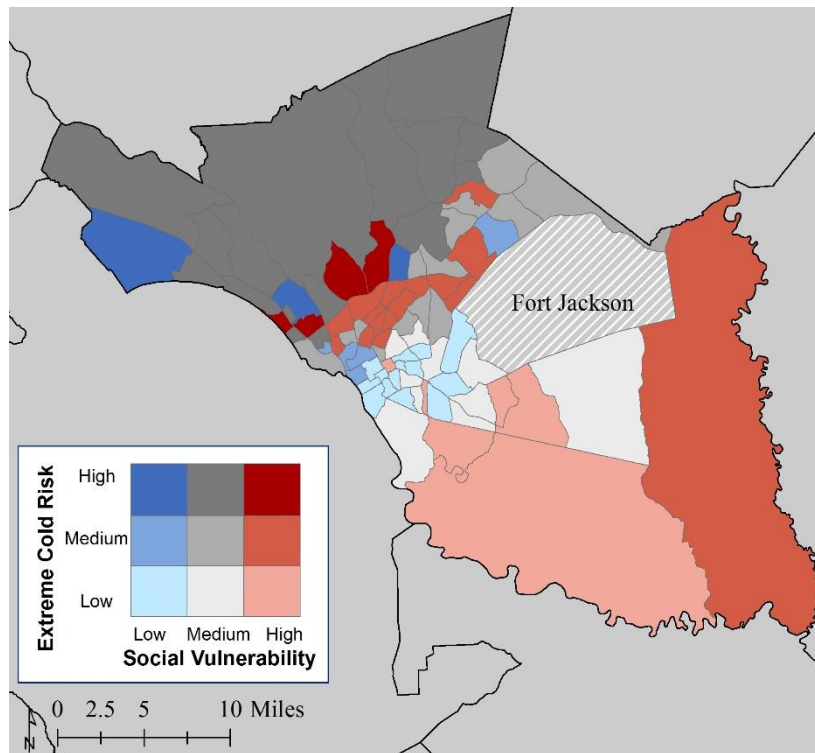


Figure 9 Extreme Cold and Vulnerability

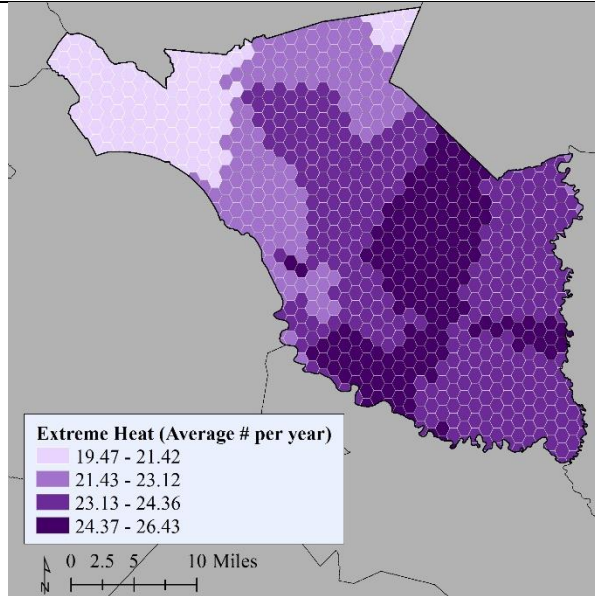
Extreme Heat Risk

The hazard classification for extreme heat exposure is based on the average number of days per year that the temperature is above 95 degrees Fahrenheit.

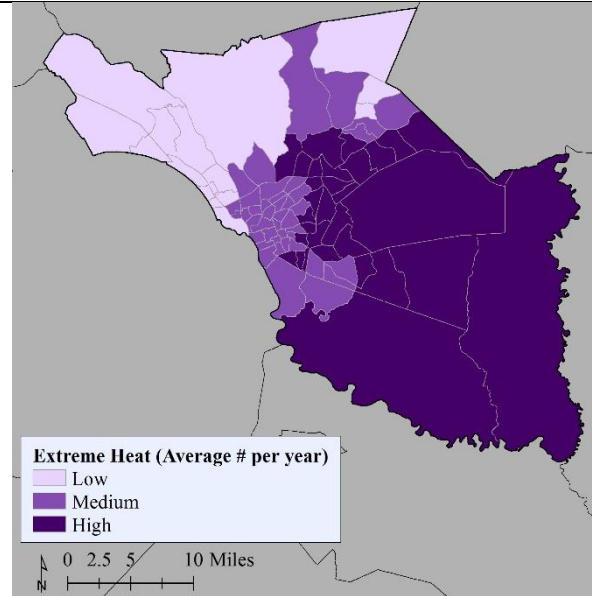


Extreme Heat Risk

Average # per year (in hexagon grids)



Average # per year (by census tracts)



Extreme heat risk (bivariate map)

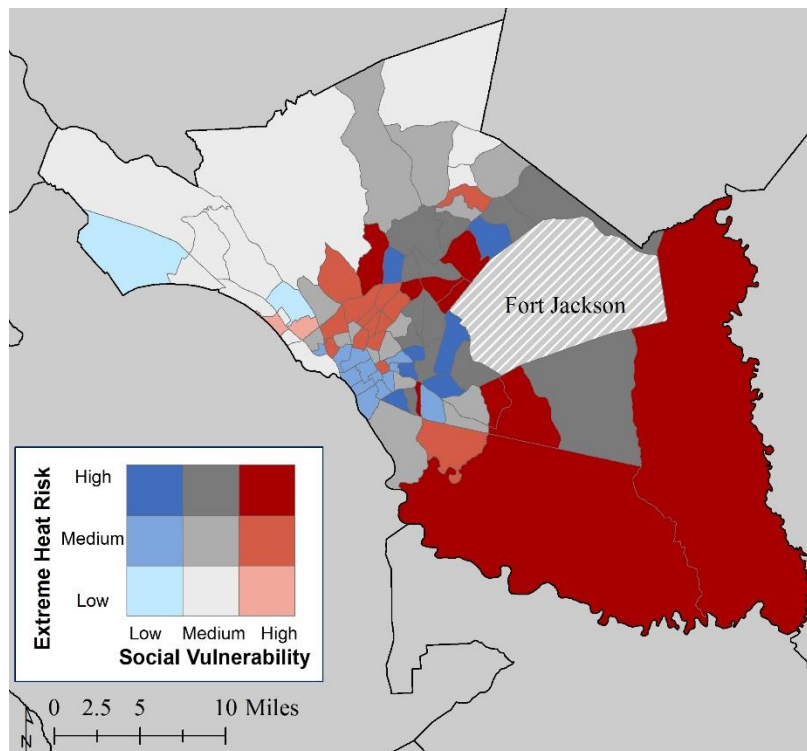
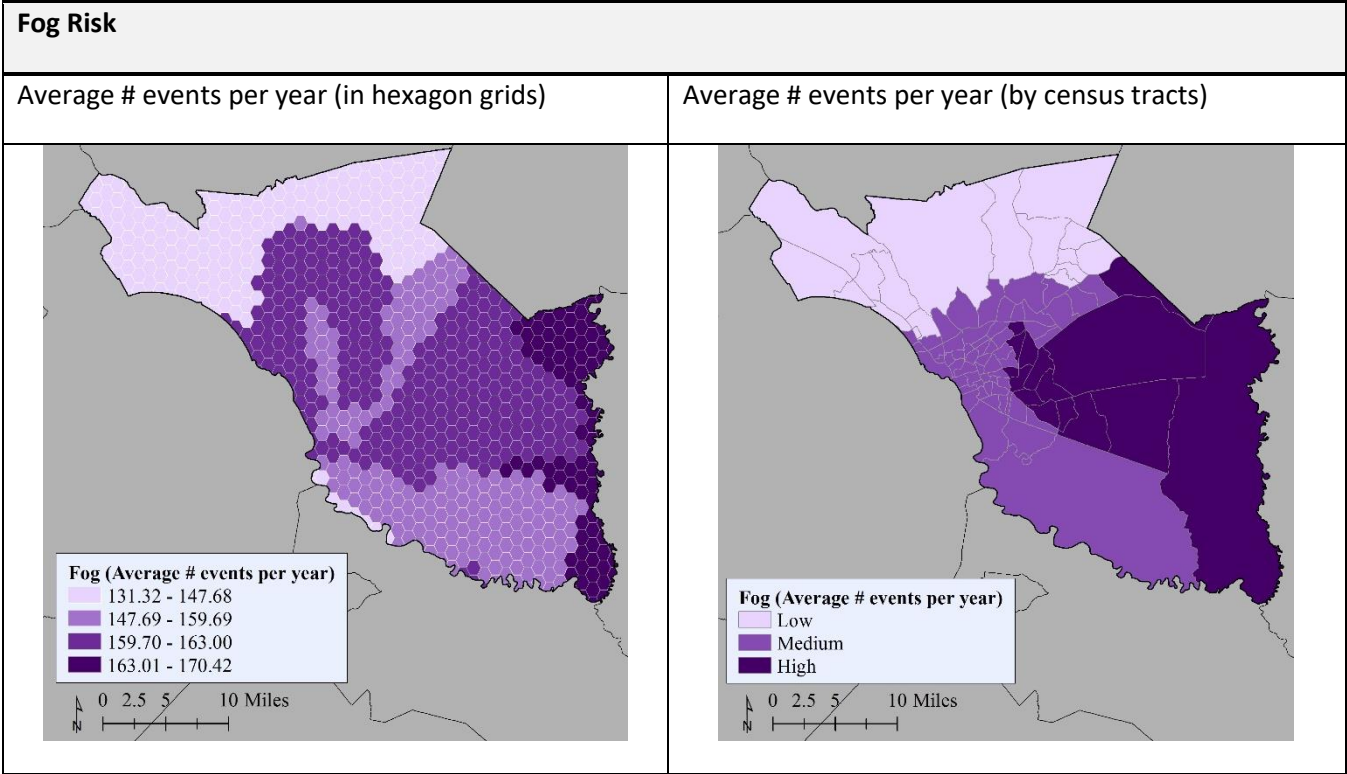


Figure 10 Extreme Heat and Vulnerability



Fog Risk

The hazard classification for fog exposure is based on the average number of days per year that a fog event has been recorded.



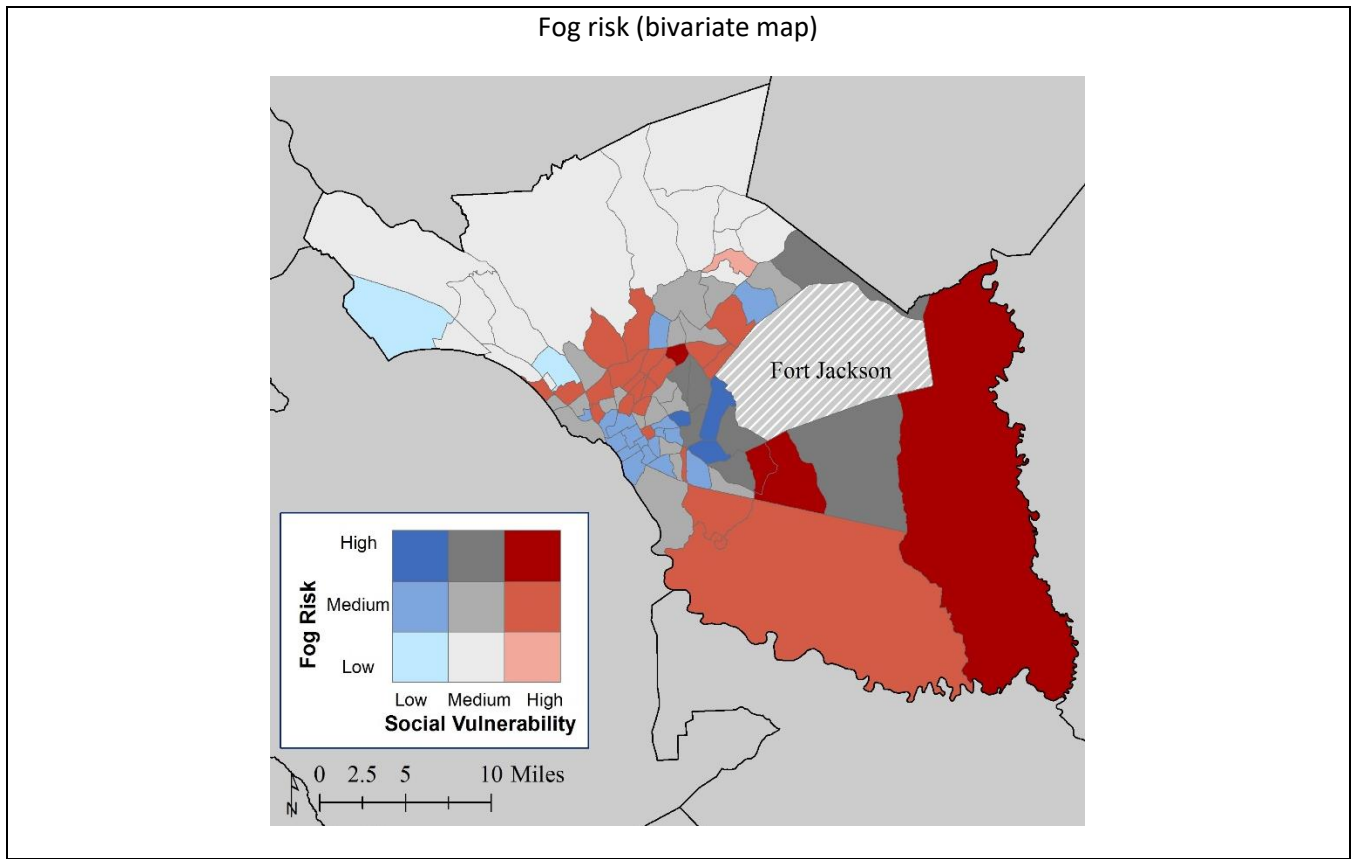


Figure 11 Fog Risk and Vulnerability

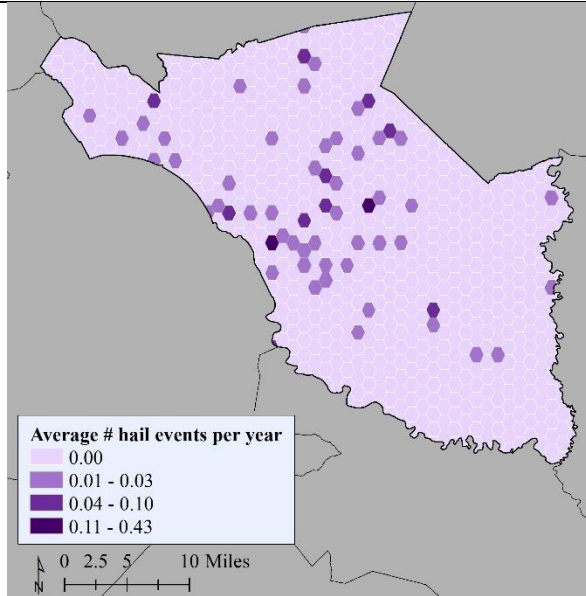
Hail Risk

The hazard classification for hail exposure is based on the average number of days per year that a hail event has been recorded.

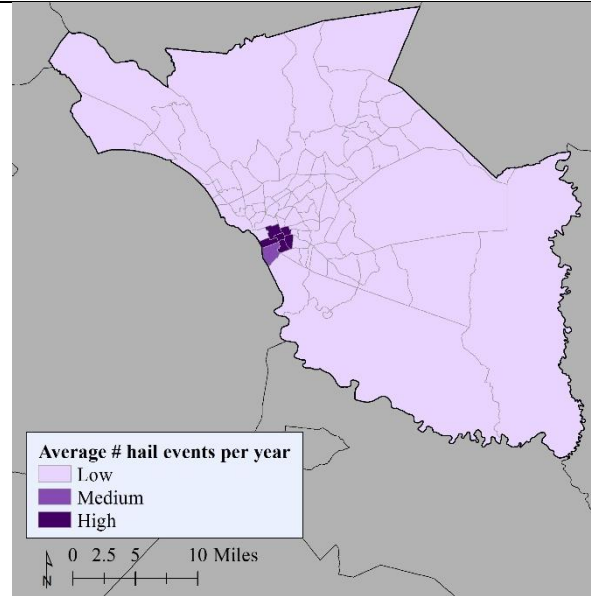


Hail Risk

Average # events per year (in hexagon grids)



Average # events per year (by census tracts)



Hail risk (bivariate map)

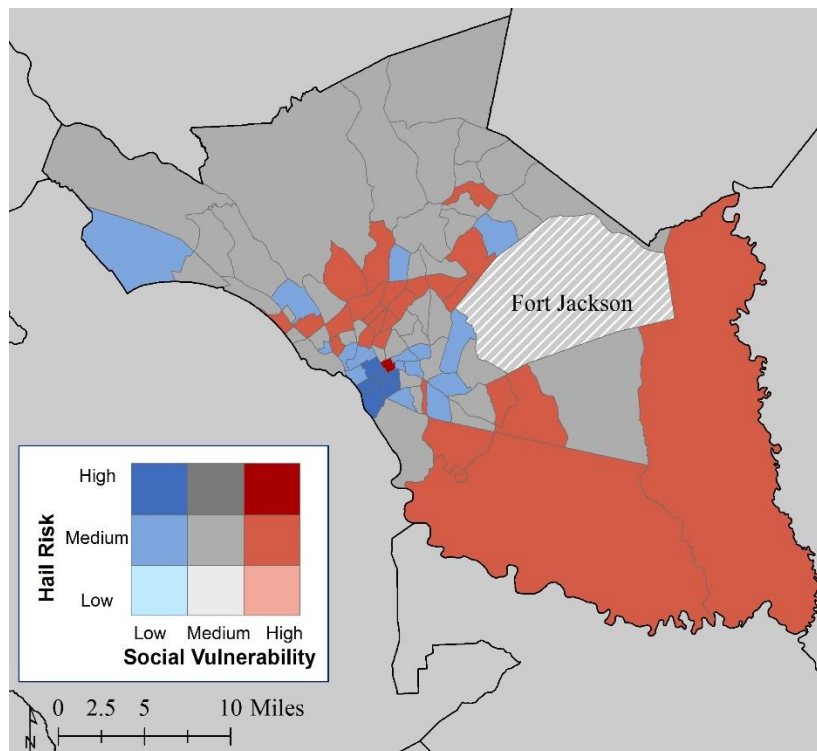
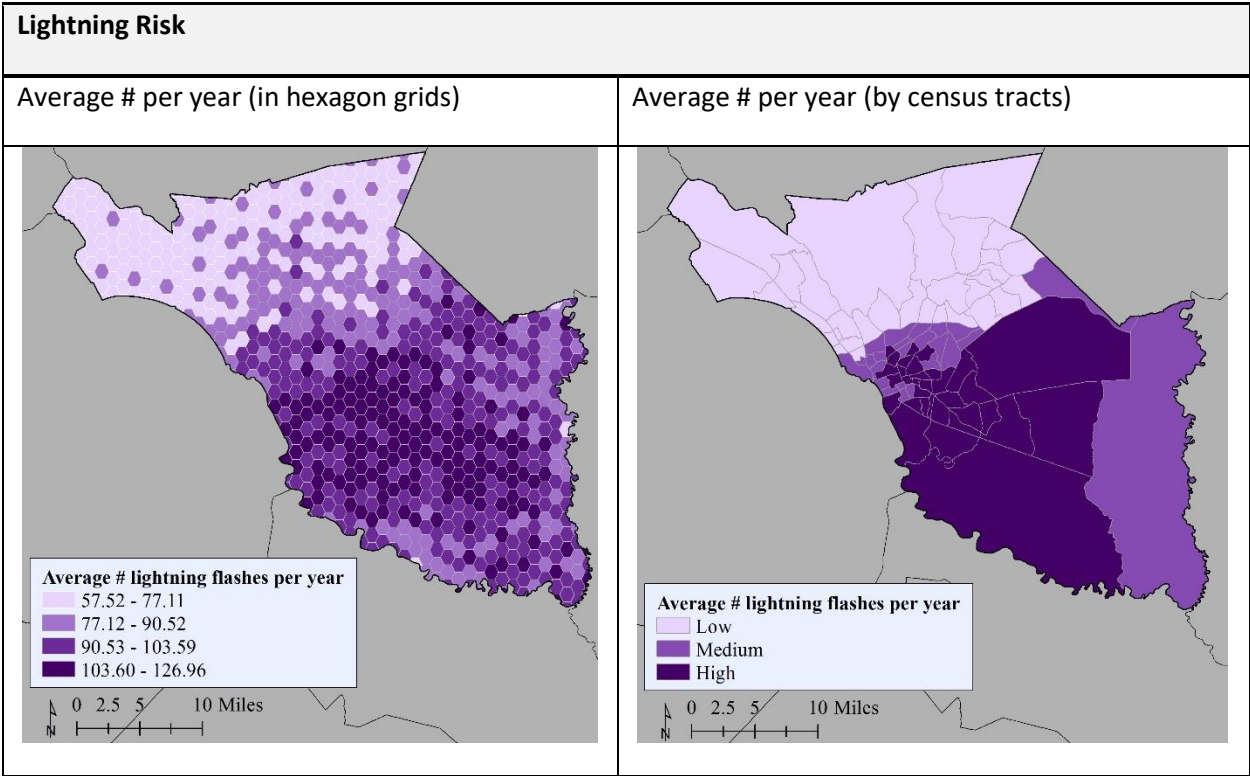


Figure 12 Hail Risk and Vulnerability



Lightning Risk

The average number of lightning flashes per year (total 27 years) is used to measure the lightning risk. In order to combine all hazards at the census tract level, the average for each tract is measured and assigned as the lightning risk score of 1, 2, or 3, based on the standard deviation from the mean.



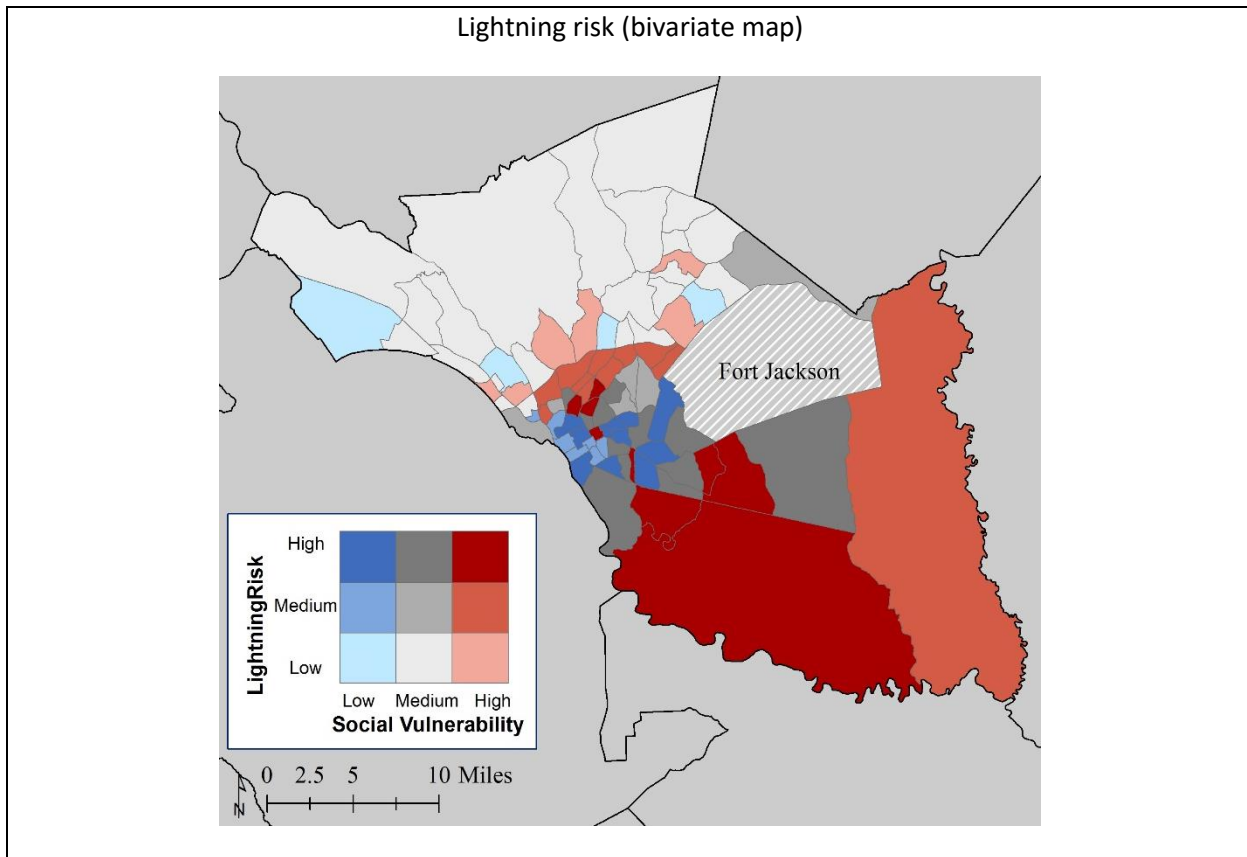


Figure 13 Lightning Risk and Vulnerability

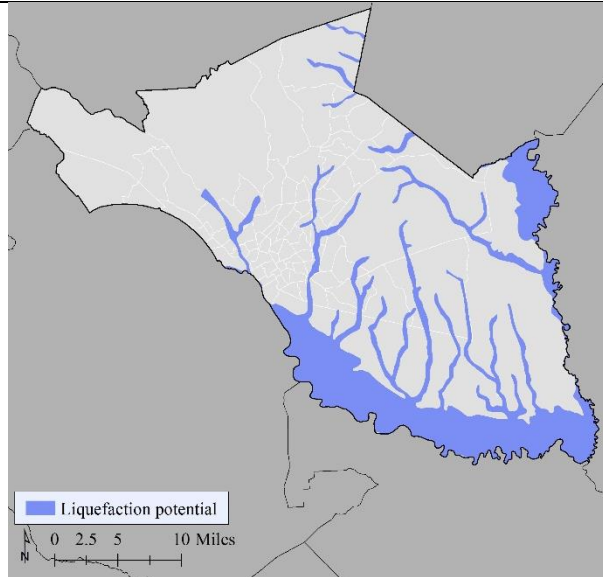
Liquefaction Risk

Liquefaction is the process whereby saturated soils lose strength and the ability to resist shear or the stress from ground shaking during an earthquake. The solid soil behaves like a liquid (e.g. quicksand) and is unable to support buildings on it. The liquefaction potential extent is delineated based on the earthquake hazard and soil conditions and type (sandy, silty, gravelly soils).

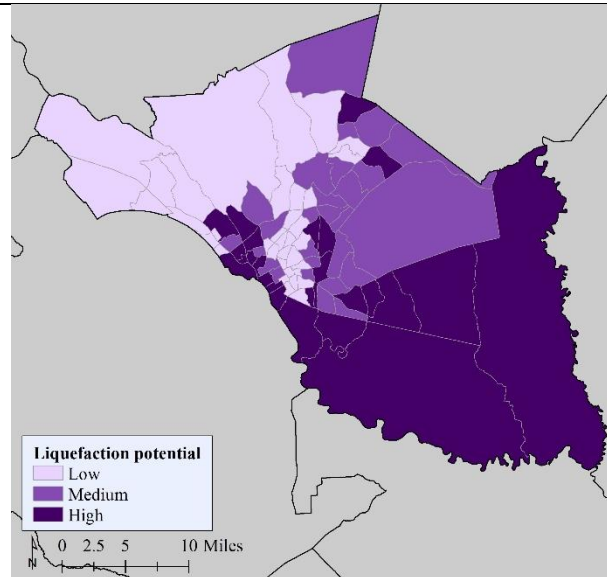


Liquefaction Risk

Liquefaction potential extent



Liquefaction potential (by census tracts)



Liquefaction risk (bivariate map)

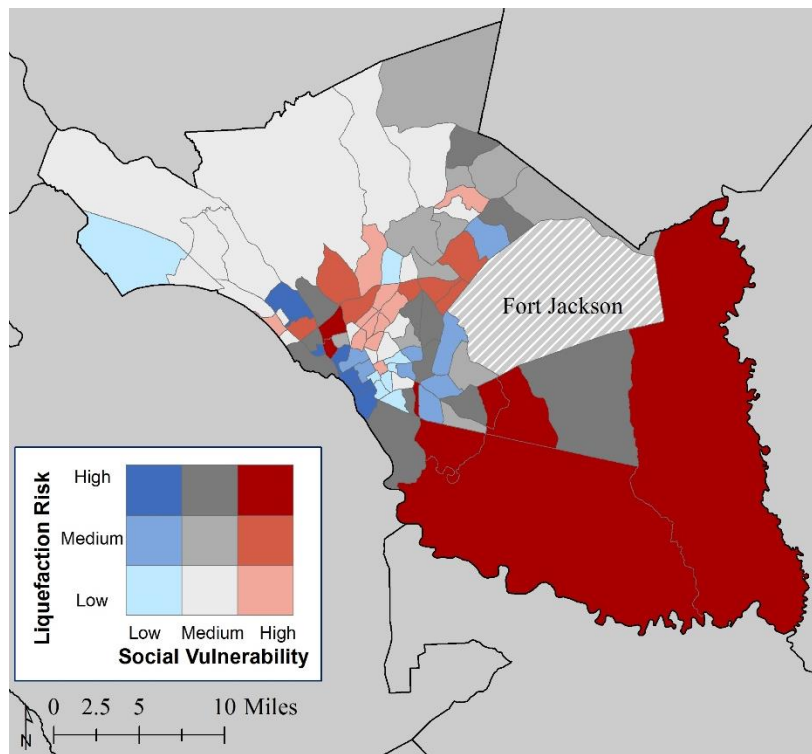
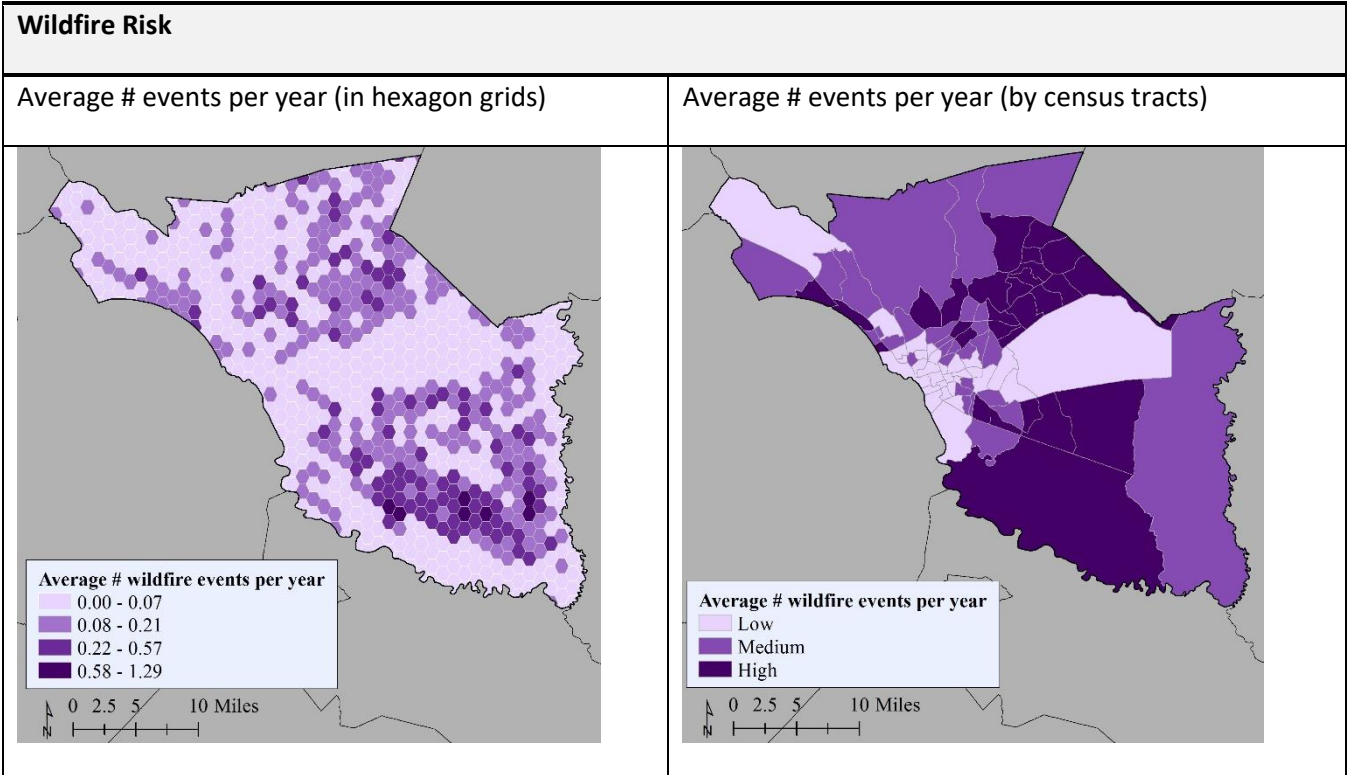


Figure 14 Liquefaction Risk and Vulnerability



Wildfire Risk

Wildfires are a natural process for the environment to clear dead vegetation, and they can be human-caused or from lightning strikes. Fire danger is highest in late winter and early spring. The hazard classification for wildfire exposure is defined based on the average number of recorded wildfire events per year since 1988, according to the South Carolina Hazard Mitigation Plan 2018 Update.





Wildfire risk (bivariate map)

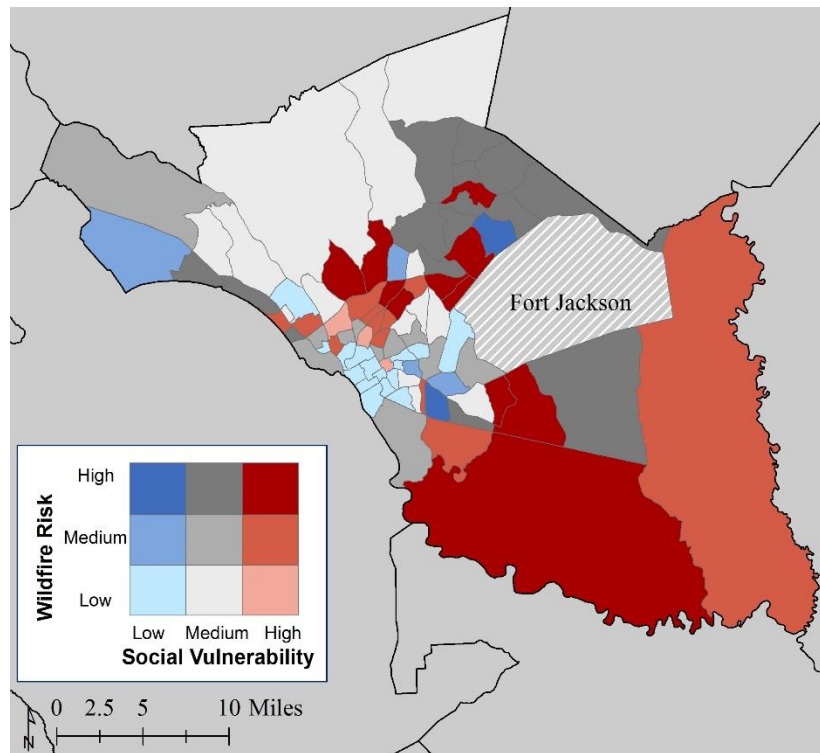


Figure 25 Wildfire Risk and Vulnerability

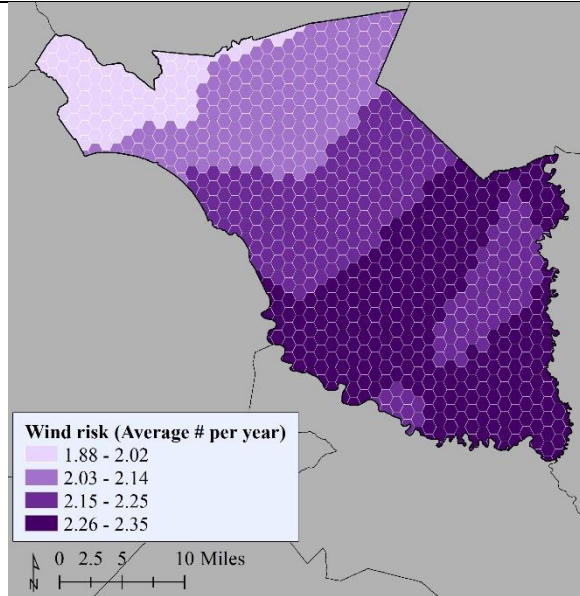
Wind Risk

The hazard classification for wind risk is based on the average number of days per year with recorded high winds (> 58 mph gusts excluding hurricane and tornadic winds).

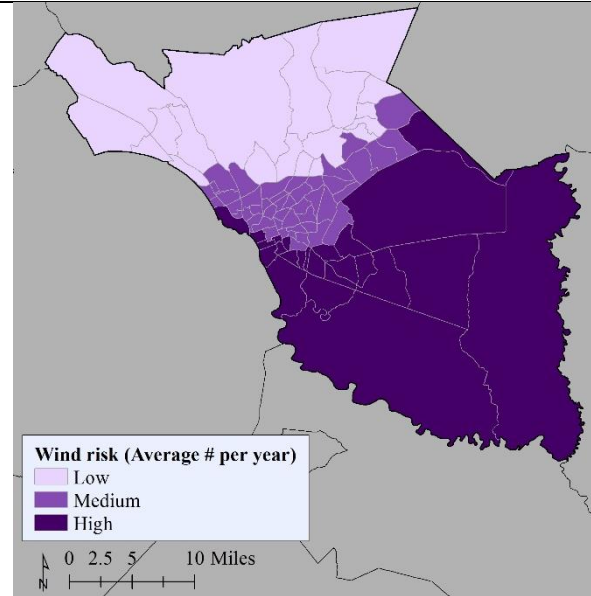


Wind Risk

Average # per year (in hexagon grids)



Average # per year (by census tracts)



Wind risk (bivariate map)

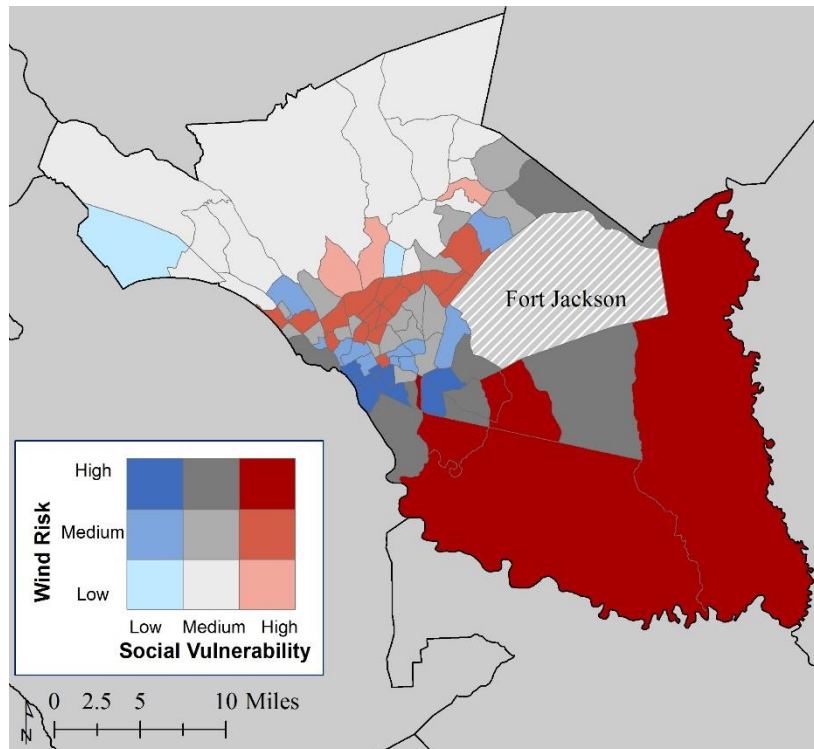
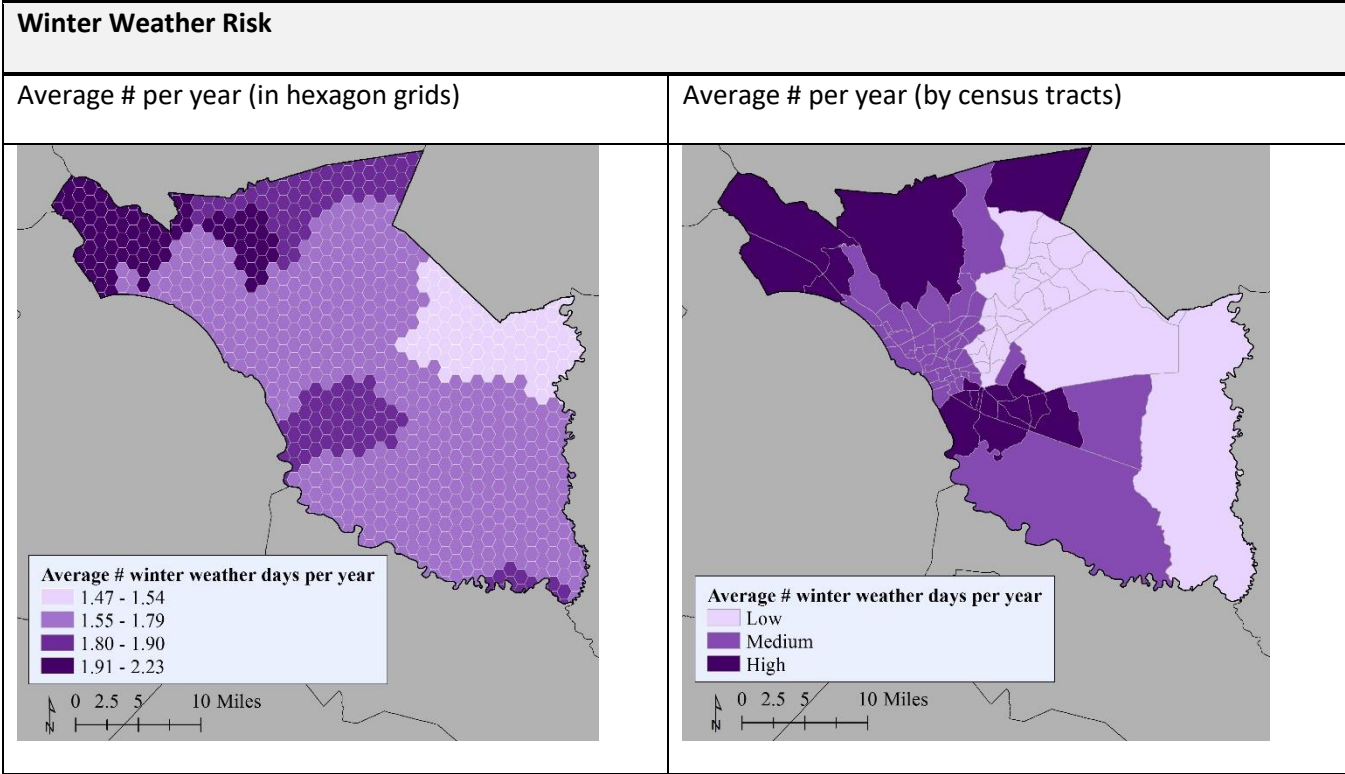


Figure 36 Wind Risk and Vulnerability



Winter Weather Risk

The hazard classification for winter weather exposure is defined based on the average number of days per year that the winter weather (snow, ice, sleet, freezing rain) conditions were recorded.





Winter weather risk (bivariate map)

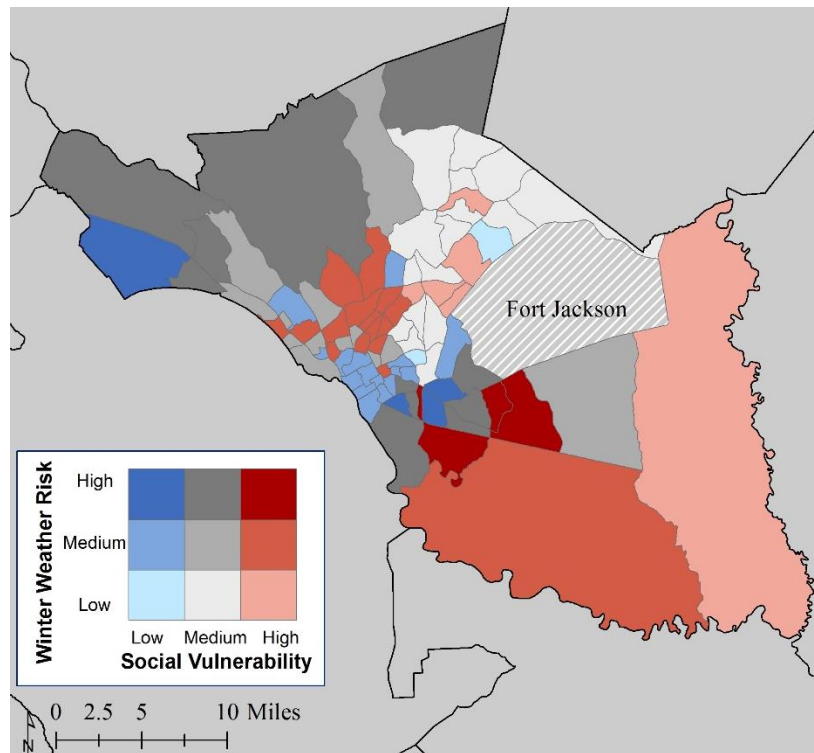


Figure 47 Winter Weather Risk and Vulnerability

Total Hazard Risk

The total hazard risk combines all the hazards described above into a comprehensive view of risk for Richland County, by census tracts. This risk map, when combined with social vulnerability, shows the intersection of the highest risk census tracts with those having higher levels of social vulnerability.

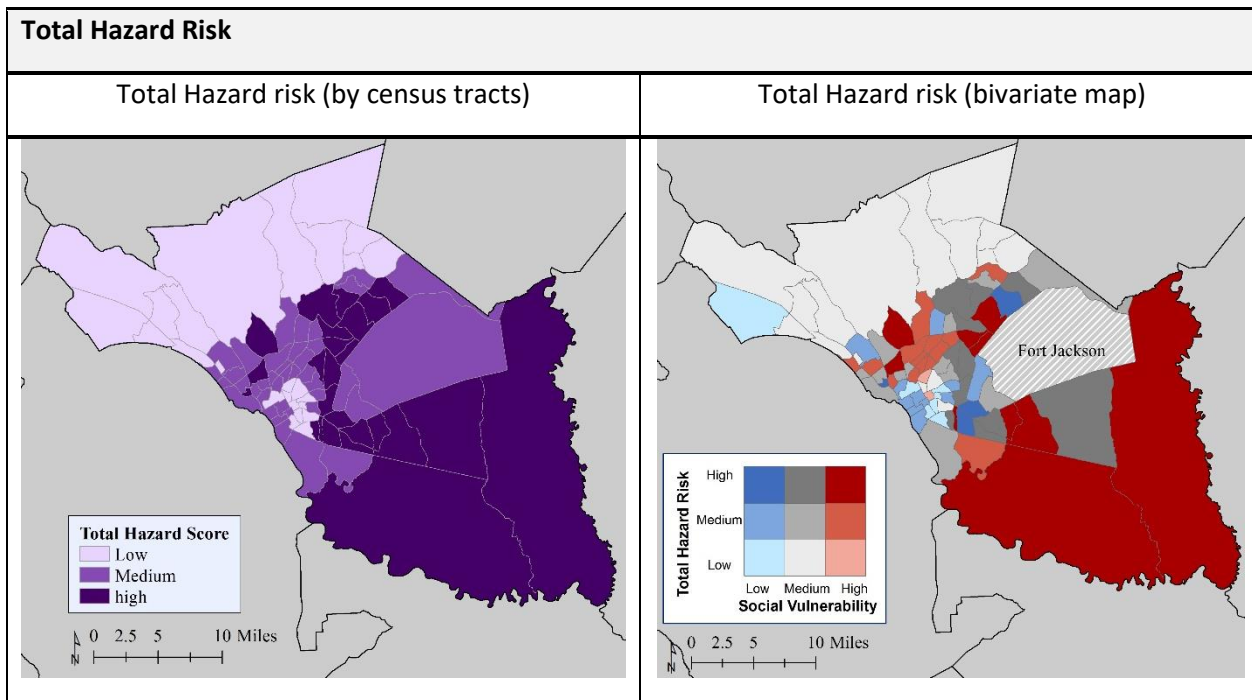


Figure 58 Total Hazard Risk and Vulnerability

The highest risk and most vulnerable census tracts (shown in dark red) are in Lower Richland County with a number of smaller areas located adjacent to the northwestern boundary of Fort Jackson, and a few tracts north of the downtown Columbia area. These correspond to those tracts with the highest total hazard score that include all of Lower Richland County and the Gills Creek Watershed to the west of Fort Jackson.

Assessment of Critical Community Lifelines

The Richland County CDBG-DR Action Plan identified unmet needs in the area of housing, infrastructure, and economic development. The need for housing rehabilitation was identified as the most important with funding to rehabilitate single-family owner-occupied housing, small rental housing reconstruction, and voluntary buyouts. According to the County's Action Plan, the goal is to facilitate multiple and complimentary recovery programs (housing, infrastructure, business assistance) while planning for longer-term resilience within the community. The destruction of community lifelines or disruptions in the services they provide is an important consideration in post-disaster recovery and in mitigation activities as a community strives to become more disaster resilient.

Lifeline Impacts 2015 Floods

Richland County was at the center of the federally declared disaster area (PDD 4241) and experienced significant freshwater riverine flooding throughout the county. The transportation system (roads and bridges), water supply, and community safety all were affected. Sixteen earthen dams breached or failed in the county, including five high-hazard dams in the Gills Creek watershed and one on Fort Jackson. An embankment breach in a diversion supply canal along the Congaree River affected the provision of potable water to many residents for over a week. Finally, downstream flooding occurred as four of the six emergency spillways at Lake Murray opened to reduce the lake levels.¹⁶

¹⁶ S.L. Cutter, C.T. Emrich, M. Gall, and R. Reeves, 2018. Flash flood risk and the paradox of urban development, *Natural Hazards Review* 19(1): 05017005. Doi: 10.1061/(ASCE)NH.1527-6996.0000268.



Assessing Lifeline Impacts: Potential Community Lifeline Impact Index (PCLII)

Following the State of South Carolina's approach in determining the potential lifeline impacts of future hazards or high-impact events, Richland County also employed the PCLII customized for the county as a quantitative spatial assessment to show where mitigation efforts to reduce hazard impacts and enhance resilience are most needed.

The PCLII uses FEMA's Community Lifelines Implementation Toolkit as the guide for input data.¹⁷ Data on each of the seven components and subcomponents were collected from publicly available sources and represent proxies for the components. Given the Community Lifelines Implementation Toolkit is oriented towards response, not mitigation and enhancing long-term resilience, not all the sub-components were applicable and thus are not included in the PCLII. An abbreviated list of components and subcomponents used to create the Richland County PCLII is in Table 5. All input variables (N=46) represent counts of lifelines (raw number, miles, acreages), not access to them or the quality or level of service they provide.

The values for each input variable were sorted for each of the 89 census tracts from highest to lowest and then transformed into values from 1.0 (the highest) to 0 (the lowest).¹⁸ The variables comprising each of the seven lifelines were averaged to produce an overall score for each of the lifeline. This was done in order to make each component comparable regardless of the number of variables within it, which could have produced higher counts. The sum of the lifeline averages produce the overall PCLII score, which theoretically ranges from 0-7. The mapped total used five categories with the darker hues representing census tracts with greater potential lifeline impacts.

¹⁷ FEMA, 2020. Community Lifelines Implementation Toolkit V2.0. Accessed 16 February 2020.

<https://www.fema.gov/media-library-data/1576770152678-87196e4c3d091f0319da967cf47ffd9c/CommunityLifelinesToolkit2.0v2.pdf>

¹⁸ This is a statistical scaling procedure called min-max which permits comparisons among variables with different base-units (miles, numbers etc.) ranging from lowest to highest or vice versa.



Table 5 Variables Included in the Richland County Potential Community Lifeline Impact Index (RC-PCLII)¹⁹

Lifeline	Component
Safety & Security	Law enforcement & security
	Fire services
	Search and rescue
	Government services
	Community safety
Food, Water, & Shelter	Food
	Water
	Shelter
	Agriculture
Health & Medical	Medical care
	Patient movement
	Medical supply chain
	Fatality management
Energy	Power grid
	Fuel
Communications	Infrastructure
	Responder communications
	Alerts, warnings
	Finance
Transportation	Highway/roadway/motor vehicle
	Mass transit
	Railway
	Aviation
Waste & Hazardous Materials	Waste facilities
	Hazardous facilities

Potential Community Lifeline Impacts

Richland County has a mix of urban, suburban, and rural landscape attributes. With a population of nearly 415,000 according to 2018 U.S. Census estimates, the county has grown rapidly (7.8% population increase) since 2010. With a land area of 757.07 square miles, the average population density for the county is 548 persons per square mile.²⁰

The largest lifeline impact based on counts occurs in the more rural areas of the county including Lower Richland, in North Central Richland, and in the urban downtown area of Columbia (Figure 19). The primary contributors to these potential impacts are energy facilities (power lines, substations, and pipelines), waste facilities (solid waste landfills, toxic release sites, Superfund sites), and in the urban areas communications infrastructure (cell phone towers, broadcast and radio transmissions towers), and health and medical facilities. The spatial patterns may be somewhat deceiving because they are mapped by census tracts which visually highlight the larger areas. Census tracts are a permanent statistical subdivision within a county and contain roughly 4,000 people each (ranging from

¹⁹ See South Carolina Disaster Recovery Office, 2019, *South Carolina CDBG-MIT Action Plan*, for details on specific variables used and their sources, pp. 50-52. https://www.scdr.sc.gov/wp-content/uploads/2019/12/South-Carolina-Mitigation-Action-Plan-December-9-2019_compressed-1.pdf

²⁰ U.S. Census, 2020. *QuickFacts*. Accessed 16 February 2020. <https://www.census.gov/quickfacts/richlandcountysouthcarolina>



1,200-8,000). Based on the decadal census, if the tract has more than 8,000 it is split into two or more tracts, and if they contain less than 1,200 they are merged. Because they contain roughly the same number of people, rural or less populated tracts appear larger on the map, while urban or more populated areas appear smaller. For some of the rural tracts, there is more infrastructure (such as roads, transmission lines, etc.) because there is more area to be covered given the rural nature of the census tract.

A more detailed depiction of the most potentially-impacted infrastructure highlights not only the differences between urban and rural tracts, but also the components leading to higher scores.

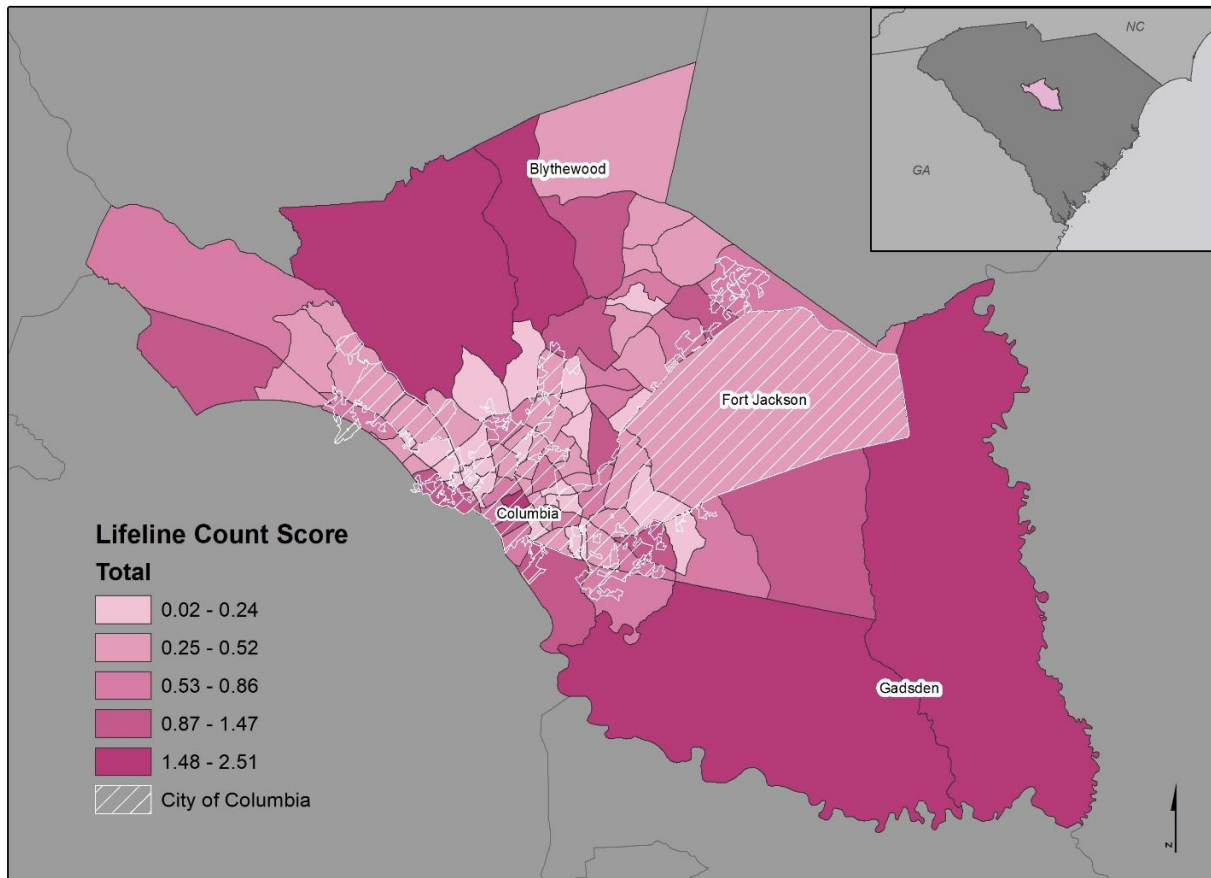


Figure 19 Potential Community Lifeline Impact Index for Richland County (RC-PCLII)

The Following figures (Figures 20-26) show the variability in potential lifeline impacts across Richland County based on each of the seven lifelines from FEMA Community Lifelines Implementation Toolkit.

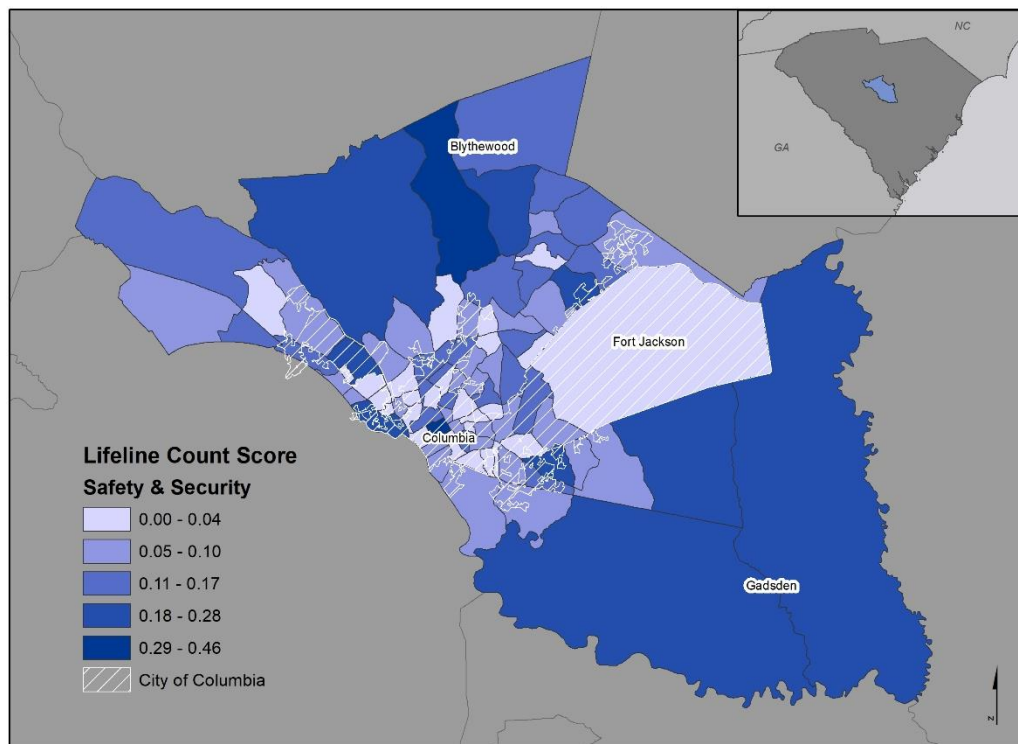


Figure 20 Safety & Security Lifeline Count Score

The spatial pattern for the Safety and Security Lifeline component highlights Lower Richland, North Central Richland, and Downtown Columbia (Figure 20). In Lower Richland, this pattern is due to the number of dams while in North Central Richland, it is the number of dams, as well as schools and daycare facilities. Downtown Columbia has a high score due to the number of government institutions. Notably, the tract just southeast of Harbison State Forest has a higher score due to the presence of prison facilities.

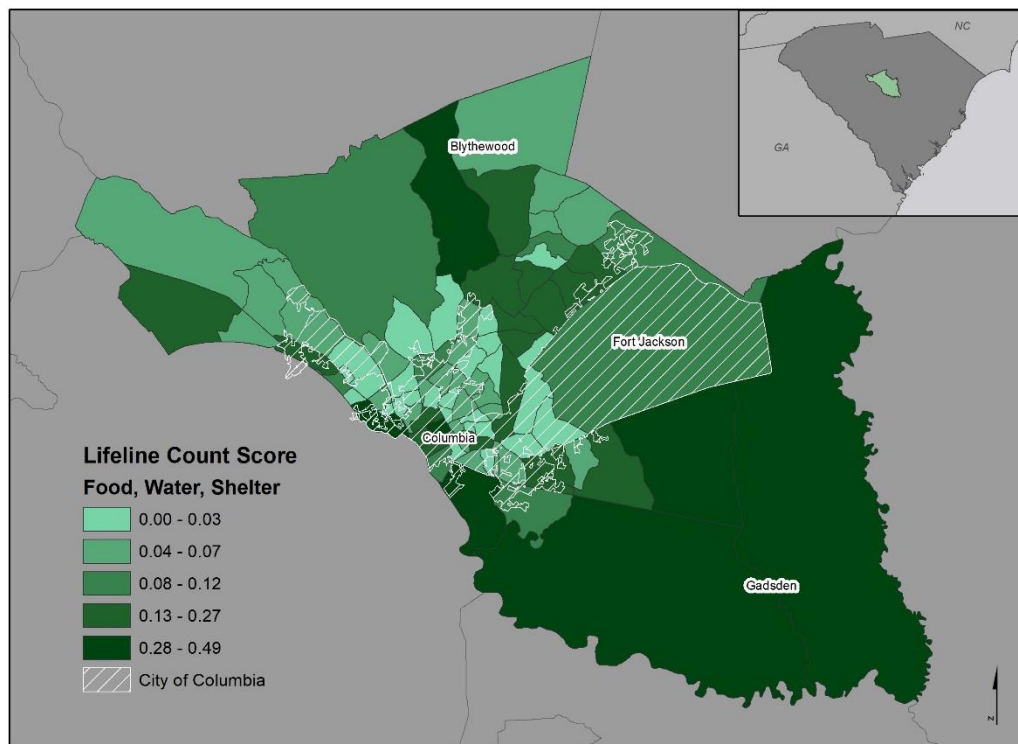


Figure 21 Food, Water, & Shelter Lifeline Count Score

In Lower Richland, the higher Food, Water, & Shelter Lifeline score is a function of agricultural cropland acreage and the number of water supply infrastructures (Figure 21). In Downtown Columbia, Blythewood, and the Decker-Two Notch Corridor, the primary drivers are the number of restaurants, grocery stores, and hotels/motels/inns, especially near exits off I-77 and I-20.

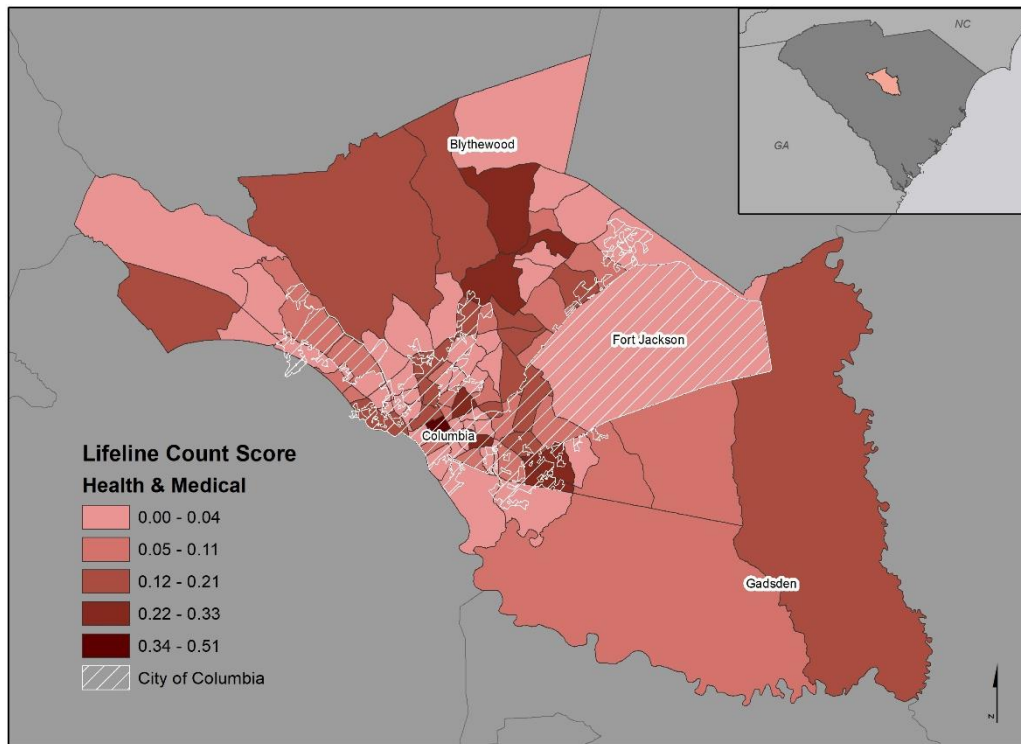


Figure 22 Health & Medical Lifeline Count Score

The Health and Medical Lifeline scores are highest in Downtown Columbia, Northeast Richland, and Garners Ferry Rd east of the I-77 Beltway (south of Fort Jackson) (Figure 22). The Intermedical Hospital, Prisma Health Baptist Hospital, and Providence Hospital are located in Downtown Columbia, along with EMS, pharmacies, and nursing homes. The scores in the Northeast Richland area and area south of Fort Jackson are a function of the number of pharmacies, nursing homes, urgent care, and emergency medical services (EMS) facilities.

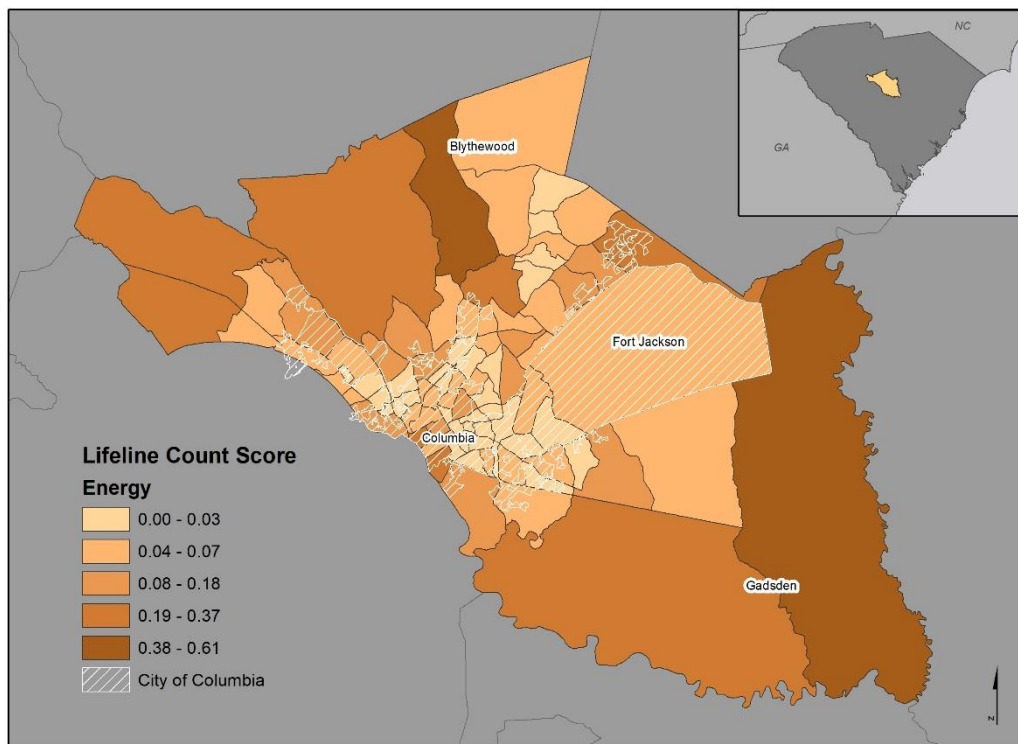


Figure 23 Energy Lifeline Count Score)

In Lower Richland (Figure 23), there are two facilities with electricity-generating capacity: International Paper Mill in Eastover, and the SCE&G Wateree Station power plant. There are also several substations and approximately 150 miles of transmission lines. In North Central to Northwest Richland County, there are approximately 163 miles of transmission lines, approximately 18 miles of liquefied natural gas (LNG) pipeline, and multiple electrical substations and fuel facilities/gas stations.

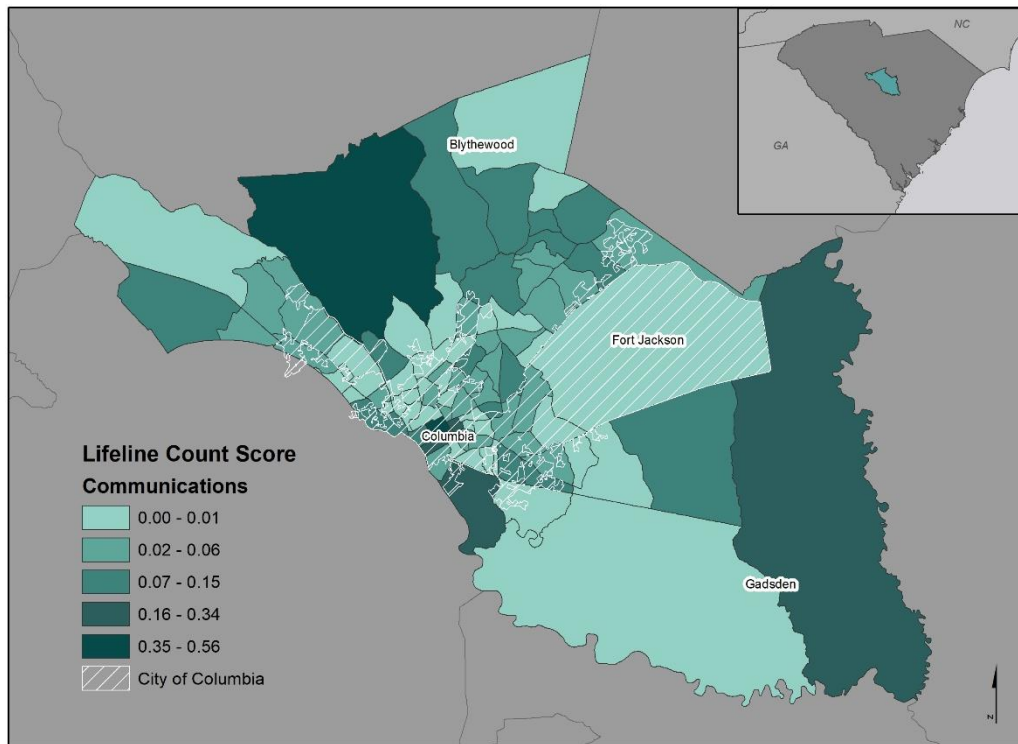


Figure 24 Communications Lifeline Count Score

In North Central Richland and Lower Richland, there are several cell, broadcast, and AM/FM towers (Figure 24). The higher score in Downtown Columbia is a function of the number of banks and credit unions, along with some communications towers. The tracts along the Two Notch corridor, Forest Drive, and Garners Ferry Road, there are also multiple banks and credit unions, which produce an elevated score on this lifeline component.

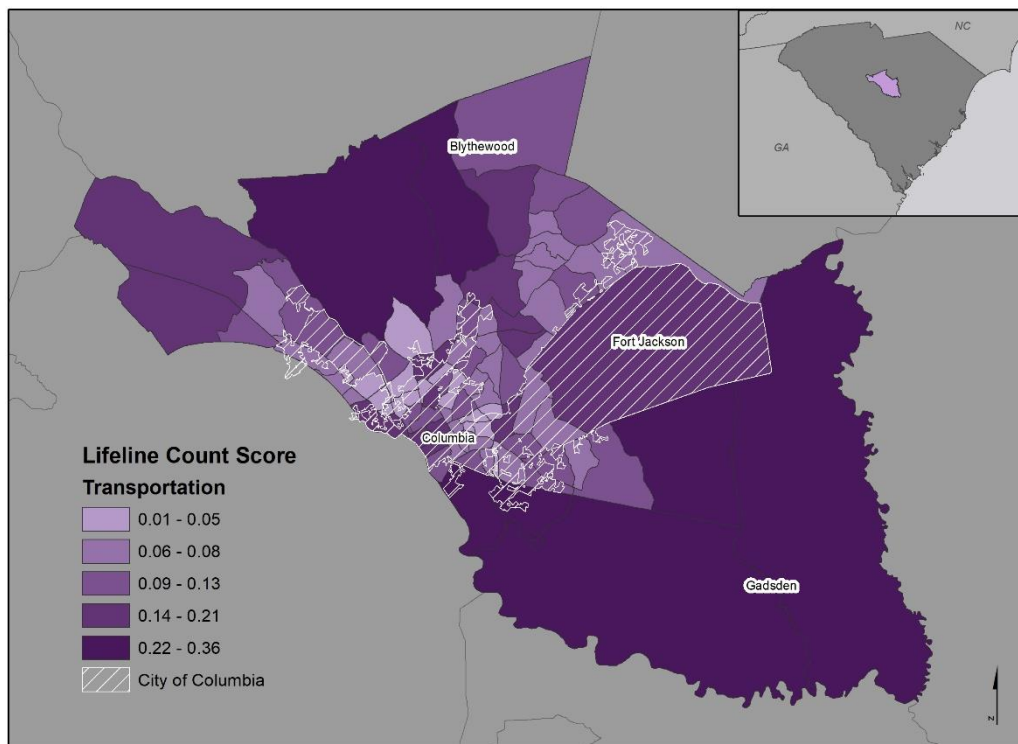


Figure 25 Transportation Lifeline Count Score

Similar to the spatial pattern for the Energy Lifeline Count score (Figure 25), the pattern for the Transportation Lifeline is due to road miles, rail miles, and the number of bridges. The pattern highlights Lower Richland as well as North Central Richland County.

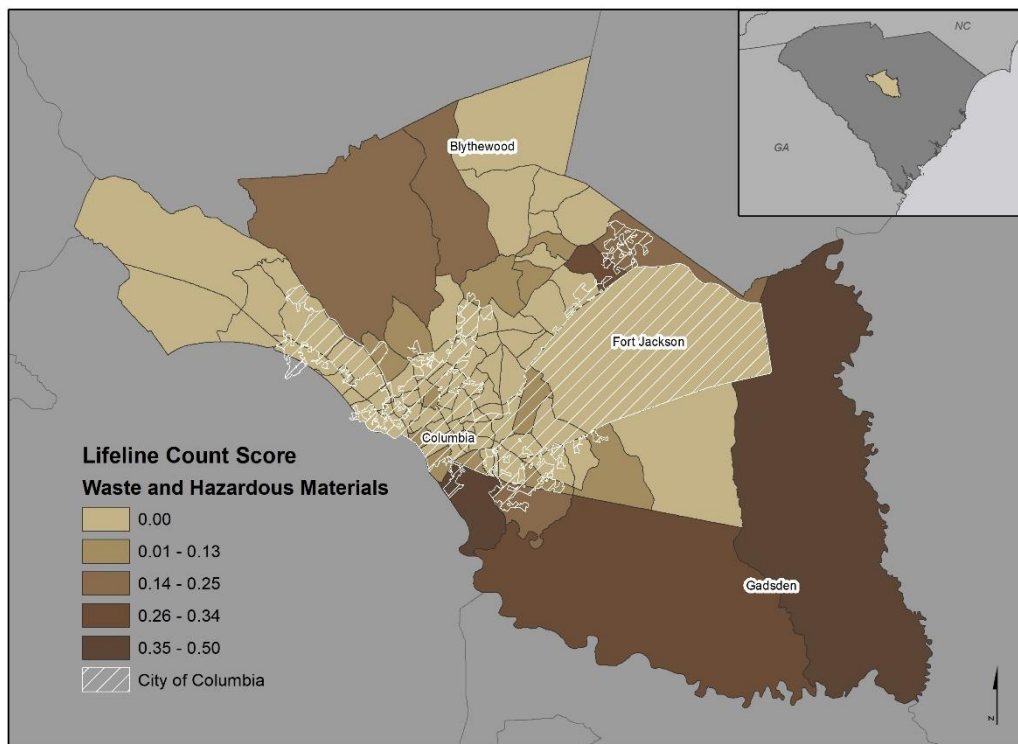


Figure 26 Waste and Hazardous Materials Lifeline Count Score

The Waste and Hazardous Waste Lifeline score (Figure 26) highlights Lower Richland, where the Republic Services Landfill is located on Jct. Westvaco Rd/Screaming Eagle Rd. For context, the other landfill is Waste Management on Jct. S-40-268 (Screaming Eagle Rd)/S-40-1904, north of Fort Jackson, where the landfill extends into Kershaw County). With just the one landfill, Lower Richland stands out primarily because of EPA-regulated Toxic Release Inventory (TRI) facilities and those with Risk Management Plans (RMP) (facilities that use large amounts of extremely hazardous substances need to file such plans). These sites include the International Paper Eastover Mill, SCE&G Wateree Station, and smaller facilities along Shop and Bluff Roads that use and/or storage hazardous substances.

The Richland County PCLII (Figure 19) clearly shows the geographic distribution of potential lifeline impacts concentrated in Lower Richland, downtown Columbia, and in the North-Central region. An additional consideration is the relationship between the potential lifeline impacts and the socially vulnerable populations within the county. As shown in Figure 27, there is a positive relationship between those census tracts with the highest lifeline potential impact and the most socially vulnerable populations (areas depicted in red). The bi-variate map graphically shows again that Lower Richland contains the most vulnerable populations and has the highest potential community lifeline impact. Another area is Decker-Two Notch area adjacent to I-20. Given the relative vulnerability and higher lifeline impact scores in the rural areas of Lower Richland, situations where there are interruptions in the services these lifelines provide may have more severe consequences thereby slowing its long-term recovery and reducing the resilience of the area because of the lack of access.

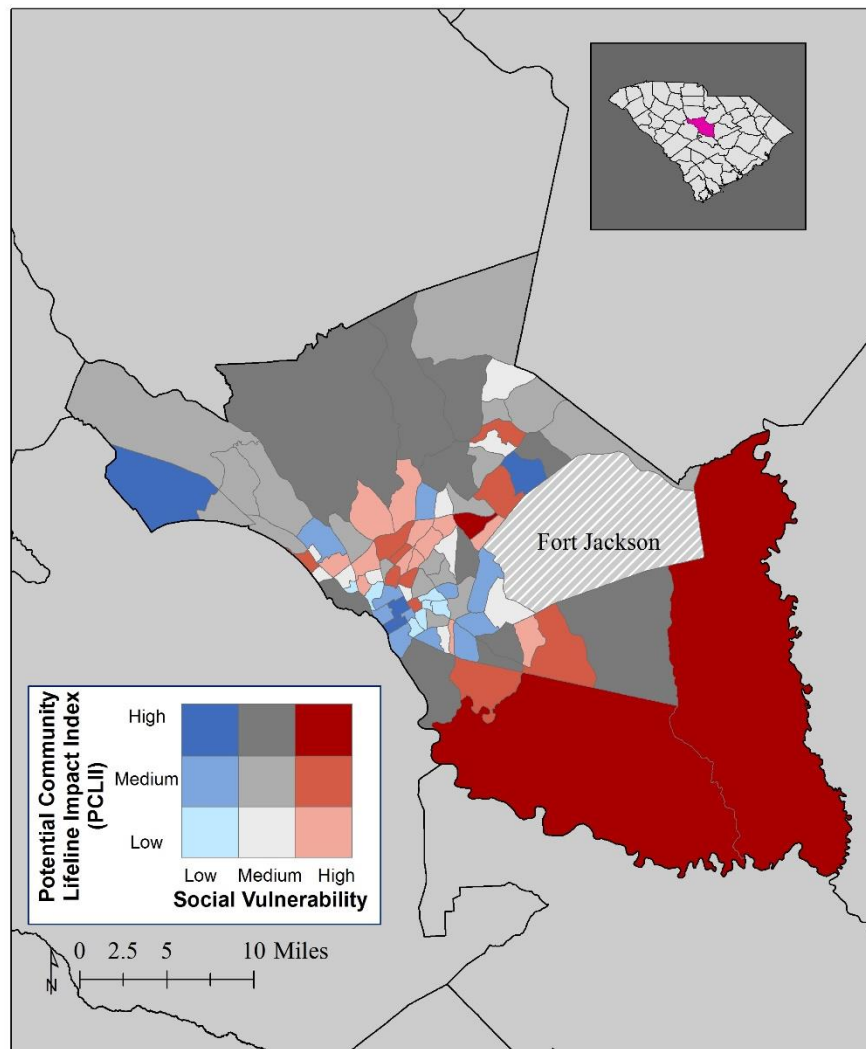


Figure 27 Relationship between Richland County Potential Community Lifeline Impact Index (RC-PCLII) and Social Vulnerability

Residential Recovery Impact and Unmet Needs Profiles

Immediately after a hazard event, the primary resources for the initial recovery of affected residents are FEMA's Individual Assistance (IA) through the Individuals and Households Program (IHP), the National Flood Insurance (NFIP) program, low-interest loans from the Small Business Administration (SBA), and over the longer term, HUD CDBG-DR funding. Determining the success of federal and state recovery efforts and delineating the additional unmet individual homeowner mitigation needs is a crucial part of HUD CDBG-MIT analysis.

This section examines the federal and state resources (or recovery safety nets) available to affected residents in Richland County.²¹ A more detailed examination using census tract analyses appears at the end of this section, showing the relationship between the availability of the recovery and short-term mitigation resources and the residual unmet mitigation needs. The complex municipal boundary for the city of Columbia makes it difficult to

²¹ Emrich, C.T., E. Tate, S.E. Larson, and Y. Zhou, 2019. Measuring social equity in flood recovery funding, *Environmental Hazards*, online 10 Nov 2019, <https://doi.org/10.1080/17477891.2019.1675578>.



differentiate the city from the county jurisdictions using census tract or zip codes when creating a detailed overview of the unmet need profiles.

FEMA Individual Housing Assistance for Homeowners

Following the 2015 flood, only 24% of the applicants statewide received housing assistance to bring their home to a safe, sanitary, and secure condition. Within Richland County, the proportions were better with 31% of the applicants receiving housing assistance. The applicants were concentrated near Congaree River and one of its main tributaries, Gills Creek (Figure 28).²²

There are many reasons for denying claims (clerical errors, inconsistent information on owner's name and address, proof of occupancy, identity verification), but one significant reason is a claim may be denied based on the results from attributing damage to a specific event. In other words, FEMA damage inspectors may judge that a dwelling had a pre-existing deteriorated condition due to deferred maintenance or other pre-storm conditions and, therefore, did not sustain damage by the present flood or storm. The 2015 HUD State CDBG-DR Action Plan for Recovery suggests that such eligibility determinations and claim denials often disproportionately affect low to moderate income (LMI) households.²³

The success ratio in receiving FEMA IHP resources only tells part of the story of the mitigation and resilience needs assessment. Another consideration is the actual dollar amount of the resources relative to the damage assessment by FEMA. As shown below (Table 6) there is an estimated unmet financial need for immediate repairs per the IHP program based on the difference between the total verified losses and the approved IHP amounts.

As of November 2019, 4,990 Richland County homeowners received FEMA housing assistance for DR-4241 which totaled more than \$19.8 million (slightly less than \$4,000 per recipient) (Table 6).²⁴ For many homeowners the average amount of funding is insufficient to rehabilitate the home to the safe, sanitary, and secure condition let alone its pre-disaster condition. The funding generally excludes secondary impacts from the floodwaters such as mold that appears much later and for which homeowners incur additional mold remediation costs as well.

²²Differences in the figures between the reporting in approved HUD Disaster Recovery Plans for the 2015 floods and the numbers here are due to the lag in identifying and qualifying applicants for assistance.

²³South Carolina Disaster Recovery Office, Note 19.

²⁴ FEMA, 2019. Housing Assistance Data, Accessed 27 November 2019. <https://www.fema.gov/media-library/assets/documents/34758>. Data reflect counts as of 11/25/2019.

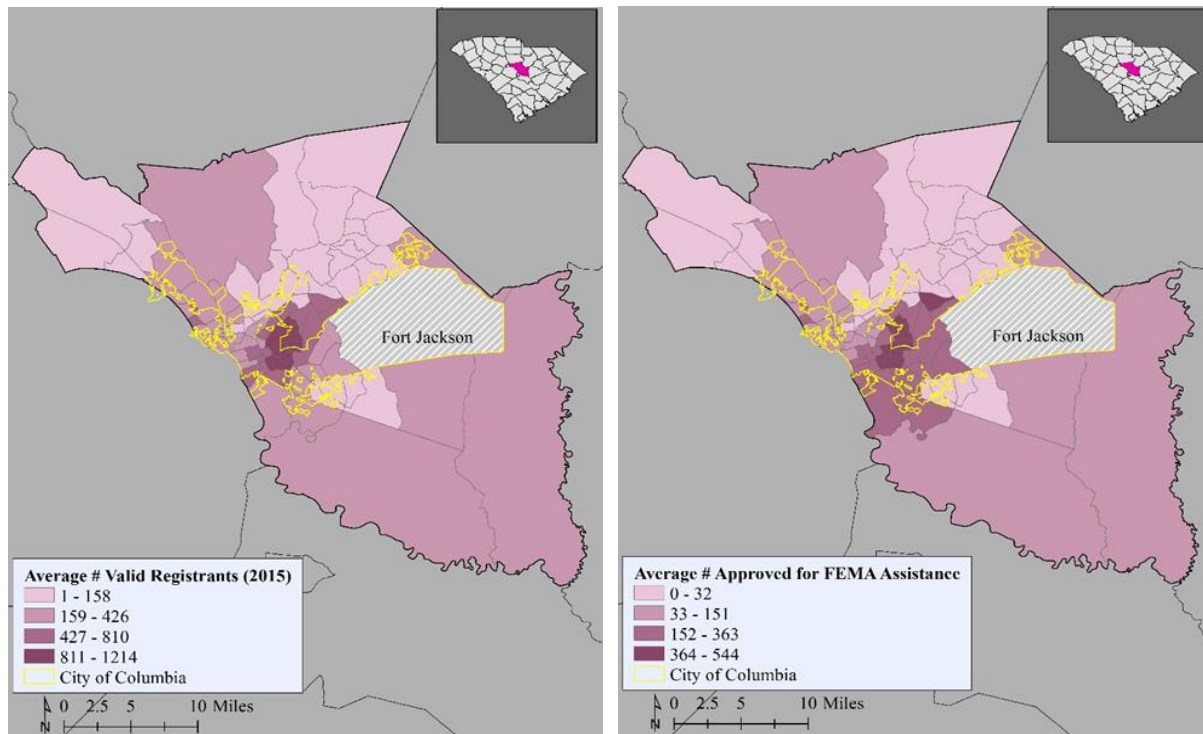


Figure 6 Number of Valid FEMA IA Registrants (by census tract, left) and Number of Approved Cases for FEMA Assistance, 2015 floods (DR-4241)

Table 3 FEMA Individuals and Households Program (IHP) Support for PDD-4241 for Richland County

Background Characteristics	Quantity or Value
Registrations (number)	16,090
Inspections (number of housing)	12,608
Approved for FEMA assistance (number)	4,990
Not approved for FEMA assistance (number)	11,100
Total damage (FEMA verified loss, \$)	\$25,317,516
Total approved IHP (\$)	\$19,845,511
Unmet FEMA need (\$)	\$5,472,005

Source: FEMA Housing Assistance Program, note 24.



National Flood Insurance Policy Coverage

Historically, Richland County has relatively little uptake of NFIP flood policies despite the flood-prone nature of its riverine environments. In Richland County, there are 87,978 owner-occupied housing units. There are roughly 5,696 homes located in the SFHA (A & AE flood zone), although not all of them are owner occupied. Less than half of these homes have NFIP policies and as of July 2019,²⁵ with an additional 107 structures located in the floodway. For the 2015 flood event, there were 447 claims (17% of the policies in force as of January 2016) that totaled nearly \$30.7 million in building and contents claims, or roughly \$68,648 per claim.

***Table 4 Number of NFIP Policies in Force in
Richland County and Incorporated Areas***

Policy as of Date	Number
30 January 2016	2,594
30 September 2016	2,886
31 December 2016	2,796
30 September 2018	2,919
30 June 2019	2,799

Source: Cutter et al. 2018 (Note 16) and OpenFEMA (Note 25)

As can be seen from Figure 29, the majority of the NFIP claims were from the Arcadia Lakes-Forest Acres-Lake Katherine area along Gills Creek.

Special Hazards Flood Area (SFHA) Damage Assessment

Given the low penetration of NFIP policies in Richland County relative to the flood risk, it is no surprise that many homes outside the SFHA experienced significant damage due to the storm. In their CDBG-DR Action Plan, Richland County identified "...179 homes in the floodplain with substantial damage (greater than 50% damaged) totaling more than \$17 million" and an additional 425 homes with varying levels of damage totaling more than \$31.7 million.²⁶

²⁵ Data downloaded from OpenFEMA claims and policy data, published July 2019, Accessed 24 February 2020, <https://www.fema.gov/data-feeds>

²⁶ Richland County, Note 1, p. 9.



Small Business Administration (SBA) Loans

In Richland County, there were very few SBA loans (20 or less) for the 2015 floods with \$39.1 million in approved amounts. There were significantly fewer SBA loans (33) for 2015 floods. The majority of the loans were in the most damaged areas in zip codes 29205, 29206, and 29209. Table 8 shows a summary of SBA loans for Richland County.

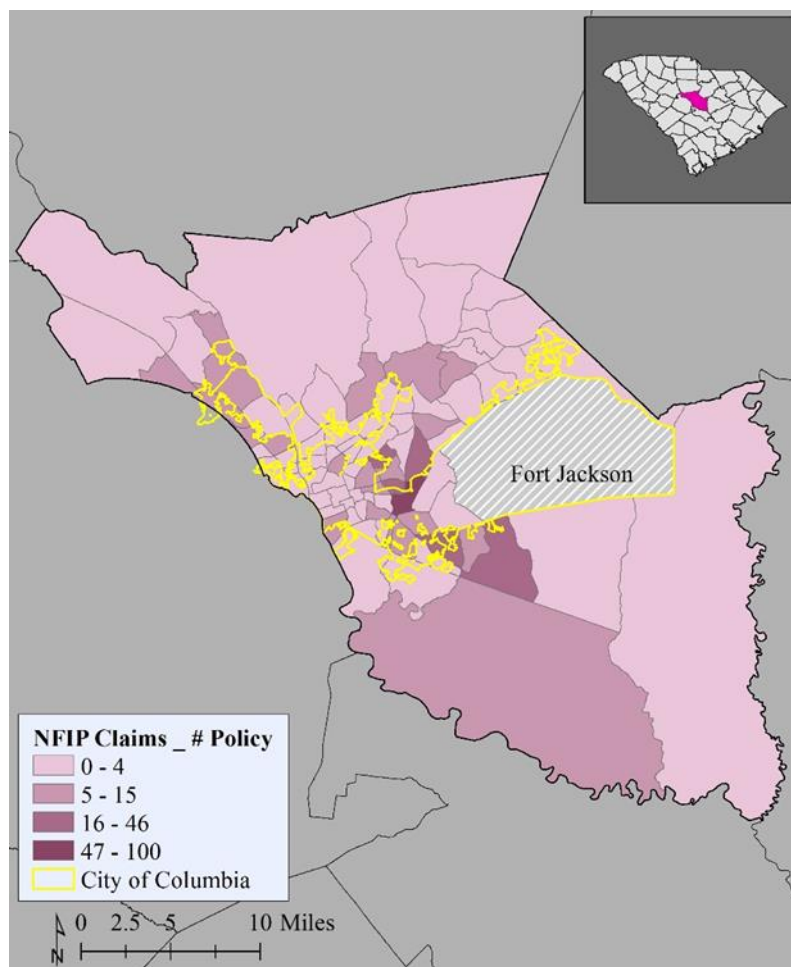


Figure 7 Distribution of NFIP Claims by Census Tract

Table 5 Summary of SBA Loans for Richland County

County	# SBA Home Loans DR-4241	SBA Verified Loss (\$)	SBA Approved Loan Amount (\$)	SBA Approved Amount Real Estate (\$)	SBA Approved Amount Content (\$)
Richland	33	\$84,482,499	\$46,398,300	\$37,252,100	\$9,077,300



HUD CDBG-DR Funding

Richland County's CDBG-DR funding specifically targets four main areas—housing, public infrastructure, economic development, and recovery and resiliency planning. In the area of housing, the primary focus was single family housing rehabilitation (including mobile home replacements) and residential buyouts through matching funds for HMGP buyouts. For the county's Single Family Homeowner Rehabilitation Program (SFHRP), 166 applicants received funding (42%), 23 applicants anticipate receiving funds upon re-allocation of existing funds (6%), 111 applicants are on the waitlist (28%), and 95 applicants were not covered by the program (24%) at the end of 2019 (Figure 30). The demand for housing rehabilitation and reconstruction remain high especially in Lower Richland with many households on the waitlist for assistance.

From the 166 that have received funding from the SFHRP, 30 are reconstruction projects (18%), 80 are rehabilitation (48%), and 56 are mobile home replacement (34%). Another element of Richland County's CDBG-DR Action Plan was the provision of the 25% match for residential buyouts from state FEMA HMGP funding designated for the county. Approximately 56 properties were acquired through FEMA's HMGP buyout program in the most flood-prone areas adjacent to Gills Creek, and in the Denny Terrace community along Crane Creek. These properties are highlighted by the red density dots (Figure 31) showing the concentrations of buyout properties.

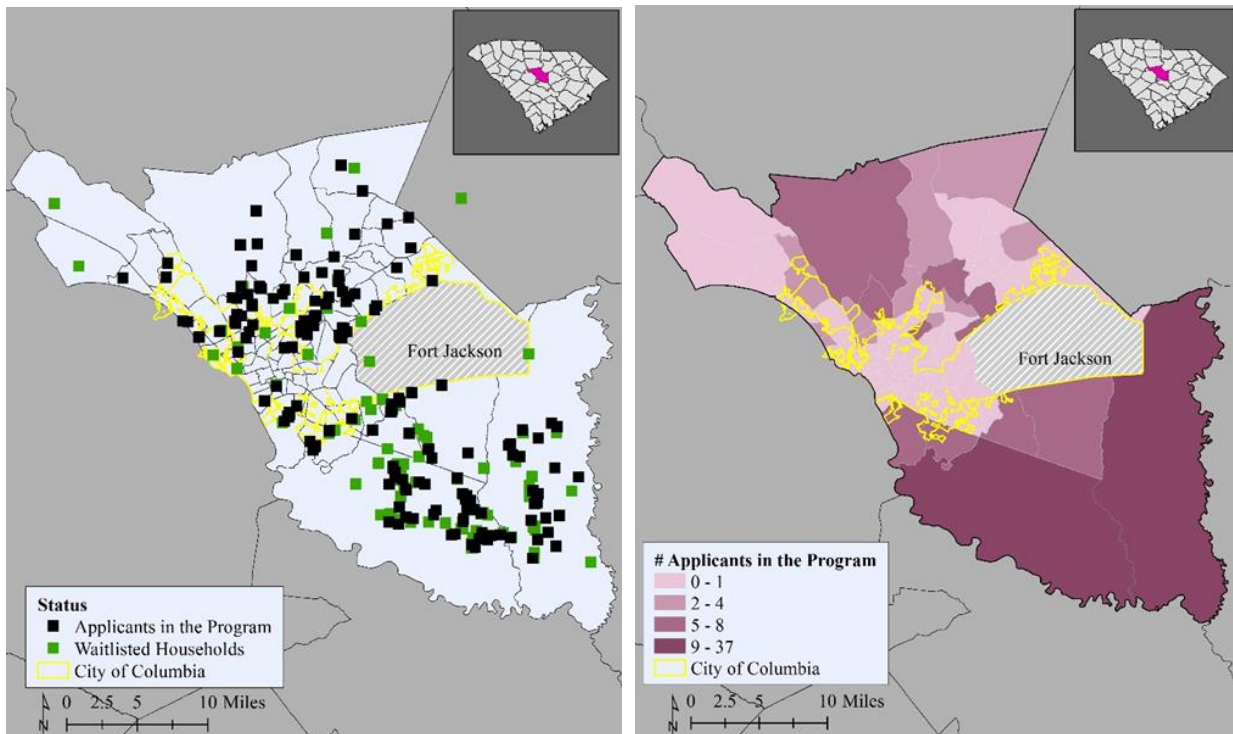


Figure 8 Distribution of SFHRP-Funded and Waitlisted Applicants (left) and the Location of Applicants by Census Tract (right)

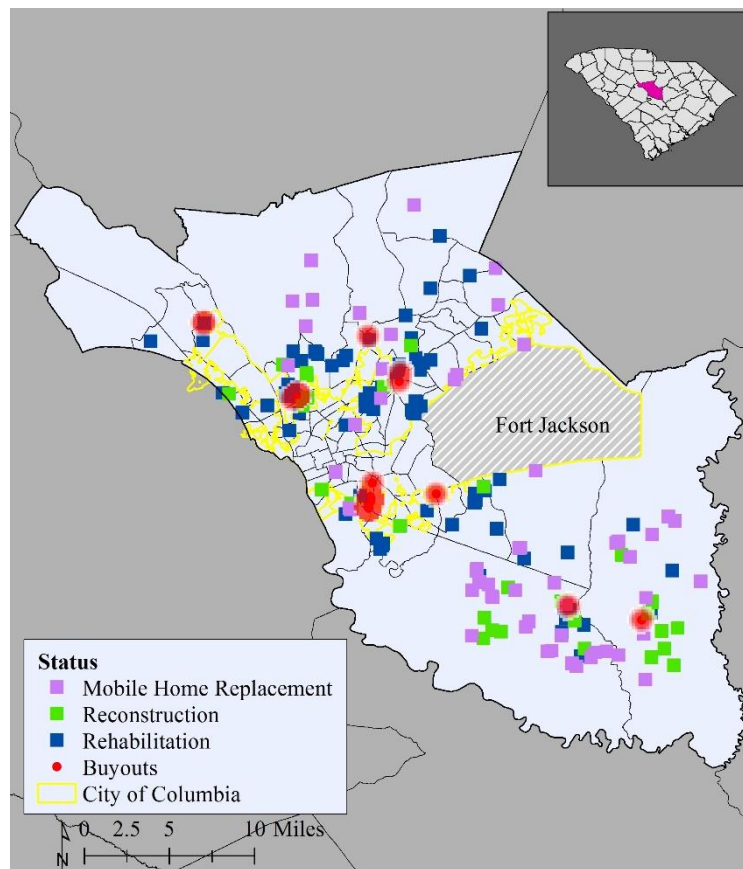


Figure 9 Type of Residential Housing Mitigation Support

The Unmet Household Mitigation Deficit

To determine the unmet household mitigation needs, all of the applicants to any of the federal or state recovery and mitigation programs (FEMA IHP, NFIP claims, SBA loans, and HUD CDBG-DR) were tallied for Richland County as well as the census tracts within the county to create a total mitigation safety net score (Table 9). To create the unmet mitigation needs the total number of mitigation safety applications was deducted from the total number of FEMA applicants for the 2015 flood and severe storm disaster declarations (DR-4241). The difference represents those with potential need based on their applications for assistance.

These results indicate that 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 individuals. For this reason, ineligible applicants must be considered in any overall housing unmet need calculation.”²⁷

²⁷ South Carolina Disaster Recovery Office, Note 19, page 51-52.



Table 6 Determination of Number of Unmet Mitigation Needs Properties

County	FEMA Total Registrants	# FEMA IHP Approvals	# NFIP Claims	Total # SBA Loans	# County Housing Properties	# HMGP Housing Buyouts	TOTAL (#) Mitigation	Mitigation Deficit (#)
Richland	16,091	4,990	447	33	166	56	5,689	10,402

Based on this analysis, roughly 35% of Richland County homeowners received financial assistance to help repair and/or mitigate future damage to their homes from federal, state, and county programs. This is significantly lower than the statewide average of 53% for both the 2015 floods and 2016 Hurricane Matthew.²⁸

Flooding and the Household Mitigation Deficit

Those census tracts with the largest household mitigation deficit appear in those inland riverine areas that had significant flood damage during the 2015 Floods (Figure 32 bottom). These include Gills Creek, Crane Creek, and Rawls Creek areas in addition to the low-lying areas in Lower Richland draining into the Congaree River in the Congaree National Park. Reducing the impact of flooding in the county through enhanced household flood mitigation is an important element in this plan, especially in those low-lying areas with repetitive flood losses.

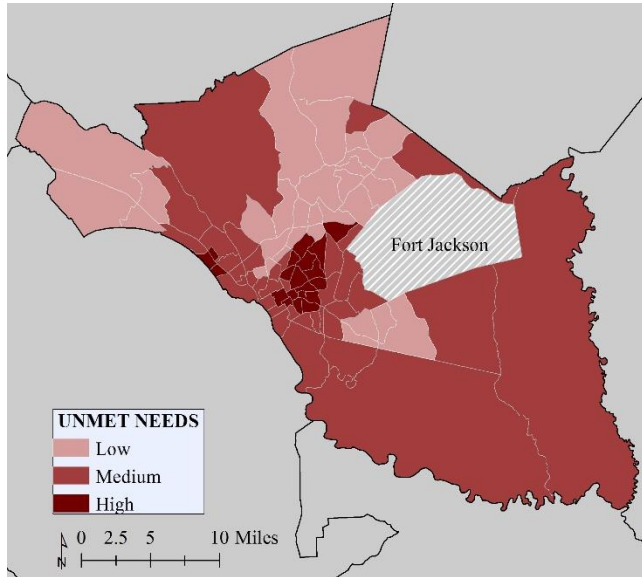
Part of the household mitigation deficit is clearly a result of ineligibility for some of the federal programs, especially FEMA's IHP approvals. In other instances, homeowners did not have flood insurance (those living within the SFHA as well as those outside), so there was no safety net for recouping flood losses from the federal program. The county's Single Family Homeowner Rehabilitation Program (SFHRP) has made progress in reducing the mitigation deficit despite its limited funding.

²⁸ Ibid.

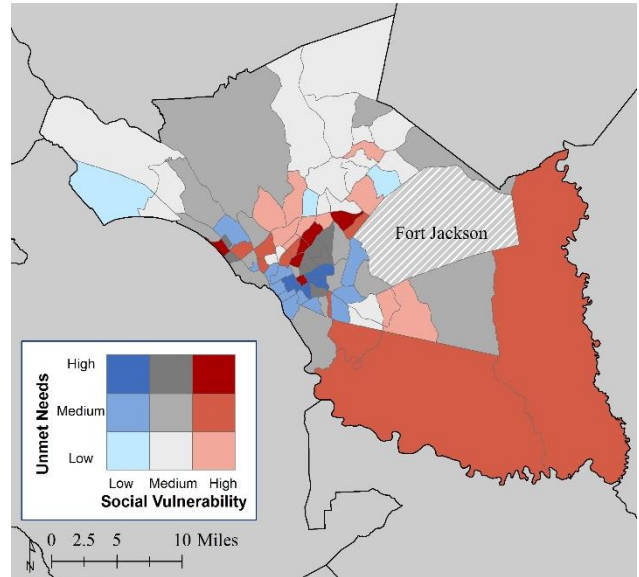


Household Mitigation Deficit

Unmet Needs (by census tracts)



SoVI® and Unmet Needs bivariate map



Unmet Needs and Flooding Risk bivariate map

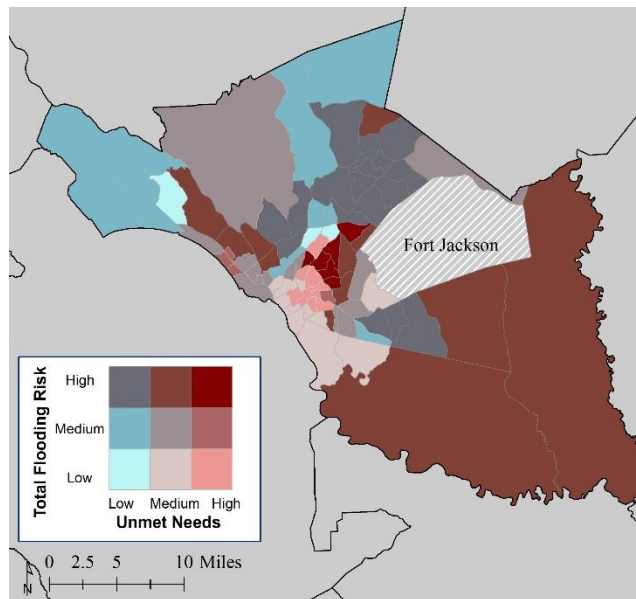


Figure 10 Unmet Household Recovery and Mitigation Needs (left) and its Relationship to Social Vulnerability (right). The bivariate map shows census tracts with high social vulnerability, but moderate (orange) to high (red) levels of a mitigation deficit. In contrast, areas with higher mitigation deficits but low social vulnerability are in dark blue. The relationship between the mitigation deficit and flooding is shown on the bottom panel, dark red showing both higher levels of flood risk and household mitigation deficits.



Mitigation Projects and Needs

Existing Mitigation Projects

Richland County received roughly \$19.7 million in FEMA Hazard Mitigation Grant Program (HMGP) funding for PDD-4241 (2015 severe storms and floods). The majority of the funds (Table 10) supported residential property acquisition and demolition (DEM). However, some of the funding in the other category (OTH) was for commercial property acquisition and demolition in the city of Columbia and elsewhere within Richland County, and for local flood reduction projects.

Table 7 Amount and Type of Hazard Mitigation Grant Projects Awarded (PDD-4241) to Richland County

Type Codes	Description	DR-4241	
		% of Projects	Grant Amount
SIP	5 Percent Initiative Projects	7.70%	\$113,881
OTH	Miscellaneous/Other	38.50%	\$3,514,795
LFR	Localized Flood Risk Reduction Projects	7.70%	\$585,000
PLN	Hazard Mitigation Planning	-	
GEN	Generators	-	
DEM	Property Acquisition and Structure Demolition	46.10%	\$15,501,010
Total		100.00%	\$19,714,686

Source: SC Emergency Management Division

The initial distribution of projects may not reflect what has occurred in the past three years because of negotiations between Richland County and/or the City of Columbia with property owners and some of the requirements and limitations of the HMGP program. However, as noted earlier in the document, Richland County has successfully purchased 56 properties using HMGP funding in addition to CDBG-DR resources. The majority of these residences were in the SFHA.

Mitigation Needs Assessment Summary

This assessment of mitigation needs for Richland County used an empirical geospatial approach to define the most vulnerable areas within the study area of interest in three broad areas—hazard risk (especially flooding), household mitigation deficits post initial recovery, and potential impacts on lifelines. Given the historic flood event of 2015 and more recent experiences with riverine and flash flooding, the significance of the flood hazard in the county is clear. Richland County ranks second in the state (behind Greenville County) in terms of flash flood risk potential exposure. It is for this reason that the CDBG-MIT plan focuses on flood hazards in our development of mitigation efforts to enhance the long-term resilience of our community that will enable a more sustainable and prosperous quality of life for the people who live and work in Richland County.

The overall hazards assessment for Richland County used data from the 2018 South Carolina Hazard Mitigation Plan Update as the foundation. Through a series of maps of individual hazards, a risk profile for Richland County



showed the relative level of hazardousness in the region. When compared to the social vulnerability of census tracts (using bi-variate mapping) the approach illustrates who is most affected by different hazards and where. The potential lifeline impacts based on the Potential Community Lifeline Impact Index (PCLII), showed an overall concentration of potential lifeline impacts in the less populated census tracts in Richland County. Additionally, the higher levels of potential lifeline impact appear in census tracts with higher levels of social vulnerability. Examination of the recovery profiles for households showed unmet household mitigation needs (or mitigation deficits) especially among the most socially vulnerable populations.

To highlight the significance of the present flood hazard in Richland County and to define unmet mitigation needs for households and community lifelines/infrastructure to reduce it, the local variability in current risk and flood exposure are presented in Figures 33-35. It should be noted that given the weather extremes associated with climate change, Richland County should anticipate an increased frequency of heavy precipitation, severe storms, and flooding events.²⁹

For this study region, many of the most socially vulnerable census tracts are adjacent to FEMA-designated 100-year and 500-year flood zones (Figure 33). There is a clear pattern of higher levels of social vulnerability near the flood-prone areas. Based on the inundation surfaces mapped by the US Geological Survey (USGS), additional flood-prone areas are in census tracts with medium levels of social vulnerability.

²⁹ U.S. Global Climate Research Program (USGCRP), 2018. Fourth National Climate Assessment, Chapter 19: Southeast. Accessed 25 February, 2020, <https://nca2018.globalchange.gov/chapter/19/>

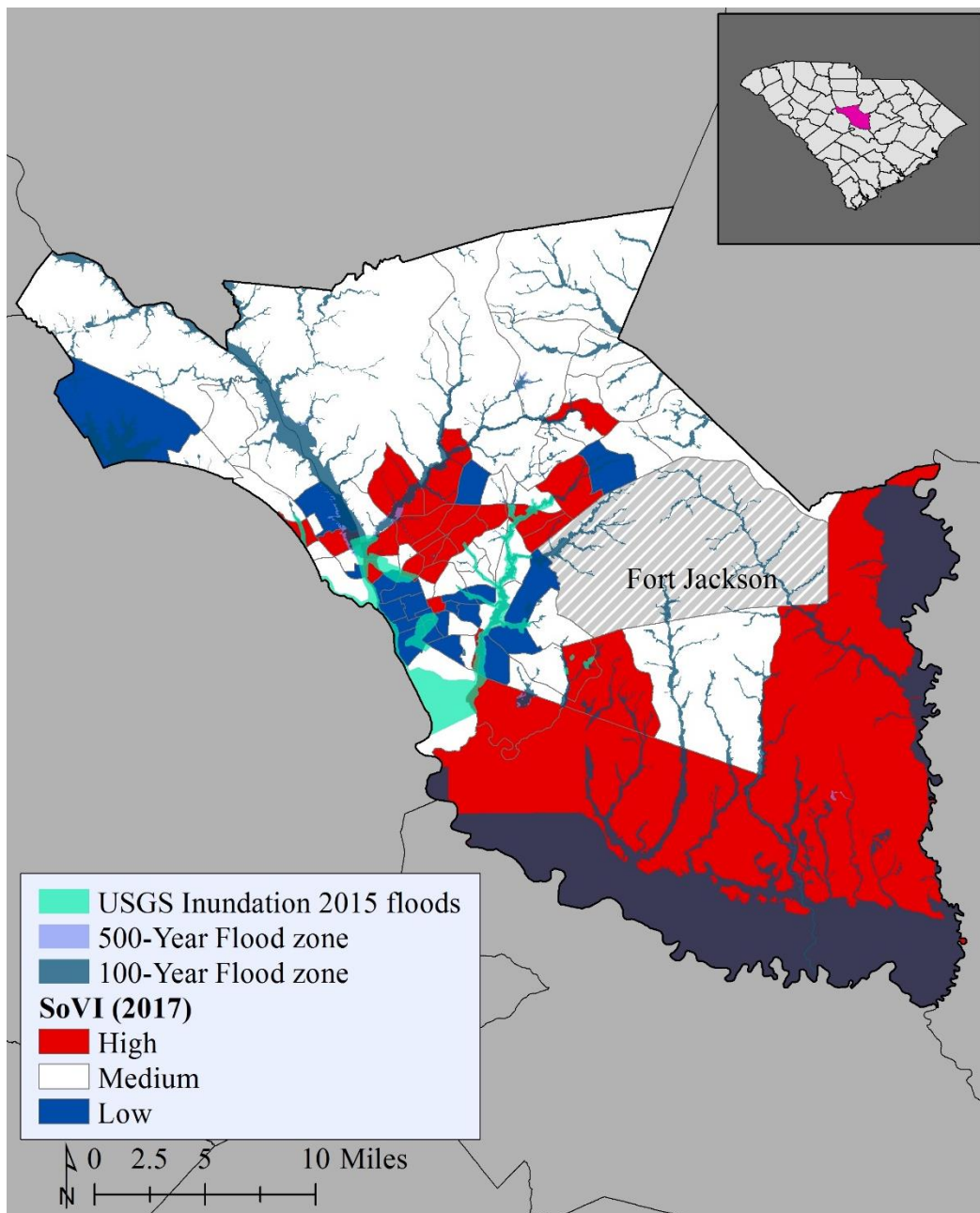


Figure 11 Flood Zones in Relation to Socially Vulnerable Populations

The generalized pattern for community lifelines shows a concentration (Figure 34) of greater potential impact in those areas of the county with significant flood-prone areas designated by the 100-year flood zones. Given that the designated SFHA covers 20% of Richland County's land area, this is not surprising. More importantly, it provides a rationale for enhanced mitigation to promote resilience, especially for the critical infrastructure that serves some of the most vulnerable populations.

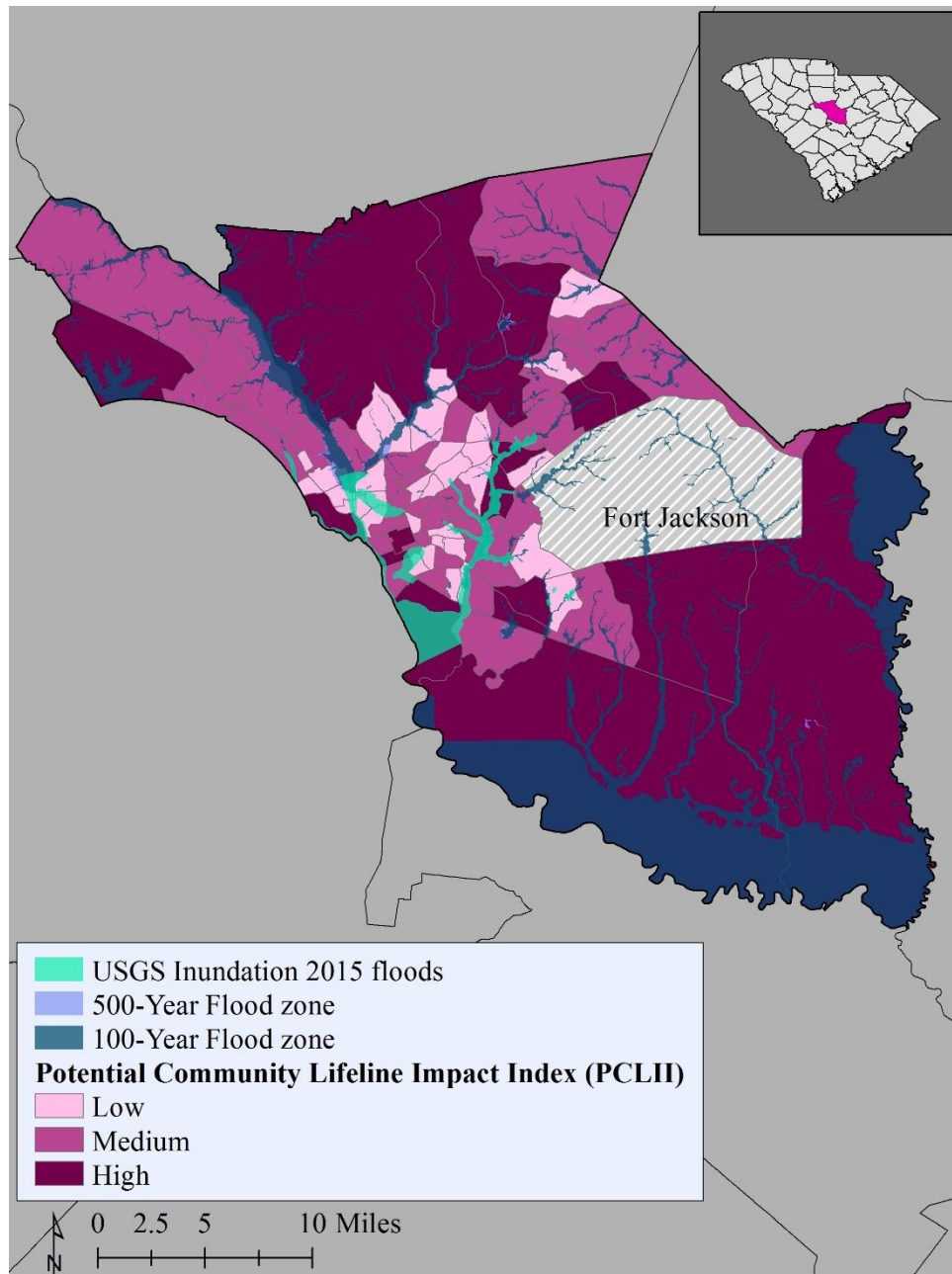


Figure 12 Flood Zones in Relation to Potential Community Lifeline Impacts

At the household level, medium to high deficits in mitigation needs persist throughout most of Richland County (Figure 35). For many households, they are still lacking resources for recovery as evidenced by the long waiting list for support for rehabilitation of their houses.

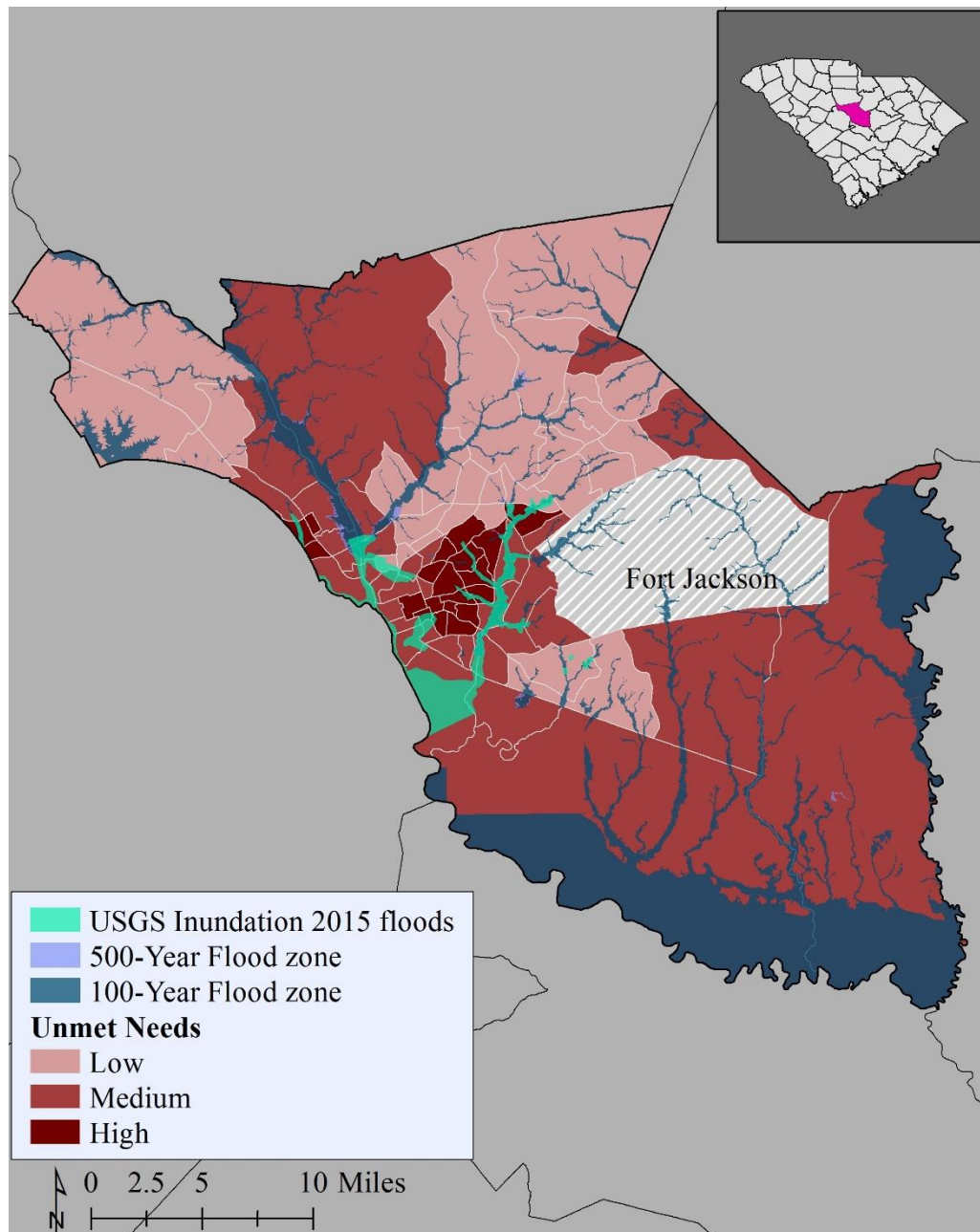


Figure 13 Homeowner Unmet Recovery and Mitigation Needs and Flood Zones

The comprehensive mitigation needs background and assessment provided here supports the core need for the HUD CDBG-MIT funding—to support the most vulnerable and most in need communities with additional mitigation resources for full recovery from the October 2015 floods. The sections that follow provide the actions necessary to mitigate against future impacts of flooding on households and the lifelines that support them.



SECTION 3. ACTION PLAN

Funding Priorities

Based on the findings of the mitigation needs assessment, Richland County will focus CDBG-MIT funding on reducing potential flood impacts in High Hazard Risk areas. This will be accomplished through flood-reduction infrastructure projects, housing buyouts and providing the local match funds for FEMA-funded mitigation programs. Richland County flood reduction efforts will only address riverine and surface flooding, not storm surge or sea-level rise issues.

Pre-award and Pre-agreement Cost Reimbursement

The County intends to seek reimbursement for the costs of eligible pre-award and pre-agreement activities. These tasks were conducted in anticipation of the award and in preparation for mitigation programs. These costs will be split appropriately between program administration costs, planning and activity delivery costs. Richland County will be seeking reimbursement for the following pre-award and pre-agreement activities:

- CDBG-MIT Action Plan Development: : \$8,488
- Mitigation Needs Assessment Development: \$14,890
- CDBG-MIT Action Plan Translation services: \$ 600.00
- CDBG-MIT Administration: \$23,400

Method of Distribution

CDBG-MIT Program National Objectives

Richland County has designed this CDBG-MIT program in compliance with the national objectives and will ensure that assistance is prioritized toward the most disadvantaged populations. Richland County will spend a minimum of 50% 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 county in which the applicant lives.

As stewards of federal CDBG funds, Richland County 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 Richland County will meet one of two named HUD national objectives:

- 1) Benefitting LMI persons;
- 2) Meeting Urgent Mitigation Needs

CDBG-MIT programs will begin after the executed grant agreement and be completed by June 2032.

All activities (except planning and program administration) funded through CDCBG-MIT grant must meet the following definition of a mitigation activity: activities that increase resilience to disasters and reduce or eliminate



the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

CDBG-MIT Program Budget

The following is a table of budgeted activities:

Program	Allocation
Infrastructure	\$7,882,500
Housing	\$9,158,700
Planning	\$3,729,600
Program Administration	\$1,093,200
TOTAL	\$21,864,000

Leveraging of Funds

The County has to identified and catalogued available sources of assistance for recovery and mitigation from recent disasters. The County will ensure that CDBG-MIT funds are only used to address funding needs not satisfied by other sources, some of which may be providing mitigation funding, including, but not limited to:

- FEMA Individual Assistance grants
- FEMA Mitigation Grant Program
- SBA Disaster Loans
- National Flood Insurance Program payments
- Private insurance
- Natural Resources Conservation Service Emergency Watershed programs
- Water Conservation District funds
- Drinking Water and Water Pollution Controls funds, and
- Private foundations

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

Infrastructure

Richland County, through its Department of Public Works (RCDPW) and Emergency Services Department (RCESD), will complete infrastructure projects aimed at improving resilience of public infrastructure, mitigating future flood damage, and reducing impacts of future storms on public safety and property damage.

Stormwater and Drainage Infrastructure Resilience Program

Program Description



The Stormwater and Drainage Infrastructure Resilience Program will be executed in two phases. Phase 1 is designed for projects that require engineering studies and design. The Richland County Department of Public Works (RCDPW) will solicit engineering services for projects in areas with known flooding concerns. Each project will be prioritized based on the methodology detailed in the “Project Prioritization” section. Phase 1 is anticipated to last until year five of the Mitigation Program. The Richland County Department of Public Works created a Steering Committee, which consists of representatives from the Engineering, Stormwater Management, and Roads & Drainage Management Divisions. The RCDPW Steering committee selected projects based on the rankings from the prioritization with additional consideration to ensure at least 50% of the funding is applied in low-to-moderate income areas.

For Phase 2, the Richland County Department of Public Works will solicit contractors to implement project recommendations in the studies completed in Phase 1. Phase two is anticipated to last until the end in year 12 of the Mitigation Program, or sooner if project construction is completed beforehand. Projects will be ranked using the same prioritization methodology as Phase 1.

The list of infrastructure projects includes projects ranked high by the PDT, will mitigate flooding or meet an urgent need to protect the safety and security of residents and transportation networks. More than half of the projects are located in or affect low-to-moderate income areas.

<u>Project Description</u>	<u>Design/Study cost</u>	<u>Construction cost</u>	<u>Total Project Amount</u>
Complete drainage studies and infrastructure improvements for multiple known drainage areas which currently experience localized flooding. The goal of the drainage studies is to identify ways to improve safety and security for residents in this area and protect county roads and other infrastructure.	\$300,000	\$1,150,000	\$1,450,000
A drainage study of and construction of infrastructure improvements in the Spears Creek Watershed, which is currently experiencing localized flooding, to increase flows in the watershed in order to protect the safety and security of residents in the area and protect transportation networks.	\$200,000	\$1,000,000	\$1,200,000
As the County inspects high risk infrastructure and updates the GIS maps immediate threats to public safety will be discovered. The goal is to quickly respond with drainage studies, design, and construction to upgrade the drainage network. Severe hazardous conditions will be replaced immediately.	\$2,200,000	\$2,200,000	\$4,400,000
	\$2,700,000	\$4,350,000	\$7,050,000

Program Budget

The total program budget for this activity is **\$7,050,000.00**. This allocation may be increased or decreased with an amendment to the Action Plan and approval by the Richland County Council and HUD.



Connection to Mitigation, Lifelines, and Long-Term Resiliency

Richland County is responsible for maintaining nearly 20,000 stormwater infrastructure assets. Many of these assets are aging and nearing the end of their useful life. Some assets might fail earlier than anticipated, which leads to emergency repairs and safety hazards for the community. By focusing on infrastructure already deemed to have a high risk of failure, addressing these needs before they become a hazard will protect the public and mitigating future flooding. Infrastructure projects, which proactively address flood control and storm water drainage needs, preserve both the safety and security and transportation lifelines in Richland County.

Support for public infrastructure projects will save lives, reduce property damage from flooding, and ensure long term resiliency through the design and construction of projects in known flooding and high-risk areas. Projects that address immediate and future infrastructure needs support Richland County's long-term resiliency strategy to make sure the County's drainage network remains in an effective and safe working condition. An effective storm drainage system also protects the safety and security of Richland County residents by guarding transportation networks connected directly and indirectly to the County's drainage system, thus, enhancing the resiliency of safety and security and transportation lifelines.

CDBG Eligibility and National Objective

Assistance for public facilities and improvements is an eligible activity under the CDBG Program as described in 24 CFR 570.201 (c). All activities funded through this program will meet the National Objectives requirement under the authorizing statute of the CDBG Program. Activities under this program are anticipated to primarily meet either the LMI Area Benefit or the Mitigation Urgent Need objective. The specific national objective to be fulfilled through this program will be project-specific. As stormwater and drainage infrastructure typically have area-wide benefits, the beneficiaries from each individual project will determine the national objective. In many cases, populations to be served by necessary stormwater and drainage infrastructure improvements will meet the LMI criteria and will thus address that objective. In other cases, however, damage to public stormwater and drainage infrastructure causing the loss or decreased performance of critical and necessary services to local homes and businesses has created an urgent need.

Geographic Area

This program will support public stormwater and drainage infrastructure located within Richland County, outside the boundaries of the City of Columbia.

Procurement

The Richland County Department of Public Works will follow all federal, state, and local procurement laws to hire experienced engineering firms and contractors to complete the work associated with each project.

Cost Verification

The Richland County Department of Public Works will utilize licensed engineers to verify costs and determine cost reasonableness on a project-by-project basis, ensuring that construction costs are reasonable and consistent with market costs at the time and place of construction.

Operating and Maintenance Plans

The Richland County Department of Public Works is the responsible entity for long-term maintenance of any infrastructure project funded under this program. The Stormwater Management Division will be responsible for



long-term inspections. The Roads & Drainage Management Division will conduct maintenance needs identified during an inspection.

Project Selection and Prioritization

Projects with known flooding problems, high-risk infrastructure and/or benefit to low-to-moderate income areas will be selected for this project. Selected projects will be prioritized using the Richland County Department of Public Works' Project Database Tool (PDT). The PDT is used to prioritize and rank Capital Improvement Projects and was developed as part of Richland County's 25-Year Roadmap and Stormwater Management Plan. The PDT ranks projects based on six criteria:

- Stormwater Drainage
- Floodplain Management
- Water Quality Improvement
- Fiscal Responsibility
- Customer Service
- Workforce

Criteria that have a greater impact on the mission of the Richland County Department of Public Works to improve and maintain the County's infrastructure and water resources, such as flood plain management and stormwater drainage improvement, have higher weights. The increased emphases in these two areas means projects that meet an urgent need rank higher than projects that do not. Thus, further meeting the Richland County Department of Public Work's goals to protect the safety and security of residents, manage high-risk infrastructure, and mitigate the effects of future flooding.

Each criteria has three metrics from which to select: 0, 2, 6, or 10, with 0 being no benefit and 10 showing substantial benefits. Each potential project is assigned a score for each criterion and then the criterion score is multiplied by the weighting factor. The sum of these calculations is the project evaluation score. More details on each criteria is outlined below.

Improves Stormwater Drainage (Weight 60)

The three stormwater drainage metrics considered in the project evaluation process include: Size of Area Improved, Part of a Larger Plan, and Public Safety. A score is assigned as follows:

- Does not provide any stormwater drainage improvements = 0
- Is located in a localized area, is not part of a larger plan, and provides minimal public safety improvement (i.e., not located near a roadway, building, or public access area) = 2
- Is located in a watershed/council district area, is part of a larger plan for stormwater improvements, and provides public safety improvement = 6
- Benefits the entire county; is part of a larger plan for stormwater improvements; and provides increased public safety to a large number of citizens, multiple structures, or community-wide improvement = 10

Improves Floodplain Management (Weight 40)

The three floodplain management metrics considered in the project evaluation process include: Size of Area Improved, Management Program, and Public Safety. A score is assigned as follows:



- Does not provide any floodplain management improvements = 0
- Provides a direct improvement to a floodplain in a neighborhood and/or reduces stream flooding for a distinct number of developed parcels = 2
- Provides a direct improvement to a watershed or equivalent area, increases points to the CRS program, reduces structural damage, and/or reduces stream flooding for a longer reach of stream network = 6
- Provides a direct improvement to a floodplain, to a watershed, or equivalent area; reduces structural damage and provides additional cost savings on community flood insurance premiums; and/or provides watershed/countywide floodplain improvements = 10

Improves Water Quality (Weight 40)

The three water quality metrics considered in the project evaluation process include: Watershed Area Improved, Part of a Larger Plan, and Public Safety. A score is assigned as follows:

- Does not provide any water quality improvements = 0
- Provides only localized improvement, is not part of a larger plan, or improves only a single point or limited nonpoint source of pollution = 2
- Provides watershed/council district scale improvements, is part of a larger plan, or improves or removes multiple point sources/watershed nonpoint sources = 6
- Improves an entire impaired stream segment, is part of a larger plan, and addresses a total maximum daily load (TMDL) = 10

Improves Fiscal Responsibility (Weight 30)

The three fiscal responsibility metrics considered in the project evaluation process include: Promotes Efficiency, Leverages Additional Funding, and Return on Investment (ROI). For this criterion, a score of 0 does not apply because all projects provide some level of fiscal responsibility. A score is assigned as follows:

- Does not provide a level of improvement on annual O&M costs; provides limited cost sharing opportunities; and is an investment with a greater than a 10-year ROI = 2
- Provides a program-level/watershed-scale level of improvement on annual O&M costs, can qualify for grant equivalent loan term(s) funding, or is an investment with a greater than a 5-year ROI = 6
- Provides a Countywide scale level of improvement on annual O&M costs, can qualify/leverage additional funding sources equal to or greater than County investment, or is an investment with less than a 5-year ROI = 10

Improves Customer Service (Weight 50)

The three customer service metrics considered in the project evaluation process include: Improves Responsiveness, Improves Communication, and Provides Education. For this criterion, a score of 0 does not apply because all projects provide some level of customer service. A score is assigned as follows:

- Does not contribute toward improving expected response times, does not contribute to improving communication, or does not provide educational opportunities = 2
- Helps meet expected level of service (LOS) of meeting/reducing maintenance requests, expands communication opportunities to a small group, and provides education activities to a defined group = 6
- Helps exceed expected LOS of meeting/reducing maintenance requests, expands communication opportunities to the entire county, and provide education activities to the entire county = 10



Improves Workforce (Weight 20)

The three workforce metrics considered in the project evaluation process include: Basic Training for Job, Education/Enhances Staff Skills, and Succession Planning. For this criterion, a score of 0 does not apply because all projects provide some level of workforce responsibility. A score is assigned as follows:

- Does not provide basic skills training, provides staff education/enhancement, or promotes succession planning = 2
- Provides a limited set of training skills or specialty skills/knowledge areas, provides education/enhances opportunities to staff (<2 per year), or dedicates limited quarterly progression opportunities to staff = 6
- Provides a greater set training skills or specialty skills/knowledge areas or provides cross-training opportunities, provides education/enhances opportunities to staff (>2 per year), or dedicates multiple hours of quarterly progression opportunities to staff = 10

Low-to-Moderate Income (LMI) % Served

After all projects were rated in the PDT, they were cross-referenced with the County's mapped low-to-moderate income census blocks. The Department of Public Works considered projects with the highest ranked score that were also located in a LMI area.

Grant Size Limits:

No grant limit is placed on this program. No project or projects will exceed the total budget of this program.

Responsible Entity:

Richland County Community Planning and Development Department is the administrator of a CDBG-MIT Program funded by HUD under Public Law 115-123. Richland County Department of Public Works is the agency responsible for administration of mitigation funds allocated to public stormwater and drainage infrastructure activities.

Water Supply Infrastructure Resilience Program

Program Description

The Richland County Emergency Services Department (RCESD), through the Water Supply Infrastructure Resilience Program, will implement a viable mitigation project to improve water supply sources for fire suppression in rural, low- and moderate-income areas of unincorporated Richland County, by building a resilient water supply system to replace failed natural water infrastructure in the Lower Richland community.

RCESD will use CDBG-MIT funds to build a resilient fire suppression water supply system to up to six (6) strategically located water re-supply points. Each water supply source will have high capacity pumps, an independent power generation system, and storage tank to supply a continuous pressured source of water for fire suppression needs.

Program Budget

The total program budget for this activity is **\$832,500.00**. This allocation may be increased or decreased with an amendment to the Action Plan and approval by the Richland County Council and HUD.

Connection to Mitigation, Lifelines, and Long-Term Resiliency



The provision of disaster-resistant and reliable sources of water supply for firefighting activities is one of Richland County's strategies to create long-term resiliency. Strategically located deep well water sources funded through the CDBG-MIT program will be designed to help minimize the negative impacts of future storm and flood events on firefighting services in our rural areas. By addressing the unmet need of resilient and reliable fire firefighting water sources, Richland County will improve the long-term safety and stability of its community and enhance the resiliency of safety and security lifelines. In addition, these sources of water supply will assist the Richland County and our residents in our continuing efforts to improve and enhance our Insurance Services Office (ISO) Public Protection Classification (PPC).

Support for public infrastructure water supply projects will address immediate needs and support Richland County's long-term resiliency strategy by helping to ensure provision of necessary services to residents and businesses. The importance of these services for the health and stability of Richland County is paramount. Fully functioning and protected public infrastructure for water supply before, during, and after a flood improves safety, mobility, and quality of life for residents and businesses, and promotes long-term health of the County.

CDBG Eligibility and National Objective

Assistance for public facilities and improvements is an eligible activity under the CDBG Program as described in 24 CFR 570.201 (c). All activities funded through this program will meet the National Objectives requirement under the authorizing statute of the CDBG Program. Activities under this program are anticipated to primarily meet either the LMI Area Benefit or the Mitigation Urgent Need objective. The specific national objective to be fulfilled through this program will be project-specific. As water supply infrastructure typically has area-wide benefits, the beneficiaries from each individual project will determine the national objective. In many cases, populations to be served by necessary water supply infrastructure improvements will meet the LMI criteria and will thus address that objective. In other cases, however, damage to public stormwater and drainage infrastructure causing the loss or decreased performance of critical and necessary services to local homes and businesses has created an urgent need.

Geographic Area

This program will support public water supply infrastructure located within Richland County, outside the boundaries of the City of Columbia, in the area of Lower Richland.

Eligibility Requirements and Threshold Factors:

All activities funded through this program must meet certain eligibility standards to qualify for assistance. The following threshold requirements must be met for a project to be eligible for assistance:

- Project must be located in Richland County.
- Project must clearly demonstrate a connection to mitigation, lifelines, and long-term resiliency.
- Project must be CDBG eligible.
- Project must meet the national objectives identified above.
- Project must have an identified need that has not been met through FEMA, SBA, insurance, or other funding sources.

Procurement

The Richland County Emergency Services Department will follow all federal, state, and local procurement laws to complete the work associated with each project.



Cost Verification

The Richland County Emergency Services Department will utilize established local procurement procedures established by Richland County to verify costs and determine cost reasonableness on a site-by-site basis, ensuring that construction costs are reasonable and consistent with market costs at the time and place of construction.

Operating and Maintenance Plans

The Richland County Emergency Services Department is the responsible entity for continuing and long-term operating and maintenance, if applicable, of any water supply infrastructure project funded under this program.

Grant Size Limits:

No grant limit is placed on this program. No project or projects will exceed the total budget of this program.

Responsible Entity:

Richland County Community Planning and Development Department is the administrator of a CDBG-MIT Program funded by HUD under Public Law 115-123. Richland County Emergency Services Department is the agency responsible for administration of mitigation funds allocated to public water supply infrastructure activities.

Housing

The focus of Richland County's CDBG-MIT Mitigation Programs is to reduce future impacts caused by climate-sensitive hazards related to flooding and severe storms, enhance the long-term resilience of community lifelines, and address the unmet household mitigation needs among the most socially vulnerable populations. As described in Section 2, only about 35% of Richland County homeowners have received financial assistance to help repair and/or mitigate future damage to their homes from federal, state, and county programs. Thus, the overall unmet housing mitigation deficit in Richland County remains at 65%. To address this unmet housing mitigation deficit, assistance will be provided through two housing programs including housing rehabilitation and voluntary property buyout.

Richland County has established two objectives for the Single Family Housing Rehabilitation Program. The first objective is to provide resilient housing in the Richland County MID or HUD MID areas through use of mitigation measures, including, but not limited to, elevation, dry flood proofing, and disaster-, flood- and mold-resistant construction materials designed to mitigate against the impact of future disasters. The second objective is to prioritize the housing needs of low-and-moderate income households.

Single Family Housing Rehabilitation Program

Program Description

The Single Family Housing Rehabilitation Program (SFHRP) will provide resilient housing to help mitigate future damage to their homes from flooding and severe storms. This program will focus on rehabilitation or reconstruction of single family housing units in the Richland County MID or SC MID areas using construction methods that incorporate principles of sustainability, including water and energy efficiency, resilience, and mitigation against the impact of future disasters. This program may also include replacing an existing substandard manufactured housing unit (MHU) with a new or standard MHU. In some cases, rehabilitation of a unit may require reconstruction of the unit due to the extent of damage, cost reasonableness or safety issues.



Reconstruction will occur on the same lot in substantially the same footprint and manner. The number of units on the lot of a re-built unit may not increase and the total square footage of the original, principal residence structure to be reconstructed may not be substantially exceeded; however, the number of rooms in a unit may be increased or decreased. Rehabilitation may be offered to applicants based on the extent of damage to the home. Replacement of MHUs will be limited to situations where local zoning/building permits or federal requirements such as environmental regulations will allow replacement of the original, storm-damaged home. Understanding that it may be necessary for applicants to remove themselves and their belongings from their homes during the period of repair, rehabilitation or reconstruction, Richland County Community Planning and Development will consider relocation assistance on a case-by-case basis.

This program does not pay for like for like replacement. The program will offer standard, basic amenities to make a home decent, safe and sanitary and all improvements will be assessed for compliance with HUD Section 8 Existing Housing Quality Standards, and local building codes. Luxury items, including but not limited to, granite (or other high-end) countertops, high-end appliances, stone flooring, garage door openers, security systems, swimming pools, fences, and television satellite dishes are not eligible under this program.

Where replacement of a MHU or stick built home is indicated, a standard floor plan option will be offered. If a replacement home is provided, the original MHU or stick built home must be demolished and removed from the site prior to the replacement of that structure.

Additional improvement parameters include:

- Lead-based paint mitigation or stabilization, as needed.
- Mold remediation, as needed.
- Accessibility features for documented special needs.
- Standard appliances limited to refrigerator, stove/oven, but will only be considered when repair would not be cost effective.
- Ventilation and energy efficiency items such as ceiling fans, window screens, and screen doors may be replaced if damage is reasonably attributable to storm damage.
- Elevation above the base flood elevation level where the rehabilitation will constitute a substantial improvement in a Special Flood Hazard Area (SFHA).
- All electrical components must be inspected including service, meter, wiring, and fixtures even if no electrical work is being specified. Unsafe components must be replaced. All exposed wiring, switches, and light bulbs in living areas must be encased.
- All homes must be equipped with a smoke detector and carbon monoxide detector, if necessary, installed in conformity with code requirements.
- Rehabilitated homes inhabited by special needs or elderly (age 62 or older) persons must be analyzed as to the special physical needs of such persons. Improvements such as widened doorways, ramps, level entry and doorways, and grab bars in bath areas may be installed, if appropriate and if the homeowner agrees to the improvements. Hearing and sight impaired adaptations should also be considered. All special needs requirements must be documented prior to approval.
- Applicants whose MHU may be replaced can request to place the new MHU on another property they currently own, which is located in Richland County outside of the City of Columbia, if the other property meets all zoning requirements for a MHU and is also not located in a FEMA SFHA. This request must be approved by the County.

Program Budget



The total program budget is **\$6,158,000.00**. This allocation may be increased or decreased based on the demand for the program with amendment to the Action Plan and approval by the Richland County Council and HUD.

Connection to Mitigation, Lifelines, and Long-Term Resiliency

The provision of safe, disaster-resistant housing is one of Richland County's strategies to create long-term resiliency. Home repairs and improvements funded through this program will be designed to help minimize the impacts of future storm and flood events. By addressing the unmet housing mitigation deficit and encouraging high-quality, disaster-resistant construction, Richland County will improve the long-term safety and stability of its community and enhance the resiliency of safety and security lifelines. In addition, making necessary repairs and stabilizing damaged neighborhoods will also create additional long-term resiliency benefits including retention of consumers for local businesses, preservation of the local tax base, and encouragement of new investment.

CDBG Eligibility and National Objective

Rehabilitation of residential structures is an eligible activity under the CDBG program as described in 24 CFR 570.202. All housing rehabilitation activities will meet the National Objectives requirement under the authorizing statute of the CDBG program, and are anticipated to primarily meet the LMI Direct Benefit, LMI Area Benefit, LMH (Housing) or the Mitigation Urgent Need objectives. The national objective to be fulfilled through this program will be specific to each home and based on verification of each applicant's household income.

Geographic Area

Damaged homes must be located in Richland County, excluding properties within the boundaries of the City of Columbia.

Eligibility Requirements and Threshold Factors

All applicants must meet certain eligibility standards to qualify for assistance. The following threshold requirements must be met for an applicant to be eligible for assistance. Eligibility does not assure assistance and it is expected that there will be more eligible applicants than can be served with available funds. Threshold requirements are those that upon their face will either allow an applicant to continue to move forward in the program or result in disqualification. All applicants must meet the following minimum requirements:

- The home must have been damaged by the storms and/or flooding of October 2015 and must have unrepaired damage as of the date of application. Applicants need not have registered for FEMA individual assistance to be eligible. For those who were registered, FEMA damage information may be used for informational purposes, but the damage verification process will constitute the official documentation of damage linking back to the October 2015 storm or flooding damage. If an applicant did not register, Richland County will verify by third party that the home was damaged using the same damage verification process. If there are no documents proving damage, Richland County will conduct on-site inspections to determine if the property was damaged by the storm.
- Damaged property must be located within Richland County (excluding City of Columbia).
- Applicant must provide proof that they resided in the structure at the time the disaster damage occurred and currently own the property.
- Damaged structure must be the applicant's principal place of residence.
- Applicant must be current on property taxes or current on an approved payment plan (including exemptions under current law).
- Applicant must be current on any child or spousal support obligation.



- Applicant must agree to occupy the home as his/her primary residence after project completion for a period of at least 5 years.
- For properties located in the SFHA, applicant must maintain insurance coverage (not less than contract amount), inclusive of casualty (hazard) and flood insurance.
- For properties located outside of the SFHA, applicant must maintain hazard insurance coverage not less than the contract amount.
- The housing assistance will be in the form of a five year zero-interest deferred forgivable loan. For each post-award year that the applicant remains in compliance with the terms of the program, one fifth (1/5) of the loan balance will be forgiven. If the applicant remains in compliance for the entire five year period, the entire balance will be forgiven and the applicant will owe nothing. If the applicant violates the terms of the loan, the un-forgiven balance of the loan will be owed back to the program.
- Eligible structures include single unit, single family stick-built dwelling units and mobile home units (MHU). Attached structures are eligible if they are under the common roof of the damaged single structure.
- Improvements must be physically attached to the house and be permanent. MHUs will only be eligible for replacement and will not be eligible for rehabilitation.
- Homes used for both residential and commercial purposes are eligible for the program; however, the portion of the home that is residential is the only portion that may be rehabilitated. The applicant must provide his/her most recent tax return to determine the percent of the property that is used for commercial purposes. Damages to the commercial portion of the home will not be repaired.
- Garages, sheds, and outbuildings not attached to the main dwelling unit are not eligible for repair.
- No condominiums, co-operatives, townhomes, or other housing units that share any common wall or area will be eligible.
- Recreational Vehicles and camper trailers used as a residence are not eligible. Houseboats used as a residence are not eligible.
- Vacation or second homes are not eligible.

Prioritization

Applicants applying for housing assistance will be processed according to priorities based on the criteria outlined below. Richland County has created a two-tiered priority system in which LMI applicants are prioritized over non-LMI applicants. The LMI qualified households will be funded at a minimum level of 50% of total available funds (excluding planning and administration funds). It is anticipated that all participants found eligible to receive funding through the program will be LMI eligible. Prioritization will be based on the order in which eligibility is confirmed, while funding remains available which is not anticipated to reduce the LMI participation.

Grant Size Limits

The following grant size limits are established for the SFHRP:

- Single family owner-occupied detached housing unit rehabilitation: Up to \$90,000. If there are accessibility and/or relocation needs for a home, Richland County will consider up to an additional \$10,000 for accessibility improvements and additional relocation assistance on a case-by-case basis
- Mobile housing unit replacement: Up to \$90,000 for single-wide replacement and \$120,000 for double-wide. If there are accessibility and/or relocation needs for a home, Richland County will consider up to an additional \$10,000 for accessibility improvements and additional relocation assistance on a case-by-case basis.
- Single family owner occupied detached housing unit reconstruction: Up to \$170,000 for demolition, site preparation, construction and all construction related costs. If there are accessibility and/or relocation needs



for a home, Richland County will consider up to an additional \$10,000 for accessibility improvements and additional relocation assistance on a case-by-case basis.

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

Responsible Entity

The Richland County Community Planning and Development (RCCPD) has direct oversight, through an Oversight Committee. Construction activities will be managed directly by the implementing contractor (IC). RCCPD is the administrator of a CDBG-MIT Program funded by HUD under Public Law 115-123. RCCPD is the agency responsible for administration of mitigation funds allocated to housing and infrastructure activities. RCCPD is administering these programs directly.

Construction Standards

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

All projects with construction components will meet all applicable local codes, rehabilitation standards, ordinances, and zoning ordinances at the time of project completion. International Residential Code (IRC) 2012 will be adhered to as required and where appropriate. All rehabilitation projects will comply with Housing Quality Standards (HQS) and all applicable local codes and ordinances. All CDBG-assisted housing must meet all applicable State and local housing quality standards and code requirements and if there are no such standards or code requirements, the housing must meet the housing quality standards in 24 CFR §982.401. All deficiencies identified in the final inspection must be corrected before final retainage is released.

All Applications will be required to meet Section 8 Housing Quality Standards detailed under local Construction Standards, as well as the Fair Housing Accessibility Standards and Section 504 of the Rehabilitation Act of 1973. Developments must also meet all local building codes or standards that may apply.

Necessary and Reasonable Costs

Part of the process in the duplication of benefits procedures includes verifying necessary and reasonable costs. This helps ensure that funds are efficiently and effectively utilized. The determination of necessary and reasonable costs will apply to any project or program receiving funding as well as administrative and planning funds. The County will utilize the cost principles described in 2 CFR Part 225 (OMB Circular A-87) to determine necessity and reasonableness. According to 2 CFR part 225, "A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made." Richland County will follow these principles and fund only project costs that are deemed necessary and reasonable.

Green Building

For all new construction, Richland County will require construction to meet one of the following industry recognized standards:

- ENERGY STAR (Certified Homes);



- Enterprise Green Communities;
- LEED;
- ICC-700 National Green Building Standard;
- EPA Indoor AirPlus (ENERGY STAR a prerequisite); or
- any other equivalent comprehensive green building program acceptable to HUD.

Richland County will monitor construction activities to ensure the safety of residents and the quality of homes assisted through the program.

Flood Insurance and Elevation

Richland County will follow HUD guidance to ensure all structures, defined at 44 CFR 59.1, designed principally for residential use and located in the 1 percent 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 percent annual floodplain elevation. Residential structures with no dwelling units and no residents below two feet above the 1 percent annual floodplain, must be elevated or flood-proofed, in accordance with FEMA flood-proofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above the 1 percent annual floodplain. Where necessary this will also include construction of adequate access to the unit. In locations where rehabilitation does not require raising the entire unit above flood stages, the County will ensure the use of construction techniques that protect or elevate critical systems to reduce the potential for flood damage. Critical systems to be elevated or protected will include HVAC, water heaters, and electrical systems (breaker box).

Property owners assisted through the mitigation program will be required to acquire and maintain flood insurance if their properties remain in a FEMA-designated Special Flood Hazard Area. 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. Richland County 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.

Richland County 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, Richland County will not aid with flood insurance costs. In cases of hardship, Richland County may provide limited, temporary assistance for the provision of flood insurance in order to properly secure the federal investment in the property.

Appeals

Richland County will institute both a complaint and an appeals process to address citizen concerns and applicant grievances. The purpose of these procedures is to set forth guidelines for processing appeals from the Community Planning and Development Department as to the resolution of grievances filed by participants in Richland County's single family housing rehabilitation program.

Homeowners who are dissatisfied with the quality of rehabilitation work may follow the appeals process outlined below. Any participant (i.e. property owner, occupant, or contractor) may appeal decisions made by the Community Planning and Development Department if he/she believes these decisions are egregious or impinge



on his/her rights. A written grievance must be submitted to the Community Planning and Development Director, 2020 Hampton Street, Columbia, South Carolina 29202.

The appeals process for property owners, occupants, or contractors is as follows:

1. Housing Rehabilitation Program Manager
2. Special Case Panel (SCP)
3. Oversight Committee
4. U.S. Department of Housing and Urban Development

Level 1: Housing Rehabilitation Program Manager

After receiving a formal complaint, every effort will be made to resolve disputes at the staff level. The Housing Rehabilitation Program Manager will review all concerns, suggestions, requests, and appeals and decide if the issue can be resolved without further scrutiny or if it should be escalated to the SCP. The Housing Rehabilitation Program Manager will provide a response within 10 business days of receipt of the complaint.

Level 2: Committee Special Case Panel

The SCP will receive and review all citizen concerns, suggestions, and requests forwarded by the Housing Rehabilitation Program Manager at its weekly meeting at the Richland County Administration Building. The SCP will attempt to resolve each citizen's issue and/or provide them with a decision response in a timely manner, usually within fifteen (15) business days, as expected by HUD, if feasible. The Housing Rehabilitation Program Manager or assignee will document each SCP meeting, decision and rationale in a Decision Memorandum and send it to the Community Planning and Development Director for his/her review and approval. Once the SCP decision has been approved, the Housing Rehabilitation Program Manager or assignee will communicate the decision in a response to each citizen, inform them of their right to appeal, and fully explain the appeal process. Citizens who receive an adverse decision from the SCP and still are unsatisfied with the result may appeal that decision to the Oversight Committee through submittal of a formal appeals form via email, postal delivery or hand delivery to:

Mail: Richland County Government Center
CDBG-MIT Office, 1st Floor
P.O. Box 192
2020 Hampton Street
Columbia, SC 29204.

Email: mitigation@richlandcountysc.gov

Hand Deliver: Housing Rehabilitation Program Manager

Level 3: Oversight Committee

The Oversight Committee will consist of an Assistant County Administrator (Chair), the Director of Community Planning and Development, and the RCESD Project Manager. The Oversight committee will meet internally and review and make a decision on behalf of the program. The Oversight Committee will provide a decision on the appeal within 15 business days of receipt of the appeal. Citizens who receive an adverse decision from the Oversight Committee and still are unsatisfied with the result may appeal that decision to HUD.

Level 4: HUD

Persons seeking to appeal a decision further will be provided with a local HUD contact.



Voluntary Residential Buyout Program

Program Description

Richland County will conduct a voluntary residential buyout program as a means in acquiring contiguous parcels of land for uses compatible with open space, natural floodplain functions, wetlands management practices, or ecosystem restoration. The acquired property will be subject to a permanent covenant on its continued use to preserve the floodplain. The term “buyout” refers to the acquisition of properties with the intent to reduce risk from future flooding. Richland County will utilize pre-disaster fair market valuation (FMV) to determine property value, unless the property owner did not own the property prior to the disaster event. If property ownership changed after the disaster, Richland County will use the current FMV. Any CDBG–MIT funds in excess of the FMV are considered assistance to the seller, thus making the seller a beneficiary of CDBG–MIT assistance. If the seller receives assistance as part of the purchase price, this may have implications for duplication of benefits calculations or for demonstrating national objective criteria.

The County will solicit applications from residents located within an identified repetitive loss area. The application phase will be used to determine the willingness and capability to move forward with the buyout program. Richland County will identify the responsible entity that will take ownership of the parcels once the buyout activity is complete. Buyout applications will be screened with the focus being LMI population and quantifiable flood reduction. Richland County will have the final authority for the approval of applications for buyouts.

Program Budget

The total program budget is **\$3,000,000.00**. This allocation may be increased or decreased based on the demand for the program with amendment to the Action Plan and approval by the Richland County Council and HUD.

Connection to Mitigation, Lifelines, and Long-Term Resiliency

Proper land use management is essential to any long-term resiliency strategy. Through the identification and buyout of properties prone to severe storm and flood events, Richland County will establish a safer and more sustainable development pattern and help minimize the impacts of future storm and flood events. By addressing the mitigation deficit identified in the Mitigation Needs Assessment as properties damaged within the SFHA, this program protects those properties from future damage, creates opportunities for open space, and enhances the resiliency of safety and security lifelines. Open spaces adjacent to waterways have numerous benefits for long-term flood resilience, including flood storage, reduced stormwater runoff velocity, removal of pollutants, and protection of streambanks, among others.

CDBG Eligibility and National Objective

The buyout of real property is an eligible activity under the CDBG-DR program as described in 24 CFR 570.201(a). All activities supported by this program will meet the National Objectives requirement under the authorizing statute of the CDBG program. Activities under the voluntary buyout program are anticipated to primarily meet either the LMI Area Benefit, LMI-Buyout, or Mitigation Urgent Need objectives. Properties to be acquired, demolished, cleared and maintained as open space for the beneficial use of persons in LMI qualified areas will be found eligible under the LMI Area Benefit criteria.

Geographic Area

Eligibility properties must be located in Richland County, excluding properties within the boundaries of the City of Columbia.



Eligibility Requirements and Threshold Factors

All applicants must meet certain eligibility standards to qualify for assistance. The following threshold requirements must be met for an applicant to be eligible for assistance:

- A property must be located within Richland County (excluding City of Columbia).
- Property must be located in the Special Flood Hazard Area or Floodway as identified on the Flood Insurance Rate Map (FIRM), or pre-firm, located in a repetitive loss area
- Applicant must provide proof that they resided and currently own the structure that will be mitigated.
- Structure must be the applicant's principal place of residence.
- Applicant must be current on property taxes or current on an approved payment plan (including exemptions under current law).
- Applicant must be current on any child or spousal support obligation.

Prioritization

Applicants applying for voluntary housing buyout assistance will be processed according to priorities based on the criteria outlined below. Richland County has created a two-tiered priority system in which LMI applicants are prioritized over non-LMI applicants. The LMI qualified households will be funded at a minimum level of 50% of total available funds (excluding planning and administration funds). Prioritization will be based on the order in which eligibility is confirmed, while funding remains available which is not anticipated to reduce the LMI participation.

Grant Size Limits

No grant limit is placed on this program. No project or projects will exceed the total budget of this program.

Responsible Entity

Richland County Community Planning and Development Department is the administrator of a CDBG-MIT Program funded by HUD under Public Law 115-123 Richland County Emergency Services Department is the agency responsible for administration of mitigation funds allocated to residential housing buyout activities.

Basis for Calculating Awards

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

- Pre-disaster housing unit value (unless property changed ownership after the disaster);
- Any applicable housing incentives;
- A review of funding from all sources to ensure no Duplication of Benefits (DOB); and DOB funds, if any, for use in the project.

Anti-displacement

Richland County plans to minimize displacement of persons and assist persons displaced as a result of implementing a project with CDBG-MIT funds. This is not intended to limit the ability of Richland County to conduct buyouts or acquisitions of residential property in a floodplain or Disaster Risk Reduction Area.

The County 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 County 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.

Richland County will ensure compliance with the URA.

Planning

Richland County will use planning funds for the development and amendment of the mitigation action plan and to develop a property acquisition and land management policy for acquisition of property impacted by flooding in lieu of construction of new infrastructure projects. The policy will include when and how to evaluate properties for potential acquisition for the safety and security of residents, determination of the benefit-to-cost ratio, and the procedures for property acquisition. The planning activity will not exceed fifteen percent of the total grant.

Program Administration

Citizen Participation Plan

Richland County values citizen and stakeholder engagement. The County 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, development, and execution of the Richland County CDBG-MIT program.

In order to facilitate citizen involvement, Richland County has identified target actions to encourage participation and allow equal access to information about the program by all citizens. Richland County intends to focus outreach efforts to facilitate participation from individuals of low and moderate income, non-English speaking persons, and other disadvantaged populations. The County will publish its Action Plan in Spanish and Korean as well as English.

Richland County will consider any comments received in writing, via email, or expressed in-person at official public hearing events. Additionally, to permit public examination and public accountability, Richland County will make the above information available to citizens, public agencies, and other interested parties upon request.

Public Hearings

Richland County will hold two public hearings during Action Plan development, one prior to publication of the Action Plan and one after publication of the Action Plan, to collect input from citizens and other stakeholders. Notice of public hearings will be announced on the Richland County Mitigation website, in the local newspapers, and on social media. Public hearings will be held at a time and location convenient to potential and actual beneficiaries. Richland County will have the capability to take questions and comments in English, Spanish and Korean at each of the public hearings. Richland County will consider any comments or views of citizens received in writing or orally at the public hearing and the responses to those comments are in the Appendix.

Public Hearings schedule is as follows:

Thursday March 12, 2020 @ 5:30 PM

Garners Ferry Adult Activity Center
8620 Garners Ferry Rd, Hopkins, SC 29061



Friday April 10, 2020 @ 5:30 PM

Decker Center Community Room

1945 Decker Blvd, Columbia, SC 29206

Public Notice and Comment Period

Notice of public comment period will be provided by publication on the Richland County Mitigation website. Richland County will open the citizen comment period for the following timeframes:

- Comment period for the original Action Plan will take place for forty-five (45) days after the publication of the Action Plan to the Mitigation website.
- Comment period for Substantial Amendments will take place for thirty (30) days after the publication of the Substantial Amendment to the Mitigation website.

Action Plan

The Action Plan defines how Richland County will effectively use all available funding to support a data driven mitigation effort based on the calculation of need across Richland County. The Action Plan describes the County's proposed allocation by activity and lays out program design for each area of assistance as well as performance and expenditure schedules. Before Richland County adopts the Mitigation Action Plan, the County will seek public input on program design issues including the amount of assistance Richland County 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 Mitigation website.

Amendments to the Action Plan

Richland County 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;
- The addition of a covered project;
- An allocation or re-allocation of more than \$5 million; or
- A change in planned beneficiaries.

Citizens will be provided with no less than thirty 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 RCFR website. For other non-substantial amendments, the County shall notify HUD, but public comment is not required.

Every amendment, substantial or not, shall be numbered sequentially and posted on the Mitigation website, not replacing, but in addition to all previous versions of the plan.

Performance Reporting



In accordance with HUD requirements, Richland County will submit a Quarterly Performance Report (QPR) through the HUD Disaster Recovery Grant Reporting (DRGR) system no later than thirty days following the end of each calendar quarter. No later than three days after submission to HUD, Richland County will post each QPR on the Mitigation website. Program QPRs will be posted on a quarterly basis until all funds have been expended and all expenditures have been reported.

Limited English Proficiency

Richland County 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 County 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 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 available.

Technical Assistance

Upon request, limited technical assistance will be provided by Richland county program staff. Requests should be made in a timely manner and within the time parameters of the appropriate program design. The County may contract with a Technical Assistance Provider(s) should enough demand for technical assistance warrant.

Citizen Complaint Procedures

All complaints received by the County, its CDBG-MIT Contractor(s), and/or other program sources, will be reviewed by the Richland County Community Planning and Development Department (RCCPD) for investigation as necessary. Richland County will ensure complaints are resolved, escalated to appropriate personnel if needed, and any necessary follow-up actions are completed. All complaints will be forwarded to HUD.

The aim of the County 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 County and RCCPD 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 program applications and/or projects to be completed. 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 Richland County. During these activities, it is possible that citizens may decide they have a legitimate reason to appeal a decision. Applicants and/or beneficiaries can appeal program decisions related to one of the following activities:



1. A program eligibility determination
2. A program assistance award calculation

Citizens may file a written complaint or appeal through the Mitigation email at Mitigation@richlandcountysc.gov or submit by postal mail to the following address:

Mail: Richland County Government Center
CDBG-MIT Office, 1st Floor
P.O. Box 192
2020 Hampton Street
Columbia, SC 29204.

Hand Deliver: CDBG-MIT Program Specialist or Housing Rehabilitation Program Manager

Richland County 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 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 Department of Housing and Urban Development (HUD) at:

Department of Housing & Urban Development
1835 Assembly Street, 13th Floor, Columbia, SC 29201

Mitigation Pre-award Implementation Plan

Richland County Community Planning and Development Department is the administrator and fiscal agent for the CDBG-MIT grant. The Department has prior experience in managing HUD funds through the CDBG-DR allocations which preceded the CDBG-MIT award.

Richland County has existing systems and procedures, as well as formally established monitoring strategies that meet or exceed regulatory requirements including those related to HUD program rules and regulations, civil rights, environmental, labor standards, fair housing, citizen participation and recordkeeping.

Richland County will manage grant funds responsibly, efficiently and transparently. The County has the financial management systems, policies, procedures and practices necessary to uphold fiscal responsibility as detailed in this Implementation Plan.

Financial Controls

Richland County certifies proficiency in financial management using established financial systems and internal controls. The sections below provide further description of existing risk management measures.

The Richland County Department of Finance has completed P.L. 115-123 Guide for Review of Financial Management, which answers specific questions about financial standards and which personnel or uses are responsible for each item. The County Department of Finance affirms that it has the requisite financial controls in place to account for the \$21,864,000 of CDBG-MIT funding in a manner that is consistent with all federal and local



accounting requirements. The completed guide and accompanying procedures will be submitted to HUD in addition to the Action Plan and Implementation Plan.

As an entitlement community, Richland County receives an annual allocation under CDBG and CDBG-DR that require similar financial management processes, policies, and procedures to those required by the CDBG-MIT program. However, the County is aware that there are differences among these programs, and will make the necessary accommodations to comply with Public Law 115-123.

Richland County certifies that the Action Plan for CDBG-MIT is authorized under the State and local law (as applicable) and Richland County, and any entity or entries designated by Richland County, and any contractor, sub-recipient, or designated public agency carrying out an activity with CDBG-MIT funds, possesses the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations. Richland County certifies that activities to be undertaken with funds under CDBG-MIT are consistent with State and local policies. In receiving funding under the CDBG-MIT, Richland County recertifies that it (and any sub-recipient or administering entity) currently has or will develop and maintain the capacity to carry out proposed activity in a timely manner.

Single Audit

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

Richland County is in full compliance with Single Audit requirements. The County maintains reports and working papers for each annual report for a minimum of five years from the date of submission to the Federal Audit Clearinghouse. The County submitted its most recent Single Audit produced in response to the most recent audit conducted in accordance with 2 Code of Federal Regulations (CFR) part 200, subpart F, and its most recent financial statement prepared in accordance with 2 CFR 200.510. Neither the Single Audit nor financial statement indicate that Richland County has material weaknesses, significant deficiencies, or questioned costs.

The Government Finance Officers Association (GFOA) has awarded Richland County with the Certificate of Achievement for Excellence in Financial Reporting every year since July 1, 1982.

<http://www.richlandcountysc.gov/Government/Departments/Business-Operations/Finance/CAFR-Reports>

Financial Management Systems

Richland County has standards to ensure that accounting records contain the appropriate information on the CDBG-DR grant award, authorizations, obligations, unobligated balances, assets, liabilities, expenditures, program income as defined by the Federal Register Notice, and interest. Specifically, the County has a centralized accounting system to support the grants management function.

Richland County has standards to ensure that accounting records contain the appropriate information on the CDBG-MIT grant award, authorizations, obligations, unobligated balances, assets, liabilities, expenditures, program income as defined by the Federal Register Notice, and interest. Specifically, the County has a centralized accounting system to support the grants management function. One Solution is managed and maintained by the Information Technology Department. Core users of the system include the Finance Department, Human Resources



Department, and Procurement Office, although other departments also use the system. One Solution is an enterprise wide software application that is used for Budgeting, Purchasing and Disbursements, General Ledger accounting, Billing and Receivables, and Human Resources (HR)/Payroll. It is a web-based application that allows the purchasing and budgeting process to be distributed to department users and allows for greater management control of expenditures through real-time financial reporting and online approvals. Access levels are customized according to staff function and department.

The Department of Community Planning and Development will use HUD's Disaster Recovery Grant Reporting (DRGR) system to draw down funds and report program income. These systems, though used for reporting critical program metrics to HUD, will be used as grant management tools by the Department as well.

In addition to electronic systems, supporting original or source accounting documentation is maintained in accordance with the County's record-keeping policies. These policies comply with the record keeping requirements specified in the CDBG-MIT Federal Register.

Richland County understands that the DRGR systems is HUD's official system of record to submit the detailed Action Plan for project setup, draw down funds, report program income, and submit Quarterly Performance Reports (QPR). The official system of record for County financial records and reporting is One Solution. Richland County staff members will be responsible for all DRGR project setup and data entry. In accordance with Richland County's policies and procedures no advance payments will be made for CDBG-MIT funds. The DRGR records and the County financial records and other reporting data points will be reconciled by County Staff.

The Richland County Finance Department is responsible for maintaining the fiscal integrity of the County's financial records. To adhere to HUD's legal requirement as contained in 24 CFR Part 570 Subpart J, HUD funded records must be retained for five years after the completion of the program, in order to allow access for audit and public examination. This office reports results of the County's operations and changes in its financial position to various interested parties such as state and federal grantors, regulatory agencies and concerned taxpayers.

Accountability and financial transparency are not only required by the Federal Government, but is the highest form of standard the Richland County Administration Office exhibits in its financial management. As a leader in financial transparency, Richland County is posting unaudited Budget Reports, and Accounts Payable Check Register online with the Comprehensive Annual Financial Report (CAFR) and approved Budget.

The Richland County Finance Department prepares the CAFR in conformity with Generally Accepted Accounting Principles (GAAP) as applied to governmental units. This encompasses all Proprietary funds, governmental funds, and business-type activities.

Internal Controls

Richland County has existing policies and procedures for meeting internal control requirements including: segregation of duties, financial accountability, authorized signatures for payments, proper requests for payments, administrative cost approvals, property management, and audit requirements. The Richland County Finance Department has cash management procedures in place that minimize the elapsed time between receipt and disbursement of CDBG-MIT funds.

The organizational structure encompasses risk management measures that establish clear lines of authority and approval, segregation of duties, separation of key processes and authorization and secure access to financial resources.



In summary, all departments' internal controls are set up for responsible management of CDBG-MIT funds and support the prevention of fraud, waste and abuse to ensure:

- No person involved in the program decision-making obtains financial benefit.
- No single-point sign-off of significant transactions
- Separate recordkeeping for mitigation funds versus general accounting operations
- Reconciliation of accounts performed by employees not responsible for handling payroll preparation and issuance of paychecks
- Hiring procedures match required financial skill sets to position descriptions
- Policies and procedures are in place to maintain effective control and accountability for all cash, real and personal property and other assets
- Policies and procedures are in place for controlled access to assets and sensitive documents
- Reasonable measures are in place to safeguard protected personally identifiable information (PII)

Procurement

In addition to local and state law, procurement for CDBG-MIT programs is governed by federal regulations under 24 CFR Part 570, 24 CFR Part 85, and 2 CFR 200.318 – 200.326. The Richland County Code (RCC) is the local body of the law governing procurement activities. Please see <http://www.richlandonline.com/Government/Ordinances.aspx> for access to the RCC.

The Richland County Office of Procurement and Contracting is currently following the RCC and its own procurement standards where these standards are equally or more restrictive as the federal requirements. However, where the local procurement standards are less restrictive, the more stringent federal requirements will be followed for CDBG-MIT programs. The County is currently revising its Procedures Manual to reflect procurement standards that comply with the specifications detailed in 2 CFR 200.318 through 200.326 (subject to 2 CFR 200.110, as applicable), where the local requirement contains a lesser standard than the federal requirements. Necessary proposed revisions will ensure that Richland County has documented procurement procedures that conform to State and local laws, regulations, and guidance in 24 CFR 200.318-326, including provision for procurement of recovered materials.

For each acquisition of services or items that will be funded by CDBG-MIT funds, the County will adhere to the RCC, its Procurement and Contracting Procedures Manual, the Contracting Officer's Representative Operational Procedures, and all terms and conditions expressed in its contracting documents entitled General Conditions and Home Rehabilitations Terms and Conditions.

Per the Federal Register Notice, the County provides the following chart cross-referencing the RCC and Procurement and Contracting Procedures Manual to the statutory requirements in 2 CFR 200.318 – 200.326. Though the Procedures Manual identifies lines of responsibility, the listing below also provides this information. Richland County's procurement practices meet the federal requirements in 2 CFR 200.318 – 200.36 ensuring fair and open competition.



2 CFR Statutory Citation	Statutory Requirements	Richland County Office of Procurement & Contracting Procedures Manual	Richland County Responsible Department
2 CFR 200.318(a)	Documented procurement standards	RCC Chapter 2 Administration, Article III Administrative Offices and Officers, Division 9 Office of Procurement, Sections 2- 153-156 Sections 1-12 of Procedures Manual	Office of Procurement & Contracting
2 CFR 200.318(b)	Contractor oversight	RCC Chapter 2 Administration, Article X Purchasing, Division 5 Nondiscrimination in contract procedures; RCC Chapter 2 Administration, Article XI Inquiries and Investigations Contracting Officer's Representative (COR) Operating Procedure, attached to Procedure Manual Home Rehabilitations Terms and Conditions "Contract Administration"	Office of Procurement & Contracting
2 CFR 200.318(c)	Conflict of interest provisions	RCC Chapter 2 Administration, Article IV Code of Ethics; RCC Chapter 2 Administration, Article X Purchasing, Section 2-592 Prohibited Contracts; RCC Chapter 2 Administration, Article X Purchasing, Division 3 Procedural Requirements, Section 2-620 Personal Interests Procedure Manual Section 7: Selection of Firms for Professional & Consulting Services Home Rehabilitations Terms and Conditions "Improper Influence"	Office of Procurement & Contracting
2 CFR 200.318(d)	Avoidance of unnecessary acquisition	RCC Chapter 2 Administration, Article X Purchasing, Division 3 Procedural Requirements, Section 2-619 Central supplies and Services	Office of Procurement & Contracting
2 CFR 200.318(e)	Promotion of economy (intergovernmental agreements / inter-entity agreements)	RCC Chapter 2 Administration, Article X Purchasing, Division 3 Procedural Requirements, Section 2-619 Central supplies and Services; Procedure Manual Section 8: Blanket Purchase Agreements; Section 9: Blanket Purchase Orders	Office of Procurement & Contracting
2 CFR 200.318(f)	Excess and surplus property	RCC Chapter 2 Administration, Article III Administrative Offices and Officers, Division 9 Office of Procurement, Section 2-153 Creation of the office of procurement, generally; RCC Chapter 2 Administration, Article X	Office of Procurement & Contracting



2 CFR Statutory Citation	Statutory Requirements	Richland County Office of Procurement & Contracting Procedures Manual	Richland County Responsible Department
		Purchasing, Division 3 Procedural Requirements, Section 2-616 County Property.	
2 CFR 200.318(g)	Value engineering clauses	Procedure Manual Section 5: Other Types of Bids	Office of Procurement & Contracting
2 CFR 200.318(h)	Responsible Contractors	RCC Chapter 2 Administration, Article X Purchasing, Division 1 Generally, Section 2-590 Definitions Procedures Manual Section 4: Requests for Bids; Section 7: Selection of Firms for Professional & Consulting Services	Office of Procurement & Contracting
2 CFR 200.318(i)	History of Procurement	RCC Chapter 2 Administration, Article X Purchasing, Division 3 Procedural Requirements, Section 2-617 Purchasing Files	Office of Procurement & Contracting
2 CFR 200.318(j)	Use of Time and Material Contracts	Procedures Manual, Introduction and Background	Office of Procurement & Contracting
2 CFR 200.318(k)	Settlement of contractual and administrative issues	RCC Chapter 2 Administration, Article III Administrative Offices and Officers, Division 7 County Attorney, Section 2-143 Settlement of Claims; RCC Chapter 2 Administration, Article X Purchasing, Division 3 Procedural Requirements, Sections 2-621.1 Authority to resolve protested solicitations and awards, 621.2 Authority to Debar or suspend; 621.3 Authority to resolve contract and breach of contract controversies Procedures Manual Section 7: Selection of Firms for Professional & Consulting Services General Conditions #s 16, 25, 52, , 53, 58 Home Rehabilitations Terms and Conditions "Default", "Defective Work", "Dispute Resolution", "Governing Laws/Disputes", "South Carolina Law Clause", "Termination"	Office of Procurement & Contracting



2 CFR Statutory Citation	Statutory Requirements	Richland County Office of Procurement & Contracting Procedures Manual	Richland County Responsible Department
2 CFR 200.319	Competition	RCC Chapter 2 Administration, Article X Purchasing, Division 2 Competitive Purchasing Policy, Section 2-598-614; Chapter 2, Article X, Division 3 Procedural Requirements, Procedures Manual Section 3: Advertisement	Office of Procurement & Contracting
2 CFR 200.320	Types of Procurement	RCC Chapter 2 Administration, Article X Purchasing, Division 2 Competitive Purchasing Policy, Section 2-598-614; Chapter 2, Article X, Division 3 Procedural Requirements Procedures Manual Section 2: Source selection; Section 4 Requests for Bids (RFP); Section 5 Other Types of Bids; Section 6 Request for Information & Competitive Proposals; Section 7: Selection of Firms for Professional & Consulting Services; Section 8 Blanket Purchase Agreements (BPA); Section 9 Blanket Purchase Orders; Section 10: Quotations; Section 11 Sole Source Procedures; Section 12 Emergency Purchasing	Office of Procurement & Contracting
2 CFR 200.321	MBE/WBE, Surplus provisions	RCC Chapter 2 Administration, Article X Purchasing, Division 6 Minority Procurement Requirements; RCC Chapter 2 Administration, Article X Purchasing, Division 7 Small Business Enterprise Procurement Requirements	Office of Procurement & Contracting
2 CFR 200.322	Procurement of recovered materials	To be addressed in Procedure Revision	Office of Procurement & Contracting
2 CFR 200.323	Contract cost and price	RCC Chapter 2 Administration, Article X Purchasing, Division 1 Generally, Section 2-593 Contract Authority; RCC Chapter 2 Administration, Article X Purchasing, Division 2 Competitive Purchasing Policy, Section 2-600 Procurement of professional services, Section 2-601 Competitive sealed proposals; 2-608 Invitation to Bid, 2-609 through 2-614 RCC Chapter 2 Administration Procedures Manual Section 10: Quotations Procedures Manual, Introduction and Background Home Rehabilitations Terms and Conditions "Covenants Against Contingent Fees",	Office of Procurement & Contracting



2 CFR Statutory Citation	Statutory Requirements	Richland County Office of Procurement & Contracting Procedures Manual	Richland County Responsible Department
"Responsibility"			
2 CFR 200.324	Federal Pass through	Procedures Manual, Introduction and Background	Office of Procurement & Contracting
2 CFR 200.325	Bonding	RCC Chapter 2 Administration, Article X Purchasing, Division 4 Performance Bonds	Office of Procurement & Contracting
2 CFR 200.326	Federal contract provisions	Procedures Manual, Introduction and Background General Conditions #s 2, 4, 8, 21, 22, Home Rehabilitations Terms and Conditions "Acts, Laws, and Regulations", "Affirmative Action", "Anti-kickback Procedures", "Drug Free Workplace Act", "Environmental Hazards", "Equal Employment Opportunity"	Office of Procurement & Contracting

Duplication of Benefits

Federal law prohibits any person, business concern, or other entity receiving from federal funds for any part of such loss as to which he/she has already received financial assistance under any other program, private insurance, charitable assistance or any other source. Such duplicative funding is called Duplication of Benefit (DOB).

Pursuant to the Stafford Act, the County will follow policies and procedures to uphold safeguard against DOB within its program guidelines for each eligible activity. Understanding that prevention of DOB is especially critical in the context of housing programs, the County has established a framework for identifying potentially duplicative sources of funds and reducing documented duplications from potential awards prior to any award actually being made.

During the application period and eligibility determination, a case manager will document sources for funds received or approved from private insurance, SBA, FEMA, and / or volunteer organizations (including in-kind assistance) used for the same purpose that the CDBG-MIT award will be intended. Once sources have been identified and after determining an applicant's remaining unmet mitigation need, any sources of funds previously received for the same mitigation need will be deducted except where those funds were spent on activities allowable per Stafford Act and HUD guidance, sometimes known or referable to as Allowable Activities. Allowable Activities will not result in a reduction of the final award. Additionally, per the Federal Register Notice and longstanding HUD guidance, forced mortgage payoffs will not be considered duplicative, as those funds were never available to the applicant.

We understand that applicant benefits from FEMA, SBA, and insurance can be a moving target with additional funds received much later than initial payouts or due to appeals and litigation. Further, all funding sources may not be known at the time of the application. Therefore, Richland County will continuously monitor program



applicants and perform its due diligence to verify benefits that may have been secured from FEMA, SBA, private insurers, charitable contributions, and any other available financial assistance after the date of the application.

Late or additional benefits from other sources can also result in a change to the outcome of the award amount which an applicant is ultimately eligible. Applicant awards may have to be adjusted as new sources are identified to prevent DOB and minimize recapture.

The County has already secured FEMA and SBA data that it will use as part of its DOB analysis and is working to put agreements in place to obtain updated data feeds.

As a part of the case management process, the County will require applicants to execute an Application for Assistance that will include an Income Certification, Insurance Certification and Release, Philanthropic Release of Information, and Subrogation Agreement, which will become part of each applicant's record. These documents will hold each applicant accountable for the accuracy of information provided and also give the County resource if it is determined at a later time that applicants received other financial assistance not identified at the time of application.

If a duplication of benefit arises within the term of the applicant benefit delivery and compliance/monitoring period, Richland County will adhere to the guidelines set forth in OMB circular A-87 and the Stafford Act (Chapter 37 of Title 31) for recapture of funds. Beneficiaries of CDBG-MIT program funds will be informed of the fund recapture in an agreement executed with the County if it is determined that a DOB exists. RCCPD will bear responsibility for ensuring compliance with DOB regulatory requirements at the eligibility stage, and for monitoring latent additional funding sources.

Timely Expenditure

Timeliness of expenditures for the grant funds under the Public Law 113-123 is defined as 6 years from the time of HUD's execution of the grant agreement for the first 50% of funds and all funds expended within 12 years of the grant agreement. Within the 12-year grant timeline, there are also requirements for prompt payment as part of the general financial management process. Richland County will reconcile these projects with actual transactions on a regular basis.

Richland County will track expenditure projections monthly over the life of the award utilizing the HUD-provided Projection of Expenditures and Outcome Templates, in conjunction with the Disaster Recovery Grant Reporting (DRGR) system. Richland County will submit a complete projection of expenditures within 120 days after then initial Action Plan has been submitted through the DRGR system. Revised projections will be sent to HUD when program changes impact projected outcomes, funding levels, and recovery timelines.

Richland County will review in-house expenditures and beneficiary expenditures to ensure that funds are spent on eligible costs in a timely manner. The County will also procure a firm to provide independent, external auditing services for the SFHRP. Project funds and schedules will be monitored by Richland County's Finance Department, and the Department of Community Planning and Development, and ultimately audited through the County's internal and external auditing functions.

Richland County will hold contractors accountable through the establishment of benchmarks and other critical milestones. Contractors will be required to provide detailed reports concerning expenditures of funds and project progress to the County upon its request. Frequency of reporting will be established on a per project basis given the potential varied nature of eligible activities that the County may choose. It is expected that the County will



require contractors to provide monthly reports; however, due to the varying nature of each project, specific projects may be asked to provide those project updates more frequently.

With respect to timely expenditures, Richland County will track expenditure projections based on the date the HUD CDBG-MIT grant is signed, award dates for all sub-recipients of CDBG-MIT funds, payment request dates and amounts, and date funds are received from HUD. Other data elements will be added as necessary to provide information sufficient to monitor timeliness of recipient expenditures, time elapsed since last recipient draw, time elapsed since recipient grant award, percent of recipient grant drawn compared with progress on the funded project, as indicated by the recipient status reports, etc. Grants which appear to be lagging will be evaluated and, consistent with Richland County's CDBG-MIT Action Plan, either: a) provided technical assistance to remediate their slow progress state, b) terminated if the project appears to be stalled at startup and the Action Plan allows for re-award to other eligible recipients, or c) the project scope will be reduced and the recipient award reduced as necessary and recaptured funds re-obligated to other eligible projects and recipients. As with Richland County's existing CDBG and CDBG-MIT Program, the focus will be on identifying fast-moving projects and recipients that have already demonstrated competence in expeditiously moving projects forward, drawing funds and moving projects towards completion.

Consistent with Richland County's CDBG-MIT Action Plan, the goal will be to obligate funds that will be available for recipients (i.e., excluding funds set-aside for program administration) as soon as possible in order to maximize the amount of time new recipients have to implement projects and expend available funds. Recipients will be required, as they are for the CDBG Program to identify under-budget contracts, changes in beneficiary eligibility, project scope changes, etc. as soon as possible. This will allow Richland County to identify funds recipients are not expected to draw, permitting Richland County to identify recipients with on-track projects where recaptured funds can be redirected, and reduce funds awarded to non-performing recipients or recipients at risk of non-performing. Where necessary, Richland County will identify additional recipients and projects (per Richland County CDBG-MIT Action Plan) that have existing funded projects and require additional funding for new/expanded project activities, or that have projects that can move forward immediately.

Under the provisions of the CDBG-MIT grant, which does not warrant the use of program income in this activity.

Management of Funds

Richland County will ensure that the appropriate protocols are in place to manage the CDBG-MIT funds and to incorporate measures to prevent fraud, waste, and / or abuse of government funds.

Richland County understands its fiduciary duty to ensure proper disbursements of grant funds for eligible activities. Richland County will remain in compliance with applicable CDBG rules and regulations such as Office of Management and Budget Circulars A-87, A-133, 2 CFR 200.318 - 326 and 24 CFR Part 85 (Uniform Administrative Requirements) in the management of the CDBG-MIT funds. Richland County will institute measures to detect, investigate, and mitigate fraud, abuse, and mismanagement related to accounting, procurement, and accountability. The County will adhere to the conflict of interest provisions referenced at 24 CFR 570. While HUD will monitor the compliance of the County Departments of Community Planning and Development, Emergency Services, and Public Works, the County Department of Community Planning and Development will:

- Fund only expenditures that are eligible CDBG-MIT activities, address mitigation-related needs, and meet at least one of the national CDBG objectives.
- Document that all program activities meet a national objective, and are eligible activities.



- Document all program costs and maintain supporting documentation for all administration costs incurred and activities undertaken.
- Develop a monitoring policy that will outline the activities that will be monitored and the compliance parameters for each activity, including frequency of the monitoring activities. The County envisions that it will monitor project activities no less than quarterly to ensure compliance and timely expenditure of funds. We anticipate that monitoring activities will include project and applicant file review, as well as on-site visits to projects. The County will utilize resources including written monitoring and technical assistance guidelines, checklists, and policies and procedures that will be developed specifically for the CDBG-MIT program activities selected for implementation.
- Build monitoring and compliance requirements into all contracts executed with vendors, professional services, and construction contractors. Vendors will be required to submit project performance reports, financial status reports, and documented requests for reimbursement/invoicing for the duration of contract periods.
- Provide a quality assurance (QA) / quality control (QC) function for internal checks-and-balances, including random sample file audits as a self-check. This will include source documentation file audits conducted monthly by the CDBG-MIT Program Specialist, as a first-level internal check.
- Use the HUD-provided DRGR contracts management system and upload all quarterly performance reports (QPR) to that system. The County will develop QPRs that will be submitted to HUD no later than 30 days following the end of each quarter after grant award, and continuing until all funds have been expended and all expenditures have been reported. Each quarterly report will include information about the uses of funds during the applicable quarter including (but not limited to) the project name, activity, location, and national objective; funds budgeted obligated, drawn down, and expended; the funding source and total amount of any non-CDBG MIT funds to be expended on each activity; beginning and completion dates of activities; achieved performance outcomes; and the race and ethnic status of persons assisted under direct-benefit activities. The County will also post the submitted Quarterly reports to its official website.
- Develop and implement corrective actions if any weaknesses are identified during monitoring activities.

In addition, Richland County will hire an additional internal auditor which will report directly to the County Administrator. The CDBG-MIT Internal Auditor's ultimate responsibility will be to ensure compliance with CDBG-MIT rules and regulations as prescribed under Public Law 115-123, and prevent occurrences of fraud, waste, and abuse of these federal funds for all non-SFHRP funds. The CDBG-MIT Auditor will test for compliance with financial standards and procedures including procurement practices and cost reasonableness investigations for all operating costs and grant-funded activities. All program expenditures will be evaluated to ensure they are necessary and reasonable, allocable, and made in accordance with Generally Accepted Government Auditing Standards (GAGAS).

The CDBG-MIT Internal Auditor will:

- Establish an internal monitoring schedule each fiscal year, to ensure monitoring occurs as outlined within Richland County CDBG-MIT Monitoring Policies and Procedures;
- Ensure proper documentation and tracking of all monitoring;
- Identify all concerns, potential findings, and areas needing technical assistance; and
- Prepare monitoring reports including recommended corrective action(s).
- On-site monitoring visits will occur at the discretion of the CDBG-MIT Internal Auditor. The timing and frequency of monitoring visits during the term of the agreement will be based on the guidelines below.



The County will also procure a firm to provide independent, external auditing services for the SFHRP. The independent, external auditing services for the SFHRP to conduct assurance audits to evaluate the following items:

- Internal controls and compliance with legislation, regulations, standards, policies, processes, procedures, action plans, and contracts
- Achievement of program objectives
- Reliability and integrity of financial and operational information
- Effectiveness and efficiency of program operations
- Safeguarding of assets

Anti-Fraud, Waste, and Abuse

Richland County has developed an Anti-Fraud, Waste, and Abuse (AFWA) policy specifically for its CDBG-MIT program. Once this policy is approved, it will be posted to the Mitigation Website.

To assist with identifying suspected fraud, waste, or abuse, the County will set up links on its Mitigation website for anyone to report suspect actions. The link will be connected to an email address that will be monitored daily. In addition, a potential complainant will be able to call or submit a handwritten complaint by mail or deliver it in person. All details of these contact options will be published on the website and contained within the final version of the AFWA policy.

Any discovered, suspected, or reported fraud, waste, and abuse within the CDBG-MIT programs will be documented and reviewed. The disposition of the incident will be documented in a written decision. Any corrective or disciplinary actions will be carried out in accordance with Richland County law and County personnel rules. Suspected fraud that requires further investigation and proven fraud situations will be referred to the RCCPD Director, County Administrator, and HUD Office of the Inspector General (OIG).

Conflict of Interest

The County will adhere to the conflict of interest provisions reference at 24 CFR 570.611. Further, the County has adopted a high standard within its Code of Conduct Provisions that is consistent with 24 CFR 570.611. These provisions can be found within Richland County Code, Chapter 2, and Article IV Code of Ethics.

Personally Identifiable Information

The Department of Community Planning and Development will follow existing practices to protect Personally Identifiable Information (PII) of program beneficiaries. All PII collected shall be conducted, to the extent applicable, in compliance with the Privacy Act (5 U.S.C. 552a) and all other federal, state, and local laws.

Comprehensive Mitigation Website

Richland County has established a website, <http://rcgov.us/mitigation>. In accordance with HUD requirements, Richland County will maintain a public-facing website with program information pertaining to applicants and stakeholders posted on an ongoing basis. Website information will be updated on an as needed basis, and at a minimum monthly. The public website serves as a central source for program information and transparency in the management of federal dollars. It is a powerful tool for public participation and engagement.

Richland County follows ADA-compliant standards for website accessibility and readability. Content and webpage layout is designed with best practices for adaptive aids use in mind. Richland County also supports



accommodation for citizens with limited English proficiency and will publish program documents to the public website in languages other than English based on the need of non-English speaking communities.

The following program information that will reside on the website include but not limited to:

- Announcement of public hearing will be posted to the website as well as local newspapers.
- Action Plan for Mitigation will be posted to the Richland County website for no less than 45 calendar days to solicit public comment before being submitted to HUD. The final approved Action Plan will then be posted to a permanent section of the website for Action Plans and Amendments.
- The DRGR Action Plan will be posted to the program website.
- Substantial Action Plan Amendments will be posted on the Richland County website for no less than 30 calendar days to solicit public comment before being submitted to HUD. The final approved Action Plan will then be posted to a permanent section on the website designated for Action Plans and Amendments.
- Non-substantial Action Plan Amendments will not be posted for public comment. These Amendments will be posted to a permanent page designed for Action Plans and Amendments.
- Each Quarterly Progress Report (QPR) will be posted to the program website within 3 days of being submitted to HUD.
- The Citizen Participation Plan will reside permanently to the program website.
- An electronic portal for citizen complaints and concerns will be located on the program website.
- Program announcements will be posted on the program website on a rolling basis as approved by the Program Manager.
- Executed contracts.

Timely Information on Application Status

Richland County will procure and implement a centralized application management system with real-time access to application status. Applicants can obtain timely communication about their application status at any time during operational hours by contacting the case manager via telephone, leaving an after-hours voicemail message to be returned the following business day, or by submitting an email inquiry.

The Case Manager will be available for face-to-face intake meetings as requested by the applicant. Accommodations can be made ahead of time for applicants with physical disabilities and/or a need for translation services.

Proactive communication from the program regarding application status will occur on a frequent basis during the initial intake. At which time, program staff will proactively contact applicants to request missing eligibility documentation and verify information entered on the application form. Once all documentation is received, verbal communication may subside until the applicant is contacted through an official letter with information regarding eligibility.

Richland County will also use CDBG-MIT Program Specialist through the Richland County Community Planning and Development Department (RCCPD) focused on resolving complaints in a timely manner, usually within fifteen (15) business day, as expected by HUD, if practicable. The CDBG-MIT Program Specialist protect the applicant's ability to participate in the process and appeal a decision when there is a reason for an applicant to believe their application was not handled according to the 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 and appeal. As required, Richland County will forward all complaints received to HUD.

Capacity Assessment & Staffing

Since 2002, Richland County has received an average annual allocation of approximately \$1,000,000 in CDBG entitlement funds. The County typically uses its program dollars to support three broad program areas—Homeowner Assistance, Financial Empowerment, and Neighborhood Revitalization. Specific programs include homeownership assistance and rehabilitation, emergency home repair, neighborhood revitalization, public improvements, and stimulus projects.

Since 2015, Richland County has received \$30,770,000 in combined CDBG-DR funds. The County is using its program dollars to support its Single Family Housing Rehabilitation Program, HMGP Residential, Commercial and Infrastructure Buyout Match Programs, and Infrastructure Improvement Program.

Through delivery of these programs, County staff members have already delivered programs in compliance with many of the regulatory requirements mandated for CDBG-MIT funding because they overlay the CDBG Entitlement Program and, in many ways, mirror the CDBG-DR Program. However, there are some additional regulations and/or alternative requirements that the County will be required to implement as a part of the CDBG-MIT program. Although the County has the general programmatic and financial infrastructure in place, it will need additional support to efficiently manage the \$21.8 million allocation under the CDBG-MIT program.

The County understands that it will have to undertake program management responsibilities covering various activities in the areas of housing and infrastructure. While the County has key staff members with prior experience with CDBG Entitlement and CDBG-DR Programs, it does envision hiring and procuring the necessary staffing and expertise to augment the County’s current staff. The County plans to acquire direct staff members and use supplemental staff through professional consultants to assist with carrying out activities under the grant. The consultants will provide technical assistance to County staff, assist with developing standard operating procedures and program policies and procedures, provide environmental review, estimate and inspect services, assist with general program management, and provide other resources as necessary to fulfill the County’s obligations under the grant. The priorities identified during the Action Planning process will assist in the County’s assessment of the resources that may be needed to support program management functions.

The County anticipates that the professional consultant will provide the following services:

- Environmental Review
- Inspection and Cost Estimating
- Title & Appraisal Services
- Uniform Relocation Act Assistance
- Supplemental Staffing
- Intake Application Review

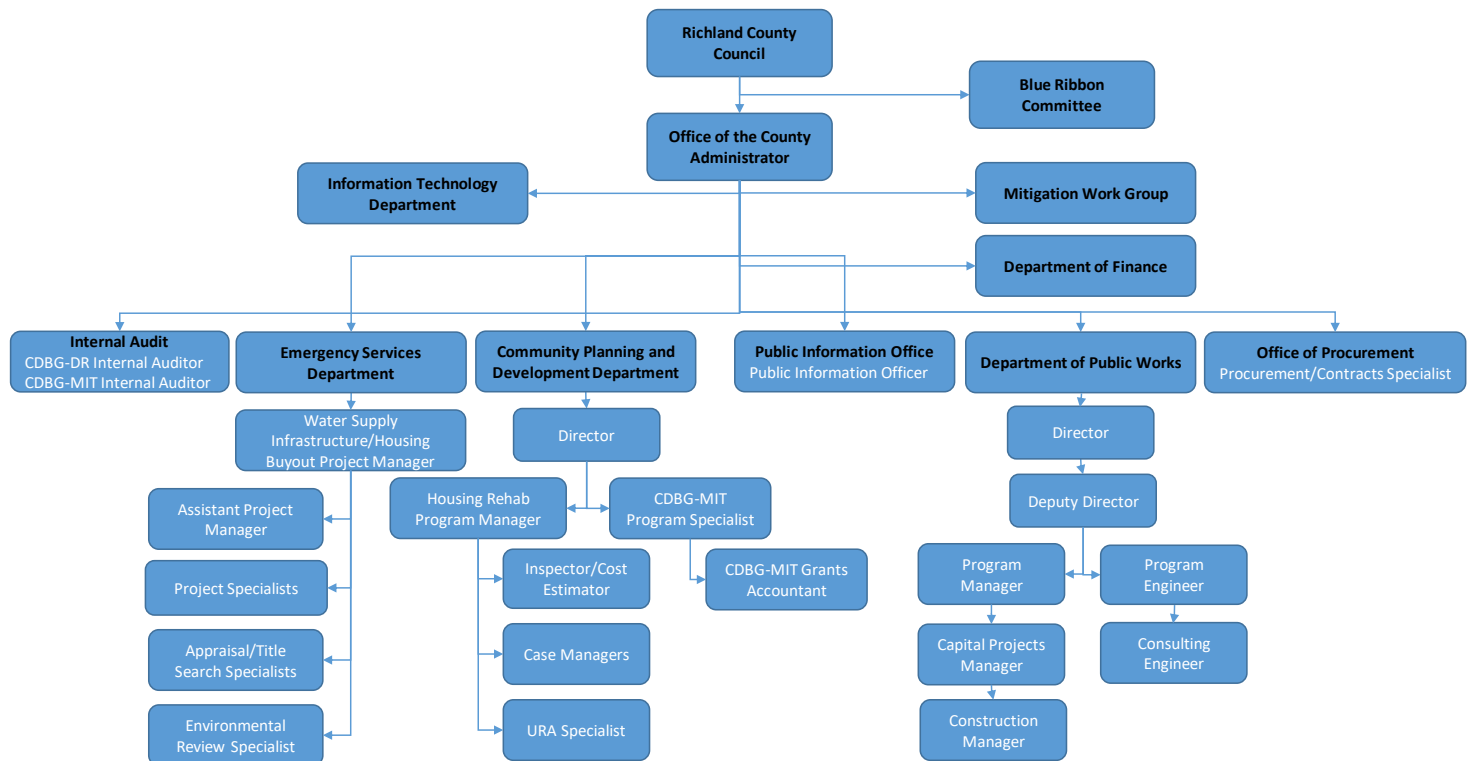
The County has identified the departments and staff responsible for functions of the CDBG-MIT program:

County Department or Office	Responsibility
Office of the County Administrator	General oversight of CDBG-MIT program delivery. Coordination of all departments in the delivery of the CDBG-MIT programs. The Independent Internal and external auditors will report directly to the County Administrator.



Emergency Services Department	Manages program activities for Water Supply Infrastructure Resilience and Residential Buyout programs and incorporates appropriate resilience and sustainability measures to mitigate and prevent future flooding
Information Technology Department	Maintains financial system and supports technology needs of County departments.
Public Information Office	Maintains comprehensive communications strategy for program activities including the mitigation website http://rcgov.us/mitigation .
Department of Finance	Implements financial controls and sound financial management practices to ensure financial compliance and timely expenditure of funds.
Office of Procurement & Contracting	Manages contracts for professional services and construction to ensure compliance with procurement and contractual obligations.
Public Works Department	Manages program activities for Stormwater and Drainage Infrastructure Resiliency Program projects and incorporates appropriate resilience and sustainability measures to mitigate and prevent future flooding.
Department of Community Planning & Development	Responsible department for general oversight of CDBG-MIT program administration, such as federal system maintenance and reporting, development of action plans and substantial amendments, and advising departments on program design and quality control functions. Manages program activities for Single Family Housing Rehabilitation Program.

Based on the above Richland County has conducted a thorough capacity assessment and developed the current administrative structure (as shown below) for positions to support critical management, oversight, and implementation.



The County's staffing model will be flexible to accommodate the needs associated with program activities. As the programs get underway, the County will make the appropriate adjustments to accommodate the work load. The organizational chart in this section shows the various functions that will be associated with program activities.

The County has existing staff members who will fulfill the roles of:

- Public Information Officer
- Procurement/Contracts Specialist

The County has existing staff members in RCESD who will fulfill the roles of:

- Water Supply Infrastructure/Housing Buyout Project Manager
- Assistant Project Manager
- Project Specialists

The County has existing staff members in RCDPW who will fulfill the roles of:

- RCDPW Director
- Deputy Director
- Program Manager
- Program Engineer
- Capital Projects Manager



The County has existing staff members in RCCPD who will fulfill the roles of:

- RCCPD Director
- CDBG-MIT Program Specialist

The County expects to direct hire the following positions:

- **CDBG-MIT Internal Auditor** – hired through the County and accountable to the County Administrator
- **CDBG-MIT Grants Accountant** – hired through the Community Planning and Development Department

The County expects to hire the following positions through a professional consultant/implementing contractor:

- **Housing Rehabilitation Program Manager**
- **Construction Manager**
- **Consulting Engineer**
- **Case Managers**
- **Appraisal and Title Search Specialists**
- **Uniform Relocation Act (URA) Specialist**
- **Inspectors/Cost Estimators**
- **Environmental Review Specialist**

Additional Capacity

Given the potential complex nature of some of the projects undertaken with CDBG-MIT funding, the state may procure technical expertise to fill any knowledge gaps identified during the execution of the CDBG-MIT program.

Internal and Interagency Coordination

Several departments within Richland County will share in the implementation responsibilities for the CDBG-MIT grant, as described above in the Capacity section. However, the County Administrator's Office will be ultimately responsible for ensuring internal and interagency coordination and communication among the various departments. Coordination has already begun as evidenced by the response phase. As the programs evolve, it may be necessary to expand the responsibilities under any given department.

As a part of this process, department leaders have been informed of the types of responsibilities they will be tasked with under the grant. To the greatest extent possible, the County will standardize its processes and program templates so that each department is well versed in the logistics associated with each program activity. The County will develop a simplified work-flow of activities based upon the setup of each program to be codified in the policies and procedures manuals for each program. Upon program startup, department managers will establish timelines and milestones that will be communicated to each department head.

In addition to the interdepartmental cooperation that has already resulted in deployment of resources to affected citizens, the County has established both the Richland County Mitigation Working Group (Working Group) and the Blue Ribbon Advisory Committee (Advisory Committee) to open communication channels and relationships that will promote implementation of mitigation activities. Both of these groups, more fully described below, will continue to provide critical services for and / or support the development and implementation of CDBG-MIT programs.



Richland County Disaster Recovery Working Group

The Working Group has provided oversight and strategic direction as we move through the Action Plan development process. The Working Group consists of representatives of the following local departments:

Departments	Offices (if applicable)
Community Planning & Development	Community Development Planning Zoning & Development Conservation
Procurement	
Executive	Administration Public Information
Public Safety	Emergency Services
Public Works	Engineering Storm water

The Working Group will participate in meetings on an as needed basis, and provide historical and local context to the mitigation activities. This includes provision of any related data and information relevant to individual members' areas of responsibility. The Working Group offers guidance related to their fields of expertise, assistance with public outreach, and participation in the development of programs and projects funded through the CDBG-MIT program.

The Working Group also provides assistance to ensure that mitigation activities are feasible and consistent with other local and regional efforts. When establishing goals and identifying mitigation programs and projects, the Working Group verifies consistency with other planning and related departmental efforts.

Richland County Blue Ribbon Advisory Committee

The Advisory Committee consists of local stakeholders who form a diverse and knowledgeable representation of the County and various local communities. The Advisory Committee meets regularly and operates in an advisory capacity for the Working Group and County Council. The Advisory Committee includes representatives from stakeholder groups throughout the County, including:

Stakeholder Group	Sub-group (if applicable)
Richland County Government	Chair of Council Vice Chair of Council Assistant County Administrator RCESD Project Manager
Municipalities in County	Eastover Irmo Forest Acres Blythewood Arcadia Lakes
Gills Creek Watershed Association	



Sustainable Midlands	
Conservation Commission	
Volunteer Organizations Active in Disaster (VOAD)	United Way Lower Richland Ministerial Alliance
State Disaster Recovery Office	
Lower Richland County Representatives	
Underserved Populations Representatives	

The Advisory Committee was charged with viewing and providing input on the development of the Action Plan and ensuring that multiple stakeholder groups and interests are included in the planning process.

Technical Assistance

Richland County anticipates that the level of technical assistance will not be in high demand for this grant because the County will be administering the grant directly. However, we will coordinate with HUD to obtain contacts of technical assistance providers or engage a vendor, through formal procurement to hire a vendor with expertise required to provide technical assistance in a regulatory compliance, construction management, environmental procedures, etc.

Richland County's staff will be provided with all training necessary to ensure that all activities funded under this Action Plan are correctly administered.

Accountability

The Director of Community Planning and Development will serve as the lead point of contact for HUD related to monitoring and compliance and issue resolution. The Housing Rehabilitation Program Manager will oversee daily operations of the program, including applicant intake and eligibility, construction and contract management, policies and procedures, public information, and reporting, to include management of CDBG-MIT system and timely expenditures.

Richland County will rely on the CDBG expertise of the team that is in place and that is currently monitoring the CDBG-DR grant. This expertise will be used to conduct Richland County's monitoring plan and to train any additional hired Richland County personnel in CDBG regulations, policies and procedures.

Certification of Accuracy of Risk Analysis Documentation

Richland County hereby certifies that it currently has the capacity to carry out mitigation activities in a timely manner and that the County has reviewed the requirements of this notice and requirements of Pub. L. 115-123 applicable to funds allocated by FR-6109-N-02, and certifies to the accuracy of Risk Analysis Documentation submitted to demonstrate that it has in place proficient financial controls and procurement processes; that it has adequate procedures to prevent any duplication of benefits as defined by section 312 of the Stafford Act, to ensure timely expenditure of funds; that it has to maintain a comprehensive mitigation website to ensure timely communication of application status to applicants for assistance, and that its implementation plan accurately describes its current capacity and how it will address any capacity gaps.

Signature of Authorized Official

Date



Certifications

Richland County makes the following certifications with this action plan:

- a. Richland County 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-MIT program.
- b. Richland County certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. Richland County certifies that the action plan for Mitigation is authorized under State and local law (as applicable) and that Richland County, and any entity or entities designated by Richland County, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG–MIT funds, 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. Richland County certifies that activities to be undertaken with funds under this notice are consistent with its action plan.
- d. Richland County 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. Richland County certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- f. Richland County 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 UGLG 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 UGLGs 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 the method of distribution of funding, or activities carried out directly by the State.
- h. Richland County 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 2015 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.) related to the consequences of Hurricane Joaquin and adjacent storm systems, Hurricane Patricia, and other flood events.
 2. With respect to activities expected to be assisted with CDBG–MIT 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–MIT funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver published in an applicable Federal Register notice) of the grant amount is expended for activities that benefit such persons.
 4. Richland County will not attempt to recover any capital costs of public improvements assisted with CDBG–MIT 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
 5. (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, Richland County certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- i. Richland County certifies that the grant will be conducted and administered 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. Richland County certifies that it has adopted and is enforcing the following policies, and, 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 or UGLG 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 Richland County has reviewed the requirements of this notice and requirements of Public Law 114–113 applicable to funds allocated by this notice, and certifies to the accuracy of Risk Analysis Documentation submitted to demonstrate that it has in place proficient financial controls and procurement processes; that it has adequate procedures to prevent any duplication of benefits as defined by section 312 of the Stafford Act, to ensure timely expenditure of funds; that it has to maintain a comprehensive disaster recovery Web site to ensure timely communication of application status to applicants for disaster recovery assistance, and that its implementation plan accurately describes its current capacity and how it will address any capacity gaps.
 - l. Richland County certifies that it will not use CDBG–MIT 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 in FEMA’s most current 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 plans 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. Richland County 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. Richland County certifies that it will comply with applicable laws.

Signature of Authorized Official

Date

SECTION 4. APPENDICES

Response to Public Comment



Financial Projections

Month	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J
County Fiscal Year	2020-2021			2021-2022											
QPR QTR	Qtr 2			Qtr 3			Qtr 4			Qtr 1			Qtr 2		
Administration															
Projected	\$24,293			\$24,293			\$24,293			\$24,293			\$24,293		
Actual															
Planning															
Projected	\$168,571			\$168,571			\$168,571			\$168,571			\$168,571		
Actual															
Infrastructure															
Projected	\$60,000			\$162,400			\$154,500			\$154,500			\$146,700		
Actual															
Housing															
Projected	\$0			\$135,000			\$1,236,000			\$1,236,000			\$1,236,000		
Actual															
Quarterly Total															
Projected	\$252,864			\$490,264			\$1,583,364			\$1,583,364			\$1,575,564		
Actual	\$0			\$0			\$0			\$0			\$0		



Month	J	A	S	O	N	D	J	F	M	A	M	J
County Fiscal Year	2022-2023											
QPR QTR	Qtr 3			Qtr 4			Qtr 1			Qtr 2		
Administration												
Projected	\$24,293			\$24,293			\$24,293			\$24,293		
Actual												
Planning												
Projected	\$168,571			\$168,571			\$168,571			\$168,571		
Actual												
Infrastructure												
Projected	\$154,500			\$139,000			\$139,000			\$139,000		
Actual												
Housing												
Projected	\$1,372,122			\$1,372,122			\$1,372,122			\$1,100,000		
Actual												
Quarterly Total												
Projected	\$1,719,486			\$1,703,986			\$1,703,986			\$1,431,864		
Actual	\$0			\$0			\$0			\$0		



Month	J	A	S	O	N	D	J	F	M	A	M	J
County Fiscal Year	2023-2024											
QPR QTR	Qtr 3			Qtr 4			Qtr 1			Qtr 2		
Administration												
Projected	\$24,293			\$24,293			\$24,293			\$24,293		
Actual												
Planning												
Projected	\$168,571			\$168,571			\$168,571			\$168,571		
Actual												
Infrastructure												
Projected	\$178,500			\$178,500			\$178,500			\$335,800		
Actual												
Housing												
Projected	\$549,334											
Actual												
Quarterly Total												
Projected	\$920,698			\$371,364			\$371,364			\$528,664		
Actual	\$0			\$0			\$0			\$0		



Month	J	A	S	O	N	D	J	F	M	A	M	J
County Fiscal Year	2024-2025											
QPR QTR	Qtr 3			Qtr 4			Qtr 1			Qtr 2		
Administration												
Projected	\$24,293			\$24,293			\$24,293			\$24,293		
Actual												
Planning												
Projected	\$168,571			\$168,571			\$168,571			\$168,571		
Actual												
Infrastructure												
Projected	\$335,800			\$335,800			\$335,800			\$335,800		
Actual												
Housing												
Projected												
Actual												
Quarterly Total												
Projected	\$528,664			\$528,664			\$528,664			\$528,664		
Actual	\$0			\$0			\$0			\$0		



Month	J	A	S	O	N	D	J	F	M	A	M	J
County Fiscal Year	2025-2026											
QPR QTR	Qtr 3			Qtr 4			Qtr 1			Qtr 2		
Administration												
Projected	\$24,293			\$24,293			\$24,293			\$24,293		
Actual												
Planning												
Projected	\$168,571			\$168,571			\$76,742					
Actual												
Infrastructure												
Projected	\$335,800			\$335,800			\$359,000			\$375,250		
Actual												
Housing												
Projected												
Actual												
Quarterly Total												
Projected	\$528,664			\$528,664			\$460,035			\$399,543		
Actual	\$0			\$0			\$0			\$0		



Month	J	A	S	O	N	D	J	F	M		A	M	J
County Fiscal Year		2026-2027											
QPR QTR	Qtr 3			Qtr 4			Qtr 1			Year 6 >50% Expended Requirement	Qtr 2		
Administration													
Projected	\$24,293			\$24,293			\$24,293				\$24,293		
Actual													
Planning										Required Amount			
Projected										\$10,932,000			
Actual										Projected Amount			
Infrastructure										\$19,467,023			
Projected	\$375,250			\$375,250			\$375,250				\$375,250		
Actual													
Housing										Actual Amount			
Projected										\$0			
Actual													
Quarterly Total													
Projected	\$399,543			\$399,543			\$399,543				\$399,543		
Actual	\$0			\$0			\$0				\$0		



Month	J	A	S	O	N	D	J	F	M	A	M	J
County Fiscal Year	2028-2029											
QPR QTR	Qtr 3			Qtr 4			Qtr 1			Qtr 2		
Administration												
Projected	\$24,293			\$24,293			\$24,293			\$24,293		
Actual												
Planning												
Projected												
Actual												
Infrastructure												
Projected	\$375,250			\$375,250			\$375,250			\$375,250		
Actual												
Housing												
Projected												
Actual												
Quarterly Total												
Projected	\$399,543			\$399,543			\$399,543			\$399,543		
Actual	\$0			\$0			\$0			\$0		



Month	J	A	S	O	N	D	J	F	M	A	M	J
County Fiscal Year	2029-2030											
QPR QTR	Qtr 3			Qtr 4			Qtr 1			Qtr 2		
Administration												
Projected	\$24,293			\$24,293			\$24,293			\$24,293		
Actual												
Planning												
Projected												
Actual												
Infrastructure												
Projected	\$10,550											
Actual												
Housing												
Projected												
Actual												
Quarterly Total												
Projected	\$34,843			\$24,293			\$24,293			\$24,293		
Actual	\$0			\$0			\$0			\$0		



Month	J	A	S	O	N	D	J	F	M	A	M	J
County Fiscal Year	2030-2031											
QPR QTR	Qtr 3			Qtr 4			Qtr 1			Qtr 2		
Administration												
Projected	\$24,293			\$24,293			\$24,293			\$24,293		
Actual												
Planning												
Projected												
Actual												
Infrastructure												
Projected												
Actual												
Housing												
Projected												
Actual												
Quarterly Total												
Projected	\$24,293			\$24,293			\$24,293			\$24,293		
Actual	\$0			\$0			\$0			\$0		



Month	J	A	S	O	N	D	J	F	M	A	M	J
County Fiscal Year	2031-2032											
QPR QTR	Qtr 3			Qtr 4			Qtr 1			Qtr 2		
Administration												
Projected	\$24,293			\$24,293			\$24,293			\$24,293		
Actual												
Planning												
Projected												
Actual												
Infrastructure												
Projected												
Actual												
Housing												
Projected												
Actual												
Quarterly Total												
Projected	\$24,293			\$24,293			\$24,293			\$24,293		
Actual	\$0			\$0			\$0			\$0		



Month	J	A	S	O	N	D	J	F	M	A	M	J	
County Fiscal Year	2032-2033												
QPR QTR	Qtr 3			Qtr 4			Qtr 1			Qtr 2			TOTAL
Administration													
Projected	\$24,293			\$24,293			\$24,293			\$24,293			\$1,093,200
Actual													\$0
Planning													
Projected													\$3,279,600
Actual													\$0
Infrastructure													
Projected													\$7,882,500
Actual													\$0
Housing													
Projected													\$9,608,700
Actual													\$0
Quarterly Total													
Projected	\$24,293			\$24,293			\$24,293			\$24,293			\$21,864,000
Actual	\$0			\$0			\$0			\$0			\$0