



ReBUILD NC

Substantial Action Plan Amendment 7
January 11, 2021

Hurricane Matthew CDBG-DR Action Plan

State of North Carolina

For CDBG-DR Funds
(Public Law 114-254, and Public Law 115-31)



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Revision History

Amendment #	Date	Description
-	04.21.2017	Initial Action Plan Submitted
#1	11.07.2017	Substantial Amendment 1
#2	04.09.2018	Non-substantial Amendment 2 Clarification of Method of Distribution
#3	12.16.2018	Substantial Amendment 3 – Method of Distribution and Program Caps
#4	03.12.2019	Non-substantial Amendment 4 – Amended method of determining construction intent (rehabilitation vs. reconstruction) and amended method of determining elevation assistance.
#5	11.22.2019	Substantial Amendment 5— NCORR designated as recipient, federal and local policy and programmatic changes such as incorporation of DOB policy changes, award cap changes to reconstruction, eligibility threshold changes for TRA, updates to MID areas from HUD guidance, emergency repairs defined, and reallocation of grant funds.
#6	06.09.2020	Substantial Amendment 6 – Changes in programs and Action Plan to align Hurricane Matthew recovery with Hurricane Florence recovery.
#7	01.11.2021	Substantial Amendment 7 – Allocation changes, changes to some program definitions, changes to the substantial action plan amendment criteria.

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Table of Contents

- 1.0 Summary of Action Plan Changes1**
 - 1.1 Action Plan Amendment 7 1**
- 2.0 Introduction5**
- 3.0 Unmet Needs Assessment7**
 - 3.1 Housing 8**
 - 3.2 Vulnerability of the Most Impacted Communities 26**
 - 3.3 Economic Recovery 35**
 - 3.4 Public Infrastructure and Facilities..... 36**
- 4.0 Planning, Coordination, and Community Outreach Needs41**
- 5.0 Nexus Between Unmet Need and Allocation of Resources43**
 - 5.1 National Flood Insurance Restrictions 43**
- 6.0 Allocation of CDBG-DR Funding45**
 - 6.1 Allocation Changes – Action Plan Amendment 7 46**
 - 6.2 MID Allocation of Funding 46**
 - 6.3 Non-MID Allocation of Funding 47**
 - 6.4 State-Identified MID Areas 47**
- 7.0 Method of Distribution & Delivery50**
- 8.0 Recovery Programs53**
 - 8.1 Homeowner Recovery Program 53**
 - 8.2 Small Rental Recovery Program..... 60**
 - 8.3 Multi-Family Rental Housing 62**
 - 8.4 Strategic Buyout Program..... 64**
 - 8.5 Public Housing Restoration Fund 65**
 - 8.6 Small Business Recovery Assistance 67**
 - 8.7 Infrastructure Recovery Program..... 70**
- 9.0 General Eligibility Requirements74**
- 10.0 Leveraging.....76**

11.0 Program Income..... 78

12.0 Schedule of Expenditures and Outcomes..... 80

13.0 Minimum Threshold for Substantial Amendment..... 82

14.0 Green Building Standards for Construction and Contractor Oversight 84

14.1 Broadband..... 86

15.0 Duplication of Benefits (DOB)..... 88

16.0 Monitoring Standards and Procedures 91

17.0 Contractor Performance Standards and Appeals Process 94

18.0 Citizen Participation Plan 96

18.1 Encouragement of Citizen Participation and Outreach..... 96

18.2 Individuals with Limited English Proficiency (LEP)..... 97

18.3 Persons with Disabilities..... 97

18.4 Response to Citizen Complaints and Appeals..... 97

18.5 Public Notice, Comment Period and Website 98

Appendix A: Response to Public Comments A-1

1.0 Summary of Action Plan Changes

1.1 Action Plan Amendment 7

1.1.1 Public Housing Restoration

Action Plan Amendment 7 updates the unmet need analysis for public housing and adjusts the allocation for that need accordingly. A description of the need is found at Section 3.1.8.1.2 below.

1.1.2 New Construction

The Homeowner Recovery Program description now allows for the new construction of stick-built homes or replacement of damaged Manufactured Home Units (MHU) on a different site, in certain situations. The criteria for new construction or MHU relocation to a different site rather than building on the existing site will be found in the HRP Policy. These changes are found in Sections 8.1.1 and 8.1.2.

1.1.3 Temporary Relocation Assistance

The program cap for Temporary Relocation Assistance (TRA) is adjusted to refer to a schedule of reasonable rates developed by NCCORR. This provides greater flexibility to NCCORR in determining what is appropriate for each temporarily-relocated homeowner applicant. The revised limits are referenced at Section 8.1.8.

1.1.4 Small Rental Recovery Program

Changes to the Small Rental Recovery Program (formerly the Small Rental Repair Program) have been made to bring that program into greater alignment with the Homeowner Recovery Program. Information on these changes is found at Section 8.2.

1.1.5 Multi-Family Housing

A project originally proposed for Infrastructure Recovery Funds has been reallocated to the Multi-Family Housing Budget. This project is a \$2.625 million proposal in Cumberland County to build new affordable housing. The North Carolina Housing Finance Agency (NCHFA) is not managing this project. The Infrastructure Recovery Budget is therefore reduced by this amount and Multi-Family Housing Budget is increased by this amount. This change is at Section 8.3.

1.1.6 Infrastructure Recovery

NCORR previously set a deadline for the submission of infrastructure projects. Previously submitted projects have not received sufficient information from the local jurisdictions presenting those projects. Therefore, NCORR is adjusting the infrastructure budget to fund projects which have sufficient detail and an identified path forward. NCORR will continue to reassess the infrastructure budget and projects as the grant moves forward. The Infrastructure Recovery Program is detailed at Section 8.7.

1.1.7 Strategic Buyout Program

The Strategic Buyout Program has been removed from the Hurricane Matthew CDBG-DR Action Plan and consolidated in the CDBG-MIT Action Plan. In consideration of all the funding sources available, NCORR believes that Strategic Buyout best fits the mission of the CDBG-MIT grant. Aligning the Strategic Buyout Program under a single funding source simplifies implementation of this program. Individuals interested in the Strategic Buyout Program are encouraged to review the CDBG-MIT Action Plan Amendment 1 at <https://rebuild.nc.gov/action-plans> or visit <https://rebuild.nc.gov/mitigation> for more information on NCORR's CDBG-MIT grant. The change to the Strategic Buyout Program is located at Section 8.4.

1.1.8 Substantial Action Plan Amendment Criteria

The Substantial Action Plan Amendment criteria are adjusted to match the criteria in its other funding sources, such as Hurricane Matthew CDBG-MIT and Hurricane Florence CDBG-DR. The significant change is the increase of the allocation or reallocation threshold to \$15 million from \$5 million. Details on the change are found at Section 13.0.

1.1.9 Allocation Changes

The allocations for several CDBG-DR programs have been adjusted. Table 17 includes a breakdown of the allocations and a comparison to the allocation in the previous Action Plan Amendment. A description and rationale for the changes is included at Section 6.1.

Activity	APA 6 Allocation	APA 7 Allocation	APA 7 LMI Allocation	APA 7 MID Allocation
Administration	\$11,826,450	\$11,826,450	\$0	\$9,461,160
Planning	\$11,826,450	\$2,365,290	\$0	\$1,892,232
Homeowner Recovery Program	\$112,863,832	\$150,835,398	\$105,584,779	\$120,668,318
Strategic Buyout	\$25,000,000	\$0	\$0	\$0
Small Rental	\$18,204,756	\$18,204,756	\$18,204,756	\$14,563,805
Multi-Family	\$23,204,756	\$25,829,756	\$25,829,756	\$25,829,756
Public Housing Restoration	\$9,959,517	\$11,172,422	\$11,172,422	\$8,459,517

Activity	APA 6 Allocation	APA 7 Allocation	APA 7 LMI Allocation	APA 7 MID Allocation
Small Business Recovery	\$3,760,000	\$4,500,000	\$3,150,000	\$3,600,000
Infrastructure Recovery	\$19,883,239	\$11,794,928	\$7,468,950	\$8,910,942
TOTAL	\$236,529,000	\$236,529,000	\$171,410,663	\$193,385,730
% OF TOTAL ALLOCATION	100%	100%	72%	82%

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2.0 Introduction

Hurricane Matthew began as a Category 5 storm in the Caribbean, before hitting the coast of North Carolina (the State) on October 8, 2016. Fifty counties in North Carolina were declared federal disaster areas with historic communities in eastern North Carolina like Princeville, Kinston, Lumberton, Goldsboro, Fayetteville, and Fair Bluff experiencing catastrophic damages. Matthew lingered along the North Carolina coast for several days, causing rivers and their tributaries to swell and ultimately overflow into adjacent communities. Over a three-day period, central and eastern parts of North Carolina were inundated with rain, and 17 counties set new records for rain and flooding. Five river systems, the Tar, Cape Fear, Cashie, Lumber, and Neuse Rivers, flooded, remaining at flood levels for two weeks.

After Matthew passed, the State assessed the damage and documented that Matthew's impact was devastating, significantly impacting residents in eastern and central North Carolina and causing catastrophic losses in the housing, business, public infrastructure, and agricultural sectors. More than 800,000 families lost power from Matthew, resulting in millions of dollars in food cost losses for families whose food needed to be frozen or refrigerated. In total, 3,744 individuals needed to be moved to shelters, and 77,607 households applied for Federal Emergency Management Agency (FEMA) emergency assistance.

When FEMA completed its analysis of impacts to housing stock, 34,284 households had evidence of flood damage and nearly 5,000 homes had major to severe damage, many of which were located in rural communities, where not only the home but also the farm and livestock were impacted and/or lost. The State estimated that more than 300,000 businesses experienced physical and/or economic impacts from the storm, including many small "mom and pop" businesses located in small rural communities. Matthew's impact on the agricultural industry was particularly hard hit, as the industry has a significant presence in driving the local economy in eastern North Carolina, where the State is among leaders in the nation in livestock and crop production. North Carolina's farms, including many small multi-generational family farms, along with the firms that provide materials needed to grow livestock and produce crops and food producers that take these products to market, lost tremendous amounts of inventory, livestock, and crops, with millions of dollars of the losses not covered by United States Department of Agriculture (USDA) programs. The impact to communities was also catastrophic, with public buildings, parks, schools, roads, water and wastewater systems, and other public infrastructure heavily impacted. Portions of the interstate system closed in some cases for up to 10 days. In total, the State estimated that Matthew's total economic impact was roughly \$2 billion.

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3.0 Unmet Needs Assessment

The Unmet Needs Assessment within this Action Plan Amendment represents the second analysis of unmet needs in the State of North Carolina following Hurricane Matthew. It presents damage estimates and recovery needs as of October 15, 2017, roughly one year after the flooding occurred, using revised Small Business Administration (SBA) and FEMA data. Since the publication of the State's initial Unmet Needs Assessment in the Spring of 2017, the State has focused recovery actions in four areas:

1. Beginning to design housing programs focused on the findings of the State's initial Unmet Needs Assessment and centered around the needs of low to moderate income persons and housing recovery in the most impacted communities and counties;
2. Completing the State's 50 county planning process to determine how to best align and structure the Community Recovery Program/Infrastructure Recovery Program with information and projects developed through this bottom-up community planning process;
3. Working with FEMA to ensure that damages to public infrastructure were captured; and
4. Working to confirm that the Matthew impacts to small businesses and the agricultural sector in particular remains unaddressed nearly a year after the storm.

As a result, the State's prior Unmet Needs Assessment remains valid as housing recovery remains a significant unmet need. The public infrastructure and facilities focus of the Unmet Needs Assessment remains accurate as the State is seeing an increase in FEMA public assistance obligations that are in line with initial estimates. In the Economic Recovery section, with new SBA data, it is apparent that the State's small businesses and agricultural enterprises in eastern and central North Carolina continue to need assistance. The analysis presented in the initial Unmet Needs Assessment, particularly for housing and vulnerable populations in most impacted communities remains particularly relevant and is included in this revised analysis as it is unchanged and is a key component for the overall program design.

As part of this Action Plan Amendment, the State of North Carolina has made it a priority to focus on continuing to assist low- and moderate-income families who experienced severe flooding and saw their homes and communities impacted by Matthew. Therefore, the funding priorities in this action plan emphasize housing and supportive service needs with the majority of this allocation going to housing recovery and housing assistance programs. The State understands that community health is not just about rebuilding homes but restoring the basic fabric of neighborhoods and ensuring future economic health and community infrastructure is restored. Therefore, the State is also providing funding to assist small businesses and farmers struggling to get back on their feet and ensuring that, as the planning process is complete, projects to rebuild and make more resilient communities can occur.

Based on this analysis, effective October 15, 2017, North Carolina's current unmet recovery needs totaled \$1,292,447,463.

3.1 Housing

3.1.1 Summary

As part of the Substantial Action Plan Amendment process, the State reviewed and analyzed unmet needs related to disaster recovery. This Unmet Needs Assessment updates the previous analysis provided by the State in the initial Action Plan. While HUD's methodology only addresses part of the full unmet needs of State generated by Hurricane Matthew, the State's updated unmet needs assessment is based on HUD's CDBG-DR Allocation Methodology as published in the January 18, 2017, Federal Register Notice FR-6012-N-01. This unmet need assessment incorporates the housing unmet need addressed through the previous action plan. Based on a variety of data sources consistent with HUD methodology, the State observed the housing unmet need remains largely unchanged. The analysis below validates the State's plan to allocate a majority of the funding, 85 percent in total funding, and 93 percent of this allocation to address a continuing housing unmet needs.

3.1.2 Analysis

This housing Unmet Needs Assessment relied heavily on the work that was conducted in the original action plan Unmet Needs Assessment. After comparison of data from FEMA, SBA, and the county planning process, the major changes to the housing Unmet Needs Assessment include a large unmet need for homeowners who wish to sell their homes and relocate to higher and safer ground and additional damages and unmet needs for Public Housing Authorities in storm impacted counties.

Hurricane Matthew inflicted devastating damage to families throughout North Carolina's eastern and central parts. The swelling of the Tar, Neuse, and Lumber Rivers caused rainwater to overflow into neighboring towns, inundating business districts and homes with floodwaters. In total, almost 35,000 homes were damaged in the storm, and the homes of roughly 5,000 families were damaged so extensively as to make them unlivable.

North Carolina's number one priority is to allow families to return to their homes and to ensure those homes are in safe and sanitary conditions. For this reason, the Unmet Needs Assessment focuses on housing recovery programs and supportive services to families and persons in need. This includes an understanding of where homes experienced the greatest damage and the capacity of those families to recover from the disaster.

The analysis and resulting recovery programs also account for long-term sustainability, with a priority placed on the homeowner and renter finding safe and suitable housing rather than simply rebuilding a damaged unit. Therefore, North Carolina will conduct a cost-benefit analysis on rebuilding a severely damaged home versus constructing a new home in an area safe from repetitive flood loss, which will take into account the cost of repairing versus replacement and estimated long-term losses due to repeat flood events.

We began the process of assessing unmet housing need by analyzing the prior Unmet Needs Assessment, which included who applied for FEMA assistance, the first step most flood victims take immediately after a disaster. This information is combined with the State's own damage assessments and the SBA's loan application information. From this data, we generated a detailed understanding of housing damages and recovery needs and compared the original analysis with updated data from FEMA and SBA. Specifically, we were able to estimate the following:

- What counties, towns, and neighborhoods experienced the greatest damage;
- The types of units that were damaged (rental versus homeowner and the structure);
- The incomes of the homeowner or renter impacted, and, combined with household size, the income classification of these impacted families;
- How many homeowners and renters were impacted, categorized by severity of damage;
- An estimate of housing recovery needs (in dollars); and
- In combination with other data, what impacted neighborhoods have a high concentration of vulnerable populations and/or additional needs.

The following is a summary of this analysis, which North Carolina will continue to build upon as the State captures more information from our community engagement meetings and outreach efforts at the county and local level.

3.1.3 Where did most of the damage occur?

Hurricane Matthew impacted 50 counties in North Carolina, largely along the eastern and central regions and along major rivers and tributaries. As previously noted, almost 35,000 families experienced some degree of damage to their homes, but the majority of damage was minor. For the purpose of the Unmet Needs Assessment, we assume that the majority of homes which experienced minor damage have likely been repaired six months after the storm event.

Unfortunately, families whose homes received major to severe damage have a far greater challenge in recovering, particularly when their homes are rendered uninhabitable due to mold, insulation issues, unstable foundations, leaky roofs, and lack of heat or plumbing due to flood damage of pipes and HVAC systems. These families either remain in their damaged homes, living in unsafe conditions because they are unable to find alternative housing they can afford, or they are displaced from their homes. The families with limited resources – low and moderate-income families who have limited savings or disposable income – are the families with the greatest needs. These homes are the focus of this Unmet Needs Assessment.¹

To determine which counties, towns and neighborhoods experienced major damage, the State

¹ Major and Severe Damage is defined using United States (US) Department of Housing and Urban Development's (HUD's) definition within FR-6012-N-01, where an owner-occupied home is considered majorly or severely damaged if it incurs at least \$8,000 in real property loss according to FEMA Individual Assistance inspections. Similarly, a renter-occupied home is considered majorly or severely damaged if it incurs at least \$2,000 in personal property loss.

mapped the FEMA applications by the address of the damaged unit and then associated that “point” with the neighborhood², town, and county the home falls within.

What we found, based on this analysis, is that major housing damage happened in very specific areas, as follows:

- 64 percent of major to severe damage is concentrated in the “most impacted” four counties.
- 52 percent of major to severe damage is concentrated in 13 towns.
- 41 percent of major to severe damage is concentrated in 14 neighborhoods.

So, while damage was widespread due to power outages, minor flooding, and wind damage, the serious impacts of Hurricane Matthew were felt in a specific handful of places. These counties, towns, and neighborhoods are defined in Table 1 through Table 3.

Table 1: Most Impacted Counties (updated October 17, 2019)

County	Owners	Renters	Total
CUMBERLAND	408	447	855
EDGECOMBE	270	305	575
ROBESON	687	705	1,392
WAYNE	299	275	574
COLUMBUS	168	125	293
BLADEN	71	13	84
TOTAL	1,903	1,870	3,773

Note that since the initial Action Plan, Columbus and Bladen Counties have been added to the MID areas.

Table 2: Towns that Experienced Major to Severe Damages from Hurricane Matthew (where at least 100 homes experienced major to severe damage)

County	Community	Damage Level	Owners	Renters	Total
COLUMBUS	Fair Bluff	Severe	50	59	109
CUMBERLAND	Fayetteville	Severe	169	283	452
EDGECOMBE	Princeville	Severe	156	211	367
LENOIR	Kinston	Severe	49	132	181

² For this analysis, a neighborhood is defined as a Census Tract, which is a geographic area defined by the US Census that on average contains 2,000 to 4,000 residents.

County	Community	Damage Level	Owners	Renters	Total
ROBESON	Lumberton	Severe	350	526	876
WAYNE	Goldsboro	Severe	87	164	251
Total			984	1,570	2,554
As % of All Major to Severe Damage in NC			38%	66%	52%

Table 3: Neighborhoods that Experienced Major to Severe Damages from Hurricane Matthew
(where at least 50 homes experienced major to severe damage)

Town	County	Neighborhood	Owner	Renter	Total
LUMBERTON	ROBESON	37155960801	150	320	470
PRINCEVILLE	EDGEcombe	37065020900	156	211	367
LUMBERTON	ROBESON	37155960802	125	144	269
FAYETTEVILLE	CUMBERLAND	37051003203	26	107	133
FAIR BLUFF	COLUMBUS	37047930600	50	59	109
FAYETTEVILLE	CUMBERLAND	37051000200	53	40	93
Rural	WAYNE	37191000901	44	48	92
GOLDSBORO	WAYNE	37191001500	24	61	85
Rural	ROBESON	37155961802	16	61	77
Rural	DARE	37055970502	47	28	75
Rural	CUMBERLAND	37051003001	52	16	68
Rural	PENDER	37141920502	41	24	65
KINSTON	LENOIR	37107010800	2	62	64
Rural	ROBESON	37155961500	47	14	61

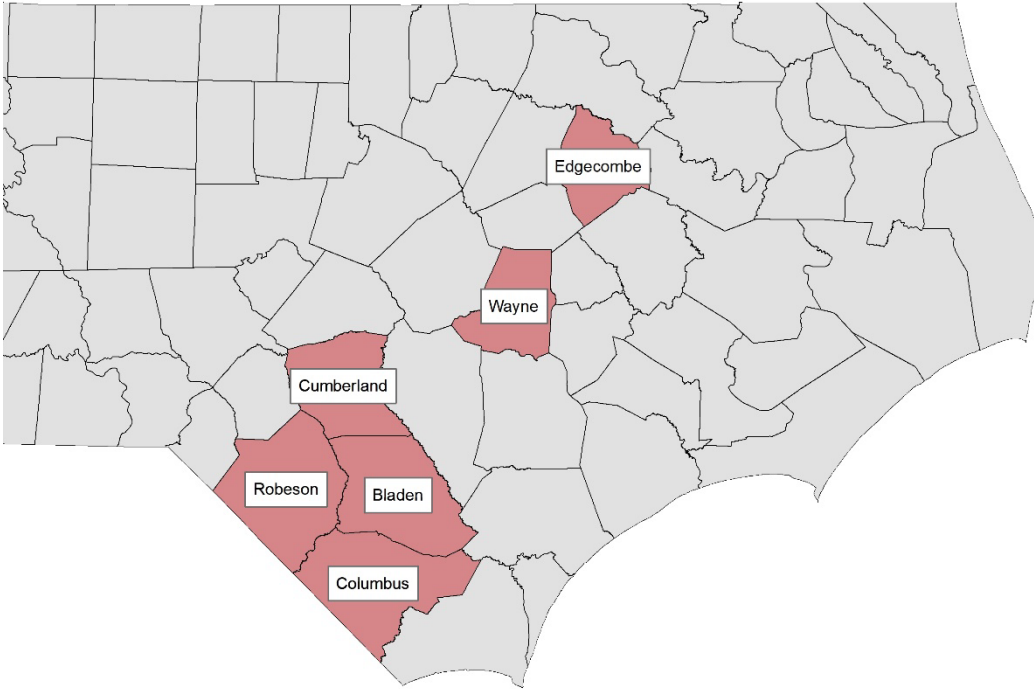
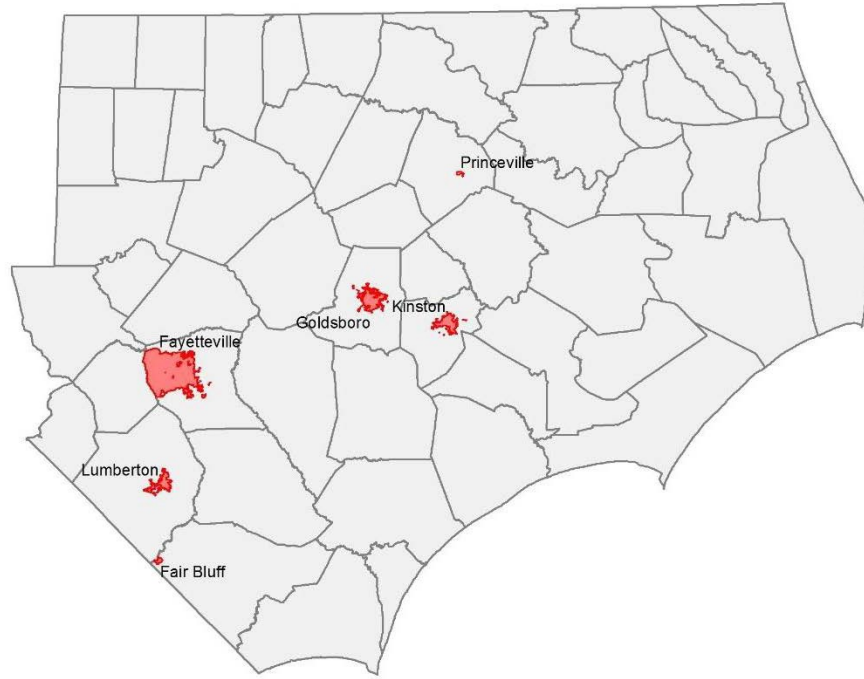


Figure 1: Most Impacted Counties



 At Least 100 homes experienced major to severe damage

Figure 2: Most Impacted Communities

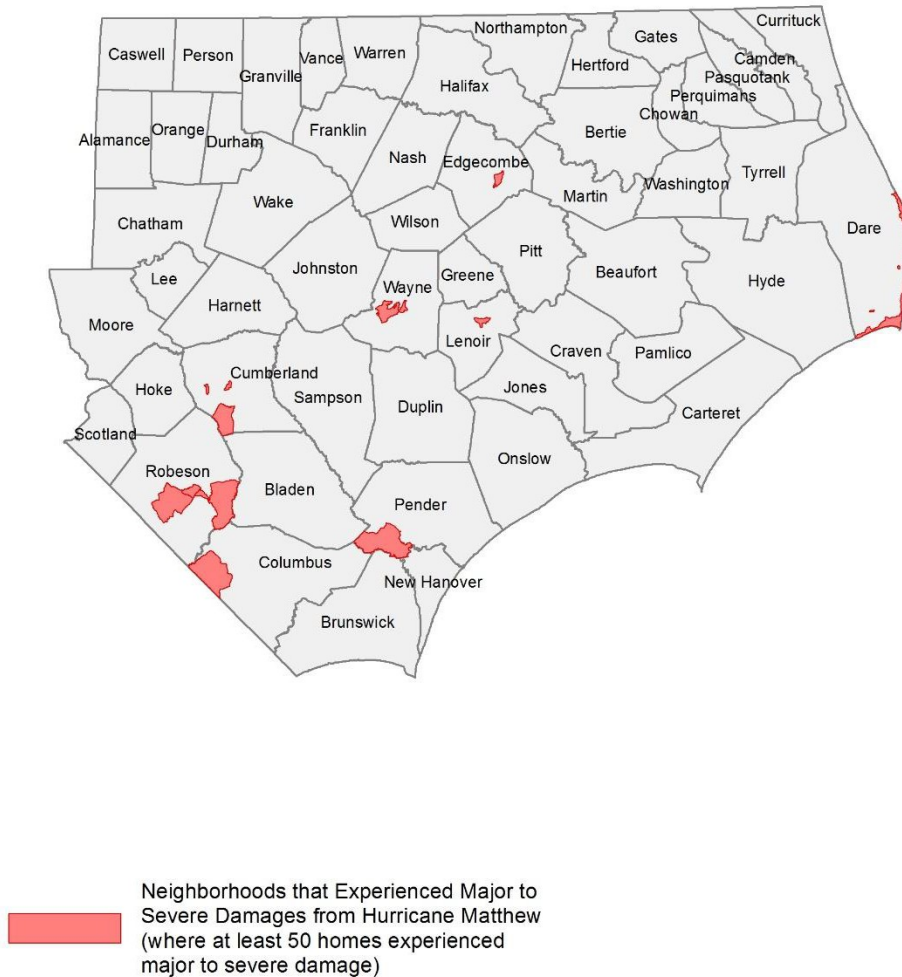


Figure 3: Most Impacted Neighborhoods

3.1.4 Severely Impacted Communities

Hurricane Matthew concentrated its damage within specific areas, in particular riverine communities already grappling with a heavy rain season. There are six towns we consider “severely impacted,” where more than 100 homes experienced major to severe damage. These communities are predominantly low- and moderate-income (LMI) and have a higher concentration of African American, Native American, and Hispanic residents.

Princeville – 367 homes had major to severe damage: The Town of Princeville, with a population of 2,373, is located in Edgecombe County along the Tar River just south of Tarboro. It is a largely African American community (96 percent of its residents are African American) and is reportedly the oldest community settled by freed slaves in the US. It is also located in a floodplain that has experienced frequent and substantial flooding over the years. The

community is a low-income community, with the median household income of \$33,011. In addition to flooded homes, the school and fire station were reported as flooded.

Kinston – 181 homes had major to severe damage: The town of Kinston, with a population of 21,589, is located in Lenoir County along the Neuse River. The community is predominantly African American (67 percent), and most of its residents are low-income, with the median household income of \$28,608. The town experienced substantial damage to its main business district, flooding many small businesses serving the community.

Lumberton – 876 homes had major to severe damage: The city of Lumberton, with a population of 21,707, is located in Robeson County along the Lumber River. A racially and culturally diverse county, where 33.8 percent of the population is African American, 12.4 percent Native American (the Lumbee Tribe), and 11 percent Hispanic/Latino. Most of its families are LMI, with a median household income of \$31,899. The community experienced substantial flooding after Hurricane Matthew, particularly along Fifth Street, its main commercial corridor, and among its public housing residents, where almost 500 very low-income renters lost their homes.

Goldsboro – 251 homes had major to severe damage: The town of Goldsboro, with a population of 35,086, is located in Wayne County along the Neuse River. It is a diverse, LMI community, where roughly 53 percent of the population is African American, and the median income is \$29,456. It is also an agricultural community, where substantial livestock was lost.

Fayetteville – 452 homes had major to severe damage: Fayetteville, located on the Cape Fear River in Cumberland County, is a densely populated city of 200,000. It is a middle-income community, with a median household income of \$44,514, and is racially diverse, where 41 percent of the population is African American and 10 percent are Hispanic. The flooding in Fayetteville was concentrated in the downtown area and in subdivisions near the Little River tributary, where flooding was so severe many residents had to be rescued to evacuate.

Fair Bluff – 109 homes had major to severe damage: Fair Bluff is a small town located along the Lumber River in Columbus County. Given its small population of 1,181 households, it was devastated by Hurricane Matthew, where approximately 25 percent of all families were severely impacted. The community is racially diverse, with 38 percent of the population white and 60 percent African American, and the majority of families are very low-income, with the median household income at \$17,008. Fair Bluff's main commercial district was particularly impacted by the floodwaters.

3.1.5 Most Impacted and Distressed Areas Identified by the State

In consideration of the unique recovery needs created by the large area of the State that was impacted by both Hurricane Matthew and Hurricane Florence, NCORR conducted an analysis of damage to areas that were impacted by both storms. In adherence with the allocation methodology outlined in Appendix A for both 82 FR 5591 for Hurricane Matthew and 85 FR 4681 for Hurricane Florence, NCORR calculated an estimated unmet need for both events

combined. This analysis used the Major-Low, Major-High, and Severe damage categories for both events and multiplied those damage categories by the repair estimation factors included in Appendix A for each respective notice. The threshold to be considered a State-identified MID is greater than \$10 million in combined losses at the county level for both storm events.

Table 4 - Estimated Unmet Housing Need, State Identified and HUD Identified MID Areas (May 2020)

County	Matthew		
	Major-Low	Major-High	Severe
Robeson (County)	\$ 76,874,000	\$ 35,179,760	\$ 6,365,751
Craven (County)	\$ 2,223,855	\$ 822,384	\$ -
Pender (County)	\$ 2,718,045	\$ 3,380,912	\$ 2,201,241
Cumberland (County)	\$ 33,357,825	\$ 20,742,352	\$ 6,246,765
Duplin (County)	\$ 3,376,965	\$ 1,279,264	\$ 297,465
Wayne (County)	\$ 28,635,565	\$ 14,346,032	\$ 3,510,087
Columbus (County)	\$ 13,782,410	\$ 6,533,384	\$ 1,070,874
Onslow (County)	\$ 164,730	\$ 91,376	\$ 59,493
Carteret (County)	\$ 54,910	\$ 45,688	\$ 59,493
New Hanover (County)	\$ -	\$ -	\$ -
Edgecombe (County)	\$ 19,987,240	\$ 15,122,728	\$ 6,901,188
Brunswick (County)	\$ 1,070,745	\$ -	\$ 178,479
Lenoir (County)	\$ 15,759,170	\$ 6,533,384	\$ 1,011,381
Jones (County)	\$ 741,285	\$ 319,816	\$ 59,493
Bladen (County)	\$ 5,765,550	\$ 2,147,336	\$ 773,409
Pamlico (County)	\$ -	\$ -	\$ -
Beaufort (County)	\$ 2,553,315	\$ 685,320	\$ 59,493
Sampson (County)	\$ 5,655,730	\$ 1,918,896	\$ 713,916
Scotland (County)	\$ 247,095	\$ -	\$ -
Pitt (County)	\$ 9,389,610	\$ 3,426,600	\$ 535,437
Harnett (County)	\$ 4,035,885	\$ 1,507,704	\$ 178,479
Dare (County)	\$ 6,616,655	\$ 3,974,856	\$ 297,465
Johnston (County)	\$ 5,463,545	\$ 3,380,912	\$ 1,130,367

County	Florence		
	Major-Low	Major-High	Severe
Robeson (County)	\$ 63,040,160	\$ 13,359,500	\$ 2,488,288
Craven (County)	\$ 72,534,160	\$ 70,562,450	\$ 15,085,246
Pender (County)	\$ 24,038,808	\$ 34,613,250	\$ 34,836,032
Cumberland (County)	\$ 17,317,056	\$ 5,951,050	\$ 5,132,094
Duplin (County)	\$ 12,228,272	\$ 28,540,750	\$ 21,150,448
Wayne (County)	\$ 8,848,408	\$ 1,214,500	\$ 311,036
Columbus (County)	\$ 22,671,672	\$ 10,748,325	\$ 1,943,975
Onslow (County)	\$ 29,773,184	\$ 19,614,175	\$ 5,132,094
Carteret (County)	\$ 35,545,536	\$ 14,574,000	\$ 3,732,432
New Hanover (County)	\$ 35,621,488	\$ 12,812,975	\$ 1,788,457
Edgecombe (County)	\$ -	\$ -	\$ -
Brunswick (County)	\$ 20,165,256	\$ 10,383,975	\$ 4,354,504
Lenoir (County)	\$ 5,392,592	\$ 1,639,575	\$ 155,518
Jones (County)	\$ 12,304,224	\$ 10,141,075	\$ 6,920,551
Bladen (County)	\$ 14,316,952	\$ 4,372,200	\$ 1,632,939
Pamlico (County)	\$ 18,950,024	\$ 5,465,250	\$ 1,555,180
Beaufort (County)	\$ 13,785,288	\$ 4,493,650	\$ 155,518
Sampson (County)	\$ 4,671,048	\$ 2,368,275	\$ 1,866,216
Scotland (County)	\$ 10,253,520	\$ 4,615,100	\$ 855,349
Pitt (County)	\$ 987,376	\$ 303,625	\$ -
Harnett (County)	\$ 4,177,360	\$ 1,153,775	\$ 1,088,626
Dare (County)	\$ -	\$ -	\$ -
Johnston (County)	\$ 683,568	\$ 60,725	\$ 77,759

County	Both Events Grand Total	MID Area
Robeson (County)	\$ 197,307,459	Matthew, Florence
Craven (County)	\$ 161,228,095	Florence
Pender (County)	\$ 101,788,288	Florence
Cumberland (County)	\$ 88,747,142	Matthew, Florence (Zip Code 28390)
Duplin (County)	\$ 66,873,164	Florence
Wayne (County)	\$ 56,865,628	Matthew
Columbus (County)	\$ 56,750,640	Matthew, Florence
Onslow (County)	\$ 54,835,052	Florence
Carteret (County)	\$ 54,012,059	Florence
New Hanover (County)	\$ 50,222,920	Florence
Edgecombe (County)	\$ 42,011,156	Matthew
Brunswick (County)	\$ 36,152,959	Florence
Lenoir (County)	\$ 30,491,620	State Defined
Jones (County)	\$ 30,486,444	Florence
Bladen (County)	\$ 29,008,386	Matthew, Florence (Zip Code 28433)
Pamlico (County)	\$ 25,970,454	Florence (Zip Code 28571)
Beaufort (County)	\$ 21,732,584	State Defined
Sampson (County)	\$ 17,194,081	State Defined
Scotland (County)	\$ 15,971,064	Florence (Zip Code 28352)
Pitt (County)	\$ 14,642,648	State Defined
Harnett (County)	\$ 12,141,829	State Defined
Dare (County)	\$ 10,888,976	State Defined
Johnston (County)	\$ 10,796,876	State Defined

The result is the addition of seven counties which are considered the State-identified MID areas. These counties are Beaufort, Dare, Harnett, Johnston, Lenoir, Pitt, and Sampson. The map of state identified MID areas are located at Section 6.4.

3.1.6 Repairing Owner-Occupied Homes

The Unmet Needs Assessment examines the impact and unmet needs of homeowners using HUD's own standard approach to analyzing housing damages, with slight modifications to the original plan based on available data.

The analysis uses the FEMA Individual Assistance (IA) data, SBA loan data to homeowners, and structural inspections performed by the State as of October 15, 2017. We determine the level of damage each property incurred using FEMA's initial estimate of Real Property Loss and HUD's guidance in FR-60120N-01. The damage categories range from 1 to 5; 1 being Minor-Low Damage and 5 being Severe Damage.

In total, 28,164 homeowners experienced some degree of damage to their homes; 2,569 homeowner families experienced major to severe damage. 78 percent of the total damages were to LMI owners and 69 percent of the homeowners with major or severe damage were LMI.

Table 5: Damage Counts of Owner-Occupied Homes by Damage Category and Income of Homeowner Family

Damage Category	All Owners	Low and Moderate Income (LMI) Owners
Minor-Low	22,795	18,128
Minor-High	2,800	2,102
Major-Low	1,581	1,121
Major-High	830	550
Severe	158	107
Total - All Damage	28,164	22,011
Total - Major to Severe Damage	2,569	1,780

Source(s): FEMA IA analysis effective 9/13/17

Because FEMA's initial inspections have historically underestimated damage costs significantly, FEMA's damage estimates are adjusted upwards based on the average SBA loan amount by damage category. For homes that received an SBA inspection, the damage costs are equivalent to that SBA inspection amount. For homes that did not receive an SBA inspection, damage costs are presumed to be the average SBA inspection amount for that damage category.

To estimate unmet needs, the Assessment subtracts the funds received from FEMA, SBA, and insurance from the damage costs. For homeowners that have flood insurance, the analysis assumes insurance covers 80 percent of the damage costs not covered by FEMA and SBA. The analysis also includes mitigation costs for homes that received major to severe damage, equivalent to 30 percent of damage costs. This reflects additional measures needed to ensure long-term sustainability of flooded homes.

The initial Unmet Needs Assessment examined what types of owner-occupied homes experienced major to severe damage. Approximately two thirds were single family structures, while the remaining one third were mobile homes.

Table 6: Owner-Occupied Housing Units that Experienced Major to Severe Damage by Structure Type

	Count	Percent
Apartment	1	0%
Boat	1	0%
Condo	4	0%
House/Duplex	1,709	67%
Mobile Home	831	32%
Other	2	0%
Townhouse	4	0%
Travel Trailer	6	0%
(blank)	11	0%
Total	2,569	100%

Source(s): FEMA Individual Assistance data. Analysis effective 3/15/17

3.1.7 Rental Housing

Almost half of all the housing that withstood major to severe damage from Hurricane Matthew was rental housing. The storm caused severe damage or destroyed at least 2,388 occupied rental homes, with 83 percent of this damage occurring in the six most impacted counties. In particular, Lumberton experienced the greatest loss of rental housing, with 526 units impacted. This is followed by Fayetteville (283 units) and Princeville (211 units). Far more than owner-occupied homes, the vast majority (86 percent) of renters severely impacted by the storm were LMI.

Table 7: Damage Counts of Renter-Occupied Homes by Damage Category and Income of Renter Family

	All Renters	Low and Moderate Income Renters
Minor-Low	2,632	1484
Minor-High	1,097	618
Major-Low	963	543
Major-High	1,244	701
Severe	181	102
Total - All Damage	6,117	3,448
Total - Major to Severe Damage	2,388	1,346

Source(s): FEMA Individual Assistance data. Analysis effective 9/15/17

Of the rental units, seriously damaged by Hurricane Matthew, we see approximately half were apartment buildings, while 40 percent were single family homes or duplexes. A significant number of rented mobile homes were also flooded (13 percent of all major to severe damage).

Table 8: Rental Housing Units that Experienced Major to Severe Damage by Structure Type

	Count	Percent
Apartment	1,084	45%
Assisted Living Facility	4	0%
Condo	13	1%
House/Duplex	955	40%
Mobile Home	308	13%
Other	5	0%
Townhouse	8	0%
Travel Trailer	1	0%
Unknown	10	0%
Total	2,388	100%

Source(s): FEMA Individual Assistance data. Analysis effective 9/15/17

3.1.8 Other Rental Housing

The State of North Carolina conducted outreach to housing providers in impacted areas to determine the damages, displacement, and unmet needs of subsidized and supportive rental housing. This included emails, a survey, and follow-up phone calls that took place between March 2 and March 20, 2017. NCEM contacted multiple Public Housing Authorities (PHAs), the State Housing Finance Agency, State Community Development Block Grant Disaster Recovery (CDBG-DR) Communities, and North Carolina's Department of Health and Human Services (DHHS) to quantify the disaster's results, understand how it has impacted the families served by the agencies, and determine what needs are still unmet. The following is a summary of these communications. This information will be updated as more details become available to include any data from the most impacted counties and communities.

3.1.8.1 Public Housing

The State contacted PHAs in the most impacted areas, including Greenville Housing Authority, Pembroke Housing Authority, Lumberton Housing Authority, the Housing Authority of the City of Rocky Mount, and Wilmington Housing Authority. The survey asked which properties/units (if any) were damaged and where they are located; how many people were displaced and if they have returned; what the overall damage cost is; whether the units have been repaired; and if any costs or repairs are remaining. Information was received by four of the five housing authorities, which resulted with Wilmington having no damage, Greenville and Rocky Mount

having minor damage, and Lumberton experiencing severe damage. Pembroke is calculating the overall costs and will provide the information when available. Each of these facilities will be eligible for FEMA Public Assistance (PA) and will have, in addition to unmet needs, a 25 percent local match requirement that will need to be met and is part of the State's unmet need.

Table 9: Survey Results from Public Housing Authorities as of March 15, 2017

City/County	What are the overall damage costs?	What amount of those costs was/is/will be covered by insurance and/or other sources?	Remaining Costs	Are there repairs that still need to be made?
Lumberton	\$8,000,000 +/-	\$3,000,000 +/-	Yes	Yes, \$5,200,000
Greenville	~\$8,000-\$10,000	None	No	No
Rocky Mount, Edgecombe, Nash Counties	\$6,000	\$2,020	\$3,980	Interior water damage not covered by insurance - repairs are being completed by force labor.
Wilmington	0			
Pembroke	Unknown			

Source: Survey results from PHA outreach, effective 3/10/17.

The Lumberton Housing Authority had, by far, the most extensive damage totaling an estimated \$8 million, with approximately \$5 million in remaining unmet need. There are currently 264 families displaced, currently living with family members or using housing vouchers, who have yet to move back into their homes as all units are still in the process of being repaired.

In addition to Lumberton, Greenville and Rocky Mount had damages with a combined total of \$16,000, and Rocky Mount still has \$3,980 costs remaining. In Greenville, 105 Public Housing families were displaced; however, all of the units have since been repaired, and all families have moved back.

3.1.8.1.1 Amendment 5 Update

After the initial PHA recovery needs were addressed, additional unmet recovery needs for PHAs were identified. In addition to the ongoing need in Robeson County with the City of Lumberton, The Housing Authority of the City of Goldsboro and the Wilson Housing Authority have both identified recovery needs. NCORR has reviewed these recovery needs and includes them in the unmet recovery needs analysis and intends to fund these initiatives through the Public Housing Restoration Fund.

The housing programs within this Action Plan will address remaining unmet needs, after considering funds available from insurance and other sources, to restore public housing and return families to their homes.

3.1.8.1.2 Amendment 7 Update

An additional need for funds was identified by Wilson Housing Authority during the selection process for the Whitfield Homes Expansion project. The total expected cost of that project has increased to \$2,712,905. The updated public housing need is therefore \$11,172,422. As public housing recovery needs change, these estimates are subject to revision.

Table 10: PHA Recovery Needs (September 2020)

Area	PHA	Housing Need	# of Projects	# of Units (Minimum)	Project Name
Robeson County	Lumberton Housing Authority	\$ 6,959,517	3	72	Hilton Heights, Myers Court
Wayne County	Goldsboro Housing Authority	\$ 1,500,000	1	48	Park Court
Wilson County	Wilson Housing Authority	\$ 2,712,905	1	32	Whitfield Homes Expansion
Total	-	\$ 11,172,422	5	152	-

3.1.8.2 Other Subsidized Housing

Similar to the PHAs, the State sent a survey to the North Carolina Housing Finance Agency (NCHFA), USDA, and other housing providers in impacted communities, to assess damages and unmet needs due to Hurricane Matthew. According to the NCHFA, 397 units were damaged. The agency believes they have sufficient funds to make the needed repairs using insurance proceeds. However, if there are instances where subsidized affordable rental housing has remaining unmet needs, their recovery will be given priority in the rental housing programs outlined in this Action Plan.

Table 11: NC Housing Finance Agency Properties Damaged by Hurricane Matthew

Name	City	County	Units
Prince Court Apartments	Princeville	Edgecombe	30
Asbury Park Apartments	Princeville	Edgecombe	48
Holly Ridge Apartments	Lumberton	Robeson	110
Mount Sinai Homes	Fayetteville	Cumberland	99
ARC/HDS Northampton Co GH	Woodland	Northampton	6
First Baptist Homes	Lumberton	Robeson	40

Name	City	County	Units
Cypress Village	Fair Bluff	Columbus	40
Glen Bridge	Princeville	Edgecombe	24

Source: North Carolina Housing Finance Agency, effective 3/10/17

The State also sent surveys to CDBG-DR Entitlement Communities in the impacted areas, and received responses back from Fayetteville and Rocky Mount. In Fayetteville, a reported 952 rental properties were severely damaged, and 671 remain unrepaired. The City cited a need for substantial mitigation and resiliency measures, as many damaged properties were severely damaged, exceeding 50 percent value. The city is currently determining the costs of repair and unmet needs, after factoring in other federal assistance and insurance proceeds. Rocky Mount reported 340 rental homes damaged and are currently determining repair costs and unmet needs.

3.1.8.3 Permanent Supportive Housing

The State contacted North Carolina’s housing partners to understand the impact Hurricane Matthew had on homeless shelters, transitional housing facilities, or any housing facilities that serve those with disabilities or supportive housing. They were asked what the total damaged properties were, how many people were displaced, and if they are still displaced.

The North Carolina Department of Health and Human Services (DHHS) manages the delivery of health- and human-related services for all North Carolinians, especially our most vulnerable citizens – children, elderly, disabled, and low-income families. DHHS has not yet reported damage to any permanent supportive housing or service facilities, while the State is currently assessing unmet needs.

In addition to restoring existing permanent supportive housing and services, this disaster event likely calls for new services to families and residents who have not historically been served by DHHS. For many very low-income owners and renters, older adults, and persons with disabilities, the impact of severe flooding can lead to a variety of needs. For many families, the loss of their homes; lost wages due to job interruption; limited access to transportation; and the stress associated with living in overcrowded or unsafe conditions due to “doubling up” or remaining in their damaged homes out of necessity warrants additional services in the form of emergency housing assistance, mental health support services, homeless prevention services, and health and transportation assistance. The State will address these needs, working closely with local communities, with emphasis on assisting families currently displaced or at risk of displacement.

3.1.9 Housing Unmet Need Summary

The State of North Carolina has taken multiple steps in estimating the unmet housing needs resulting from Hurricane Matthew. This includes conducting field inspections of damaged homes; analyzing and updating FEMA IA data, SBA loan information, and insurance information;

conducting county-led planning efforts; and surveying PHAs and other housing providers to determine what financial needs will be required to restore our homes and neighborhoods.

This estimate accounts for the costs to repair damaged homes that are owned or rented by LMI persons. The State estimates that, to assist 7,831 LMI homeowners, it would need an additional \$104,081,224 and, to assist 3,448 LMI renters, it would need an additional \$68,912,793, which includes providing required mitigation for these homes to avoid future losses, resulting in an additional \$172,994,017 in unmet need.

There are additional needs beyond repairing damaged homes. The State has been proactive in initiating outreach with the most impacted communities to determine the cost benefit of repairing homes that experience repetitive flood loss and/or are located in flood-prone areas versus the cost of acquiring these properties and relocating these families to safer ground. This is an ongoing effort, and as of October 15, 2017, the State estimates an additional need of \$260,971,916 to elevate homes, or acquire and demolish homes, and then relocate families to new housing.

Additionally, the State will require that all new construction and repair of substantially damaged homes meet, at a minimum, Advisory Base Flood Elevations. All homes located in the 100-year floodplain that receive assistance for reconstruction or repair of substantial damage shall be elevated to at least two-feet above Base Flood Elevation. The method of determining elevation assistance and cost-reasonableness will be outlined in detail in the ReBuild NC Homeowner Recovery Program Manual.

The estimate also accounts for the repair of the public housing units that were severely damaged (\$15,200,000) as well as an increased estimate of need for support services for persons needing assistance relating to the homeless, families living in poverty, persons needing medical or mobility assistance due to disabilities, permanent supportive housing needs, persons who are currently displaced and need additional housing assistance, and services to older residents especially challenged by displacement (\$17,371,361).

Finally, the unmet needs analysis factors in a preliminary estimate of subsidies needed for LMI homeowners who will expect to see their insurance premiums increase and who will not be able to afford flood insurance once their homes are rebuilt (\$8,800,000). In addition, the estimate includes the providing funds to address shortfalls for homeowners who sell their homes to the State through a buyout program and, because of the cost of new housing, will have a gap in what the home sale price was and the cost to move into the new residence (\$10,077,200).

These estimates are based on existing data; as the State and local planning efforts continue to work with the most impacted communities, these figures may be adjusted based on better data and feedback.

Table 12: Housing Unmet Needs

Source	Amount
Owner - Repair Damages	\$104,081,224
Renter - Repair Damages	\$68,912,793
Elevation/Buyout	\$260,971,916
Public Housing	\$15,200,000
Supportive Services	\$17,371,361
Homeowner Assistance Program	\$10,077,200
Insurance Subsidies for LMI Owners	\$8,800,000
<i>TOTAL</i>	\$485,414,494

Source(s): FEMA Individual Assistance, Small Business home loan data; survey responses from State and local housing providers and agencies; analysis effective 9/13/17

3.2 Vulnerability of the Most Impacted Communities

As was articulated in the initial Action Plan, North Carolina’s approach to recovering its homes and neighborhoods after Hurricane Matthew is to strategically examine where the damage occurred and then focus its recovery efforts in those areas, paying special attention to the housing types, household types, and special needs of these unique communities. The allocation of funds in the Action Plan Amendment, shows North Carolina’s commitment to the most vulnerable communities. The original analysis remains unchanged, and the use of the metrics in this analysis is shaping program design.

Families and individuals with social vulnerabilities oftentimes face greater challenges in evacuating during a disaster event, including finding suitable and affordable housing if displaced, and being able to afford making the repairs needed so that they can return to their homes. To address this issue, North Carolina analyzed IA applications to determine which neighborhoods withstood the brunt of Hurricane Matthew’s impact and then examined the socio-economic and demographic profiles of these neighborhoods.

For the purpose of this study, we consider a neighborhood to be “most impacted,” if at least 25 homes experienced major to severe damage (i.e. homes with a category 3, 4, and 5 damage level, or Major-Low, Major-High, and Severe damage), or where at least 5 percent of all homes had major to severe damage. The analysis defines vulnerable populations as older residents (65 years old or older), persons with disabilities, homeless or individuals at risk of homelessness, neighborhoods where at least 50 percent of households earn less than 80 percent Area Median Income (AMI) (LMI neighborhoods), households with English language barriers, and households who do not own personal vehicles. This data is publicly available using the 2010-2014 American Community Survey (ACS) and is collected at the Census Tract-level (aligned with our definition of a neighborhood). To determine if a Census Tract has a disproportionate number of residents

or families with social vulnerability, we compare the figures to state averages, or use HUD-standard benchmarks (i.e. majority of households are low-income, for example).

Based on this analysis, there are five neighborhoods located in Lumberton, Princeville, Fayetteville, and Fair Bluff that were severely impacted (where at least 100 homes experienced major to severe damage). Of these five neighborhoods, an impacted family is more likely to be low-income, minority, and without a family car than what is typical in the State. Among the other impacted neighborhoods, there are pockets of damage where residents have English language barriers, disabilities, and are also low-income and minority neighborhoods. There are no substantially impacted neighborhoods with a disproportionate number of older residents. Even so, North Carolina understands that many older households have substantial rebuilding challenges, and their needs will be addressed through local outreach efforts and prioritization among programs.

Additionally, North Carolina is committed to rebuilding damaged communities in a manner that furthers fair housing opportunities to all residents. For this reason, the Assessment identifies which impacted neighborhoods have a disproportionate concentration of minority populations. As these communities rebuild, the State will focus its planning and outreach efforts to ensure that rebuilding is equitable across all neighborhoods, which may include providing affordable housing in low-poverty, non-minority areas where appropriate and in response to natural hazard-related impacts.

Table 13: Most Impacted Neighborhoods and Social Vulnerability [Y = Disproportionate Social Vulnerability]

Town	County	Neighborhood	Owner	Renter	Total	Disability	Language Barriers	No Access to Vehicle	Minority	LMI
Lumberton	ROBESON	37155960801	150	320	470	N	N	Y	Y	Y
Princeville	EDGECOMBE	37065020900	156	211	367	N	N	Y	Y	Y
Lumberton	ROBESON	37155960802	125	144	269	Y	N	Y	Y	Y
Fayetteville	CUMBERLAND	37051003203	26	107	133	N	N	N	Y	N
Fair Bluff	COLUMBUS	37047930600	50	59	109	Y	N	Y	N	N
Fayetteville	CUMBERLAND	37051000200	53	40	93	Y	N	Y	Y	Y
Rural	WAYNE	37191000901	44	48	92	N	Y	N	N	N
Goldsboro	WAYNE	37191001500	24	61	85	Y	N	Y	Y	Y
Rural	ROBESON	37155961802	16	61	77	Y	N	N	Y	Y
Rural	DARE	37055970502	47	28	75	N	N	N	N	Y
Rural	CUMBERLAND	37051003001	52	16	68	N	N	N	N	N
Rural	PENDER	37141920502	41	24	65	N	N	N	N	N
Kinston	LENOIR	37107010800	2	62	64	Y	N	N	Y	N
Rural	ROBESON	37155961500	47	14	61	N	N	N	N	N

Town	County	Neighborhood	Owner	Renter	Total	Disability	Language Barriers	No Access to Vehicle	Minority	LMI
Hope Mills	CUMBERLAND	37051001601	32	17	49	N	N	N	N	N
Fayetteville	CUMBERLAND	37051003800	4	42	46	Y	N	Y	Y	Y
Lumberton	ROBESON	37155961302	23	23	46	N	Y	N	Y	N
Rural	ROBESON	37155961601	35	10	45	N	N	N	Y	N
Goldsboro	WAYNE	37191001400	12	31	43	N	N	Y	Y	Y
Rural	EDGECOMBE	37065021500	34	8	42	N	N	N	N	N
Fayetteville	CUMBERLAND	37051001400	22	20	42	Y	N	N	Y	Y
Goldsboro	WAYNE	37191002000	13	27	40	N	N	Y	Y	Y
Rural	WAYNE	37191001101	27	13	40	N	N	N	N	N
Rural	PENDER	37141920501	31	8	39	N	Y	N	Y	N
Rural	BLADEN	37017950100	34	4	38	Y	N	N	N	N
Seven Springs	WAYNE	37191000602	22	12	34	N	Y	N	Y	N
Kinston	LENOIR	37107010200	7	26	33	Y	N	Y	Y	Y
Rural	SAMPSON	37163971000	30	3	33	N	Y	Y	Y	N
Whiteville	COLUMBUS	37047930900	6	26	32	Y	N	Y	Y	Y
Lumberton	ROBESON	37155960701	29	2	31	N	Y	N	Y	Y
Kinston	LENOIR	37107011300	23	7	30	Y	N	N	N	N
Windsor	BERTIE	37015960400	18	12	30	Y	N	Y	Y	N
Rural	CUMBERLAND	37051001903	0	29	29	N	N	N	N	N
Tarboro	EDGECOMBE	37065021000	10	19	29	N	N	Y	Y	Y
Rural	CRAVEN	37049960200	24	3	27	Y	N	N	N	N
Rural	LENOIR	37107011300	15	12	27	Y	N	N	N	N
Rocky Mount	EDGECOMBE	37065020400	0	27	27	N	N	Y	Y	Y
Rural	WAYNE	37191001000	24	3	27	N	Y	N	N	N
Fayetteville	CUMBERLAND	37051000800	0	26	26	N	N	N	N	N
Rural	CUMBERLAND	37051001400	6	19	25	Y	N	N	Y	Y
Rural	GREENE	37079950102	20	5	25	Y	N	N	Y	Y
Rural	MOORE	37125950501	14	11	25	N	N	N	N	N

Source: Source(s): FEMA Individual Assistance data dated 1/16/17; American Community Survey 2010-2014; analysis effective 3/15/17.

The challenges associated with vulnerable populations can be categorized as follows:

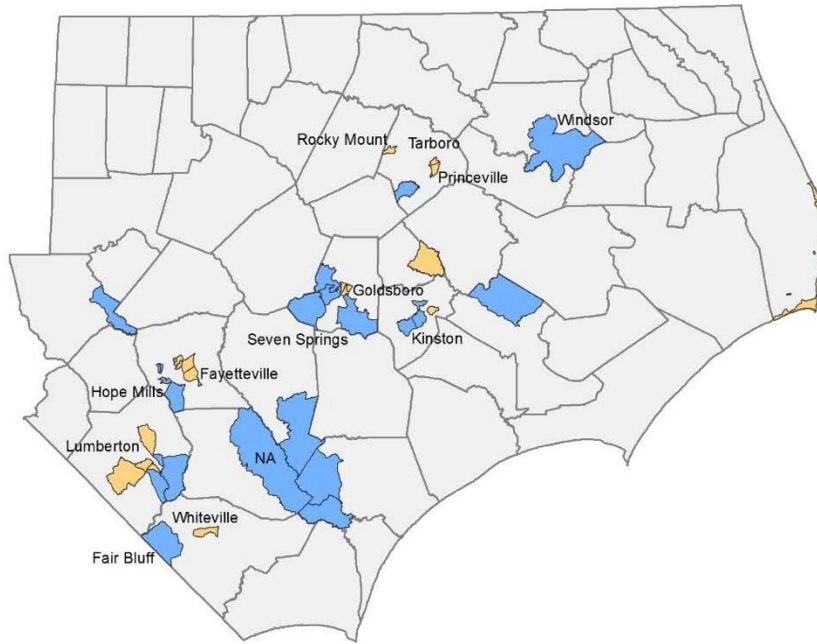
Evacuation Needs – Many low-income families lack the financial capacity to evacuate during a storm event, with limited resources to pay for alternative lodging. Many do not own a vehicle

and simply cannot evacuate without assistance. Similarly, older residents and persons with disabilities may not be able to evacuate due to mobility challenges and the need to be near their existing medical care. There are also residents who are unaware of impending disasters due to language barriers and social isolation from to lack of technology. These individuals and families often risk their safety, and even their lives, due to their inability to get out of harm's way as storm approaches. Although the storm has since passed, North Carolina acknowledges that many impacted neighborhoods are at continued risk of flooding in the event of a future storm and are using this flood event to understand what the evacuation needs may be for the neighborhoods hit hardest by flooding.

Displacement and Temporary Housing Needs – The greatest challenge most low-income families face immediately after evacuation is finding suitable temporary housing that is affordable and located near their jobs and basic services. Many are not able to pay for two homes (a mortgage on their damaged home and renting a new home) leading to severe debt or households “doubling up” with other family members. Even more challenging, many older adults and persons with disabilities have mobility challenges and medical needs, and moving far from their existing support network can lead to a sedentary, unhealthy living environment, or worse, a medical crisis. Very low-income residents, persons with disabilities, and many older adults impacted by Hurricane Matthew have supportive service needs like medical care, access to medicine, transportation assistance, and financial support during the rebuilding process.

Rebuilding Needs – The long-term goal of North Carolina is to safely return families and individuals to their communities and homes. The cost of repair is a major issue for low-income homeowners, particularly for those whose homes were devastated by flooding and whose insurance did not cover the damages. Many low-income residents cannot afford to move and cannot afford to rebuild. What often happens is that they remain in their damaged home, living in an environment that poses health risks like mold and structural damage. Renters may face even greater challenges, since it is up to the landlord to rebuild or not, and if the rental income was insufficient to encourage rebuilding, the landlord may choose to keep the insurance payout and not rebuild. This leads to long-term displacement of renters, which can be particularly challenging in smaller communities where there is a limited supply of rental units.

North Carolina will address these challenges by tailoring its housing recovery programs to the communities most impacted while providing a suite of supportive services and financial assistance to low-income families and other vulnerable populations struggling to rebuild their lives.

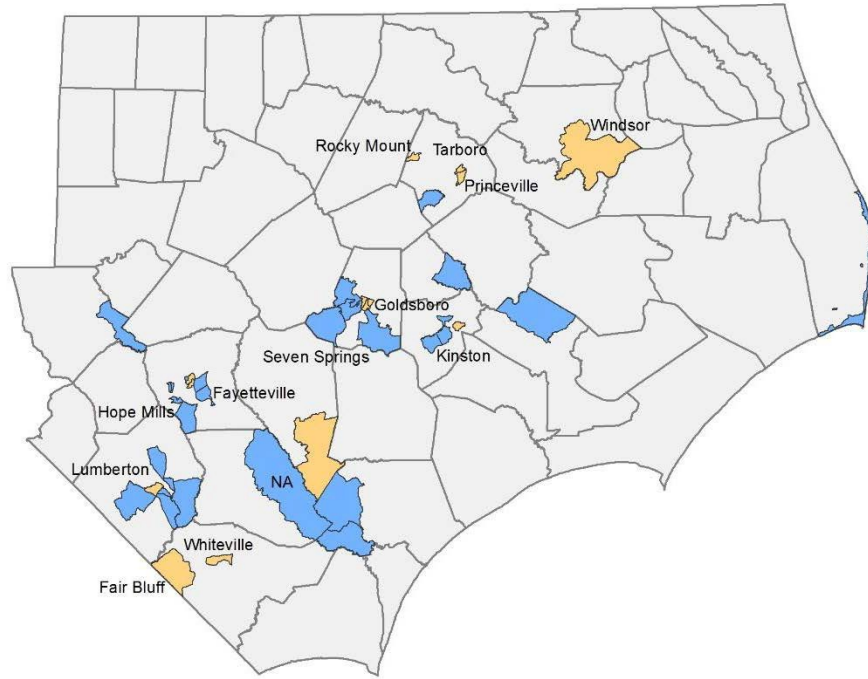


Neighborhood Vulnerability

LMI

- No
- Yes

Figure 4: Most Impacted Neighborhoods that are Low- and Moderate-Income

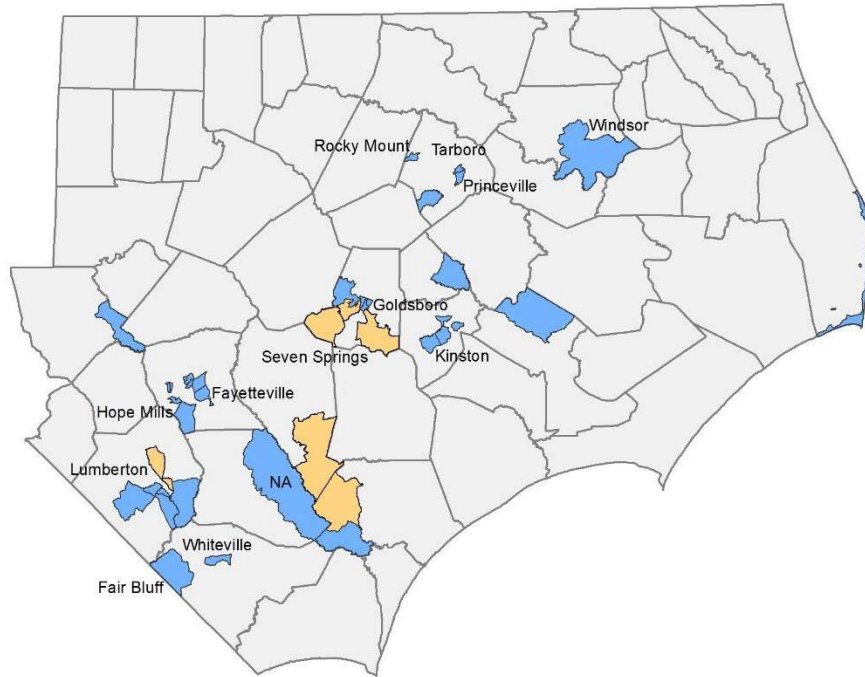


Neighborhood Vulnerability

No Access to Vehicles

- No
- Yes

Figure 5: Most Impacted Neighborhoods with a Disproportionate Concentration of Households without a Car

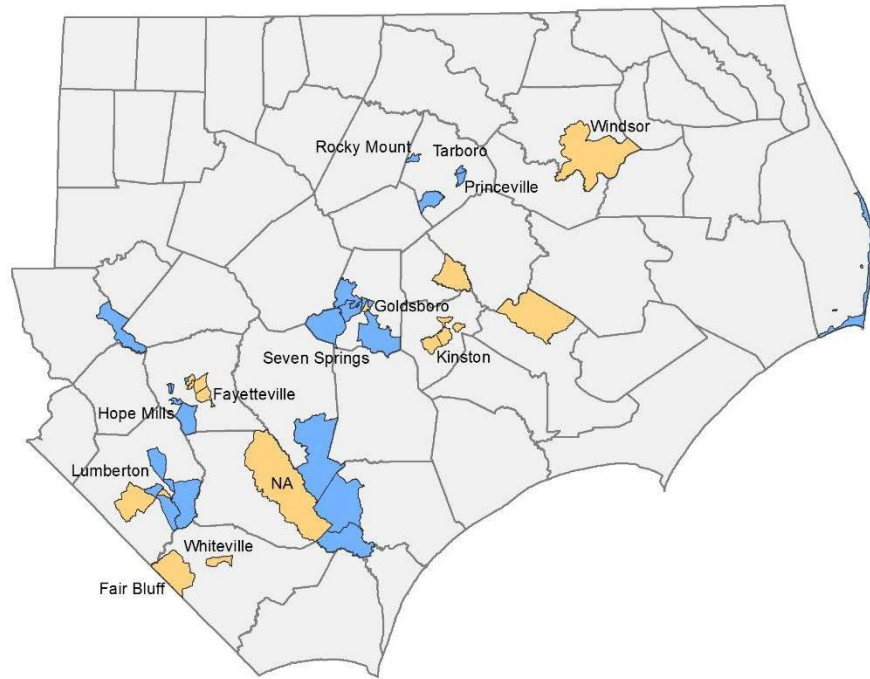


Neighborhood Vulnerability

Language Barrier

- No
- Yes

Figure 6: Most Impacted Neighborhoods with a Disproportionate Concentration of Residents who Maintain Language Barriers

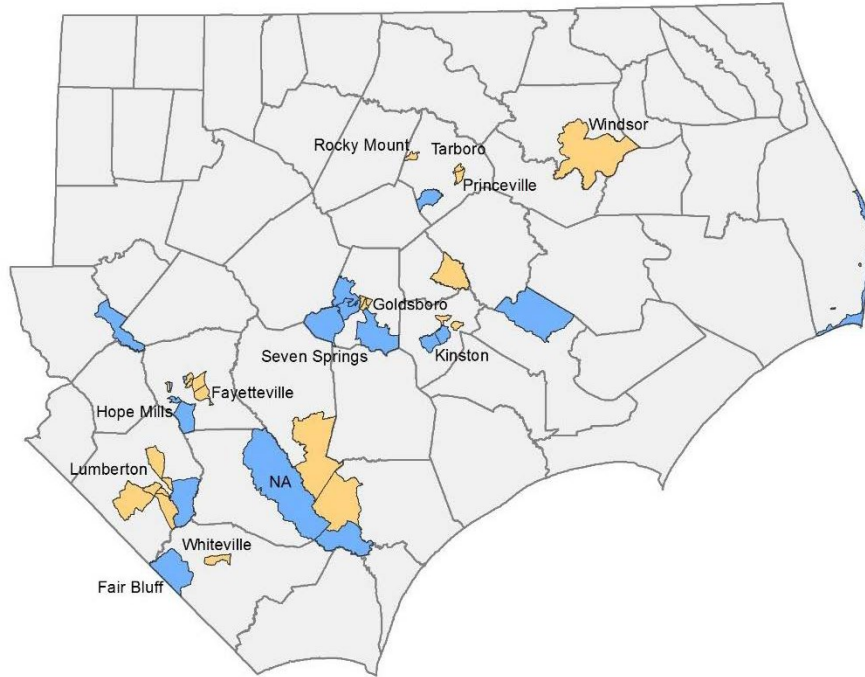


Neighborhood Vulnerability

Disability

- No
- Yes

Figure 7: Most Impacted Neighborhoods with a Disproportionate Number of Residents with Disabilities



Neighborhood Vulnerability

- Minority**
- No
 - Yes

Figure 8: Most Impacted Neighborhoods with a Disproportionate Concentration of Minority Populations

3.3 Economic Recovery

As was shown in the initial Unmet Needs Assessment, Hurricane Matthew caused extensive damage to small businesses in eastern and central North Carolina with most businesses located in rural counties leaving a large unmet need. That analysis continues to be accurate as, to date, neither the SBA nor USDA has addressed the recovery needs following Matthew. Small businesses are the economic backbone of most towns in North Carolina, and these businesses are where residents shop for groceries, buy gas, dine, lodge, and acquire retail and other services that define the community. Many businesses also support and rely on the state's agricultural economy, including family farms and agribusinesses, for survival. As was shown in the initial Action Plan, a key industry sector that was impacted by Matthew was the State's agricultural economy. The State still estimates that in part due to SBA loan denials and lack of dedicated recovery funding from the USDA for the farming community, the agricultural and small business community continues to have a \$263 million unmet need.

The most recent data from the SBA, continues to show that the counties most impacted by Matthew have the highest number of per county applications for assistance, and 95 percent of these businesses have less than 100 employees. Based on the September 2017 data on business related loans programs, small businesses in North Carolina are seeing more loans denied than approved, with 645 applications approved and 752 denied.

In addition to the businesses who were denied an SBA loan, there were 7,740 businesses who were referred to the program but never applied. The State, in consultation with community leaders and through the planning process, believes that many of these businesses, while having unmet recovery need, did not submit the loan package to SBA because they knew they would not qualify.

A primary component of North Carolina's economic strength is its agricultural sector. The USDA declared 79 of the State's 100 counties as having significant agricultural damage from Matthew and the North Carolina Department of Agriculture and Consumer Services reported that 48 counties were seriously impacted, with these counties accounting for 71 percent of the total farm cash receipts and representing \$9.6 billion of the \$13.5 billion total. The Department assessed that Matthew had a \$422 million impact to major commodities and, because agriculture production is seasonal, many farms lost an entire year's crop from Matthew and, along with it, a potential loss of markets. As a result, the State is continuing to assess agricultural recovery throughout the 2017-2018 growing season, but based on current information, there is substantial evidence that small agricultural businesses were substantially impacted, losing their anticipated 2017 earnings in the floodwaters. Without being fully compensated from USDA or SBA, they represent a large, unmet need.

Based on information from State Agencies and SBA, the current estimated unmet need for small businesses, including the agricultural sector, is \$263,435,519. This assessment is based on a conservative approach of taking (1) 10 percent of the business losses for firms that were referred to FEMA who did not submit an application for an SBA, (2) all businesses that applied

for an SBA loan but were denied, (3) an assumption that SBA business loans cover 80 percent of unmet needs, and (4) State estimates of ongoing agricultural losses that were not addressed by USDA through its programs. The data highlights that the most vulnerable businesses in North Carolina continue to be small businesses in rural counties, within the service, agriculture, and retail industries. The fact that these firms are located within or connected to the residential areas in the hardest hit counties amplifies the importance of obtaining funding to address the unmet needs of the business and agricultural sector as the services, local employment, and stability provided by small businesses are critical factors in ensuring that overall community and regional recovery will occur.

Table 14: Unmet Business Needs

	Business Loans Denied	Business Loans Approved	Referrals only	Average Loan Amount	Estimated Damages	Amount Received	Estimated Unmet Need
Total	752	645	25,064	\$92,981	\$288,186,019	\$24,750,500	\$263,435,519

Source: US SBA, 09/18/17

3.4 Public Infrastructure and Facilities

As was shown in the State's initial Action Plan, Matthew devastated public infrastructure in eastern and central North Carolina. The State recognizes that the primary funding source used to repair and restore damaged public infrastructure is FEMA's PA program. Since the initial Action Plan was published, the State has completed its 50-county comprehensive, ground up, community planning process. As a result, infrastructure-related projects will be implemented that were developed from these plans.

FEMA, through its PA program, assists communities rebuild following a disaster. Table 15 shows the current FEMA PA obligations for Matthew. In total, over 424 applicants now have eligible PA projects. While the amount of funding and number of applicants in the FEMA PA program is expected to grow as of October 10, 2017, these applicants had \$292,780,270 obligated to PA projects, an increase of \$279,253,605 since the initial Action Plan was published. As was shown in the State's initial Action Plan, and remains true for this Amendment, the State estimates that once all FEMA PA projects are accounted for, the PA program will exceed \$400 million, with over \$101 million in match required.

Table 15: FEMA PA Obligations by Category

FEMA Category	Category	Project Obligations (Project Worksheets (PWs))		Match Requirements	
		100% PW	Estimated	Current	Estimated
Debris Removal	A	\$43,520,496	\$46,648,598	\$10,880,124	\$11,662,150
Emergency Protective Measures	B	\$54,284,215	\$55,465,188	\$13,571,054	\$13,886,297
Roads & Bridges	C	\$43,792,986	\$116,750,334	\$10,948,246	\$29,187,584
Water Control Facilities	D	\$17,304,456	\$10,634,800	\$4,326,114	\$2,658,700
Public Buildings and Contents	E	\$35,885,478	\$74,620,505	\$8,971,370	\$18,655,126
Public Utilities	F	\$47,524,289	\$48,290,124	\$11,881,072	\$12,072,531
Parks, Recreational, Other Facilities	G	\$50,468,351	\$53,932,676	\$12,617,088	\$13,483,169
FEMA PA Total		\$292,780,270	\$406,342,226	\$73,195,067	\$101,585,557

FEMA PA Data: October 10, 2017

In addition, to the PA program the State anticipates receiving \$100 million in Hazard Mitigation Grant Program (HMGP) funding with FEMA providing \$75 million and the State required to provide \$25 million. The State will use its HMGP allocation to buyout and acquire homes turning them into greenspace. As a result, the match required for both the FEMA PA and HMGP programs the current estimate for all FEMA PA programs exceeds \$107 million.

As was disclosed in the original Action Plan, all infrastructure related projects will refer to the *Federal Resource Guide for Infrastructure Planning and Design*: <http://portal.hud.gov/hudportal/documents/huddoc?id=BAInfra ResGuideMay2015.pdf>.

The following sections provides more information on unmet public infrastructure and facilities service to address community recovery needs.

3.4.1 Community and Supportive Facilities

As was documented in the State's original Action Plan, some public facilities that were damaged will be repaired using FEMA PA funds. However, State facilities that provide social, community, and health (including mental health) services to support Matthew also incurred unmet needs that are not eligible for FEMA PA program funds. Through local outreach and needs assessments, the State continues to estimate an additional unmet need of \$45.4 million to address and pay for these services and facility upgrades.

3.4.2 Dams and Levees

As was documented in the State's original Action Plan, North Carolina has the largest number of dams in the nation with 1,200 high hazard dams that could potentially endanger lives and property if they fail. North Carolina's Division of Energy, Mineral, and Land Resources reported that 20 dams were breached and 46 additional dams damaged as a result of Matthew, including the levee protecting the Town of Princeville, which resulted in millions of dollars in damages while other dams threatened more than 500 structures and residences.

North Carolina's dam/levee work, which represents an unmet need of \$38 million, will ensure the structures admitted under the United States Army Corps of Engineers (USACE) P.L. 84-99 are accredited under the FEMA National Flood Insurance Program (NFIP).

3.4.3 Department of Transportation (DOT)/HUD/Federal Highway Association (FHWA) Transportation Facilities and Infrastructure

As was shown in the State's original Action Plan, North Carolina's road system was heavily impacted by Matthew. An important component of the national disaster response plan is the integration and delineation of how FEMA and US DOT provide funding to states to address storm-related repairs to road systems. As a result of Matthew, approximately 42,000 miles of roads needed to have either debris removal, emergency protective measures, and or specific site repairs. These activities will require the State to provide matching and, as disclosed in the initial Action Plan, represent an unmet need of \$52.6 million dollars.

3.4.4 USDA / FSA Disaster Grant Programs

As was shown in the State's original Action Plan and highlighted in the Economic Recovery section, Hurricane Matthew caused substantial damage to North Carolina's rural areas. This included the loss of field crops and livestock who perished in the floodwaters, causing environmental hazards in the streams, ponds, and other bodies of water. The State, working with the USDA, continues to estimate an unmet need of \$177.7 million for USDA related activities including clean-up efforts and restoration of watersheds that are tied to Matthew.

3.4.5 Environmental Protection Agency (EPA) – Drinking Water and Wastewater Repair and Mitigation

As was highlighted in the State's original Action Plan, since the publication of the plan, the State has continued to work with the EPA and FEMA, to address the substantial unmet needs for the repair and mitigation of the water and wastewater treatment systems that were impacted by Matthew. Even after taking into account opportunities to restore and mitigate these systems with FEMA PA funds the State continues to have an unmet need of \$274 million dollars.

3.4.6 National Guard Facilities and Equipment

The National Guard plays a vital and critical role in disaster recovery during the initial response period, providing emergency response functions (ESFs), helping citizens to safe ground, and

securing assets. The National Guard’s staging facilities and equipment must be maintained. Matthew impacted five facilities that will require a match that represents an unmet need of \$730 thousand.

Table 16: Infrastructure Unmet Need

Source	Unmet Need
FEMA PA and HMGP Match (estimate)	\$101,585,557
Repair health care, daycare, and other supportive facilities with remaining unmet needs (after subtracting FEMA and insurance)	\$45,370,264
Other Federal Agencies	Unmet Need
USACE - Levee and Dam Repair Safety	\$38,132,675
DOT/HUD/FHWA - pavement, storm pipes, highway embankment	\$52,586,192
USDA /FSA Disaster Grant Programs	\$177,663,583
EPA - Drinking Water and Waste Water Repair and Mitigation	\$274,481,000
National Guard	\$734,000
TOTAL	\$543,597,450

The State recognizes that the data collection and documentation of community infrastructure and public facilities needs is ongoing at this stage in the State’s recovery process. In addition to the documented costs in from Federal sources with the completion of the State’s community planning effort, additional recovery related projects will be implemented that represent an unmet need for infrastructure projects. The infrastructure projects are contained in each of the 50 county plans that were submitted to the State in the summer of 2017 and are shown on the rebuild.nc.gov website at <https://www.rebuild.nc.gov/resiliency/hurricane-matthew-resilient-redevelopment-plans>. As a result of the large unmet need in this program area, the State will need to maximize all funding sources and obtain additional resources to address this program area’s unmet need. As a result, the State may need to modify funding levels for sub-programs within this CDBG-DR allocation.

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4.0 Planning, Coordination, and Community Outreach Needs

The State's initial Action Plan highlighted the robust planning effort in response to the unmet needs resulting from Hurricane Matthew. In addition to the Action Plan process, the North Carolina General Assembly established the North Carolina Resilient Redevelopment Planning (NCRRP) program as part of the *2016 Disaster Recovery Act* (Session Law 2016-124). This effort was funded by the State and did not use CDBG-DR funds. North Carolina Emergency Management served as the coordinating body to develop regional planning strategies to ensure consistency across the State and establish the basis for the state's disaster recovery action plan. The planning effort was initiated in February of 2017 and was completed in August of 2017 with the final submission of 50 county recovery plans. The plans can be found at <https://www.rebuild.nc.gov/resiliency/hurricane-matthew-resilient-redevelopment-plans#a-b-c>.

The purpose of the program was to 1) provide a roadmap of strategic plans and actions for a more resilient community rebuilding and revitalization for areas that were impacted by the Matthew, and; 2) define any unmet funding needs required to implement those actions after other funds are used. The program empowered communities to prepare locally-driven recovery plans, to identify redevelopment strategies, suggest innovative reconstruction projects, and identify other needed actions to allow each community not only to recover from Matthew but also to become more resilient to future storm events. At the state level, this planning effort assisted in promoting sound, sustainable, long-term recovery planning. By using post-disaster evaluation of hazard risk, especially land-use decisions that reflect responsible floodplain management, the potential for possible sea level rise, increasing frequency and severity of rain and other storm events, the plans helped shape the recovery process that is incorporated in this Action Plan, which along with citizen input, provides a roadmap for how recovery, rebuilding, and resiliency can occur in impacted counties.

With the planning process complete, implementation of the proposed projects and actions described in the Plans can begin, subject to applicable federal, state, and local laws and regulations. Proposed projects or actions may be eligible for state or federal funding or could be accomplished with municipal, nonprofit, or private investments. While the State will utilize the Plans as a roadmap for recovery as it engages with community and county governments through this recovery process, inclusion of a project or action in a specific Plan does not guarantee that it will be eligible for recovery funding as currently the State is significantly oversubscribed and underfunded across all program areas.

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5.0 Nexus Between Unmet Need and Allocation of Resources

The State's initial Action Plan prioritized providing funds to communities that experienced the most significant damage from Hurricane Matthew as described in the Unmet Needs Assessment. The State continues to be focused on aiding these communities and the counties that were most impacted. Based on the recently completed 50 county planning process, the State will support recovery objectives in each of the impacted counties, with a focus on the four most impacted counties. Based on the county planning process, community outreach, and research and analysis of revised and updated available Federal data, the following unmet needs are the main priorities for this Action Plan Amendment #1 as reflected in the proposed recovery activities:

- Providing a significant portion of the allocation as additional assistance to the housing sector to ensure that homeowners that were impacted by Matthew have resources and options available as they begin to rebuild, repair, or replace homes with major to severe damage. Continuing to ensure that an adequate supply of rental housing is available that is safe, sustainable, and affordable in the most impacted areas.
- Providing additional assistance to LMI families and other persons with supportive service needs.
- Providing additional assistance to address community recovery needs, including funds to assist with the local match for FEMA funded programs (PA and HMGP) so that homeowners can relocate to higher and safer ground, to assist units of government address recovery and rebuilding needs of public infrastructure, and to ensure that some projects and priorities identified in the county planning process can be implemented.

All proposed activities and uses described in the following programs are authorized under Title I of the Housing and Community Development Act of 1974 or allowed by waiver or alternative requirement and will be located in a Presidentially declared county eligible for assistance.

5.1 National Flood Insurance Restrictions

Homeowners who receive Hurricane Matthew CDBG-DR funds detailed in the Action Plan should be aware that the State must conduct a check to see if the homeowner has maintained flood insurance if they were previously assisted with FEMA IA or other federal disaster funds and were required to maintain flood insurance as a condition of receiving those funds. In the event that a homeowner is found to have not maintained adequate flood insurance when required to do so, the property will be ineligible for repair, replacement, or restoration assistance with CDBG-DR funds.

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6.0 Allocation of CDBG-DR Funding

The State of North Carolina continues to prioritize housing activities for CDBG-DR assistance with a total of \$203,417,332 (86 percent) in funding dedicated to this activity. This is a combination of the Homeowner Recovery Program, Small Rental Program, Multi-Family Housing Program, and the Public Housing Restoration Fund.

Previous Action Plan amendments have defined MID and non-MID areas as Tier 1 and Tier 2 counties, respectively. This Action Plan amendment simplifies the Tier 1 and Tier 2 designation as MID or non-MID. MID refers to the designation assigned by HUD for “most impacted and distressed” area. HUD defines MID areas as counties that are eligible to receive FEMA Individual Assistance (IA) funds, have a housing recovery need greater than \$13 million after other funds to repair have been received. Table 17, as shown below, summarizes the current allocation of CDBG-DR funding followed by a description of the methods of distribution to MID and non-MID Counties.

Table 17: Distribution of CDBG-DR Funds by Program

Activity	APA 6 Allocation	APA 7 Allocation	APA 7 LMI Allocation	APA 7 MID Allocation
Administration	\$11,826,450	\$11,826,450	\$0	\$9,461,160
Planning	\$11,826,450	\$2,365,290	\$0	\$1,892,232
Homeowner Recovery Program	\$112,863,832	\$150,835,398	\$105,584,779	\$120,668,318
Strategic Buyout	\$25,000,000	\$0	\$0	\$0
Small Rental	\$18,204,756	\$18,204,756	\$18,204,756	\$14,563,805
Multi-Family	\$23,204,756	\$25,829,756	\$25,829,756	\$25,829,756
Public Housing Restoration	\$9,959,517	\$11,172,422	\$11,172,422	\$8,459,517
Small Business Recovery	\$3,760,000	\$4,500,000	\$3,150,000	\$3,600,000
Infrastructure Recovery	\$19,883,239	\$11,794,928	\$7,468,950	\$8,910,942
TOTAL	\$236,529,000	\$236,529,000	\$171,410,663	\$193,385,730
% OF TOTAL ALLOCATION	100%	100%	72%	82%

Of the allocated amounts, at least 80 percent of the total funds provided to the state of North Carolina will address unmet needs in HUD’s Most Impacted and Distressed (MID) counties of Cumberland, Edgecombe, Robeson, Wayne, and as of June 21, 2019, Bladen and Columbus. Non-MID counties, including Anson, Beaufort, Bertie, Brunswick, Camden, Carteret, Chatham, Chowan, Craven, Currituck, Dare, Duplin, Franklin, Gates, Greene, Halifax, Harnett, Hertford, Hoke, Hyde, Johnston, Jones, Lenoir, Martin, Moore, Nash, New Hanover, Northampton, Onslow, Pamlico, Pasquotank, Perquimans, Pitt, Richmond, Sampson, Tyrrell, Wake, Warren, and Wilson remain eligible for the remaining 20 percent of CDBG-DR assistance. Recent

guidance provided by HUD on the use of Florence MID areas allows for expenditures in Brunswick, Carteret, Craven, Duplin, Jones, New Hanover, Onslow, Pamlico, Pender, and Scotland to meet the MID expenditure requirement.

70 percent of the aggregate of CDBG-DR program funds will be used to support activities benefitting low- and moderate-income persons.

6.1 Allocation Changes – Action Plan Amendment 7

Substantial Action Plan Amendment 7 introduces several changes to allocations. The reduction of the planning allocation from \$11.8 million to \$2.3 million represents a shift from planning to implementation and positions NCORR to successfully leverage CDBG – Mitigation (CDBG-MIT) as a major source of planning rather than CDBG-DR funds. However some planning activities will continue to be funded with CDBG-DR funds, such as certain planning recommendations made by the various Recovery Support Functions (RSFs) operating in the State. This change in strategy is further reflected in an increase in the Homeowner Recovery Program budget to \$150.8 million, a response to the increased interest in that program since applications reopened in 2020.

The Public Housing Restoration Fund, Small Business Recovery Program, and Infrastructure Recovery Program all have modest changes to their allocations to account for the identification of actual project delivery costs for those programs. The updated need for the increase in the Public Housing Restoration Fund is found at Section 3.1.8.1.2. The Small Business Recovery Program allocation is slightly increased to account for the cost of project delivery for that program. The Infrastructure Recovery Program budget is slightly decreased to account for the expected cost of the infrastructure projects currently in the implementation process with NCORR and local subrecipients.

The Strategic Buyout Program has been consolidated into the CDBG-MIT Action Plan to simplify the administration and implementation of that program under a single set of guidance. Significant changes have been made in the Strategic Buyout Program. Individuals interested in the Strategic Buyout Program should review the CDBG-MIT Action Plan and visit <https://www.rebuild.nc.gov/about-us/mitigation>.

6.2 MID Allocation of Funding

In accordance with the State’s Citizen Participation Plan, the CDBG-DR program held several public meetings throughout the impacted regions to review the State’s Action Plan and proposed activities eligible for the first allocation of CDBG-DR funding resulting from Public Law 114-254. These meetings were held during the months of June, July and August 2017 and were targeted to County Managers, Emergency Management Personnel, Planners and Community Development Specialists. The meetings highlighted the total amount of funding (\$198,553,000) that the State received for the DR program and potential amount of funding by activity that would be made available to both MID and Non-MID counties as well as the process for applying

for funding. Public comments were also submitted and included as part of the State’s initial Action Plan.

Subsequent to the first Action Plan, the State of North Carolina was provided an additional \$37,976,000, bringing the total CDBG-DR allocation to \$236,529,000 under Public Laws 114-254 and 115-31. This additional funding was amended into the first Substantial Action Plan Amendment in which public commentary was considered and included as part of the plan.

The Federal Register Notices for both State allocations require the expenditure of 80 percent of CDBG-DR funding in the “most impacted and distressed areas” which include the counties of Cumberland, Edgecombe, Robeson, Wayne, and as of June 21, 2019, Bladen, and Columbus. The breakdown of available funding for MID counties is as follows:

Federal Register Notice	CDBG-DR Allocation	MID Counties Allocation
Public Law 114-254	\$198,553,000	\$158,842,400
Public Law 115-31	\$ 37,976,000	\$30,380,800
TOTAL	\$236,529,000	\$189,223,200

As required, a minimum of \$189,223,200 will be disbursed in MID Counties in order to address unmet needs in all program areas. Existing subrecipient agreements with MID Counties will be adjusted as funds are re-allocated and/or as specific projects are approved.

6.3 Non-MID Allocation of Funding

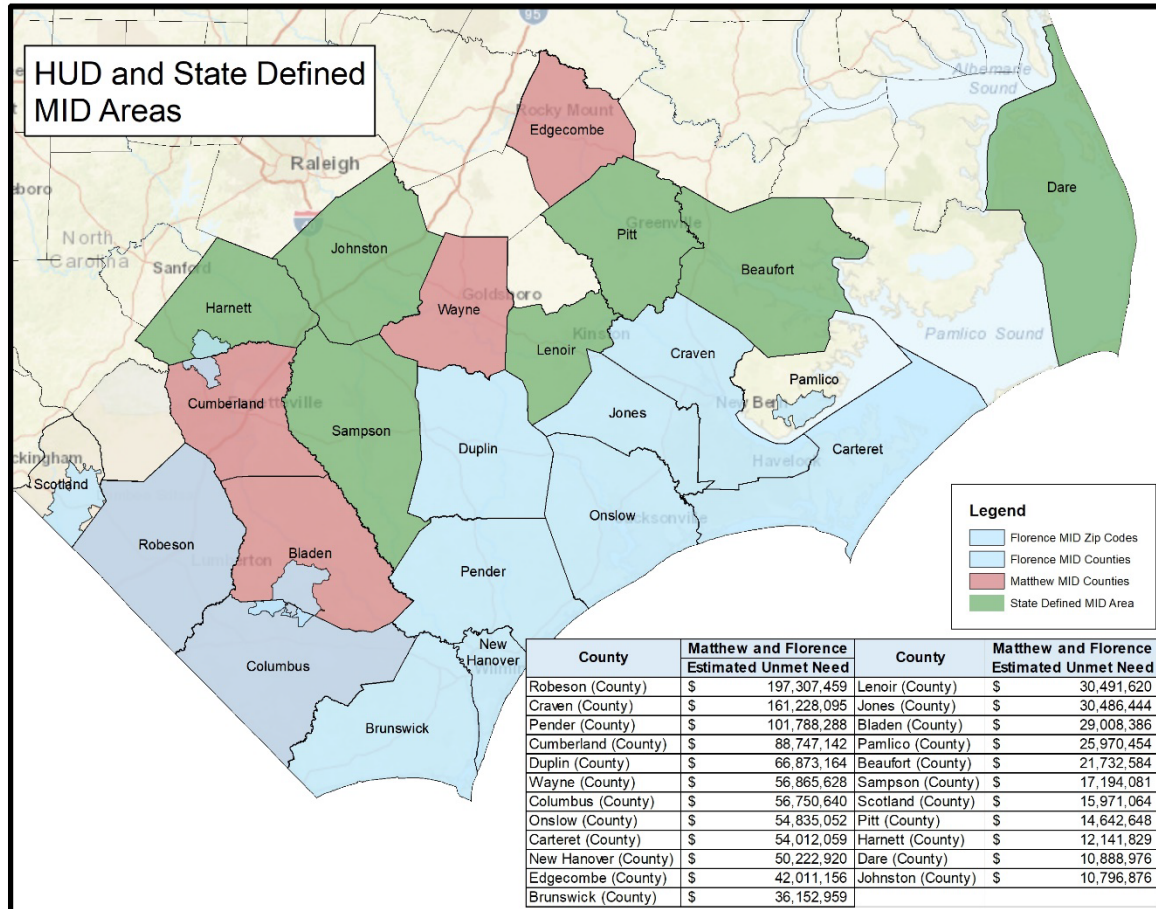
Funding is currently available to Non-MID Counties for CDBG-DR projects. Non-MID county funding will be obligated, de-obligated, or re-allocated to specific projects as detailed applications are reviewed and approved by NCORR as part of an application process. Existing subrecipient agreements with certain Non-MID Counties will be adjusted as funds are reallocated and/or specific projects are approved.

6.4 State-Identified MID Areas

In consideration of the unique recovery needs created by the large area of the State that was impacted by both Hurricane Matthew and Hurricane Florence, NCORR conducted an analysis of damage to areas that were impacted by both storms. In adherence with the allocation methodology outlined in Appendix A for both 82 FR 5591 for Hurricane Matthew and 85 FR 4681 for Hurricane Florence, NCORR calculated an estimated unmet need for both events combined. This analysis used the Major-Low, Major-High, and Severe damage categories for both events and multiplied those damage categories by the repair estimation factors included in Appendix A for each respective notice. The threshold to be considered a State-identified MID is greater than \$10 million in combined losses at the county level for both storm events.

The result is the addition of seven counties which are considered the State-identified MID areas. These counties are Beaufort, Dare, Harnett, Johnston, Lenoir, Pitt, and Sampson.

Figure 9 - State-Identified Most Impacted and Distressed Areas



These state-identified areas are for recovery planning purposes and for a deeper understanding of the hardest hit dual impacted areas of the State. While expenditures in these state-identified MID areas do not meet the 80 percent expenditure requirement set by HUD, they do satisfy the requirement set at 85 FR 4686 which reiterates that:

“CDBG–DR grants in response to Hurricane Matthew may be used interchangeably and without limitation for the same activities that can be funded by CDBG–DR grants in the most impacted and distressed areas related to Hurricane Florence. Additionally, all CDBG–DR grants under the 2018 and 2019 Appropriations Acts in response to Hurricane Florence may be used interchangeably and without limitation for the same activities in the most impacted and distressed areas related to Hurricane Matthew.”

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7.0 Method of Distribution & Delivery

The HUD designated Grantee is the North Carolina Office of Recovery and Resiliency (NCORR). In addition to Program Administrative and Planning funding, NCORR, as the Grantee, will be responsible for managing the majority of CDBG-DR programs to include the Homeowner Recovery Program, Small Rental Recovery, and Strategic Buyout Programs. NCDOC, acting as a subrecipient to NCORR, will manage the Small Business Recovery Assistance Program in conjunction with Community Development Financial Institutions (CDFIs). The North Carolina Housing Finance Authority will be subgranted funds to execute the Multi-Family Rental Housing Program. Counties executing program delivery will be responsible for administering Community Recovery/Infrastructure Programs. In some instances, counties executed elements of the Homeowner Recovery Program. These roles are indicated on Table 18. If requested by a county, NCORR may enter into a subrecipient agreement with municipalities within the county, or with other non-federal entities such as public housing authorities, to carry out CDBG-DR programs within the county.

Supplemental to the Method of Distribution for CDBG-DR funding, Table 18 depicts the method of delivery for the Homeowner Recovery Programs for counties that have elected not to participate in the State-Centric model managed by NCORR. While most affected counties have elected to participate in the state-centric model managed by NCORR, some have chosen to become Subrecipients and administer all or a portion of housing assistance provided by the Homeowner Recovery Program. Table 18 depicts the 8-steps of the Homeowner Recovery Program and the method of program delivery in each county not participating in the state-centric model. Note that only counties which are participating in program delivery are depicted. If a county is not included in the table, the State-Centric model applies. As of Substantial Action Plan Amendment 6, the State administers all aspects of the Homeowner Recovery Program. Table 18 is included only to record past program administration efforts.

Table 18: Method of Program Delivery for CDBG-DR Homeowner Recovery Programs (Prior to Amendment 6)

	① Step 1 Application	② Step 2 Eligibility Review	③ Step 3 Duplication Check	④ Step 4 Inspection & Environmental Review	⑤ Step 5 Grant Determination	⑥ Step 6 Contractor Selection	⑦ Step 7 Construction	⑧ Step 8 Completion
Cumberland	C	S	S	S	S	S	S	S
Edgecombe	C	S	S	S	S	S	S	S
Robeson	C	C	C	C	C	C	C	C
Wayne	C	S	S	S	S	S	S	S

S=State-Centric Activity administered by NCDERM,

C=County-Centric Activity administered by the *County and/or Municipality*

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8.0 Recovery Programs

The State's initial Action Plan created a suite of disaster recovery programs to address the impacts from Hurricane Matthew. Occasionally, some program requirements and caps are adjusted to address any potential unmet needs that may arise. The following sections of the Action Plan describe each program in detail.

8.1 Homeowner Recovery Program

The Homeowner Recovery Program (HRP) will provide assistance to homeowners who experienced major to severe damage to their homes and have remaining unmet needs, after accounting for assistance received to recover. The program will include rehabilitation, repair, reconstruction, and new construction activities as well as elevation and flood insurance subsidies to eligible homeowners. Homeowner Recovery Programs will be administered by NCORR.

Available homeowner assistance is listed below.

8.1.1 Homeowner Rehabilitation and Reconstruction

For homeowners who wish to remain in their homes or rebuild on their existing property, the program will provide grants for rehabilitation or reconstruction. Applicants eligible for rehabilitation assistance may reach a level of repair scope, cost, or other situation in which reconstruction, instead of rehabilitation, is more feasible. Building a new stick-built home on a different site is also allowable in certain situations, as set forth in the HRP Policy. The method of determining the construction intent (rehabilitation or reconstruction/new construction) will be outlined in detail in the *ReBuild NC Homeowner Recovery Program Manual*.

8.1.2 Manufactured Home Repair or Replacement

Manufactured homes with damages between \$1,000 and \$5,000 may be eligible for assistance with repairs. Applicants with repairs exceeding \$5,000 may be eligible for replacement. Replacing a damaged MHU on a different site is allowable in certain situations, as set forth in the HRP Policy.

New applicants participating in the 2020 application period (and beyond) with a double-wide or larger MHU will be eligible for repairs between \$1,000 and \$10,000 and replacement of units with damages greater than \$10,000.

8.1.3 Reimbursement

For new applicants in 2020, only LMI homeowners who expended funds that are not duplicated with other assistance received in order to make necessary repairs or purchased a replacement manufactured home may be eligible for a reimbursement grant if these expenses were incurred prior to application for assistance to the program or September 14, 2018, whichever occurred

first. Applicants earning between 80 percent AMI and 120 percent AMI may be eligible for a reimbursement if a hardship is demonstrated to the Program.

Homeowners that performed Emergency Repairs after the “stop work” period (from the time of the application until completion of the Tier II environmental review) may still be eligible for assistance following a review of the scope of the repairs. Emergency Repairs are defined at 24 CFR Part 58.34(a)(10) as repairs that ‘do not alter environmental conditions and that are necessary only to arrest the effects from a state or federally declared public disaster or imminent threats to the public safety including those resulting from physical deterioration’.

Homeowners that performed Emergency Repairs during the “stop work” period will be asked to submit documentation demonstrating that the repairs performed comply with 24 CFR Part 58.34(a)(10). Homeowner-provided documentation will be reviewed to determine eligibility to participate in the program. Participating homeowners must certify that their repairs meet the definition of Emergency Repairs before receiving reimbursement funding.

8.1.4 Elevation Assistance

In addition to assistance for rehabilitation, reconstruction, and MHU replacement, homeowners may receive elevation assistance to ensure that their homes are elevated. Elevation assistance is provided in addition to the rehabilitation and reconstruction award limits. The elevation assistance maximum for rehabilitation awards is a \$/SF cap based on the conditions of the project and limited to the actual cost of elevation. Applicants that meet the criteria to be elevated (defined below) are offered resilient reconstruction as an alternative to the rehabilitation and elevation scope of work. After a review of the average cost of elevation (including elevation design, engineering, and other “soft costs” of elevation), the average cost of repair, and a comparison to the cost of a comparable reconstruction, NCORR has determined that elevation is not a suitable alternative to reconstruction. This determination is based on the cost of elevation compared to a safer, more resilient, and mitigated reconstruction project. NCORR has accordingly adjusted the elevation program to be supplemental to the reconstruction program and is not offered as a part of the rehabilitation scope. Applicants may appeal to have their property elevated as a part of a rehabilitation rather than reconstructed. In some instances, reconstruction will not be allowable (such as with SHPO requirements), and elevation may need to be pursued instead. NCORR will make determinations on these instances on a case-by-case basis.

Mandatory Elevation

- Properties located within the 100-year floodplain that are considered by the ReBuild NC to meet the FEMA definition of “substantially damaged” or will be “substantially improved”; or
- Properties that are required to be elevated by local ordinance or by the local code enforcement officials within and outside of the 100-year floodplain; or

- Properties located within the 100-year floodplain that are damaged and not yet elevated two feet above base flood elevation (BFE) or two feet above the high-water mark.
 - Properties located within a Disaster Risk Reduction Area (DRRA) as formally adopted by NCORR, within or outside of the 100-year floodplain must also meet this requirement. DRRA adoption is effective as of the date that the DRRA was finalized by NCORR and approved by NCORR Senior Staff. Applicants who completed construction prior to the effective date of the DRRA, or applicants who are undergoing CDBG-DR funded construction (i.e. the contractor has been issued a notice to proceed) for rehabilitation, reconstruction, or MHU replacement prior to the date of DRRA adoption are not retroactively affected by the DRRA adoption.

At a minimum, homes will be elevated to two feet above the BFE as required by HUD or at least two feet above the highest level of water that can be documented using FEMA data or height of documented water marks as measured by the Damage Assessor, whichever documented water level is highest and reasonable.

Optional Elevation

- Properties outside of the 100-year floodplain that:
 - Sustained at least six inches of water damage during Hurricane Matthew or Hurricane Florence and/or sustained water damages from both Hurricanes Matthew and Florence due to flooding and not roof or other “horizontal” water penetration; and
 - Are considered to be “substantially damaged” or will be “substantially improved” by the Program, as determined by program policies or the local jurisdiction.

Applicants who qualify for an optional elevation will be provided the option to reconstruct. Applicants who do not wish to reconstruct must forgo the optional elevation component of their scope of work. Applicants outside of an area with a designated Base Flood Elevation (BFE) that request optional elevation will be required to elevate their home at least two feet above the highest level of water that can be documented using FEMA data or height of documented water marks as measured by the Damage Assessor, whichever documented water level is highest.

8.1.5 Flood Insurance Assistance

LMI homeowners whose damaged home is located in the 100-year floodplain may be eligible for payment of their flood insurance premiums for up to \$2,000 and a maximum of two years.

8.1.6 Application Process

North Carolina citizens who were directly impacted by the disaster who are located in an eligible county can apply to the Homeowner Recovery Programs through one application into the program at any of the ReBuild NC Centers as listed on the ReBuild NC website. Additional avenues are available for remote applications during the COVID-19 pandemic. The application allows applicants to list their housing recovery needs in more than one eligible category of assistance listed above.

8.1.7 Allocation for Homeowner Recovery Activities

\$150,835,398

8.1.8 Maximum Award

Homeowner Rehabilitation: up to \$70,000 per home.

- Additional assistance is available for structural elevation, consistent with the elevation assistance cost calculation found in the Elevation SOP, based on actual elevation costs.
- Costs necessary to perform lead abatement and/or asbestos remediation are in addition to the program cap. Reasonable and necessary costs for lead abatement and asbestos remediation will be paid as needed separate from the program cap of \$70,000.
- Unforeseen circumstances identified by a construction contractor, engineer, or architect may result in change orders which exceed the \$70,000 cap. Change orders will be reviewed to ensure that costs are necessary and reasonable. Change orders that increase the costs of the rehabilitation above the \$70,000 cap may be allowable based on a review of the facts and circumstances of each change order proposed.

The minimum amount of rehabilitation assistance needed to participate is \$1,000.

LMI applicants located in the 100-year floodplain may also receive up to \$2,000 in Flood Insurance Assistance.

Homeowner Reconstruction: The Program will provide awards necessary to completely reconstruct the damaged property, and in some circumstances, build the property on a new site, including demolition and removal of the original structure. The specific award amount is capped based on the size of the applicant's selected floorplan. Additional funds may be provided above the award cap to address site-specific accessibility needs (i.e. ramps and lifts), environmental issues, resiliency/mitigation measures, elevation requirements, and municipal ordinances, as needed.

Reimbursement: up to \$70,000 to reimburse homeowners for non-duplicative expenses to repair their homes following the disaster prior to applying to the Homeowner Recovery Program. The reimbursement of expenses will be paid to homeowners who have completed disaster related repairs verified by inspections and program staff subject to environmental

review. The conditions for exceeding the program cap specified in the ‘Maximum Award’ section of the Homeowner Rehabilitation Program are also in effect for the Reimbursement Program. Costs are only reimbursable if expended after Hurricane Matthew and prior to application for CDBG-DR assistance or September 14, 2018, whichever occurred first.

New applicants to 2020 programs must earn equal to or less than 80 percent AMI as previously stated above. Applicants earning between 80 percent AMI and 120 percent AMI may be eligible for a reimbursement if a hardship is demonstrated to the Program.

Mobile/Manufactured Home Repair: Up to \$5,000 per applicant for homes with damages totaling between \$1,000 and \$5,000. For new applicants in 2020, double-wide and larger MHUs may be repaired when damaged between \$1,000 and \$10,000.

Manufactured Home Replacement: The Program will provide awards necessary to replace the damaged MHU, including demolition and removal of the original structure. MHUs may be replaced on a different site in certain situations. ADA compliant units are available for applicants that require those accommodations. Awards cover the cost of the unit as well as delivery, installation, and setup of the selected unit. Environmental remediation and accessibility features such as ramps or lifts are included in the award cost. An additional allowance is available for structural elevation.

Temporary Relocation Assistance (TRA): NCORR has adopted an Optional Relocation Policy to provide households with incomes less than or equal to 120 percent of Area Median Income (AMI) with temporary relocation assistance while they are unable to occupy their home during construction activities. Households earning greater than 120 percent AMI may qualify for TRA through a hardship exception. The Program will pay reasonable costs based on rate schedules developed by NCORR. This benefit is in addition to program caps for construction assistance.

Uniform Relocation Act (URA) policies and notification requirements will be followed to assist any tenants who are temporarily or permanently displaced due to program activities.

Table 19 - Homeowner Recovery Program Maximum Award Amounts

Program	Maximum Awards and Clarifications
Rehabilitation	Up to \$70,000 per home. Does not include costs for lead abatement, asbestos remediation, accessibility costs (including disability accessible ramps or lifts), and unforeseen conditions necessitating an approved, reasonable change order.
Reimbursement	The Program cap for reimbursement is the same as the activity being reimbursed. For example, a rehabilitation reimbursement is capped at \$70,000 per home.
Reconstruction	The Program will provide awards necessary to completely reconstruct the damaged property, including demolition and removal of the original structure. The specific award amount is capped based on the size of the

	applicant's selected floorplan. Additional funds may be provided above the award cap to address site-specific accessibility needs (i.e. ramps and lifts), environmental issues, resiliency/mitigation measures, elevation requirements, and municipal ordinances, as needed.
MHU Repair	Up to \$5,000 for single-wide units and up to \$10,000 for double wide units.
MHU Replacement	The Program will provide awards necessary to replace the damaged MHU, including demolition and removal of the original structure. ADA compliant units are available for applicants that require those accommodations. Awards cover the cost of the unit as well as delivery, installation, and setup of the selected unit. Environmental remediation and accessibility features such as ramps or lifts are included in the award cost. An additional allowance is available for structural elevation.
Elevation Assistance	The Program will provide grant funds in order to elevate structures to comply with program or local elevation requirements, whichever standard is greater. Elevation costs are separate from other program award caps. Costs associated with structural elevation are determined based on the activity. Eligible elevation costs are included in the HRP Policy Manual.
Temporary Relocation Assistance (TRA)	The Program will pay reasonable costs based on rate schedules developed by NCCORR to cover the amount of time an applicant must be temporarily relocated out of the unit while it is repaired, replaced, or reconstructed.
Flood Insurance Assistance	Up to \$2,000, and a maximum of two years of assistance.

8.1.9 National Objective

LMI, Urgent Need.

8.1.10 Eligible Activities

105 (a) (1) (3) (4) (5) (6) (7) (8) (9) (10) (11) (13) (14) (15) (16) (18) (20) (23) (24) (25)
 Rehabilitation; Reconstruction, Acquisition; New Residential Construction; Relocation,
 Demolition and Clearance, Non-Federal Match, and Homeowner Assistance.

8.1.11 Geographic Eligibility

Homes must be located in one of the damaged-declared counties eligible to receive HUD funds.

8.1.12 Priorities

LMI households will be prioritized for assistance.

8.1.13 Eligible Applicants

All owner-occupants whose primary residence was directly impacted by Hurricane Matthew are eligible for Homeowner Rehabilitation, Homeowner Reconstruction, Manufactured Home Repair, and Manufactured Home Replacement. Owner-occupants whose primary residence was directly impacted by Hurricane Matthew are eligible for the track of the Homeowner Recovery

Program which best suits their recovery needs.

For new applicants to recovery programs beginning in 2020 and beyond, the maximum income for participating individuals and families is 150 percent area median income (AMI). HUD releases AMI updates periodically. AMI information is available at https://www.huduser.gov/portal/datasets/il.html#2020_data. Individuals and families earning greater than 150 percent AMI with a demonstrable hardship as defined in program policies are eligible. Some program tracks within the Homeowner Recovery Program require less than 150 percent AMI. Those requirements are indicated below.

Homeowner Reimbursement will be limited to homeowners with incomes up to 80 percent AMI as stated above. Applicants earning between 80 percent AMI and 120 percent AMI may be eligible for a reimbursement if a hardship is demonstrated to the Program. Temporary Relocation Assistance is limited to those earning 120 percent AMI or less, unless a hardship is demonstrated by the applicant.

Flood Insurance Assistance is limited to LMI applicants (80 percent AMI) located in the 100-year floodplain.

8.1.14 Program Start Date

Q3 2017

8.1.15 Projected End Date

Q3 2023

8.2 Small Rental Recovery Program

The Small Rental Recovery Program (SRRP) will provide assistance to landlords whose rental units experienced storm damage and have not been repaired or reconstructed. The program is reserved for small rental structures, including single family rental units, duplexes, triplexes, manufactured housing (MHU), and buildings with four or fewer units. In an effort to increase affordable rental housing, the program will treat the repair and replacement of rental housing in a similar fashion to the treatment of homeowner property as described in Section 8.1 above and in accordance with the criteria in the program manual. The program differs from the Affordable Housing Development Fund in that landlords and owners of rental property will apply for assistance to repair their property directly, rather than providing proposals for the new construction of rental units. NCORR may provide owner-occupied property an opportunity to convert to small rental property, if property owners apply for assistance and agree to comply with the terms of the Small Rental Recovery Program. The program will be administered by NCORR.

8.2.1 Allocation for Activity

\$18,204,756

8.2.2 Maximum Award

The award limits are similar to the Homeowner Recovery Program. Permissible construction costs greater than the award limits include lead and asbestos abatement costs, increased costs for green building standards, accessibility requirements such as ramps and lifts, and NCORR-approved construction change orders if necessary and reasonable to complete construction. These additional costs are addressed in a manner consistent with the Homeowner Recovery Program.

8.2.3 National Objective

LMI

8.2.4 Eligible Activity

Sec. 105 (a) (1) (3) (4) (5) (6) (7) (8) (9) (10) (11) (13) (14) (15) (16) (18) (20) (23) (25)
Rehabilitation; Reconstruction, Acquisition; New Residential Construction; Relocation,
Demolition and Clearance, Non-Federal Match.

8.2.5 Geographic Eligibility

Properties must be located in one of the damaged-declared counties eligible to receive HUD funds.

8.2.6 Priorities

The program will prioritize damaged rental units located in MID counties, followed by similarly

damaged rental units in non-MID counties.

8.2.7 Eligible Applicants

Eligible applicants are owners of rental units with four or fewer units (including MHUs) that experienced storm-related damage and have remaining unmet needs, and owners of property willing to convert a storm-damaged property to affordable rental units in accordance with the requirements of the Small Rental Recovery Program. A separate application is required for each property, and an owner may submit a maximum of four applications under this program. Units must be affordable to renters earning 80 percent AMI or less for at least five years or for a greater length of time set forth in the Small Rental Recovery Program manual. Landlords must agree to fair housing requirements and tenant screening requirements to be set in the Small Rental Recovery Program Manual.

8.2.8 Projected Start Date:

Q3 2021

8.2.9 Projected End Date

Q3 2023

8.3 Multi-Family Rental Housing

The Multi-Family Rental Housing Program has been designed to provide financing to repair majorly to severely damaged rental housing in the most impacted communities, and to create new affordable multi-family housing for LMI renters in the most impacted communities. The Multi-Family Rental Housing Program may also fund the one for one replacement of units within the 100-year floodplain to a new location outside of the 100-year floodplain. The program will be administered by the North Carolina Housing Finance Authority (NCHFA) on behalf of NCORR. NCHFA will loan CDBG-DR funds to qualified developers to execute construction of new multi-family facilities. NCORR will monitor NCHFA to ensure compliance with the Action Plan and adherence to the Multi-Family Rental Housing Program policies and procedures, as well as crosscutting federal statutory requirements. NCHFA will determine what reasonable rent is based on the nature of the project.

A project originally submitted for consideration for Infrastructure Recovery Program funds has been correctly reallocated to the Multi-Family Rental Housing budget. This project is in Cumberland County and is expected to cost \$2.625 million. This project is not managed by NCHFA. The overall allocation for Multi-Family Rental Housing is increased in consideration of this project.

8.3.1 Allocation for Activity:

\$25,829,756

8.3.2 Maximum Award

Up to \$53,000 per unit for rehabilitation. Up to \$150,000 per unit for reconstruction or new construction. The State, upon review of applications for this Housing Program, reserves the right to alter the maximum award based on applications and may on a case by case basis utilize this exception policy to address specific rental housing needs. The conditions through which the program maximum award can be exceeded will be detailed in program policies and procedures and NCORR will document when the exception is applied.

8.3.3 National Objective

LMI

8.3.4 Eligible Activity

Sec. 105 (a) (1) (3) (4) (5) (6) (7) (8) (9) (10) (11) (13) (14) (15) (16) (20) (23) (25) Rehabilitation; Reconstruction, Acquisition; New Residential Construction; Relocation, Demolition and Clearance, Non-Federal Match, Construction of Housing.

8.3.5 Geographic Eligibility

Rental housing must be located in a damaged-declared county eligible to receive HUD funds.

8.3.6 Priorities

Priority will be given to projects located in the most impacted and distressed counties. Priority will also be given to projects that leverage other resources and produce new housing that is sustainable, integrated with neighborhood services and jobs, and provides deeper affordability. Projects will be selected through a competitive application process overseen by NCHFA.

8.3.7 Eligible Applicants

Developers building rental housing reserved for households earning less than 80 percent of AMI. Projects must be multi-family new construction or substantial rehabilitation, consisting of more than eight units.

8.3.8 Projected Start Date

Q3 2019

8.3.9 Projected End Date

Q3 2023

8.4 Strategic Buyout Program

Homeowners who do not wish to remain at their damaged address may be eligible for participation in the Strategic Buyout Program if their property is located in an NCCORR approved Disaster Risk Reduction Area (DRRA). The Strategic Buyout Program will be funded through the CDBG-MIT grant. Aligning the Strategic Buyout Program under a single funding source with a single set of rules and requirements simplifies the implementation of this program and better supports the mission of CDBG-MIT as a grant focused on long-term mitigation and resiliency. Future amendments to the Matthew CDBG-DR Action Plan will not include this activity.

Individuals interested in the Strategic Buyout Program are encouraged to visit <https://rebuild.nc.gov/mitigation> to learn more. Further information on the Strategic Buyout Program is also included in the CDBG-MIT Action Plan, found at <https://rebuild.nc.gov/action-plans>.

8.5 Public Housing Restoration Fund

The State's initial Action Plan created the Public Housing Restoration Fund and allocated \$5 million to the program. Action Plan Amendment 5 has increased the Public Housing Restoration Fund by \$4.959 million to correctly identify projects in Robeson, Wilson, and Wayne counties as eligible for the Public Housing Restoration Fund. Amendment 7 further increases this allocation, as described in Table 10. The types of activities that PHAs can engage in, including using funds to cover the non-federal share or local match from FEMA PA program and engaging in activities that make facilities and units more resilient to future storm events, have also been added.

The original Action Plan highlighted the significant damages that PHAs suffered as a result of Hurricane Matthew based on surveys administered to PHAs in March 2017. Since the initial Plan, additional PHAs have identified potential unmet recovery needs. As recovery needs change, funds from the program can be used to assist other PHAs that were impacted by Matthew.

8.5.1 Program Description:

The Public Housing Restoration Fund will be administered by NCORR. Funds from the Program can be used to rehabilitate and/or repair PHA properties that were damaged from Hurricane Matthew. Funds can also be used to address unmet recovery needs after accounting for insurance and other Federal disaster funding, to cover the non-Federal share or local match that PHAs have to provide to access FEMA PA grant program, or to make facilities more resilient from future storm events. Based on direct communication between NCORR and the PHAs, deeply affordable rental units managed by PHAs in impacted areas experienced severe damage due to Hurricane Matthew. NCORR is working directly with the PHAs to assess and determine the total unmet need for each facility. In the event that the unmet need of the PHAs exceeds the total allocation of funds, the program, through its policy and procedures, will document how funding allocations to PHAs were made and what eligible activities will be prioritized. The State also reserves the right for this program to either State-manage the Public Housing Restoration fund or provide grants directly to the PHAs to implement the projects using program funds.

8.5.2 Activity Type

Public Facilities Repair and Rehabilitation.

8.5.3 Allocation for Activity

\$11,172,422

8.5.4 Maximum Award

Award amounts based upon PHA unmet needs.

8.5.5 National Objective

LMI

8.5.6 Eligible Activity

Sec. 105 (a) (1) (2) (4) (5) (8) (9) (11) (14) (18) (24)

8.5.7 Geographic Eligibility

PHA must be located in a federally declared county for Matthew.

8.5.8 Priorities

PHAs located in a HUD defined most impacted county.

8.5.9 Eligible Applicants

PHAs

8.5.10 Projected Start Date

Q3 2018

8.5.11 Projected End Date

Q3 2023

8.6 Small Business Recovery Assistance

The State's initial Action Plan created the Small Business Recovery Assistance Program providing forgivable loans to impacted businesses after highlighting the significant damages that small businesses suffered as a result of Hurricane Matthew. For the purposes of the programs detailed herein, economic revitalization is not limited to activities that are "special economic development" activities under the Housing and Community Development (HCD) Act, or to activities that create or retain jobs. For CDBG-DR purposes, Economic Revitalization can include any activity that demonstrably restores and improves some aspect of the local economy; the activity may address job losses, or negative impacts to tax revenues or businesses. All Economic Revitalization activities must address any economic impact(s) caused by the disaster (e.g., loss of jobs, loss of public revenue). At the time of unmet needs analysis, 10,419 North Carolina small businesses had applied for assistance with SBA with business types ranging from, retail operations, entertainment, and tourism-based businesses to industries that support the agricultural and fishing sectors. While many businesses were impacted by Matthew, unfortunately, two-thirds of businesses that applied for an SBA business loan were denied funding, due to SBA's tightened credit requirements, reporting requirements, and repayment stipulations, leaving a large amount of unmet need.

The Small Business Recovery Assistance Program is administered by NCDOC on behalf of NCORR. A total allocation of \$4,500,000 is allocated to complete delivery of this program.

8.6.1 Program Description

The Small Business Recovery Assistance Program will be administered by the NCDOC who has expertise and experience working with small businesses providing resources and technical assistance. The NCDOC also has relationships with key partners including Small Business Development Centers (SBDCs) and Community Development Financial Institutions (CDFIs) located in the impacted areas. This lending program is being carried out through multiple Community Development Financial Institutions (CDFIs), established as program subrecipients. The NCDOC has begun to implement this recovery program.

Funding of up to \$300,000 per business can be used to address unmet recovery needs and to rehabilitate small businesses that were damaged from Hurricane Matthew. This includes using funds to address storm-related business losses, repair or replace and install furniture fixtures and equipment, provide working capital, pay for marketing costs, operating expenses, and inventory or to undertake storm-related repairs in the future. The Small Business Loan Program will provide small businesses the financial support needed to stabilize their business operations. Standard, uniform, underwriting procedures will be followed by the program CDFI's in determining both capacity and amount of loan per business and will be documented in the programs policy and procedures manuals and provided online at the ReBuild NC website.

The program will enable a broad spectrum of activities to support the varied needs of businesses and communities recovering from the Matthew. By expanding assistance to include a

comprehensive range of economic development activities, the State and local governments will also have the opportunity to address economic impacts of the disaster in such a way that aligns with the long-term economic development goals of impacted communities. Additional activities supporting the business sector may include: small business technical assistance, commercial redevelopment or enhancement by public or private entities, development of public facilities related to economic development, industry cultivation and/or preservation, workforce training or development, planning for economic growth, and other activities to catalyze the state's economic recovery. Eligible activities may also include infrastructure development for economic revitalization purposes as well as mitigation, resiliency, and green building efforts to protect, strengthen, and increase efficiency of such investments. Through this comprehensive approach to revitalize, the State will be able to support communities as they rebuild and grow.

8.6.2 Allocation for Activity

\$4,500,000

8.6.3 Maximum Award

Up to \$300,000 per business.

8.6.4 Activity Type

Reimbursement, repair, replacement, or rehabilitation of damaged facilities and equipment, business operating losses, inventory, and customer base.

8.6.5 National Objective

LMI, Urgent Need.

8.6.6 Eligible Activity

Sec. 105 (a) (1) (2) (4) (8) (11) (14) (15) (17) (21) (22) (24) 42 U.S.C. 5305(a) (14) (15) (17) (22); Economic Revitalization FR- 5696-N-01 (VI) (D);

Applicants can use funds to address business operation losses that were already incurred (reimbursement for the repair and/or replacement of damaged structures and equipment) or to undertake remaining repair and business rebuilding and expansion costs.

In addition to providing direct assistance to impacted small business through the loan program mentioned above and assisting microenterprise and special economic development activities needed to restore commercial activity, the program can use economic revitalization efforts to enable a multi-pronged approach to ensure the businesses in North Carolina's most impacted areas are provided the support they require. This includes: financial and technical assistance to microenterprise, small and medium-sized businesses coordination of priority projects and to key economic revitalization needs identified within the County Resiliency Reconstruction Plans.

Aligning with state and local long-term economic development priorities, financial support can

be provided to impacted communities for economic revitalization efforts including, but not limited to:

- Prioritized economic revitalization assistance to impacted LMI communities.
- Workforce training in key economic sectors.
- Development of high-growth industry clusters.
- Revitalization and preservation of key industry sectors including agriculture and fisheries.
- Rebuilding and expansion of infrastructure to attract and retain businesses and improve job access.
- Rebuilding and development to mitigate and increase resiliency for future impacts.
- Conducting planning activities to develop comprehensive revitalization and development plans.
- Enhancement of public facilities promoting economic development, including but not limited to: streetscapes, lighting, sidewalks, other physical improvements to commercial areas, and other activities for transformative projects such as property acquisition, demolition, site preparation and infrastructure repair and installation.

8.6.7 Geographic Eligibility

Small Businesses located in one of the damaged-declared counties.

8.6.8 Priorities

80 percent of program funds are set aside for services within the most impacted counties.

8.6.9 Eligible Applicants

Any SBA/NC defined Small Business or agriculture enterprise who has documented unmet recovery needs related to Hurricane Matthew, or will contribute to the economic recovery of one of the damage-declared counties through the addition of jobs and added economic activity to the community. Eligible applicants may also include local and county governments and nonprofits, who are engaged in activities that support small business economic recovery in the most impacted areas.

8.6.10 Projected Start Date

Q1 2019

8.6.11 Projected End Date

Q3 2023

8.7 Infrastructure Recovery Program

Formerly the Community Recovery Program, funding in this program may be used to address a wide range of community recovery and infrastructure needs including engaging in projects that restore, repair, rebuild, or make more resilient public assets that were impacted by Matthew. Examples include but are not limited to: roads, schools, water and wastewater treatment facilities, parks, and other public facilities that communities have determined are important publicly owned assets. The funds provided will primarily be for recovery projects that are community-based projects or for cost share for FEMA disaster recovery programs including the HMGP and the PA Program, which allows the State to have FEMA provide 75 percent of the cost for each project with the State or applicant providing the remaining 25 percent. Via HMGP, the State is offering homeowners who live in the floodplain or have homes that suffer repetitive losses, the opportunity to take part in a state-run buyout program that allows homeowners to sell their homes and relocate to higher and safer ground.

In addition to using funds to implement community recovery plans from the planning process that was completed in the summer of 2017, the State will be using funds to address the non-federal share requirements for other Federal disaster recovery programs. To ensure that the nonfederal share program remains compliant with HUD, The State has added two activities, debris removal and buyout and acquisition as eligible activities, as to utilize CDBG-DR funds for non-federal share program activities, the State must identify one eligible HUD activity in addition to match as an eligible activity.

In addition to the planning process, FEMA's disaster recovery programs have a 25 percent local cost share. Currently 423 units of local government and not-for-profits have obligated FEMA PA claims. While costs within the PA program are expected to increase, currently there is \$292,780,272 obligated to address recovery from Matthew with an estimated total match across the disaster of \$101,585,557.

The State's HMGP is focused on offering a voluntary homeowner buyout program for residents who wish to sell their homes and relocate to higher and safer ground out of the floodplain. This program is dramatically oversubscribed, with over 2,987 residents requesting a buyout. FEMA provided funding for the buyout program will only cover 800 homes whose total cost is \$100,649,434. FEMA will only provide 75 percent of the total cost of the program providing \$75,487,098 in funds, leaving a \$26,162,366 match that is an unmet need that the State will be providing through this program. In addition to funding provided in this allocation, the State will implement a HUD funded housing buyout program providing an additional \$10 million of funds to acquire more homes.

8.7.1 Program Description

The Infrastructure Recovery Program will be managed and run by NCORR. NCORR will implement the program by providing grants to assist to local and county jurisdictions and not-for-profits to repair and make more resilient storm damaged facilities after factoring in FEMA

funding, other federal funds, and private insurance proceeds. While the program is expected to be primarily state managed, the State may enter in subrecipient agreements with units of governments or not-for-profit entities in storm impacted areas to implement specific programs. Funding for the community recovery program is expected to be used to cover the nonfederal share or local match for FEMA disaster recovery programs, centered on the PA and HMGP, however a significant portion of the funds may also be used to address recovery and resiliency needs of public facilities that are not covered by FEMA PA and or have been identified through the county recovery and resiliency plans.

Each UGLG's total allocation for the program will be determined based on criteria outlined and published in the program's policy and procedure manual that is shown on the ReBuild NC website. Additional program specific information will be contained in the policy and procedures manual, including how projects were selected. All applicants to the program will need to clearly document that the facility was damaged by Matthew. They will also need to document that the facility is used and needed by residents living in the community and that the applicant has accessed and exhausted all other resources to address the recovery need. The CDBG-DR share of the project is capped at \$2 million, but eligible, necessary, and reasonable costs above \$2 million may be allowable by NCORR after review. In the event that a UGLG desires to use more than \$2 million of its CDBG-DR allocation for a project, a written request must be submitted to the State to request funds above the \$2 million cap. The request should justify how the proposed use of funds addresses a recovery objective for the UGLG and is subject to approval by the State. NCORR will document when the exception is applied. Although projects may be proposed by a specific UGLG, NCORR may select an alternate recipient of funds or subrecipient to execute the project, if it has been determined to be in the best interest of the success of the project to do so.

Due to the large unmet need, the State plans to prioritize funding to assist community facilities that serve older adults, children, persons with disabilities, and/or families living in poverty. It will also prioritize funding projects that are located within a substantially damaged, town, cities, or neighborhoods.

8.7.2 Activity Types

To repair, replace, rebuild, make more resilient or improve public facilities that were damaged by Hurricane Matthew. To engage in public service activities that support community recovery and or to provide funds to cover the local match from other Federal disaster recovery programs primarily FEMA.

8.7.3 Allocation for Activity

Total Program Allocation is \$11,794,928. The State as documented in its policy and procedures manual will provide specific allocation of funds to UGLGs.

8.7.4 Maximum Award

Up to \$2,000,000 per project. Applicants may request an exception to the maximum award amount.

8.7.5 National Objective

LMI, Urgent Need.

8.7.6 Eligible Activity

Sec. 105 (a) (1) (2) (3) (4) (5) (7) (8) (9) (11) (12) (14) (15) (16) (17) (19) (21) (22) (23) – public facilities, public services, debris removal, relocation, buyout and acquisition, and payment of the non-federal share.

8.7.7 Geographic Eligibility

Projects must be in a Federally declared county for Hurricane Matthew.

8.7.8 Priorities

80 percent of program funds are set aside for services within the most impacted counties.

8.7.9 Eligible Applicants

Local, county and State governments, non-profit organizations in a storm eligible county. All applicants in FEMA PA program with a DR-4285 designated project who have been determined to be eligible for funding.

8.7.10 Projected Start Date

Q1 2019

8.7.11 Projected End Date

Q3 2023

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9.0 General Eligibility Requirements

According to federal regulations mandated under the National Flood Insurance Reform Act (NFIRA) of 1994, buildings and property which utilized financial assistance from the Federal Government following a presidentially declared disaster may have been required to have and maintain flood insurance coverage. In the event that flood insurance lapsed or was no longer in effect at the time of Hurricane Matthew's impact, the owner of the building and/or property may not be eligible for additional federal assistance.

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10.0 Leveraging

The State's initial Action Plan and through this Amendment has described how, given the limited resources and large amount of unmet need, the State would need to leverage and maximize every available resource to address the recovery needs from Matthew. Since the posting of the original Action Plan, the State has continued to advance strategies that will maximize Federal funds, and is looking at innovative strategies and techniques that other States who are recovering from disasters are employing to repair, rebuild, and make more resilient public and private assets. The State continues to look for additional funding to address large unmet needs in three primary areas;

1. Funds in the housing and Homeowner Assistance Programs;
2. Funds for the Community Recovery Program/Infrastructure Recovery Program that will not only address public assets that were damaged by Matthew but also funding for innovative projects identified through the planning process that will make communities more resilient to future storm events; and
3. Targeted recovery funds for the business community focusing on the needs of rural businesses and key industry sectors including the agriculture industry.

The State is committed to maximizing the impact and use of all CDBG-DR funds. This includes ensuring that all other available funds available for recovery are utilized before CDBG-DR funds are used; continuing to work in close coordination with other local, State, and federal agencies, to address North Carolina's recovery needs; and, when feasible, combining CDBG-DR funds with other public and private investment as a means to increase the overall benefit to impacted residents, families, businesses, and communities.

The State of North Carolina most recently introduced and identified Opportunity Zones as part of its effort to leverage additional funding and maximize other community investment opportunities as part of the overall recovery strategy across the state in the areas impacted by the storm. This new federal program was created by the recently passed federal tax legislation, known as the *Tax Cuts and Jobs Act* (H.R.1). North Carolina's Governor designated 252 Opportunity Zones throughout the state on May 18, 2018. Of these 252 zones, 50 of them correlate with counties that have been impacted by [both] Hurricanes Matthew and Florence. The complete list of North Carolina Opportunity Zones can be downloaded here:

<https://public.nccommerce.com/oz/>

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11.0 Program Income

In the previously submitted Action Plan, the State described how any program income that is derived will be utilized to address remaining unmet recovery needs within the program area where the program income was derived. This Action Plan Amendment modifies how the State will address program income. In the event that the State receives program income from a project, the State will assess and determine how to allocate the program income to other recovery programs that maintain unmet recovery needs. The determination of what program to allocate the funding will be based on existing program priorities, determining what remaining unmet needs have not been addressed with prior CDBG-DR funding, and prioritizing what programs are in the most urgent need. While throughout the life of this recovery program priorities are expected to change, the State currently estimates the program area with the most pressing unmet recovery need is housing. In the event that program income results from economic revitalization and development projects or from assisting small business through the planned revolving loan program, to address other recovery needs in the housing or infrastructure recovery program areas, the State may use the program income generated from those programs and create a revolving loan fund for future generations of loans to address remaining unmet recovery needs and community recovery and revitalization objectives that are consistent with the policies and procedures of the program.

The State will retain up to 5 percent of any funds to address unanticipated administrative costs resulting from the program income. The maximum 5 percent administrative cap will be maintained for the overall total of CDBG-DR funds including program income. In the case that program income is generated through an activity that a subrecipient undertakes, the State, in consultation with the sub-recipient, may determine that program income will remain with the subrecipient, providing the activity or activities in the subrecipient agreement continue to have unmet need. The State reserves the right to have the program income be returned to the State to address other unmet recovery needs. In the case of a subrecipient which maintains no remaining unmet needs, any program income shall be returned to the State. The State will then allocate the funds to programs and projects in a manner consistent with this policy. The State's administrative policy and procedure manual will document how reallocation of any program income will occur.

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12.0 Schedule of Expenditures and Outcomes

NCORR routinely updates the schedule of expenditures and outcomes section shown in the original Action Plan to adhere to its reporting requirements. The schedule of expenditures and outcomes is located at <https://www.rebuild.nc.gov/reporting-and-compliance/reporting>. All funds will be expended within six years of HUD's grant execution date.

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13.0 Minimum Threshold for Substantial Amendment

In the State's initial Action Plan, the State identified the thresholds which will trigger the requirement for a substantial amendment. Those thresholds being 1) a change in program benefit or eligibility criteria, 2) the addition or deletion of an activity or 3) allocation or reallocation of \$5 million within the approved Action Plan activity allocations.

With the addition of Hurricane Matthew CDBG-MIT funds and Hurricane Florence CDBG-DR funds, NCORR is adjusting the minimum threshold for Substantial Action Plan Amendments to match the requirements set in those Action Plans. The revised criteria are:

1. A change in program benefit or eligibility criteria; or
2. The addition or deletion of an activity; or
3. An allocation or reallocation of \$15 million.

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14.0 Green Building Standards for Construction and Contractor Oversight

The State will follow best practices such as those provided by the U.S. Department of Energy's Guidelines for Home Energy Professionals—Professional Certifications and Standard Work Specifications for homes that are rehabilitated. Reconstruction and replacement activities that include changes to the structural elements such as flooring systems, columns, or load bearing interior or exterior walls must incorporate Green Building Standards.

For homes that are rehabilitated or substantially rehabilitated, the project scope will incorporate Green Building materials to the extent feasible according to specific project scope. Materials must meet established industry-recognized standard that have achieved certification under at least one of the following programs:

1. ENERGY STAR (Certified Homes or Multifamily High-Rise);
2. Enterprise Green Communities;
3. LEED (New Construction, Homes, Midrise, Existing Buildings Operations and Maintenance, or Neighborhood Development);
4. ICC-700 National Green Building Standard, (v) EPA Indoor AirPlus (ENERGY STAR a prerequisite), or
5. Any other equivalent comprehensive green building program.

In some instances, NCORR has evaluated alternate proposed green building design standards for single-family residential reconstruction, such as a Home Energy Rating System (HERS) rating that provide a significant energy savings and alternate ENERGY STAR compliance, such as ENERGY STAR 2.0 for multi-family projects, and finds those building standards acceptable in lieu of the proposed standards above. These alternate building standards substantially conform to a comprehensive green building program. The specific green building design features and standards selected are included in each project file.

North Carolina will implement and monitor construction results to ensure the safety of residents and the quality of homes assisted through the program. All Single-Family, Rental and Manufactured Home repairs will comply with current HUD Housing Quality Standards (HQS). In addition, NCORR will ensure that applicants are aware of the risks associated with mold and take steps to limit the impact of any mold issues that may arise. Rehabilitation of non-substantially damaged structures must comply with the HUD CPD Green Building Retrofit Checklist available at <https://www.hudexchange.info/resource/3684/guidance-on-the-cpd-green-building-checklist/>, to the extent that the items on the checklist are applicable to the rehabilitation.

New housing developed with CDBG-DR funds will comply with accessibility standards set at 24

CFR Part 40. NCORR will utilize the [UFAS Accessibility Checklist](#) as a minimum standard for structures with five or more units to assist in the compliance of Section 504 of the Rehabilitation Act. The checklist will be used when reviewing the design of all newly constructed residential structures (other than privately owned residential structures). The Fair Housing Act (including the seven basic design and construction requirements set in the Fair Housing Act)³ also applies to buildings with four or more units. Titles II and III of the Americans with Disabilities Act also applies to public housing.

Contractor compliance will be maintained through the review and approval of monthly project performance reports, financial status reports, and documented requests for reimbursement throughout the contract period. The State will utilize the HUD-provided contract reporting template (for PL 113-2) for upload to the Disaster Recovery Grant Reporting (DRGR) on a quarterly basis: <https://www.hudexchange.info/resource/3898/public-law-113-2-contract-reporting-template/>.

All program activities will meet HUD requirements for national objectives, which will be supported by documentation in the program file system of record. North Carolina is dedicated to prioritizing assistance toward residents that face the most financial barriers to recovery and fully intends to comply with the HUD Low-to-Moderate Income (LMI) national objective requirement of 70 percent of the total grant.

Residents will be required to provide household income information and supporting documentation at the time of application for processing and verification. North Carolina will apply a methodical approach to applicant assistance that assigns priority to program applicants based on household income and other social vulnerability factors.

The State will review files and test for compliance with financial standards and procedures including procurement practices and adherence to cost reasonableness for all operating costs and grant-funded activities. All program expenditures will be evaluated to ensure they are:

- Necessary and reasonable;
- Allocable according to the CDBG contract;
- Authorized or not prohibited under state/local laws and regulations;
- Conform to limitations or exclusions (laws, terms, conditions of award, etc.);
- Consistent with policies, regulations and procedures;
- Adequately documented; and
- Compliant with all Cross Cutting Federal Requirement including Uniform Administrative Requirements at 2 CFR 200.

The FR allows individuals, businesses, and non-profits to be reimbursed for out of pocket repair

³ Fair Housing Accessibility First. *Fair Housing Requirements*. <https://www.fairhousingfirst.org/fairhousing/requirements.html>

cost that would have been covered under a CDBG-DR program repair program if the program had existed at the time. This type of reimbursement is eligible for repairs made up to one year after the disaster, although an extension can be granted by HUD if requested by the Grantee on a case-by-case basis, or until application to the CDBG-DR repair program (whichever comes first). Before making these reimbursements, a retroactive environmental review must be done by the program. This is when State Historic Preservation Office (SHPO), Fish and Wildlife Service (FWS), and National Marine Fisheries Service (NMFS) will be contacted. These steps will be followed before any reimbursement for repairs is made by the State.

14.1 Broadband

The State's initial Action Plan, highlighted that all recipients receiving CDBG-DR funds for the substantial rehabilitation or new construction of residential units, with four or more units per structure, must include broadband infrastructure in accordance with program requirements. This requirement remains in force with this Action Plan Amendment.

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15.0 Duplication of Benefits (DOB)

In review of the guidance on multiple storm impacts and DOB provided at 84 FR 28844 and clarifying guidance received from HUD, NCORR has developed a DOB policy that applies funds received to recover from the qualifying event (i.e. the event that the application for assistance is tied back to) rather than all assistance received for each disaster that impacted the recovering applicant. NCORR reviews assistance received for applicants in multiple disaster scenarios, such as those impacted by Hurricanes Matthew and Florence, and assesses which assistance is duplicative. Assistance received to recover from a disaster declaration other than the qualifying event is not considered duplicative. The application of assistance from multiple storms as a duplication of benefit is only applicable when an applicant is continuing to recover from multiple storms. NCORR establishes whether an applicant is recovering from Hurricane Florence and not recovering from Hurricane Matthew when storm tie-back is determined.

The following policies regarding subsidized loans apply to housing recovery programs, including Reconstruction, Rehabilitation, MHU Replacement, Buyout, and in some instances Small Rental Recovery or other housing benefit. The *DOB Notice* provided guidance on the treatment of subsidized loans in Duplication of Benefits analysis as follows: “The full amount of a subsidized loan available to the applicant for the same purpose as CDBG-DR assistance is assistance that must be included in the DOB calculation unless one of the exceptions [in the *DOB Notice*] applies including the exception in V.B.2 (iii) authorized in the DRRRA amendments to section 312 of the Stafford Act (which applies to disasters occurring between January 1, 2016 and December 31, 2021, until the amendment sunsets October 5, 2023). A subsidized loan is available when it is accepted, meaning that the borrower has signed a note or other loan document that allows the lender to advance loan proceeds.”

Declined SBA loans are loan amounts that were offered by a lender in response to a loan application, but were turned down by the applicant, meaning the applicant never signed loan documents to receive the loan proceeds. NCORR will not treat declined loans as DOB. NCORR will request documentation for the declined loan only if the information received from the third party (SBA, FEMA, etc.) indicates that the applicant received an offer for the subsidized loan and NCORR is unable to determine from that available information that the applicant declined the loan. In that case, the applicant must provide written certification that they did not receive the loan. The applicant will complete the Affidavit of Declined or Canceled Subsidized Loan form. NCORR will submit the Affidavit of Declined or Canceled Subsidized Loan to SBA (or other lender) and will re-verify DOB at project close-out.

Cancelled loans are loans (or portions of loans) that were initially accepted, but for a variety of reasons, all or a portion of the loan amount was not disbursed and is no longer available to the applicant. The cancelled loan amount is the amount that is no longer available. The loan cancellation may be due to the agreement of both parties to cancel the undisbursed portion of the loan, default of the borrower, or expiration of the term for which the loan was available for disbursement. The following documentation will be required to demonstrate that any undisbursed portion of an accepted subsidized loan is cancelled and no longer available to the

applicant:

1. A written communication from the lender confirming that the loan has been cancelled and undisbursed amounts are no longer available to the applicant, OR;
2. A legally binding agreement between NCORR and the applicant indicating that the period of availability of the loan has passed and the applicant agrees not to take actions to reinstate the loan or draw any amounts in the future.

Without either of the two documents listed above, any approved but undisbursed portion of a subsidized loan must be included in the DOB calculation of the total assistance unless another exception applies.

For canceled loans, NCORR will send the Affidavit of Declined or Canceled Subsidized Loan to SBA (or other lender) as notification that the applicant has agreed to not take any actions to reinstate the cancelled loan or draw down any additional undisbursed loan amounts.

In cases of cancelled loans where partial disbursements were made prior to cancellation of the loan, the disbursed funds will be treated as funds disbursed for active loans below. As with declined loans, awards with canceled subsidized loans will have DOB re-verified at project close-out.

A subsidized loan is not a prohibited duplication of benefits under section 312(b)(4)(C) of the *Stafford Act*, as amended by section 1210 of the DRRRA, provided that all Federal assistance is used towards a loss suffered as a result of a major disaster or emergency. As part of the DOB analysis, NCORR will exclude disbursed loan amounts as non-duplicative provided the funds were provided for a different purpose or were provided for the same purpose as the recovery program's activities, but for a different, allowable use.

NCORR will evaluate loans remaining open for non-duplicative activities. In cases where the undisbursed loan amount is for potentially duplicative activities, NCORR will notify the lender (SBA or other) and will obtain a written agreement from the applicant that the applicant will not make additional draws from the subsidized loan without NCORR's approval. Applicable program funding caps remain in effect for any award amount changes performed under this guidance.

NCORR reviews and confirms DOB calculations at project closeout. If duplicative assistance was received, NCORR exercises the subrogation agreement in place with applicants for assistance to recapture duplicate assistance, if necessary. Specific policy on DOB review is found in each program manual as well as the *NCORR DOB Uniform Procedures*.

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16.0 Monitoring Standards and Procedures

The State will begin monitoring shortly after commencement of contracted activities, and risk-based on-site monitoring will occur as appropriate to contracted activities and award amounts. The State will also conduct at least one on-site monitoring visit with each subrecipient prior to project completion, to verify funds were expended appropriately.

The State will implement its monitoring and compliance program for both state managed and subrecipient managed programs using policies and guidance that are designed to be consistent with the US HUD monitoring policies as defined in the HUD Monitoring Desk Guide: Policies and Procedures for Program Oversight. The Desk Guide is located at:

http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_35339.pdf.

16.1.1 Summary of Monitoring Objectives

1. To determine if an entity is carrying out its grant-funded program, and its individual activities, as described in the Grant Agreement between the State of North Carolina and sub-recipients.
2. To determine if an entity is carrying out its activities in a timely manner, in accordance with the schedule included in the Agreement.
3. To determine if an entity is charging costs to the project which are eligible under applicable laws and federal regulations and reasonable in light of the services or products delivered.
4. To determine if an entity is conducting its activities with adequate control over program and financial performance, and in a way that minimizes opportunities for waste, mismanagement, fraud and abuse.
5. To assess if the entity has continuing capacity to carry out the approved project, as well as other grants for which it may apply.
6. To identify potential problem areas and to assist the entity in complying with applicable laws and regulations.
7. To assist entities in resolving compliance problems through discussion, negotiation, and the provision of technical assistance and training.
8. To provide adequate follow-up measures to ensure that performance and compliance deficiencies are corrected by entities, and not repeated.
9. To determine if any conflicts of interest exist in the operation of the federally funded program.
10. To ensure that required records are maintained to demonstrate compliance with applicable regulations, such as rent, occupancy, household income, meeting property standards, Fair Housing, Affirmative Action and Davis-Bacon wage rates.

11. To conduct site visits/inspections of CDBG-R assisted units to ensure that units are in full compliance with all applicable regulations, codes and ordinances.

16.1.2 Risk Analysis

The State will, at the beginning of each calendar year, conduct a monitoring Risk Analysis for all recipients of CDBG-DR funding. The Risk Analysis identifies risk criteria and establishes a baseline level of risk for each recipient on annual basis. The Risk Analysis is used to determine which recipients will need to receive an on-site monitoring visit during the funding year, the frequency of visits, and if additional reporting and monitoring requirements are necessary. Each criterion is weighted based on the level of risk indicated by each item and applicants that are selected for monitoring following the published procedures will be informed of the monitoring activity.

All recipients are assigned levels of monitoring based on the outcome of the above Risk Analysis criteria. A preliminary schedule of on-site monitoring visits is established at the beginning of the calendar year. The level of monitoring can be adjusted during the contract period for reasons such as non-compliance with contract provisions, failure to meet performance objectives, failure to submit accurate and timely reports, findings identified from on-site monitoring, staff turnover in key positions of the organization, and other identified changes that increase the risk of administering grant funds. Non-compliance by the recipients can result in suspension of funds, termination of the contract, and request for repayment of all funds provided under the contract.

16.1.3 On-Site Agency Monitoring

Prior to notifying organizations of an on-site monitoring, the monitoring staff will read the grant agreements, notes any late and/or incorrect submissions of invoices and performance reports, and reviews any previous monitoring letters, regardless of the funding source. The purpose of this review is to determine the scope of the monitoring visit prior to sending a letter notifying the organization of the visit.

Two weeks prior to conducting an on-site monitoring visit, a letter is sent to the organization. The letter confirms the dates and scope of the monitoring and indicates the information and/or documentation that will be reviewed.

Within 45 days of the monitoring visit, staff issues a monitoring letter noting any findings, concerns, and any resolutions discovered during the review. The letter is addressed to the appropriate staff member(s). Organizations will be given 30 days to respond to monitoring letters.

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17.0 Contractor Performance Standards and Appeals Process

In the State's initial approved Action Plan, the State outlined the contractor performance standards and appeals process, stating that construction contractors performing work funded with CDBG-DR funds shall be required to be a licensed contractor with the State of North Carolina and to possess all applicable licenses and permits from applicable jurisdictions where work will be performed, prior to incurring any costs to be CDBG-DR reimbursed. Licenses will confirm the required standards set forth by the applicable county, city and/or town code to conduct work within the jurisdiction and the reflected scope of work (SOW) in the construction contract. Permits will be the required registration and documentation of county, city, and/or town code to be secured prior to any construction work commences. It will be the obligation of the contractor to secure all such permits, provide copies to the State agency or subrecipient administering the contract prior to commencing work.

This requirement will be included as a standard provision in any applicable subrecipient agreement and will need to be enforced by the subrecipient involving housing, small business, or infrastructure recovery programs and or projects. All CDBG-DR-funded contracts involving construction contractors performing work for homeowners and small business activities shall be required to have in the contract work pertaining to an individual homeowner and small business owner a one-year warranty on all work performed. The contractor is required to provide notice six months and one month prior to the end of the one-year warranty to the homeowner and small business owner with a copy of each notice to the state agency and/or sub recipient administering the applicable activity.

Each homeowner and small business shall be provided prior to the commencement of any work involved through such contracts, a written notice of their right to appeal the work being performed when it is not to the standards set forth or the scope established. The homeowner and small business owner shall be provided an appeal contact person within the state agency or sub recipient responsible for managing the activity. Policies and procedures will be established as part of the activity setting forth timelines and step-by-step process for resolving appeals and said policies and procedures shall be provided to each homeowner and small business prior to the start of any work and shall be included in the contract with each participating contractor as an enforceable part of the contract.

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18.0 Citizen Participation Plan

The State of North Carolina is in receipt of a U.S. Department of Housing and Community Development Block Grant-Disaster Recovery (CDBG-DR) appropriation in accordance with the *Disaster Relief Appropriations Act, 2016* (Public Laws 114-254 and 115-31). The Act describes the applicable waivers and alternative requirements, relevant statutory and regulatory requirements, the grant award process, criteria for the action plan approval, and eligible disaster recovery activities. These funds are being made available to assist disaster recovery efforts in response to Hurricane Matthew as described in Federal Register Notice published Wednesday January 18, 2017, at 82 FR 5591.

The primary goal of this *Citizen Participation Plan* is to provide all North Carolina citizens with an opportunity to participate in the planning, implementation, and assessment of all the State's recovery programs. The plan sets forth policies and procedures for citizen participation, which are designed to maximize the opportunity for involvement in the community recovery process from citizens, property owners, renters, business owners, developers as well as federal, state, local stakeholders. A copy of the *Citizen Participation Plan* is available on the ReBuild NC website.

18.1 Encouragement of Citizen Participation and Outreach

NCORR will invite and encourage citizen participation in the Action Plan and associated amendments process with a focus on outreach to low- and moderate-income persons, racial/ethnic minorities, persons with disabilities, and persons with Limited English Proficiency.

Strategy: The State will advertise opportunities for public participation in the Action Plan process through various state, federal, local governments, tribal communities, public housing authorities, other housing related service providers, churches and faith-based organizations, for-profit developers, professional organizations, other known constituency groups, and citizens who have requested notification. Additionally, the State will advertise through:

- Neighborhood associations and groups, community-based organizations, agencies, and churches providing services to or advocating for low- and moderate-income persons, racial/ethnic minorities, persons with disabilities, and persons with Limited English Proficiency; and
- Media sources that have direct contact with low- and moderate-income persons, culturally diverse persons, racial/ethnic minorities, persons with disabilities, and persons with Limited English Proficiency.

The North Carolina Office of Recovery and Resiliency (NCORR) is committed to ensuring that all populations impacted by the storm are aware of and have equal access to information about the programs to assist in the recovery from Hurricane Matthew. Through in person meetings, outreach events, online and traditional media, the State has publicized existing programs and will publicize changes to such programs, and conducted outreach efforts throughout the storm

impacted areas. In addition, the Governor's Office has engaged a grass-roots community driven process that engages the public as a key stakeholder in the planning and rebuilding process.

18.2 Individuals with Limited English Proficiency (LEP)

Based on LEP data within the impacted areas collected by the State, both the instructions for commenting on, and access to, the Action Plan will be translated into Spanish. Comments will be accepted through the online commenting form in English and Spanish. The State will make every possible effort to translate and consider comments submitted in any other language within the timeframe.

NCORR provides both oral Interpretation and written Translation services to persons at no cost and are available upon request. Meaningful and equal access to federally funded programs and activities is required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

18.3 Persons with Disabilities

As noted above, hard copies of Action Plans will be available in large print format (18pt font size) at the location listed above. The online materials will also be accessible for the visually impaired. For more information on how people with disabilities can access and comment on the Action Plan, dial (800) 735-2962.

18.4 Response to Citizen Complaints and Appeals

The State of North Carolina shall provide a response to every complaint relative to the CDBG-DR Program within fifteen (15) working days of receipt. The state will execute its Appeals Process in response to appeals received and will require subgrantees to adopt a similar process. The process will be tiered whereby applicants will be able to appeal a decision and received further review from another level.

All sub-contractors and local government grantees will be required to develop an appeals and complaint procedure to handle all complaints or appeals from individuals who have applied for CDBG-DR housing, infrastructure and business programs or other programs that may be included through subsequent amendments. A written appeal may be filed when dissatisfied with program policies, eligibility, level of service or other complaints by including the individual facts and circumstances as well as supporting documentation to justify the appeal.

Generally, the appeal should be filed with the administrating entity or sub-contractor. The appeal will be reviewed by the administrating entity with notification to NCORR, the CDBG-DR state implementation agency, for the purpose of securing technical assistance. If the appeal is denied or the applicant is dissatisfied with the decision, an appeal can be made to NCORR directly. If NCORR denies the appeal, the final step in the internal appeals process is to appeal to the Secretary of the Department of Public Safety

Applicants to the State’s Recovery Programs may appeal their award determinations or denials that are determined based on Program policies. However, it should be noted that an applicant is unable to appeal a federal statutory requirement.

18.5 Public Notice, Comment Period and Website

A comment period of at least fourteen days, as required by HUD, shall be provided for citizens, affected local governments, and other interested parties an opportunity to comment on substantial amendments to the Action Plan.

In accordance with CDBG-DR requirements, NCORR has developed and will maintain a comprehensive website regarding all disaster recovery activities assisted with these funds. NCORR will post all Action Plans and amendments on the NCORR’s CDBG-DR website at <http://www.rebuild.nc.gov>. The website gives citizens an opportunity to read the plan and to submit comment(s). This website is featured prominently on, and is easily navigable from, NCORR’s homepage. NCORR will maintain the following information on its website: actions plan, any substantial amendments, all performance reports, citizen participation requirements, and activities/program information that are described in the action plan, including details on contracts and ongoing procurement opportunities and policies, including opportunities for minorities, women and other disadvantaged persons, veteran, and other historically underutilized businesses (HUB). Paper copies of the Action Plan Amendment will be available in both English (including large, 18pt type) and Spanish as needed at applicant service centers. Applicant service center locations are found at the ReBuild NC website at <https://www.rebuild.nc.gov/information-assistance>.

After the conclusion of the required comment period, all comments shall be reviewed and the State will provide responses to the comments as best as information currently available allows. The State’s consideration on all public comments can be reviewed below.

Upon approval of the State’s Action Plan, HUD provided the state an action plan approval letter, grant terms and conditions, and grant agreement. Upon receipt of the grant agreement, the State will reviewed and began the process of executing the grant agreement with HUD.

Contact Information: Interested parties may make comments or request information regarding the Citizen Participation Planning process by mail, telephone, facsimile transmission, or email to NCORR.

Comments and complaints may be submitted as follows:

- Written comments may be mailed to:
North Carolina Office of Recovery and Resiliency (NCORR)
PO Box 110465
Durham, NC 27709
- Email comments: publiccomments@rebuild.nc.gov

- By telephone for those hearing impaired:
(984) 833-5350, TDD 1-800-735-2962
- By Fax transmission:
(919) 405-7392

NCORR will post this and all Action Plans and amendments on the State's CDBG-DR website at <https://www.rebuild.nc.gov/reporting-and-compliance/action-plans> to give citizens an opportunity to read the plan and to submit comment(s). Please provide comments to NCORR directly at 984.833.5350 or publiccomments@rebuild.nc.gov. Please specify the Action Plan and topic in the subject of the email. At the conclusion of the public comment period, all comments will be reviewed and the State shall respond to each comment.

According to 82 FR 36812, HUD's review period for substantial Action Plan amendments is 45 days from the date of submission to HUD. Upon approval by HUD, a final version of this amendment will be posted on NCORR's website, along with any revisions or changes made as the result of public comment or HUD review.

Appendix A: Response to Public Comments

The public comment period for Substantial Action Plan Amendment 7 began December 7, 2020 and ended January 7, 2021. This public comment period is greater than the 14-calendar day public comment period requirement set in 81 FR 83256. The longer public comment period was used so that comments on amendments to Hurricane Matthew and Hurricane Florence plans could be made at the same time.

In some instances, public comments are shortened to focus on the specific elements of the comment. Where commenters revealed private details or personal information, that information was removed from the public comment to protect the commenter's identity.

Comments that were specific to the status of an ongoing CDBG-DR application for assistance were referred internally for additional review and direct response, and may not be reflected in this response to public comments.

1. **Comment:** In most industries an action plan contains a detailed timeline to ensure the project meets deadlines. I do not see a timeline in the amendment.

Response: The timeline for completion of each individual program is included in a description of the program. All CDBG-DR funds must be spent within six years of their allocation to the State.

2. **Comment A:** Projects should focus on re-establishing shoreline vegetation and restoring off-shore landscape ecosystems in open water to increase roughness and decrease storm velocity, surge height, and damage to on-shore infrastructure.

Comment B: A comment from Restoration Systems LLC encouraging NCORR to allocate funds to the promotion and installation of natural infrastructure projects such as living shorelines.

Response: Primarily CDBG-DR funds focus on the restoration and long-term mitigation of risk to housing. Other funds are available for infrastructure projects, such as FEMA Public Assistance (PA) funds.

3. **Comment:** I have been patiently waiting for the rental rebuild program and haven't heard anything or been given any updates on the program. No one appears to know when the program will be available and I really would like to give a deserving resident a home to live once when it is repaired. I wish there would be more effort on helping individuals repair rental properties for low income people and people who need a place to live. I am a small landlord and need assistance from the program.

Response: The Small Rental Recovery Program (SRRP) is a significant focus for both Hurricane Matthew and Hurricane Florence CDBG-DR funding sources - more than \$50

million has been allocated for this activity across both grants. Details and clarifications on this program have been updated in the amendment to Hurricane Matthew and Hurricane Florence. This program is expected to begin in earnest in 2021 and will more closely resemble the existing Homeowner Recovery Program.

- Comment:** I feel it would be of great interest to help improve the phone/internet lines for many areas. Since the flood many of the damaged lines have not be repaired. I understand it is a responsibility of the phone company. Since the Hurricane they have promised to replace the lines. Still many are living with lines run over the ground. They are subject to be cut, damaged, and do not tolerate rain. This has caused lack of internet for children who have to virtual learn, and employees who may need to work from home.

Response: Infrastructure projects, such as repairing phone and internet lines, are often the responsibility of the utility provider. Other funds may be available for these projects.

- Comment:** The North Carolina Farmworkers Project seeks clarification on how this plan would address damage to employer-provided housing, such as the housing of North Carolina's more than 10,000 migrant farmworkers on H-2A visas. The comment also places an emphasis on hiring bilingual staff to further language accessibility.

Response: NCORR is committed to affordable housing development and has allocated more than \$110 million for this purpose across both Hurricane Matthew and Hurricane Florence CDBG-DR grants. Affordable housing development could help fill the gap provided by employer-provided housing. NCORR is also working to identify housing gaps and continuously updates policy to better address the needs of the recovering people in the state.

NCORR performs an analysis of the need for language accessibility based on HUD requirements and all critical documents and case management items are available in Spanish. Other languages may be available if needed to serve individuals that request them. NCORR currently maintains 10 bilingual staff that are available to serve applicant needs.

- Comment:** My only concern about the plan, which may be beyond the scope of permitted activities, is the relation to voluntary community, particularly community based long term recovery organizations. I am concerned that there needs to be more support for construction supervision in long term recovery organizations. Far more LTRGs close their doors for lack of funds to maintain the organization than because they run out of funds for materials. If the state were to more directly assist LTRG's either with funds to hire construction supervisors/coordinators volunteer work teams could multiply their impact on rebuilding.

Response: Volunteer Organizations (VOADS) and other community groups are essential to the ongoing recovery effort. NCORR has been meeting with many large VOAD groups to coordinate resources, especially as they relate to homeowner recovery. The establishment of the Construction Trades Training Program also seeks to help build capacity.

7. **Comment:** The Redevelopment Commission of New Bern adopted their Redevelopment Plan in February of 2020, with a focus on housing. The City of New Bern would like to comment that the focus areas should include portions of Craven County for targeted recovery efforts. The detailed resiliency planning work solidifies the need for funding in the community to mitigate against future flooding and should bring confidence to NCORR and HUD on how the City of New Bern prioritizes actions to build community resilience.

Response: Craven County was identified by HUD as a most impacted and distressed (MID) area for Hurricane Florence. Craven was also visited during CDBG-MIT public hearings and the county remains a major focus of the recovery effort. Currently, Rebuild NC has committed approximately \$2.6 million in awards for the Homeowner Recovery Program in Craven County and intends to continue to focus on housing recovery in the county.

8. **Comment:** A comment from the Environmental Defense Fund, NC Conversation Network, the Nature Conservancy, and the Conservation Fund regarding the reduction of planning funds in the combined Action Plans.

Response: NCORR notes that the planning budget across all three allocations is currently set at \$16.1 million, a significant amount of funding for planning efforts. NCORR is supportive of the planning activity and has set more specific criteria on how planning funds are used for ongoing planning efforts in the state, including potentially funding planning activities provided by the Recovery Support Function (RSF) groups operating in the State. Already some funding projects have been proposed by these groups which NCORR is looking forward to funding. More planning funds may be made available as compelling resilient planning opportunities are introduced to NCORR and such planning activities are in line with CDBG-DR and CDBG-MIT eligible uses of funds.