



Nonsubstantial Action Plan Amendment 13  
May 20, 2026

# Hurricane Matthew CDBG-DR Action Plan

State of North Carolina

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## Revision History

Version	Date	Description
1.0	April 21, 2017	Initial Action Plan Submitted
2.0	November 7, 2017	Substantial Amendment 1
3.0	April 9, 2018	Non-substantial Amendment 2 Clarification of Method of Distribution
4.0	December 16, 2018	Substantial Amendment 3 – Method of Distribution and Program Caps
5.0	March 12, 2019	Non-substantial Amendment 4 – Amended method of determining construction intent (rehabilitation vs. reconstruction) and amended method of determining elevation assistance.
6.0	November 22, 2019	Substantial Amendment 5 — NCORR designated as grantee, 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.
7.0	June 9, 2020	Substantial Amendment 6 – Changes in programs and Action Plan to align Hurricane Matthew recovery with Hurricane Florence recovery.
8.0	January 11, 2021	Substantial Amendment 7 – Allocation changes, changes to some program definitions, changes to the substantial action plan amendment criteria.
9.0	April 20, 2021	Non-substantial Amendment 8 – Allocation changes.
10.0	January 18, 2022	Substantial Amendment 9 – Reallocation of the small rental recovery program, infrastructure and homeowner recovery allocation changes,
11.0	December 9, 2022	Substantial Amendment 10 – Allocation changes, changes to program descriptions, updates to program timelines.
12.0	March 15, 2024	Non-substantial Amendment 11 – Minor allocation changes, technical updates to elevation requirements, and minor clarifications to program timelines and reimbursement only awards for the Homeowner Recovery Program.
13.0	August 23, 2024	Non-substantial Amendment 12 – Minor allocation changes and technical updates in preparation of closeout of grant.
14.0	May 20, 2026	Added a comprehensive MID list to supplement Appendix B.

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# 1.0 Summary of Action Plan Changes – Nonsubstantial Amendment 13

## 1.1 Overview

This CDBG-DR Action Plan modification is being classified as a Nonsubstantial Amendment due to the technical clarification being added to Appendix B.

## 1.2 Comprehensive Identification of MIDs

The Initial Hurricane Matthew Action Plan ( [April 21, 2017 CDBG-DR Action Plan](#)) established the counties eligible to receive CDBG-DR assistance (see “Table 1: Counties Eligible for Assistance”). At that time, the plan did not distinguish between the two different types of Most Impacted and Distressed (MID) areas:

- HUD-identified MID counties, and
- State-identified MID counties.

The HUD identified MID counties at the time the action plan was published were Cumberland, Edgecombe, Wayne and Robeson (also known as “Tier 1 Counties”). All other counties listed in the eligible for assistance table were viewed as State identified MID counties (also known as “Tier 2 Counties”).

When the Action Plan was published, HUD had designated Cumberland, Edgecombe, Wayne, and Robeson Counties as MID areas, commonly referred to by the State as Tier 1 Counties. All other counties listed as eligible were recognized by the State as MID counties and were referred to as Tier 2 Counties. On July 23, 2019 HUD added Bladen and Columbus counties to the HUD MID area.

In Amendments 2 through 4, the Action Plan continued to use the broad term “eligible counties,” applying it to both HUD-identified and State-identified MID counties. The terminology “Tier 1” and “Tier 2” remained consistent in these amendments.

On November 22, 2019, Substantial Amendment 5 introduced terminology changes as part of the transition to the State-Centric model, which moved administration of CDBG-DR programs to the North Carolina Office of Recovery and Resiliency (NCORR). During this transition, the amendment unintentionally conflated the distinction between State-identified MID counties (Tier 2) and “non-HUD MID counties,” implying the Tier 2 counties were not MID areas.

([November 22, 2019 Amendment 5](#) Reference Page 43). This unintended change in terminology led subsequent Action Plans for the Matthew grant to incorrectly label State-identified MID counties as “non-MID counties.” As a result, the action plans left the mistaken impression that these counties were ineligible for CDBG-DR funding, even though they remained fully eligible under the program.

On December 9, 2022, both the Hurricane Matthew and Hurricane Florence Action Plans were amended, and Appendix D was introduced as part of Florence Substantial Amendment 4 ([Hurricane Florence CDBG-DR Action Plan](#)). This appendix established new State-designated MID areas for the Florence program. However, it did not clearly describe the expansion of HUD-identified MID areas from specific ZIP codes to full counties, nor did it incorporate the State-identified MID areas previously established for Matthew in 2017.

Following the introduction of Appendix D in Substantial Amendment 4, it appears that the main text in subsequent Florence and Matthew Action Plan amendments was not updated to reflect the State-designated MID areas. This amendment corrects that oversight by aligning the text of the Action Plan with the proper MID designations. It does not create any new MID areas. Instead, a supplemental Appendix B has been added, providing a comprehensive and consolidated list of MID designations. For ease of reference, the original Appendix B is also included in this amendment.

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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 Impact and Unmet Needs Assessment

The Impact and Unmet Needs Assessment within this Action Plan represents the third analysis of unmet needs in the State of North Carolina following Hurricane Matthew. It presents damage estimates as of October 15, 2017, roughly one year after the flooding occurred. The full needs assessment can be found in previously published action plans. For the purposes of this amendment, the recovery needs assessment has not changed since Action Plan Amendment 12. [Action Plans | ReBuild NC](#)

### 3.1.1 Most Impacted and Distressed (MID) Areas Identified by the State

Based on data as of May 2020, NCCORR conducted an analysis of damage to counties that were impacted by both Hurricane Matthew and Hurricane Florence in consideration of the unique recovery needs created by the large area of the State that was impacted by both hurricanes. The threshold to be considered a State Defined MID areas is greater than \$10 million in combined estimated housing unmet need at county level for both hurricanes.

The result is the addition of seven counties which are considered the State Defined MID areas. These counties are Beaufort, Dare, Harnett, Johnston, Lenoir, Pitt, and Sampson and are in **bold** font in Table 2 below. The map of state-identified MID areas is located at Section 6.5.

See Appendix B for the Methodology & Detailed Data to Identify State Defined MID Areas for Hurricane Matthew and Hurricane Florence.

**Table 1 – Estimated Combined Housing Unmet Need, State and HUD Defined MID Areas**

County	Estimated Combined Housing Unmet Need	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

<b>County</b>	<b>Estimated Combined Housing Unmet Need</b>	<b>MID Area</b>
Edgecombe (County)	\$ 42,011,156	Matthew
Brunswick (County)	\$ 36,152,959	Florence
<b>Lenoir (County)</b>	<b>\$ 30,491,620</b>	<b>State Defined</b>
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)
<b>Beaufort (County)</b>	<b>\$ 21,732,584</b>	<b>State Defined</b>
<b>Sampson (County)</b>	<b>\$ 17,194,081</b>	<b>State Defined</b>
Scotland (County)	\$ 15,971,064	Florence (Zip Code 28352)
<b>Pitt (County)</b>	<b>\$ 14,642,648</b>	<b>State Defined</b>
<b>Harnett (County)</b>	<b>\$ 12,141,829</b>	<b>State Defined</b>
<b>Dare (County)</b>	<b>\$ 10,888,976</b>	<b>State Defined</b>
<b>Johnston (County)</b>	<b>\$ 10,796,876</b>	<b>State Defined</b>

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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 Impact and 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 \$217,456,550.10 (92 percent) in funding dedicated to this activity. This is a combination of the Homeowner Recovery Program and Multi-Family Housing Program.

**Table 2: Distribution of CDBG-DR Funds by Program**

Activity	CURRENT APA 13 Allocation	CURRENT APA 13 LMI Allocation	CURRENT APA 13 MID Allocation
Administration	\$11,826,450	\$0	\$9,461,160
Planning	\$3,742,353	\$0	\$2,542,046.5
Homeowner Recovery Program	\$207,635,032.1 0	\$163,718,790.2	\$166,557,907.9
Small Rental	\$0	\$0	\$0
Multi-Family	\$9,821,518	\$9,821,518	\$9,821,518
Public Housing Restoration	\$0	\$0	\$0
Small Business Recovery	\$3,503,646.90	\$484,985	\$2,514,929.5
Infrastructure Recovery	\$0	\$0	\$0
<b>TOTAL</b>	<b>\$236,529,000</b>	<b>\$174,025,293.2</b>	<b>\$190,897,562</b>
<b>% OF TOTAL ALLOCATION</b>	<b>100%</b>	<b>74%</b>	<b>81%</b>

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.

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

### 6.1 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 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.

After 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:

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

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.

## 6.2 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. Up to 20% of total funding may be used in State identified MID counties for CDBG-DR projects. See Appendix B for comprehensive list of State identified MID counties.

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.”*

## 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. The North Carolina Department of Commerce (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 (NCHFA) 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 22. 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 22 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 22 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 22 is included only to record past program administration efforts.

**Table 3: Method of Program Delivery for CDBG-DR Homeowner Recovery Programs (Prior to Amendment 6)**

	① <b>Step 1 Application</b>	② <b>Step 2 Eligibility Review</b>	③ <b>Step 3 Duplication Check</b>	④ <b>Step 4 Inspection &amp; Environmental Review</b>	⑤ <b>Step 5 Grant Determination</b>	⑥ <b>Step 6 Contractor Selection</b>	⑦ <b>Step 7 Construction</b>	⑧ <b>Step 8 Completion</b>
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 NCDEM

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 aid 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. In consideration of changing construction costs and the availability of labor and materials, NCORR has made the strategic decision to use modular home construction as a viable replacement for reconstruction and certain manufactured home unit (MHU) replacement work. 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* and may change over time.

#### 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, 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 more than 80 percent AMI shall no longer need to demonstrate a hardship to the Program to receive a reimbursement award.

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.

Reimbursement only awards may be offered to eligible homeowners that wish to be reimbursed for work performed and not proceed with program-managed rehabilitation, if the remaining rehabilitation scope is modest and the homeowner is satisfied with a reimbursement only award. The method for calculating this award type is noted in each project file that accepts this alternative award.

#### **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 meet the FEMA definition of substantially damaged, will be substantially improved, or meet the Program reconstruction threshold and not yet elevated 2 ft. above base flood elevation (BFE) or 2 ft. above an interior 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.
  - 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.

At a minimum, homes will be elevated to two feet above the BFE as required by HUD or at least 2 ft. above the interior documented water marks as measured by the assessor, whichever documented water level is highest and reasonable. Local requirements for elevations more than two feet above BFE and the HUD requirement prevail where required. For MHUs, if the Program elevation standard makes it infeasible to elevate, the HUD elevation requirement prevails. The Program is unable to elevate structures that are situated on leased land unless the permission of the landowner is secured.

### **Optional Elevation**

- Properties outside of the 100-year floodplain that:
  - Sustained at least six inches of interior 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 or meet the Program’s “not suitable for rehabilitation” threshold.

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 above the height of interior documented water marks. For MHUs, if the program elevation standard makes it infeasible to

elevate, the local requirement prevails. Otherwise, if a local requirement is not available, the program may opt to forego the optional elevation. The Program is unable to elevate structures that are situated on leased land unless the permission of the landowner is secured. If permission cannot be secured, the applicant must forego the optional elevation.

### 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 Subsidized Forgivable Loan

In cases where a DOB analysis is performed and the Program identifies that there would be a duplication for a household whose damaged home still requires recovery assistance, the Program may provide a CDBG-DR subsidized forgivable loan up to duplication amount not to exceed \$50,000. If the household demonstrates a hardship or the facts and circumstances of their recovery warrant a loan greater than \$50,000, the Program may extend an offer to loan more. The rationale for loans more than \$50,000 will be documented in NCORR's system of record.

Additional details on subsidized loan, payment rates, forgiveness or cancellation terms, repayment schedule, monitoring requirements, acceleration schedule, and other loans terms will be found in the loan documents and Program manual or procedures.

### 8.1.7 Application Process

North Carolina citizens who were directly impacted by the disaster who are located in an eligible county could 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 until applications for assistance were closed on April 21, 2023. Additional avenues were available for remote applications during the COVID-19 pandemic. The application allowed applicants to list their housing recovery needs in more than one eligible category of assistance listed above.

### 8.1.8 Allocation for Homeowner Recovery Activities

#### 8.1.9 \$207,635,032.1 Maximum Award

**Homeowner Rehabilitation:** up to \$20,000 per home. This cap has been adjusted to prioritize resilient reconstruction rather than rehabilitation of damaged property. Projects that were offered an award under the previous threshold (\$70,000) will have that award type honored and will not need to agree to a new award, unless that award has been determined to be infeasible based on a review of the conditions on site. In those instances, a reconstruction may be required.

- 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 \$20,000.
- Unforeseen circumstances identified by a construction contractor, engineer, or architect may result in change orders which exceed the \$20,000 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 \$20,000 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.

**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 4 - Homeowner Recovery Program Maximum Award Amounts**

Program	Maximum Awards and Clarifications
Rehabilitation	Up to \$20,000 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.

Program	Maximum Awards and Clarifications
Temporary Relocation Assistance (TRA)	The Program will pay reasonable costs based on rate schedules developed by NCORR 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.
Subsidized Forgivable Loan	Up to duplication found in the DOB analysis and not to exceed \$50,000 unless hardship or the facts and circumstances of the household's recovery warrant a greater amount. The rationale for the greater amount will be documented in NCORR's system of record.

### 8.1.10 National Objective

LMI, Urgent Need.

### 8.1.11 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.

### 8.1.12 Geographic Eligibility

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

### 8.1.13 Priorities

LMI households will be prioritized for assistance.

### 8.1.14 Eligible Applicants

All owner-occupants whose primary residence was directly or indirectly impacted by Hurricane Matthew are eligible for Homeowner Rehabilitation, Homeowner Reconstruction, Manufactured Home Repair, and Manufactured Home Replacement. Owner-occupants are eligible for the track of the Homeowner Recovery Program which best suits their recovery needs. In accordance with HUD guidance that CDBG-DR funds may rehabilitate units not damaged by the disaster if the activity clearly addresses a disaster related impact and is located in a disaster-affected area (81 FR 83259 and 83 FR 5851), HRP will now assist properties in need of rehabilitation, reconstruction, or replacement in the most impacted and distressed (MID) areas regardless of the direct storm impact, as lingering challenges in suitable housing continue to stress housing availability in the MID areas. This MID designation includes the State-identified MID areas.

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](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 alternative requirements are specified in their respective sections of the Action Plan.

#### **8.1.15 Program Start Date**

Q3 2017

#### **8.1.16 Projected End Date**

Q4 2024

## 8.2 Multi-Family Rental Housing Program

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 demolished 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.

Action Plan Amendment 8 included an additional \$5.1 million in contingency to allow NCORR flexibility to review and potentially approve increased construction costs if they arise.

### 8.2.1 Allocation for Activity:

\$9,821,518.

### 8.2.2 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.

### 8.2.3 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) (20) (23) (25) Rehabilitation; Reconstruction, Acquisition; New Residential Construction; Relocation, Demolition and Clearance, Non-Federal Match, Construction of Housing.

### 8.2.5 Geographic Eligibility

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

### 8.2.6 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.

### 8.2.7 Eligible Applicants

Developers and local government entities 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.

### 8.2.8 Projected Start Date

Q3 2019

### 8.2.9 Projected End Date

Q4 2023

## 8.3 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 NCORR 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>.

## 8.4 Public Housing Restoration Fund

The State's initial Action Plan created the Public Housing Restoration Fund with an allocation totaling to \$13.4 million across the initial Action Plan and subsequent Substantial Amendments. 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 \$13.4 million previously allocated to the Public Housing Restoration Fund have been reallocated to the CDBG-MIT Action Plan. The reallocation further strengthens the ongoing recovery efforts of the Homeowner Recovery Program. The reallocation is also in consideration of a realignment of longer-term resilience and mitigation activities, such as those in the Public Housing Restoration Fund, with the objectives of the CDBG-MIT funds. Refer to the State's Mitigation Action Plan for more details on these activities.

## 8.5 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 \$ \$3,503,646.9 was allocated to complete delivery of this program.

### 8.5.1 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.

### **8.5.2 Allocation for Activity**

\$3,503,646.9

### **8.5.3 Maximum Award**

Up to \$300,000 per business.

### **8.5.4 Activity Type**

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

### **8.5.5 National Objective**

LMI, Urgent Need.

### **8.5.6 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.

### **8.5.7 Geographic Eligibility**

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

### **8.5.8 Priorities**

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

### **8.5.9 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.

### **8.5.10 Projected Start Date**

Q1 2019

### **8.5.11 Projected End Date**

Q3 2023

## 8.6 Infrastructure Recovery Program

Previously, the Infrastructure Recovery Program refocused on infrastructure repair and new infrastructure development as a tie-back to the housing recovery need. Funding in this program was 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.

After a review of the housing programs available and in response to increased demand for Homeowner Recovery Program activity, the CDBG-DR Matthew Infrastructure Recovery Program has had its allocation removed. Necessary infrastructure to support housing may be included as a part of a scope of work for affordable housing projects funded by the Affordable Housing Development Fund. The Infrastructure Recovery Program will be funded through the CDBG-MIT grant in order to better support the mission of CDBG-MIT as a grant focused on long-term mitigation and resiliency. NCORR may reevaluate the need and resources available for infrastructure recovery at a later date.

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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 for the repair, replacement, or restoration of that property.

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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 or more.

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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,
5. EPA Indoor AirPlus (ENERGY STAR a prerequisite), or
6. 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 Decent, Safe, and Sanitary (DSS) standards. 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)<sup>1</sup> 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. Per 2 CFR § 200.317, Subrecipients utilizing Program funds must follow all procurement guidelines contained in 2 CFR §§ 200.318-327.

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<sup>1</sup> Fair Housing Accessibility First. *Fair Housing Requirements*. <https://www.fairhousingfirst.org/fairhousing/requirements.html>

The FR allows individuals, businesses, and non-profits to be reimbursed for out-of-pocket repair costs that would have been covered under a CDBG-DR 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)

Applicants to disaster recovery programs will be required to provide information regarding all assistance received for the recovery purposes as required by the HUD's Certification of Duplication of Benefits Requirements under the Stafford Act for Community Development Block Grant (CDBG) Disaster Recovery Grantees (76 FR 71060, November 16, 2011). Any funds found to be duplicative will be deducted from the CDBG-DR award prior to the disbursement of the award amount. A review of potential DOB is necessary for all CDBG-DR funded activities.

On June 20, 2019, HUD published two Federal Register (FR) notices on the calculation of Duplication of Benefits (DOB): 84 FR 28836 (here after referred to as the *DOB Notice*) and 84 FR 28848 (here after referred to as the *DOB Implementation Notice*). After reviewing the notices, NCORR has updated its DOB policy to comply with the new guidance.

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.

### 15.1 NCORR Subsidized Loans

In some instances, a homeowner may continue to face challenges reconciling other funds received to recover before receipt of CDBG-DR funds to recover. In lieu of receiving an escrow payment, NCORR may offer a subsidized loan for the DOB amount due from the applicant. These subsidized loans (sometimes referred to as promissory notes) are forgivable based on the terms included in the note. These conditions and other terms of the note are included in the subsidized loan agreement executed between the applicant and the disaster recovery program.

In recognition that some households may experience challenges making regular payments on the subsidized loan, in cases where a DOB analysis is performed and NCORR notes that there would be a duplication of benefits, NCORR will apply a forgivable loan structure that would allow the loan and loan payment to be forgiven over time as the applicant lives in the house and otherwise complies with the terms of the subsidized loan agreement. This approach would be exclusively available for LMI households and is only available for households that earn up to 120% area median income that can demonstrate hardship, as defined by the disaster recovery program. Other exceptions may be granted on a case-by-case basis to targeted populations, such as the elderly, persons with disabilities, families with children, or others that may face

disproportional challenges in their disaster recovery. NCORR has determined that a set proportion of the subsidized loan will be forgiven on an annual basis after completion of the recovery work is a reasonable basis for loan forgiveness. Additional details on NCORR's mechanism for collecting any remaining balance of the loan will be included in the household's loan documents. NCORR shall identify any additional monitoring procedures in its monitoring process for these loans. NCORR will use its flexibility as a grantee to use a variety of sources for the forgivable loan, including CDBG-DR funds as part of the household's disaster recovery assistance or other available funding sources. This approach is allowable because a subsidized loan is not a duplication under the DRRRA amendments to Section 312 of the Stafford Act for DRRRA-covered disasters (84 FR 28842) if the funds were used for a disaster-related purpose. Hurricanes Matthew and Florence are DRRRA-covered disasters.

A household unable to be assisted by NCORR may experience housing instability as they ultimately are unable to repair their damaged home or fully recover from disaster. If faced with housing instability, the household may require assistance from other sources, such as housing vouchers, subsidized housing, or public housing units. The preservation of housing for impacted households, particularly LMI households, is central of HUD's mission and the risk of losing housing for impacted households is real if a DOB issue is not able to be overcome. If not but for this concept, impacted households may be disproportionately affected and unable to participate in the recovery effort. Such considerations are central to this subsidized forgivable loan framework.

## 15.2 Other Subsidized Loans

For the purpose of this Action Plan, subsidized loans (including forgivable loans) are loans other than private loans. Both SBA and FEMA provide subsidized loans for disaster recovery. Subsidized loans may also be available from other sources. Subsidized loans are assistance that must be included in the DOB analysis, unless an exception applies.

The following policies regarding subsidized loans apply to housing recovery programs, including Reconstruction, Rehabilitation, MHU Replacement, and in some instances 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 exceptions in V.B.2 (i), V.B.2 (ii), and V.B.2 (iii), which were 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 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 subsidized loan is not otherwise exempt for DOB considerations or the information received from the third party (SBA, FEMA, etc.) indicates that the applicant received an offer for the not exempted subsidized loan and NCORR is unable to determine from that available information that the applicant declined the loan. In such cases, 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 not exempted 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 an otherwise not exempted for DOB considerations subsidized loan must be included in the DOB calculation of the total assistance unless another exception applies.

For not exempted canceled loans, NCORR will send the Affidavit of Declined or Canceled Subsidized Loan to the 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 not otherwise exempted for DOB considerations 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 not exempted declined loans, awards with not exempted 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 DRRA, provided that all Federal assistance is used towards a loss suffered as a result of a major disaster or emergency declared between January 1, 2016, and December 31, 2021 (DRRA Qualifying Disasters). As part of the DOB analysis, NCORR will exclude disbursed loan amounts as non-duplicative. The exception for DRRA Qualifying disasters no longer applies after October 5, 2023. NCORR will evaluate not exempted loans remaining open for non-duplicative activities. In cases where the undisbursed loan amount is for potentially duplicative activities, NCORR will notify the lender 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 there is reason to believe that the DOB calculation has changed. 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](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 at <https://rebuild.nc.gov/action-plans>.

### 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

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 <https://rebuild.nc.gov/action-plans>. The website gives citizens an opportunity to read the plan and to submit comments on substantial amendments. 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 any required comment period, all comments shall be reviewed and the state will provide responses to the comments received. The State’s consideration of public comment is available as an appendix to the action plan, when applicable.

Upon approval of the state’s original Action Plan, HUD provided the state an action plan approval letter, grant terms and conditions, and grant agreement. After receipt of the grant agreement, the State reviewed and executed the grant agreement with HUD.

### 18.5.1 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](mailto:publiccomments@rebuild.nc.gov)  
Please include “CDBG-DR Matthew” in the subject line
- 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/action-plans>. When public comment is required the method for submitting public comment is also included on the website.

According to 81 FR 83262, NCORR must notify HUD of a nonsubstantial amendment but is not required to undertake a public comment period. HUD must be notified at least five business days before the amendment becomes effective.

## Appendix A: Response to Public Comments

## Appendix B Updated Comprehensive MID List

County	Storm	Place of Original Designation	State or HUD Designation
Anson	Matthew	Matthew AP 1 "Eligible County"	State MID
Beaufort	Florence	Flo SAPA 4 Appendix D - Designated MID	State MID
Beaufort	Matthew	Matthew AP 1 "Eligible County"	State MID
Bertie	Matthew	Matthew AP 1 "Eligible County"	State MID
Bladen	Florence	Zip Code Expanded to Full County	HUD MID
Bladen	Matthew	Matthew AP 1 "Eligible County"	State MID
Brunswick	Florence	HUD Declared MID	HUD MID
Brunswick	Matthew	Matthew AP 1 "Eligible County"	State MID
Camden	Matthew	Matthew AP 1 "Eligible County"	State MID
Carteret	Florence	HUD Declared MID	HUD MID
Carteret	Matthew	Matthew AP 1 "Eligible County"	State MID
Chowan	Matthew	Matthew AP 1 "Eligible County"	State MID
Columbus	Florence	HUD Declared MID	HUD MID
Columbus	Matthew	Matthew AP 1 "Eligible County"	State MID
Craven	Florence	HUD Declared MID	HUD MID
Craven	Matthew	Matthew AP 1 "Eligible County"	State MID
Cumberland	Florence	Zip Code Expanded to Full County	HUD MID
Cumberland	Matthew	HUD Declared MID	HUD MID
Currituck	Matthew	Matthew AP 1 "Eligible County"	State MID
Dare	Florence	Flo SAPA 4 Appendix D - Designated MID	State MID
Dare	Matthew	Matthew AP 1 "Eligible County"	State MID
Duplin	Florence	HUD Declared MID	HUD MID
Duplin	Matthew	Matthew AP 1 "Eligible County"	State MID
Edgecombe	Matthew	HUD Declared MID	HUD MID
Edgecombe	Florence	Flo SAPA 4 Appendix D - Designated MID	State MID
Franklin	Matthew	Matthew AP 1 "Eligible County"	State MID
Gates	Matthew	Matthew AP 1 "Eligible County"	State MID
Greene	Matthew	Matthew AP 1 "Eligible County"	State MID
Halifax	Matthew	Matthew AP 1 "Eligible County"	State MID
Harnett	Florence	Flo SAPA 4 Appendix D - Designated MID	State MID
Harnett	Matthew	Matthew AP 1 "Eligible County"	State MID
Hertford	Matthew	Matthew AP 1 "Eligible County"	State MID
Hoke	Matthew	Matthew AP 1 "Eligible County"	State MID
Hyde	Matthew	Matthew AP 1 "Eligible County"	State MID
Johnston	Florence	Flo SAPA 4 Appendix D - Designated MID	State MID
Johnston	Matthew	Matthew AP 1 "Eligible County"	State MID
Jones	Florence	HUD Declared MID	HUD MID
Jones	Matthew	Matthew AP 1 "Eligible County"	State MID

Lee	Matthew	Matthew AP 1 "Eligible County"	State MID
Lenoir	Florence	Flo SAPA 4 Appendix D - Designated MID	State MID
Lenoir	Matthew	Matthew AP 1 "Eligible County"	State MID
Martin	Matthew	Matthew AP 1 "Eligible County"	State MID
Montgomery	Matthew	Matthew AP 1 "Eligible County"	State MID
Moore	Matthew	Matthew AP 1 "Eligible County"	State MID
Nash	Matthew	Matthew AP 1 "Eligible County"	State MID
New Hanover	Florence	HUD Declared MID	HUD MID
New Hanover	Matthew	Matthew AP 1 "Eligible County"	State MID
Onslow	Florence	HUD Declared MID	HUD MID
Onslow	Matthew	Matthew AP 1 "Eligible County"	State MID
Pamlico	Florence	Zip Code Expanded to Full County	HUD MID
Pamlico	Matthew	Matthew AP 1 "Eligible County"	State MID
Pasquotank	Matthew	Matthew AP 1 "Eligible County"	State MID
Pender	Florence	HUD Declared MID	HUD MID
Pender	Matthew	Matthew AP 1 "Eligible County"	State MID
Perquimans	Matthew	Matthew AP 1 "Eligible County"	State MID
Pitt	Florence	Flo SAPA 4 Appendix D - Designated MID	State MID
Pitt	Matthew	Matthew AP 1 "Eligible County"	State MID
Richmond	Matthew	Matthew AP 1 "Eligible County"	State MID
Robeson	Florence	HUD Declared MID	HUD MID
Robeson	Matthew	HUD Declared MID	HUD MID
Sampson	Florence	Flo SAPA 4 Appendix D - Designated MID	State MID
Sampson	Matthew	Matthew AP 1 "Eligible County"	State MID
Scotland	Florence	Zip Code Expanded to Full County	HUD MID
Scotland	Matthew	Matthew AP 1 "Eligible County"	State MID
Tyrrell	Matthew	Matthew AP 1 "Eligible County"	State MID
Wake	Matthew	Matthew AP 1 "Eligible County"	State MID
Warren	Matthew	Matthew AP 1 "Eligible County"	State MID
Washinton	Matthew	Matthew AP 1 "Eligible County"	State MID
Wayne	Matthew	HUD Declared MID	HUD MID
Wayne	Florence	Flo SAPA 4 Appendix D - Designated MID	State MID
Wilson	Matthew	Matthew AP 1 "Eligible County"	State MID

Sources:

[State of North Carolina CDBG-DR Matthew Action Plan 1](#)

[State of North Carolina CDBG-DR Florence Action Plan 4](#)

[86 FR 569 - Allocations, Common Application, Waivers, and Alternative Requirements for Disaster Community Development Block Grant Disaster Recovery Grantees; Second Allocation - Content Details - 2020-29262](#)

## Appendix B: Methodology & Detailed Data to Identify State Defined MID Areas

Based on data as of May 2020, the State conducted an analysis of damage to counties that were impacted by both hurricanes Matthew and Hurricane Florence in consideration of the unique recovery needs created by the large area of the State that was impacted by both hurricanes. Aligning with the allocation methodology outlined in Appendix A for both 82 FR 5591 (Hurricane Matthew) and 85 FR 4681 (Hurricane Florence), the State calculated an estimated housing unmet need for each county, for each hurricane. This analysis used the Major-Low, Major-High, and Severe damage categories for both hurricanes 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 Defined MID is greater than \$10 million in combined unmet need at the county level. Table 2 in the Housing Impact and Unmet Needs Assessment combines the data below to create the State and HUD Defined MID areas.

County	Hurricane 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	\$ -	\$ -

County	Hurricane Matthew		
	Major-Low	Major-High	Severe
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	Hurricane 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

## Appendix C: Methodology & Assumptions for Estimating Housing Unmet Need

### Owner-Occupied and Rental Housing

Data Source	Methodology & Assumptions Estimated Total Loss (Need)	Methodology & Assumptions Estimated Resources Available/Received
<b>NCORR Hurricane Matthew Homeowner Recovery Program Damage Assessments as of 11/2/2022</b>	<b>Based on estimated construction intent from approved Homeowner Recovery Program Damage Inspections:</b>	<b>N/A</b>
	For Mobile Home Replacement or Single-Family Reconstruction an average estimation of replacement or reconstruction costs	N/A
	For Rehabilitation/Reimbursement the sum of verified completed repair costs and verified estimate of remaining repair costs	N/A
<b>Hurricane Matthew SBA Home Loans as of 10/21/2022</b>	<b>Based on verified damage amounts</b>	<b>Based on current amounts for non-canceled loans</b>
	Sum of verified damage amounts excluding contents, debris removal and landscaping	Sum of current amounts excluding contents, debris removal, landscaping and refinance
<b>Hurricane Matthew FEMA IA as of 10/10/2019</b>	<b>Based on Real Property (RP) Verified Loss for Owners</b>	<b>Based on FEMA IA Repair/Replace assistance received for Owners</b>
	Multiplied by 5.6 based on State Determined Multiplier (see Analysis Comparing FEMA Verified Loss and SBA Verified Damage below)	No other assumptions
	<b>Based on Personal Property (PP) Verified Loss for Renters</b>	<b>Based on Renter Income reported to FEMA for Renters</b>
	Multiplied by 7.6 based on State Determined Multiplier (see Analysis Comparing FEMA Verified Loss and SBA Verified Damage below)	Renters with income \$20,000 and below likely have landlords without insurance to cover estimated total loss (\$0.00 for assistance available/received)

Data Source	Methodology & Assumptions Estimated Total Loss (Need)	Methodology & Assumptions Estimated Resources Available/Received
Hurricane Matthew NFIP as of 4/5/2020	Based on NFIP Building Payment Amount	Based on NFIP Building Payment Amount
	Increased by 20% under assumption NFIP Building Payment Amounts cover 80% of total building loss	No other assumptions

Duplicate property addresses that applied for multiple sources of assistance across the various data sets were identified and only the highest estimated property loss was used when aggregating the Estimated Total Loss (Need).

### Analysis Comparing FEMA Verified Loss and SBA Verified Damage

Because FEMA’s initial inspections arriving at verified loss historically underestimate total damage and typically only estimate costs to make the home habitable, FEMA’s verified loss amounts were adjusted upwards based on a State Determined Multiplier. The State Determined Multiplier was calculated based on comparing the FEMA Verified Loss for owners and renters to the SBA Verified Damage amount using the most recent FEMA and SBA data for both Hurricane Matthew and Hurricane Florence. The FEMA and SBA data sets were matched based on the FEMA Registration ID, and only includes owners and renters with loss amounts calculated by both FEMA and SBA.

The State’s analysis shows that for owners the SBA Verified Damage Amount in total is 5.6 times higher than FEMA’s Verified Loss, and for renters the SBA Verified Damage Amount in total is 7.6 times higher than FEMA’s Verified Loss:

Owners versus Renters	Total Applicants Analyzed	FEMA Verified Loss (FVL)	SBA Verified Damage Amount	Percent Difference	State Determined Multiplier Applied to FEMA Verified Loss (FVL)
Owners	10,403	\$64,189,984	\$427,199,692	566%	5.6
Renters	1,034	\$2,664,706	\$23,012,782	764%	7.6

## Appendix D: September 2017 Housing Unmet Need Assessment

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 5: 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

## Appendix E: October 2017 Infrastructure Unmet Need Assessment

FEMA, through its PA program, assists communities rebuild following a disaster. Table 25 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 6: 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 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=BAInfraResGuideMay2015.pdf>.

**Table 7: Infrastructure Unmet Need**

<b>Source</b>	<b>Unmet Need</b>
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
<b>Other Federal Agencies</b>	<b>Unmet Need</b>
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
<b>TOTAL</b>	<b>\$543,597,450</b>

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.

## Appendix F: SAPA 10 Analysis of Estimated Unmet Need Across CDBG Funding Sources to Inform State Allocation Changes

The following sections reflect NCORR’s ongoing analysis of unmet needs across CDBG disaster recovery and mitigation programs and the corresponding reallocations implemented in SAPA 10. Given that the total CDBG funding allocations from HUD have not changed, NCORR will continue to make the necessary allocation changes for its CDBG-DR and CDBG-MIT grants to respond to the remaining unmet needs highlighted in this reanalysis and support the lingering demand for housing recovery programs. Such changes will be reflected in future amendments of this Action Plan.

### Section F1: Background

The Department of Housing and Urban Development (HUD) and the State have recognized the exacerbating impact of Hurricane Matthew and Florence due to the occurrence of the storms in quick succession. The State can use funds allocated in response to Hurricane Matthew interchangeably and without limitation for the same activities in the most impacted and distressed areas related to Hurricane Florence, and vice versa<sup>2</sup>. For this reason, the State conducted an analysis of combined estimated unmet need for Hurricane Matthew and Florence to inform allocation changes in the following Substantial Action Plan Amendments:

- Hurricane Matthew CDBG-DR Action Plan Substantial Amendment 10
- Hurricane Florence CDBG-DR Action Plan Substantial Amendment 4
- CDBG-MIT Action Plan Substantial Amendment 4

Under the substantial amendments noted above, there were allocation changes within each CDBG funding source, and reallocations across CDBG funding sources.

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<sup>2</sup> “Public Law 116-20: Additional Supplemental Appropriations for Disaster Relief Act, 2019.” (Sec. 1101(a); Date: 06/06/2019). <https://www.congress.gov/bill/116th-congress/house-bill/2157/text>.

## Section F2: Executive Summary

This analysis highlights that the \$52.8 million allocation increase to the CDBG-DR housing recovery programs are rooted in the fact that the estimated owner-occupied and rental housing unmet need is so great when compared to the unmet need across all other categories. Additionally, this allocation increase is tied to the fact that this category also has the highest estimated funding gap when accounting for the revised allocations. The increased demand for Homeowner Recovery Program and increased construction costs further supports the State's decision to maximize funding for the CDBG-DR housing recovery programs.

Given that the total CDBG funding allocations from HUD have not changed, the State made a series of allocation changes for the CDBG-DR and CDBG-MIT grants to support an increase to the CDBG-DR housing recovery program allocations.

For CDBG-DR funds, this included a reallocation of \$47.7 million in funding for public housing and infrastructure to the CDBG-MIT grant, which also aligns the longer-term resilience and mitigation activities for these programs with the objectives of the CDBG-MIT funds. A decrease of \$5.1 million across the Code Enforcement Support Program and planning allocations accounted for the remaining funds needed to allocate the additional \$52.8 million in funding to the housing recovery programs.

For CDBG-MIT funds, the Strategic Buyout Program allocation was subsequently decreased by \$59.4 million, largely to offset the increase of funding to the CDBG-MIT grant with the reallocation of the \$47.7 million in public housing and infrastructure funds. This decrease also allowed for an increase of \$5.1 million in the planning allocation and an increase of \$6.6 million in the public housing allocation. These allocation increases will support the additional planning capacity anticipated for the larger scale public housing and infrastructure projects, and the anticipated increase in construction costs needed to support public housing restoration.

The State recognizes the significant estimated unmet need across all categories of recovery, however, has rooted the recent allocation changes in addressing the most significant estimated unmet need – owner-occupied and rental housing. Given the limited HUD funding available to address the total estimated unmet need, the State will continue to assess current allocations and use the limited funding to reduce the estimated funding gap across all categories of recovery and mitigation.

### Section F3: Supporting Data for Analysis

Table F1 below provides a summary of allocation changes including revised total allocations for Hurricane Matthew (CDBG-DR), Hurricane Florence (CDBG-DR) and Mitigation (CDBG-MIT) activities combined.

**Table F1 – Allocation Change Summary: Revised Total Allocations by CDBG Funding Source, Category & Program**

CDBG Funding Source	Category	Program(s)	Revised Total Allocation	Allocation Change Summary
CDBG-DR	Owner-Occupied & Rental Housing	Homeowner Recovery Program	\$581,085,307	<b>Increased</b> by \$52 million
		Affordable Housing Development Fund	\$121,719,805	<b>Increased</b> by \$785,000
		Multi-Family Rental Housing Program	\$19,516,018	
		Homeownership Assistance Program	\$3,000,000	No allocation change
		Housing Counseling Fund	\$1,500,000	No allocation change
		Code Enforcement Support Program	\$3,000,000	<b>Decreased</b> by \$2.4 million
	Economic (Small Business)	Small Business Recovery Assistance	\$4,500,000	No allocation change
	Administration & Planning	N/A	\$44,851,870	<b>Decreased</b> by \$2.7 million
<b>Total CDBG-DR Allocation</b>			<b>\$779,173,000</b>	--
CDBG-MIT	Owner-Occupied & Rental Housing	Strategic Buyout Program	\$123,103,334	<b>Decreased</b> by \$59.4 million
	Public Housing	Public Housing Restoration Fund	\$36,246,916	<b>Increased</b> by \$6.6 million; includes <b>Re-allocation</b> of \$29.7 million from CDBG-DR
	Infrastructure	Infrastructure Recovery Program	\$18,000,000	<b>Reallocation</b> from CDBG-DR
	Administration & Planning	N/A	\$25,335,750	<b>Increased</b> by \$5.1 million
<b>Total CDBG-MIT Allocation</b>			<b>\$202,686,000</b>	--
<b>Total CDBG-DR &amp; CDBG-MIT Allocations</b>			<b>\$981,859,000</b>	--

This appendix provides additional context and a consolidated justification for the allocation changes rooted in the combined analysis of estimated unmet needs. Table F2 below summarizes the combined unmet need estimates for Hurricane Matthew, Hurricane Florence and Mitigation activities, along with revised program funding allocations as the basis for contextualizing and justifying the

allocation changes. Table F2 also includes an estimated funding gap, calculated as the estimated unmet need less the revised program funding allocated.

**Table F2 - Hurricane Matthew, Hurricane Florence & Mitigation Activities: CDBG Unmet Need and Allocation Summary**

Category	CDBG Funding Source(s)	Estimated Unmet Need	% of Total Unmet Need*	Revised Program Funding Allocated	% of Total Allocation*	Estimated Funding Gap (Estimated Unmet Need less Revised Program Funding Allocated)	% of Total Estimated Funding Gap*
Owner-Occupied & Rental Housing	DR & MIT	\$1,510,608,417	63%	\$852,924,464	87%	\$657,683,953	44%
Economic (Small Business)	DR	\$584,411,718	24%	\$4,500,000	<1%	\$579,911,718	39%
Public Housing	MIT	\$127,434,056	5%	\$36,246,916	4%	\$91,187,140	6%
Infrastructure	MIT	\$181,657,339	8%	\$18,000,000	2%	\$163,657,339	11%
Administration & Planning	DR & MIT	--	--	\$70,187,620	7%	--	--
<b>Total CDBG Activities</b>		<b>\$2,404,111,530</b>	<b>100%</b>	<b>\$981,859,000</b>	<b>100%</b>	<b>\$1,492,440,150</b>	<b>100%</b>
<i>Subtotal for CDBG-DR Activities</i>		<i>\$2,095,020,135</i>	<i>87%</i>	<i>\$779,173,000</i>	<i>79%</i>	<i>\$1,483,802,339</i>	<i>85%</i>
<i>Subtotal for CDBG-MIT Activities</i>		<i>\$309,091,395</i>	<i>13%</i>	<i>\$202,686,000</i>	<i>21%</i>	<i>\$254,844,479</i>	<i>15%</i>

\*Percentages may not add to 100% due to rounding

For reference, see Section F9 for a high-level summarization of the estimated unmet need reanalysis as outlined in the substantially amended CDBG-DR Action plans for Hurricane Matthew and Florence.

Following is a discussion of the data summarized in Table F2 by category.

### Section F4: Owner-Occupied & Rental Housing

The owner-occupied and rental housing category has the highest estimated unmet need at \$1.5 billion and represents 63 percent of the total estimated unmet need across all qualified disasters. The estimated unmet need for this category is nearly three times greater than the economic (small business) estimated unmet need, the next highest category in terms of estimated unmet need. The owner-occupied and rental housing category has the highest allocation with nearly \$853 million in funding, representing 87 percent of the total CDBG allocations. This category also has the highest estimated funding gap at roughly \$658 million, representing 44 percent of the total estimated funding gap across all categories.

The reanalysis of owner-occupied and rental housing unmet need conducted by the State (see Section F9) highlights an increased serious housing unmet need, specifically for Hurricane Florence, when compared to previous estimates. Additionally, the CDBG-DR Action Plans note an increased demand for the Homeowner Recovery Program and increased construction costs which further necessitate a need for additional funding. For these reasons, coupled with the significant estimated unmet need and estimated funding gap, the State has chosen to maximize funding in this category to further support the housing recovery efforts.

The increased allocations for the housing recovery programs were largely achieved through a reallocation of previous CDBG-DR funding to CDBG-MIT funding for Infrastructure (\$18 million) and the Public Housing Restoration Fund (\$29.7 million). To offset the reallocation of these funds to the CDBG-MIT grant, the State decreased the CDBG-MIT Strategic Buyout allocation in this category. These reallocations coupled with a decrease of \$2.4 million in the Code Enforcement Support Program allocation allowed the State to allocate an additional \$52.8 million to the housing programs.

It is also important to note that more funding has been allocated to the Homeowner Recovery Program as the estimated owner-occupied housing loss (need) represents over 90% of the estimated total loss (need) in this category. To further maximize funding allocated for the Homeowner Recovery Program, no additional allocations were made to the Homeownership Assistance Program or Housing Counseling Fund.

### **Section F5: Economic (Small Business)**

The economic (small business) category represents 24 percent of the total estimated unmet need, with over \$584 million in estimated unmet need. While there is a significant estimated unmet need for this category, as noted above the estimated unmet need for owner-occupied and rental housing is nearly three times greater. Additionally, the estimated funding gap for the economic (small business) category is roughly \$580 million, however is five percent lower than the estimated funding gap for the owner-occupied and rental housing category. For these reasons, the State has chosen to maximize funding for housing recovery and has not made any additional allocations to the existing \$4.5 million allocation for the economic (small business) category.

### **Section F6: Public Housing**

The public housing category represents five percent of the total estimated unmet need, with over \$127 million in estimated unmet need. The public housing category has \$36.2 million in funding allocated, representing four percent of the total CDBG allocations. This category has the lowest estimated funding gap at \$91 million, representing six percent of the total estimated funding gap across all categories.

As noted in the owner-occupied and rental housing discussion, the State has reallocated \$29.7 million of funding for the Public Housing Restoration Fund from CDBG-DR to CDBG-MIT. This reallocation not only allows the State to further strengthen the ongoing recovery efforts related to housing with CDBG-DR funds, but also creates a realignment of longer-term resilience and mitigation activities, such as those in the Public Housing Restoration program, with the objectives of the CDBG-MIT funds. The public housing allocation under CDBG-MIT was further increased by \$6.6 million in anticipation of increased construction costs which further necessitate a need for additional funding.

### **Section F7: Infrastructure**

The infrastructure category represents eight percent of the total estimated unmet need, with over \$181 million in estimated unmet need. The infrastructure category has \$18 million in funding allocated, representing eight percent of the total CDBG allocations. This category has the second lowest estimated funding gap at \$164 million, representing 11 percent of the total estimated funding gap across all categories.

The reanalysis of infrastructure unmet need conducted by the State (see Section F9) highlights a decrease in infrastructure unmet need for both Hurricane Matthew and Florence when compared to previous estimates. The reanalysis also highlights that a significant amount of Federal and State funds has been obligated or allocated to address the ongoing infrastructure unmet needs for both hurricanes. For these reasons, the State has chosen to maximize funding for housing recovery and has not made any additional allocations to the infrastructure category.

As noted in the owner-occupied and rental housing discussion, the State has reallocated \$18 million of funding for the Infrastructure Recovery Program from CDBG-DR to CDBG-MIT. This reallocation not only allows the State to further strengthen the ongoing recovery efforts related to housing with CDBG-DR funds, but also creates a realignment of longer-term resilience and mitigation activities, such as those in the Infrastructure Recovery program, with the objectives of the CDBG-MIT funds.

### **Section F8: Administration & Planning**

The administration and planning category has \$70.2 million in funding allocated, representing seven percent of the total CDBG allocations. This category allocates funds for administrative costs associated with implementing the various CDBG recovery/mitigation programs and planning related activities, such as Action Plan development, public outreach, and coordination on future planning with local and regional coordinating entities.

CDBG-DR funding allocated for planning has decreased by \$2.7 million, and CDBG-MIT funding allocated for planning has increased by \$5.1 million; the net change across CDBG allocations for planning is a \$2.4 million increase. These planning allocation changes are tied to the reallocation of the public housing and infrastructure funds from CDBG-DR to CDBG-MIT referenced above and efforts to enhance resilience planning efforts in impacted counties. Larger scale public housing and infrastructure projects may require significant planning efforts necessitating a need for additional planning funds under the CDBG-MIT grant. Moreover, ongoing support for resilience planning efforts will continue to help impacted communities mitigate and prepare for future disasters. Administration allocations have not changed across the CDBG funding sources.

### **Section F9: Summary of Unmet Need Reanalysis for Hurricane Matthew and Florence**

The State conducted a reanalysis of unmet need specifically related to owner-occupied housing, rental housing and infrastructure, based on most recent disaster recovery data sets. The methodology used to complete the reanalysis aligns closely to HUD's own standard approaches to analyzing unmet need, with a slight modification to the previous methodology. The revised methodology for the reanalysis accounts for additional and more finalized disaster recovery data sets that were not available when previous unmet need estimates were calculated.

As it relates to owner-occupied and rental housing for Hurricane Florence, the reanalysis estimates the serious housing unmet need for owner-occupied and rental housing is roughly \$1.1 billion. The reanalysis highlights a roughly 26 percent increase in serious housing unmet need when compared to previous estimates. For Hurricane Matthew, the reanalysis estimates the housing unmet need for owner-occupied and rental housing is roughly \$428 million. The reanalysis highlights a slight 1.33 percent decrease in housing unmet need when compared to previous estimates.

As it relates to infrastructure for Hurricane Florence, the reanalysis estimates the infrastructure unmet need is roughly \$111 million. The reanalysis highlights a roughly 20 percent decrease in infrastructure unmet need when compared to previous estimates. For Hurricane Matthew, the reanalysis estimates the infrastructure unmet need is roughly \$70 million. The reanalysis highlights an 87 percent decrease in infrastructure unmet need when compared to previous estimates. The reanalysis also highlights that a significant amount of Federal and State funds has been obligated or allocated to address the ongoing infrastructure unmet needs for both hurricanes.

These revised estimates for unmet need were combined with existing unmet need estimates related to public housing and economic (small business) to determine the total estimated unmet need. For the full reanalysis details, see *Hurricane Matthew CDBG-DR Action Plan Substantial Amendment 10* and *Hurricane Florence CDBG-DR Action Plan Substantial Amendment 4*.