

South Carolina Office of Resilience



ACTION PLAN

for

Hurricane Helene

Amendments 4 - 6

U.S. Department of Housing and Urban Development
(HUD) Community Development Block Grant – Disaster
Recovery (CDBG-DR) Funding

Action Plan
Effective Date:
1 AUGUST 2025

Amendment(s)
Posted for
Comment:

24 August 2026

Amendment(s)
Approved:

TBD

AMENDMENT LOG

Amendment # / Date	Amendment Type	Page	Summary of Changes Made
Amendment 1 09/08/25	Substantial	72	Housing Program Number Three: Voluntary Buyouts; Eligibility. Change “The home must be located within the 100-year flood plain, as identified by the Tier II environmental review” to “The home must be located within the 100-year flood plain, as identified by the Tier II environmental review, or within a Disaster Risk Reduction Area as defined by SCOR in its policies and procedures manual.”
Amendment 2 09/08/25	Substantial	73	Mitigation Program Number One: Infrastructure; Program Description. Change “Infrastructure projects mitigate future flood damage associated with riverine and surface flooding. Counties with a population of greater than 200,000 will be required to contribute a 10% cost share for awarded Hurricane Helene CDBG Mitigation Infrastructure projects” to “Infrastructure projects mitigate future flood damage associated with riverine and surface flooding. Based on applicant capacity, there may be a local cost share requirement of up to 25% for awarded Hurricane Helene CDBG Mitigation Infrastructure projects.”
Amendment 3 09/08/25	Non-Substantial	74	Mitigation Program Number Two: Voluntary Buyouts; Program Description. Remove “and benefit-cost analysis” from Program Description.
Amendment 4 08/21/26	Non-Substantial	70, 73	Housing Program Numbers One and Three: Remove 81% to 120% column from Priority Matrix
Amendment 5 08/21/26	Substantial	73	Housing Program Number Three: Eligible Geographic Areas: add Grantee-identified MID areas to match Eligibility (first bullet)
Amendment 6 08/21/26	Substantial	74	Housing Program Number Three: Maximum Amount of Assistance Per Beneficiary: change from \$350,000 to \$400,000 to accommodate market

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EXECUTIVE SUMMARY

OVERVIEW

The U.S. Department of Housing and Urban Development (HUD) announced that the State of South Carolina will receive \$150,354,000 in funding to support long-term recovery efforts following Hurricane Helene (FEMA DR-4829-SC) through the South Carolina Office of Resilience (SCOR). Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be used to address the remaining unmet need in South Carolina.

HUD has allocated \$150,354,000 in CDBG-DR funds to the State of South Carolina in response to Hurricane Helene (FEMA DR-4829-SC) through the Allocation Announcement Notice published in the Federal Register at 90 FR 4759 dated January 16, 2025. This allocation was made available through the Disaster Relief Supplemental Appropriations Act of 2025 (Public Law 118-158). To meet disaster recovery needs, the Appropriations Act making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and facilitate a quicker recovery.

DISASTER-SPECIFIC OVERVIEW

Following record oceanic heat in the Gulf of America, Hurricane Helene formed on September 25, 2024, and rapidly intensified from a tropical storm to a Category 4 hurricane with 140 miles per hour (mph) winds by landfall at Perry, Florida on September 26—the strongest on record for the Big Bend region of Florida. Given the storm’s large diameter and unusually fast forward motion at 31 mph, Helene’s center remained at hurricane strength as far inland as Macon, Georgia, spreading hurricane-force wind gusts well into South Carolina on September 27.

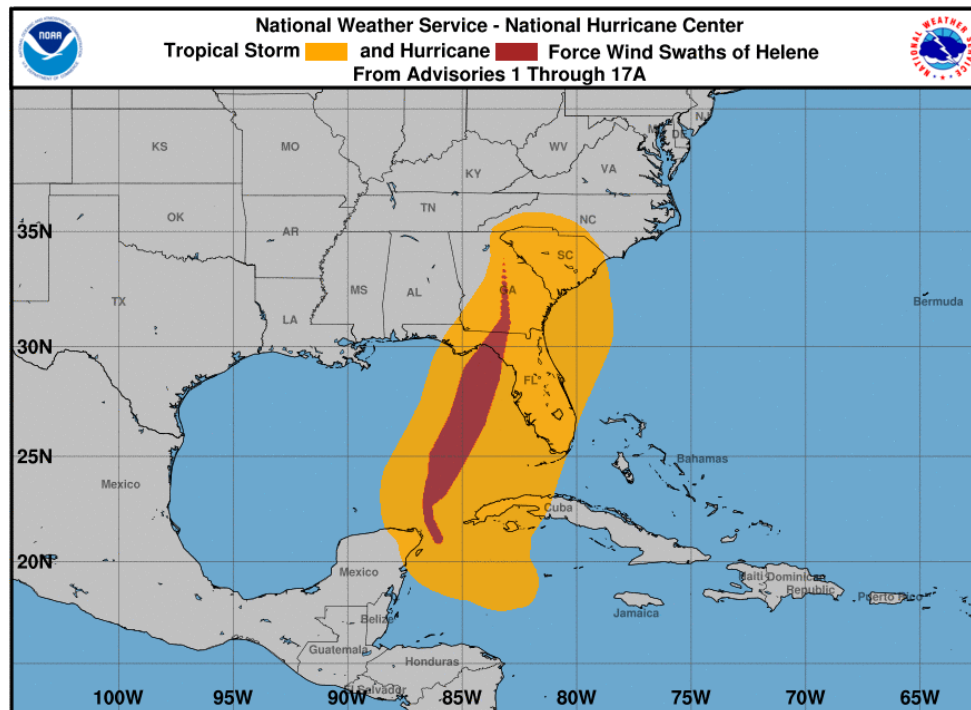


Figure 1: National Weather Service Summary of Hurricane Helene Advisories

In the days prior to Helene’s approach, parts of northern South Carolina received more than 10-15 inches of rain,¹ particularly in the Blue Ridge and upland Piedmont regions of the state, in what is characterized as a “predecessor rain event”—a meteorological term for unusually heavy, sustained rainfall sometimes associated with landfalling hurricanes.

The rainfall preceding Hurricane Helene’s arrival, including as much as 10 inches near Orangeburg County,² set the conditions for extreme flooding and extensive tree damage as the storm’s persistent wind field moved into the Appalachian Mountains. Anemometers recorded 77-mph wind gusts in the Piedmont at Laurens (Laurens County), SC, 75-mph in the coastal plains at Beaufort (Beaufort County; notably, many weather stations failed during peak storm conditions), SC, 73-mph at Sassafras Mountain (Pickens County, highest elevation in the state), SC, 72-mph at Anderson (Anderson County), SC, and 68-mph at the Greenville-Spartanburg International Airport (Greenville County).³

¹ https://www.nhc.noaa.gov/data/tcr/AL092024_Helene.pdf

² <https://abcnews4.com/newsletter-daily/wind-floods-and-tornadoes-how-helene-ravaged-the-midlands>

³ https://www.nhc.noaa.gov/data/tcr/AL092024_Helene.pdf

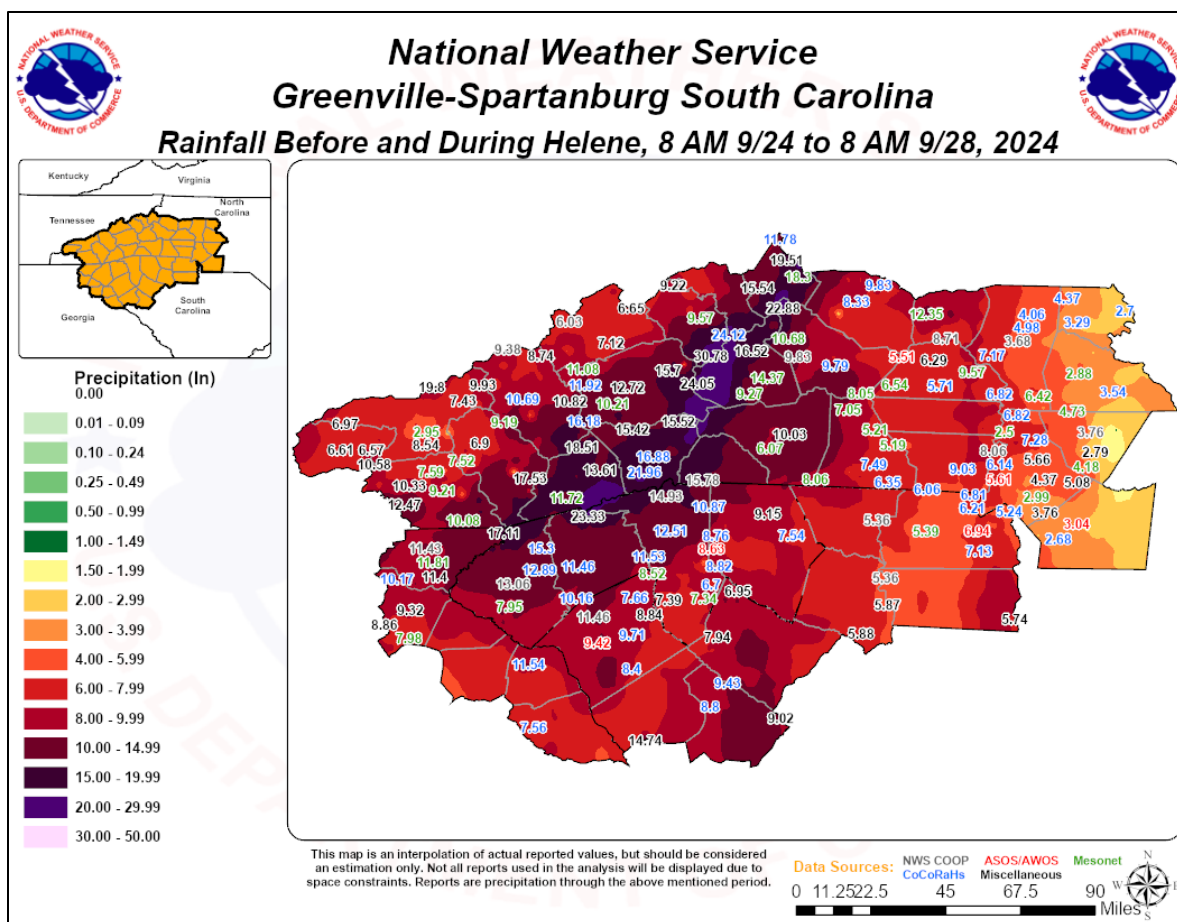


Figure 2: National Weather Service Rainfall Before and During Helene 9/24/24 to 9/28/24

Strong tropical storm-force winds were observed throughout South Carolina, leading to the largest power outage among all states affected by Helene, with nearly 1.4 to 1.6 million customers reporting outages.^{4,5} As the storm moved into the southern Appalachian Mountains, orographic uplift—essentially, the frictional interaction of atmospheric weather with the increasing elevation of the ground and mountains—caused more than 8 to 24 inches of rainfall in parts of upstate South Carolina, leading to historic flooding in some areas.⁶ At least 21.66 inches of rain fell near Sunfish Mountain in Greenville County.⁷

⁴ <https://www.dnr.sc.gov/climate/sco/Publications/Helene-OFR.pdf>

⁵ https://www.nhc.noaa.gov/data/tcr/AL092024_Helene.pdf p. 19

⁶ <https://sc.edu/uofsc/posts/2024/10/conversation-hurricane-helene-deadly-disaster-six-states.php>

⁷ https://www.nhc.noaa.gov/data/tcr/AL092024_Helene.pdf

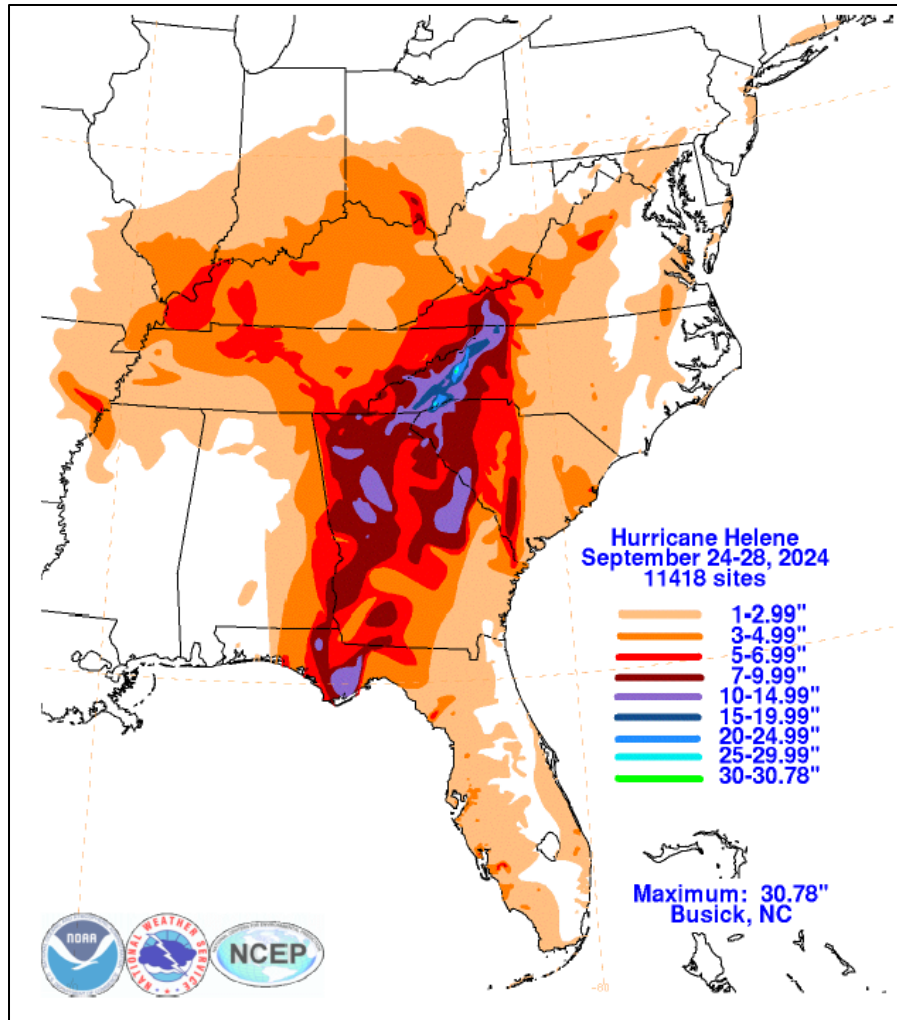


Figure 3: Regional Rainfall Totals from Helene

The widespread heavy rainfall associated with Hurricane Helene caused substantial flooding throughout much of South Carolina. Just west of Greenville, SC, the Saluda River reached a new record crest of 20.26 feet on September 28, 2024, nearly 6 feet above major flood stage.⁸ On September 30, low-lying areas flooded in Columbia, SC, as the Congaree River crested in major flood stage at just under 31 feet—within about one foot of the peak, historic floods in 2015.⁹

⁸ <https://water.noaa.gov/gauges/gsls1>

⁹ <https://water.noaa.gov/gauges/COLS1>



Figure 4: Congaree River Level Data – Helene Response Phase

In addition to closing more than 900 roads and bridges throughout the state,¹⁰ the Saluda, Reedy, and Broad Rivers reached record crests, with the Broad River at Alston setting an all-time record of 29.48 feet on September 30.¹¹ The Broad River also set a record near Blacksburg, SC, cresting at 26.23 feet, more than 2 feet above the record set in 2020.¹² The combination of saturated soils and strong winds resulted in extensive tree damage throughout South Carolina, with timber losses expected to exceed \$200 million.¹³ Further, losses to urban trees and related canopy and debris removal is estimated to be more than \$60 million.¹⁴ Numerous homes throughout Greenville County were damaged by falling trees amidst Helene’s gusty winds.¹⁵

¹⁰ <https://www.scdot.org/inside/SCDOTPress/2024/SCDOT-FHWA-Helene-Road-Update.html>

¹¹ <https://www.thestate.com/news/local/environment/article295992319.html>

¹² https://www.weather.gov/gsp/20240926-20240927_flood_eventSum

¹³ <https://www.navigatehousing.com/housing-recovery-begins-in-areas-hit-hard-by-hurricane-helene/>

¹⁴ <https://columbiabusinessreport.com/how-did-hurricane-helene-affect-south-carolinas-economy-picture-still-emerging/>

¹⁵ https://www.nhc.noaa.gov/data/tcr/AL092024_Helene.pdf

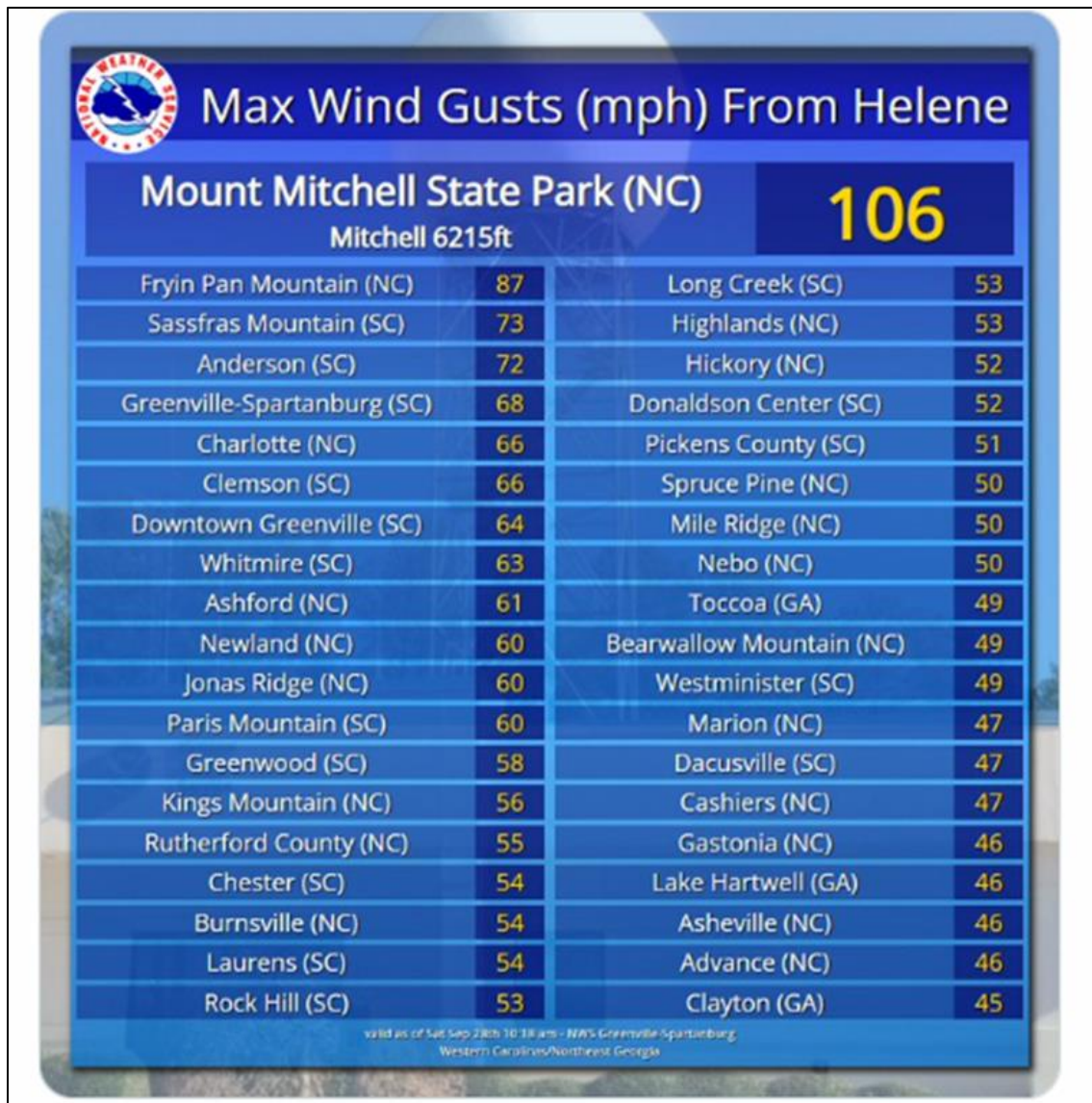


Figure 5: Maximum Recorded Wind Gusts from Helene

Hurricane Helene also led to a widespread outbreak of tornadoes across South Carolina. At least 21 tornadoes were confirmed and classified as either EF-0 (15) with winds up 85 mph or EF-1 (5) with peak wind gusts up to 110 mph.¹⁶ The National Hurricane Center notes that at least two tornadoes in South Carolina were particularly unusual: one, an EF-1 tornado, had a forward speed of almost 57 mph and was approximately 800 yards wide; the second notable tornado, however, another EF-1 funnel, now stands as the widest tornado of record at 1,100 yards wide, in the entire database of US tropical cyclone tornadoes, dating to 1995.¹⁷ Another tornado recorded near Sumter, SC was nearly 1,000 yards wide.

As a result of the intense winds across South Carolina during Hurricane, the National Hurricane Center reported that 24 individuals perished in the state; further, the NHC reports that 2 people died as a result of inland flooding in

¹⁶ <https://www.dnr.sc.gov/climate/sco/Publications/Helene-OFR.pdf>

¹⁷ https://www.nhc.noaa.gov/data/tcr/AL092024_Helene.pdf p. 16

South Carolina.¹⁸ Indirect casualties in South Carolina, resulting from heart attacks, car accidents, and other medical issues, are summarized by the National Hurricane Center and include 23 individuals. The cause of one person's death is unknown, for a total of 50 deaths attributed to Hurricane Helene. By comparison, Hurricane Hugo, in 1989, caused 13 deaths directly related to the hurricane, and 22 deaths were indirectly related. Hurricane Helene exceeded Hurricane Hugo in the number of tragic deaths, FEMA-designated Individual Assistance (IA) counties (24 for Hugo and 28 plus the Catawba Indian Nation for Helene), and eligible IA applications (29,980 for Hugo and over 451,000 for Helene).

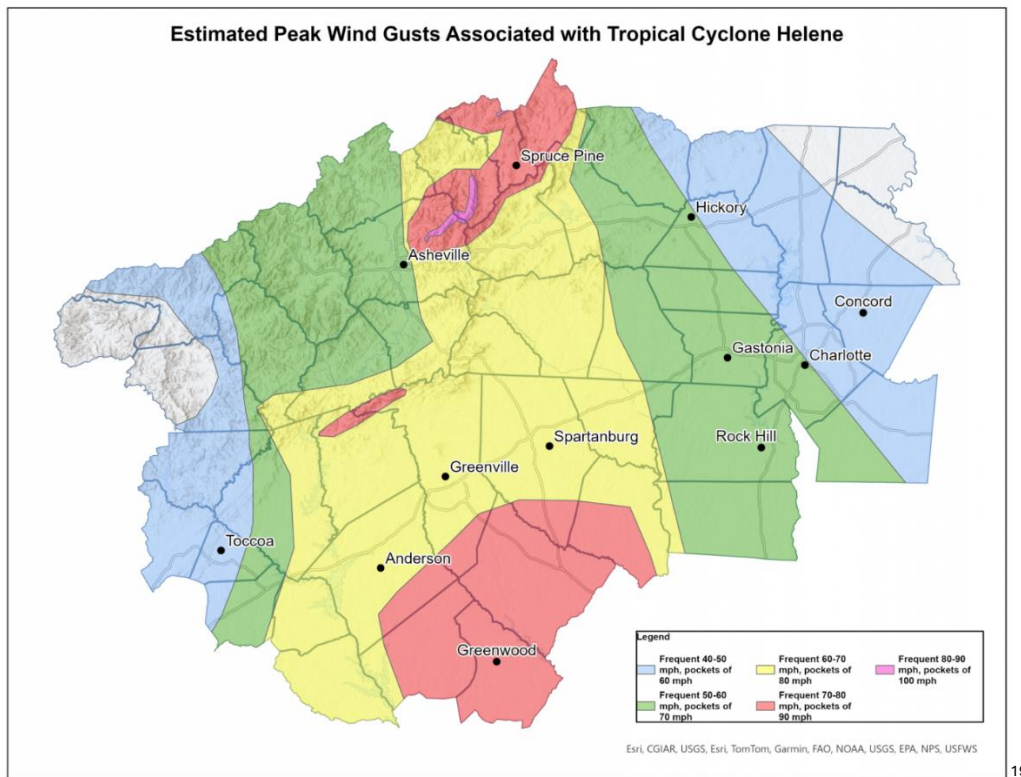


Figure 6: Estimated Peak Wind Gusts from Helene

Hurricane Helene is South Carolina's fourth major disaster in ten years. For the 2015, 2016, and 2018 South Carolina disasters, FEMA received approximately 170,000 valid Individual Assistance registrants. In 2024, that number nearly tripled at over 440,000. For the previous three Presidentially declared disasters, the total CDBG-DR grant funding amounted to \$293,859,000, and for 2024 Hurricane Helene, the CDBG-DR funding is \$150,354,000, or just over half of the three previous disasters.

Table 1: CDBG-DR funding announcements for 2015-2024 disasters affecting South Carolina.

Disaster Year (Name)	Grantee	PL 114-113 81 FR 39687	PL 114-254 82 FR 5591	PL 115-31 82 FR 36812	PL 115-254 PL 116-20 85 FR 4681	PL 118-158 90 FR 4759
	Lexington County, SC	\$16,332,000		\$5,038,000		

¹⁸ https://www.nhc.noaa.gov/data/tcr/AL092024_Helene.pdf p. 17

¹⁹ https://www.weather.gov/images/gsp/20240926-20240927_flood/Wind_Analysis.png

2015 (Joaquin)	Columbia, SC	\$19,989,000		\$6,166,000		
	Richland County, SC	\$23,516,000		\$7,254,000		
	State of South Carolina	\$96,827,000		\$29,871,000		
2016 (Matthew)	State of South Carolina		\$65,305,000	\$29,781,000		
2018 (Florence)	State of South Carolina				\$72,075,000	
2024 (Helene)	State of South Carolina					\$150,354,000

The following impact and unmet needs assessment evaluates the impacts of Hurricane Helene on South Carolina through the lens of the HUD CDBG-DR framework, focusing on impacts across three broad categories: housing, infrastructure, and economic revitalization. The assessment evaluates data pertaining to the 28 counties declared for FEMA Individual Assistance, notated in Table 2: List of Declared IA Counties included in Assessment.

Table 2: List of Declared IA Counties included in Assessment

Abbeville**	Cherokee**	Jasper	Orangeburg**
Aiken*	Chester	Kershaw	Pickens**
Allendale	Edgefield**	Laurens*	Richland
Anderson*	Fairfield	Lexington	Saluda**
Bamberg	Greenville*	McCormick**	Spartanburg*
Barnwell	Greenwood*	Newberry	Union**
Beaufort	Hampton	Oconee**	York

***HUD MID**

**** Grantee MID**

MOST IMPACTED AND DISTRESSED (MID) AREAS

HUD IDENTIFIED MID AREAS

HUD has identified the following areas as Most Impacted and Distressed (MID): Aiken County, Anderson County, Greenville County, Greenwood County (ZIP code 29646), Laurens County (ZIP code 29325), and Spartanburg County. For Greenwood County and Laurens County in which a zip code was determined as most impacted and distressed, South Carolina has elected to expand the MID designation to the entire county for both respective counties. 80% of funds will be spent in support of these six counties as HUD-designated MID counties.

GRANTEE-IDENTIFIED MID AREAS

South Carolina has elected to designate 9 additional counties as grantee-identified MID areas. These nine counties are: Abbeville, Cherokee, Edgefield, McCormick, Oconee, Orangeburg, Pickens, Saluda, and Union. These nine counties will be eligible to benefit from a maximum of 20% of the total allocation.

Abbeville County

Of its 2,668 Manufactured Housing Units (MHUs), 1,383 (52%) were impacted by Hurricane Helene. 36% of the county's households are under 80% Area Median Income. Low to moderate income (LMI) residents of Abbeville County are unlikely to fully recover from the impacts of Hurricane Helene without help from CDBG-DR funds.

Cherokee County

46% of the county's households are under 80% Area Median Income, and 16% (8,896) of FEMA applicants are LMI. With an average FEMA Verified Loss (FVL), for homeowners, of \$17,447, Cherokee County LMI residents will need CDBG-DR funds to begin to recover.

Edgefield County

Edgefield had a portion of a zip code with more than \$1,000,000 in FEMA verified real property loss (RPFVL). The average FVL for homeowners in Edgefield County is \$21,820, landing it in the top ten FVL counties. 1,625 (57%) of Edgefield's 2,873 MHUs were impacted by Hurricane Helene. 30% of FEMA applicants in this county are LMI. Edgefield will need CDBG-DR assistance to recover from Hurricane Helene's impacts.

McCormick County

62% of McCormick County's 1,152 MHUs were impacted by Hurricane Helene. Additionally, 42% of the county's households are under 80% Area Median Income. Without additional resources, McCormick County will have difficulty recovering from Hurricane Helene.

Oconee County

40% of the county's households are under 80% Area Median Income. With an average FVL of almost \$10,000, Oconee County will need additional help recovering from the impacts of this disaster.

Orangeburg County

Orangeburg had a portion of a zip code with more than \$1,000,000 in FEMA verified real property loss (RPFVL) and an average FVL, for homeowners, of \$44,008. 26% of its MHUs were impacted by Hurricane Helene. This county needs additional help to recover from the effects of this disaster.

Pickens County

The average FVL for homeowners in Pickens County is \$18,936, and 41% of its 10,173 MHUs were impacted by Hurricane Helene. 40% of FEMA applicants in this county are LMI. They will likely not be able to fully recover without CDBG-DR assistance.

Saluda County

Two zip codes within Saluda County are classified as having high average real property loss. 39% of Saluda County's 2,892 MHUs were impacted by this disaster, and 44% of its households are under 80% Area Median Income.

Union County

Nearly half (48%) of Union County’s 2,909 MHUs were impacted by Hurricane Helene, while 43% of its households are under 80% Area Median Income. Union County will face a difficult time recovering from the impacts of this disaster without CDBG-DR funding.

OVERVIEW OF THE IMPACTS OF THE QUALIFYING DISASTER

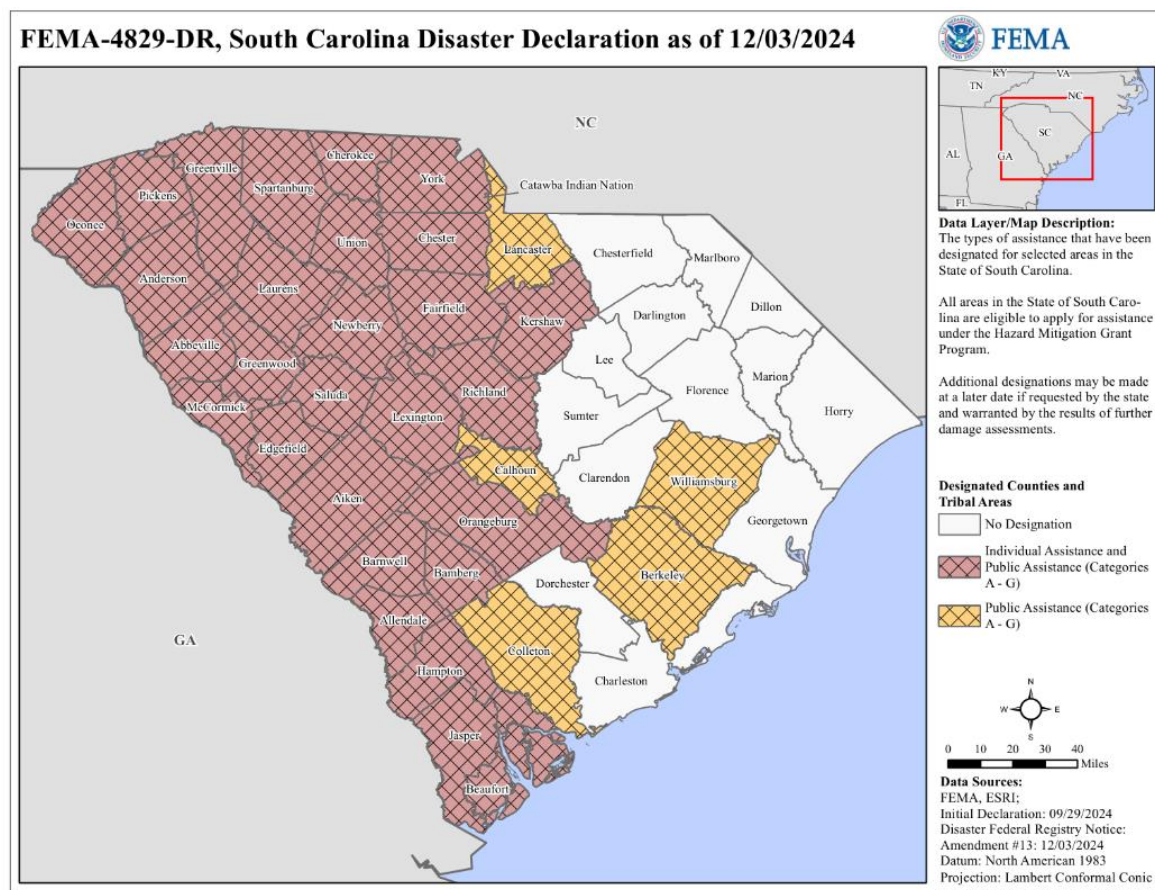


Figure 7: Presidentially Declared Hurricane Helene Counties in South Carolina (Source: <https://www.fema.gov/disaster/4829/designated-areas>)

28 Counties and the Catawba Indian Reservation were declared for FEMA Individual Assistance and Public Assistance. An additional five counties were declared for FEMA Public Assistance only.

Table 3: Disaster Overview

Disaster Summary	
Qualifying Disaster:	Hurricane Helene, DR-4829

HUD-identified MID Areas:	Aiken County; Anderson County; Greenville County; Greenwood County; Laurens County; Spartanburg County
Grantee-identified MID Areas:	Abbeville County; Cherokee County; Edgefield County; McCormick County; Oconee County; Orangeburg County; Pickens County; Saluda County; Union County

The combination of HUD-identified and Grantee-identified MID (Figure 8) more closely focuses the path of Helene (Figure 1). Winds on the eastern side of Hurricane Helene’s path produced devastating effects on South Carolina’s western most counties, including Abbeville, Aiken, Anderson, Cherokee, Edgefield, Greenville, Greenwood, Laurens, McCormick, Oconee, Orangeburg, Pickens, Saluda, Spartanburg, and Union.

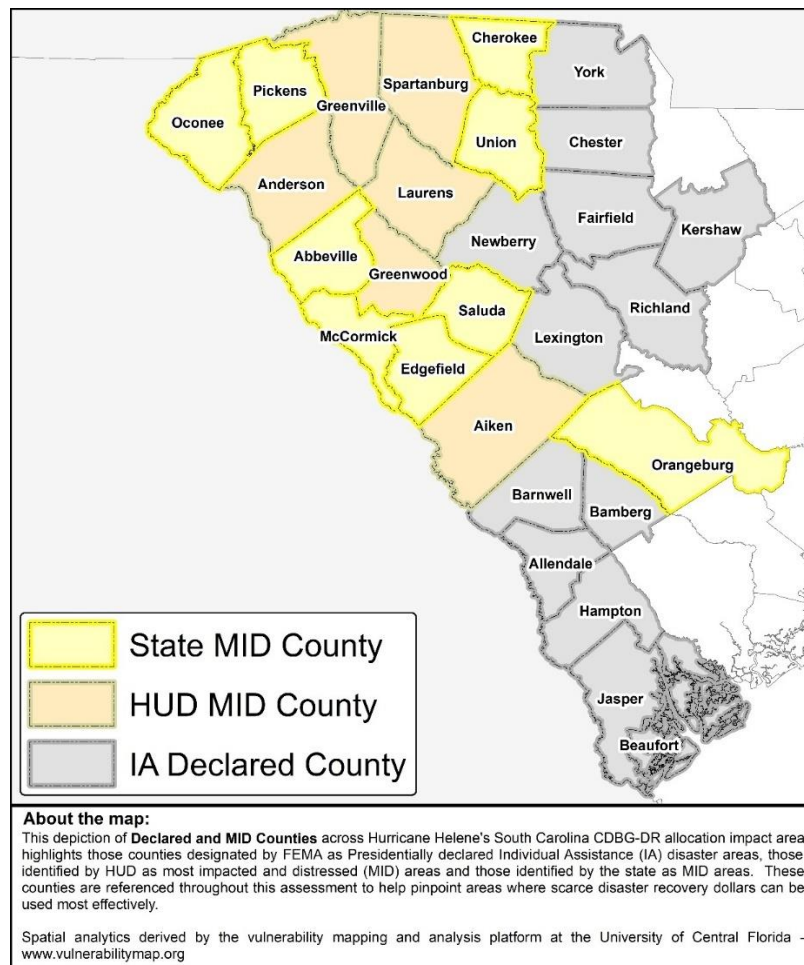


Figure 8: IA Declared and MID Counties

Table 4: Allocation Overview

CDBG-DR Allocation Overview

CDBG-DR Allocation:	\$130,743,000
CDBG-DR Mitigation Set Aside:	\$19,611,000
Total Allocation:	\$150,354,000

FEMA’s OPEN data²⁰ provides a broad summary of disaster survivors, damage, and funding at the zip code level across South Carolina’s Helene Impact Area of Interest (AOI). Aggregating individual applicant information to the zip code level enables a visual depiction of Helene damage from various perspectives, including: total applicants, total Real Property FEMA Verified Loss (RPFVL), average loss, and counts of FEMA applicants with any REFVL. These four distinct perspectives on the same dataset can help identify not only where disaster survivors were impacted but also provide a measure of intensity and magnitude of Helene’s impacts across the AOI.

An initial inspection of total FEMA Individual Assistance applicants can show us where people reached out for Federal assistance following Hurricane Helene. Here, the northwest and west central portions of the state have the highest number of zip codes with more than 1,500 FEMA IA applicants each (Figure 9).

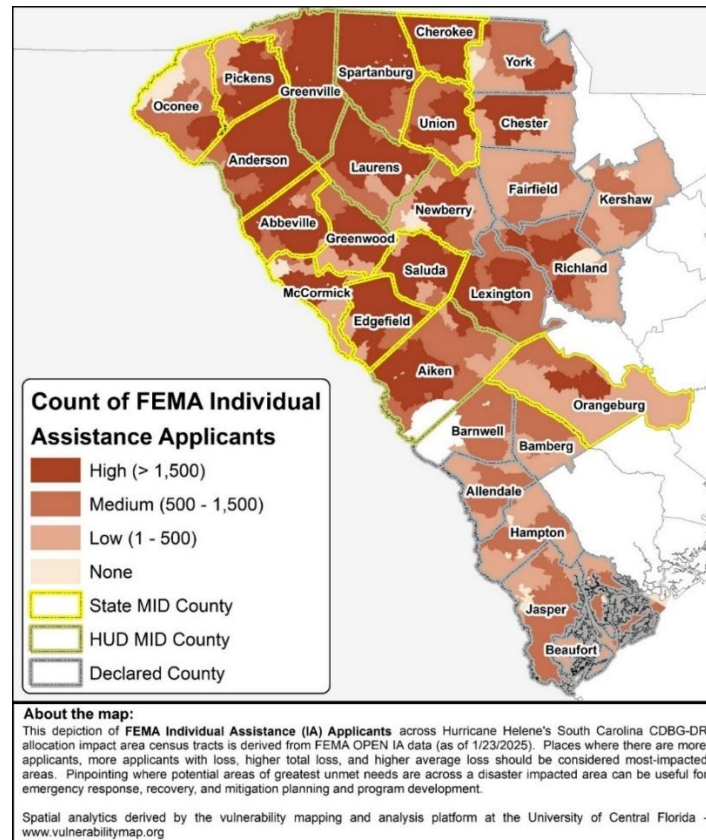


Figure 9: FEMA Individual Assistance Applicants by Zip Code

Total losses clearly depict where the greatest amount of damage occurred across the Helen declared counties but may not provide a complete picture of the impacts in terms of the number of damaged structures and the relative

²⁰ <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

intensity of damage. To pinpoint where higher relative damage occurred and identify those areas with more damaged housing requires an assessment of the RPFVL data in two additional ways, namely: damage assessed through averages and damage assessed through counts of applicants impacted.

Narrowing down the aperture to focus only on applicants with inspected real property loss provides a slightly different perspective on impacts. Here, 51 zip codes across all but eight (8) IA declared counties have (>100) applications with some inspected real property damage.

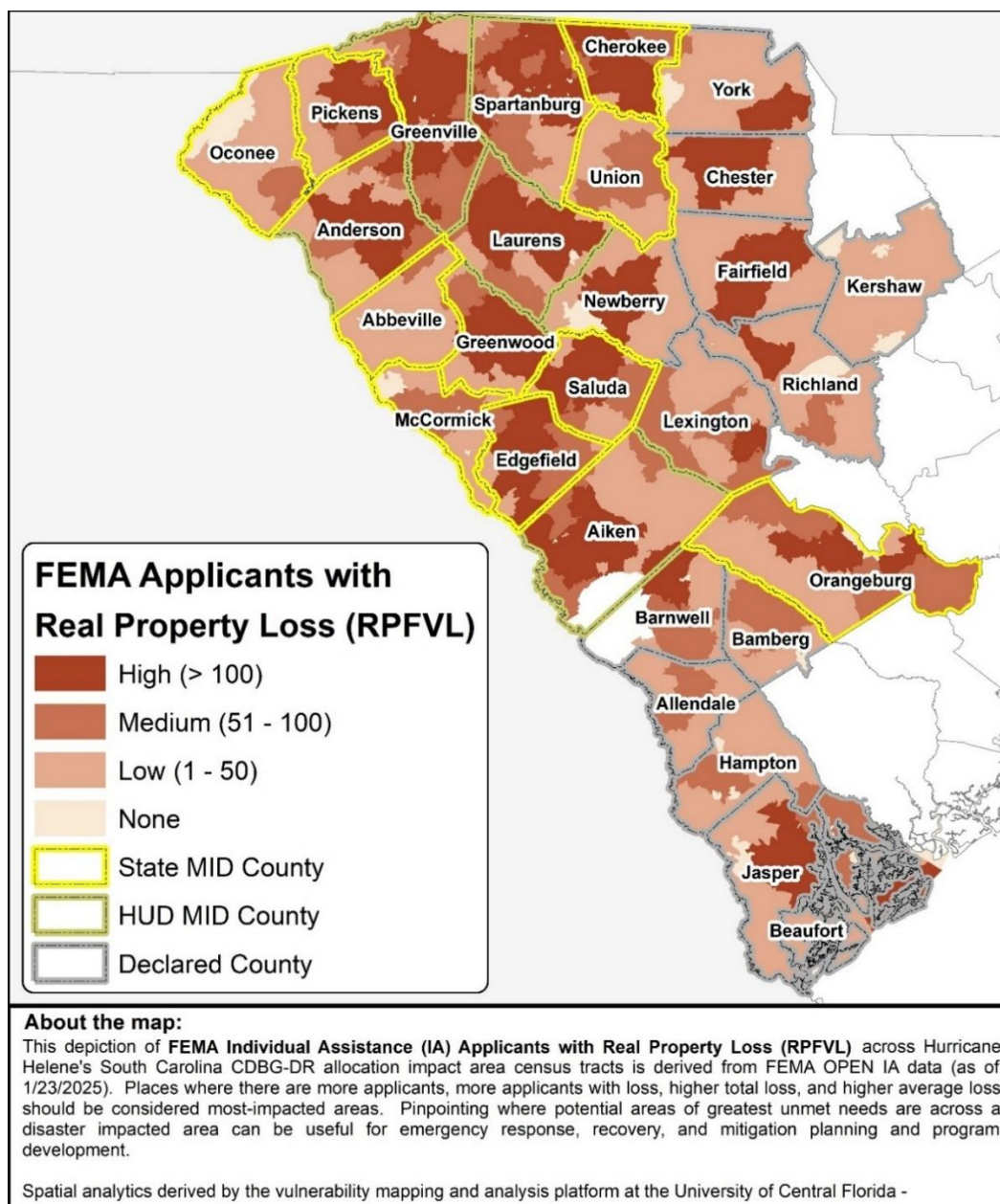


Figure 10: FEMA Individual Assistance Applicants with Real Property Loss by Zip Code

An assessment of total damage indicates that northwest and west central South Carolina absorbed the brunt of Hurricane Helene's impact. Here, 23 zip code in total, some spanning across several HUD declared MID areas,

including Aiken (n=5), Anderson (n=3) Greenville (n=5), Greenwood (n=3), Laurens (n=4), Spartanburg (n=4) had more than \$1,000,000 in total FEMA verified real property loss. Beyond these, both Edgefield and Orangeburg each have at least a portion of a zip code with more than \$1,000,000 in FEMA verified real property loss (RPFVL).

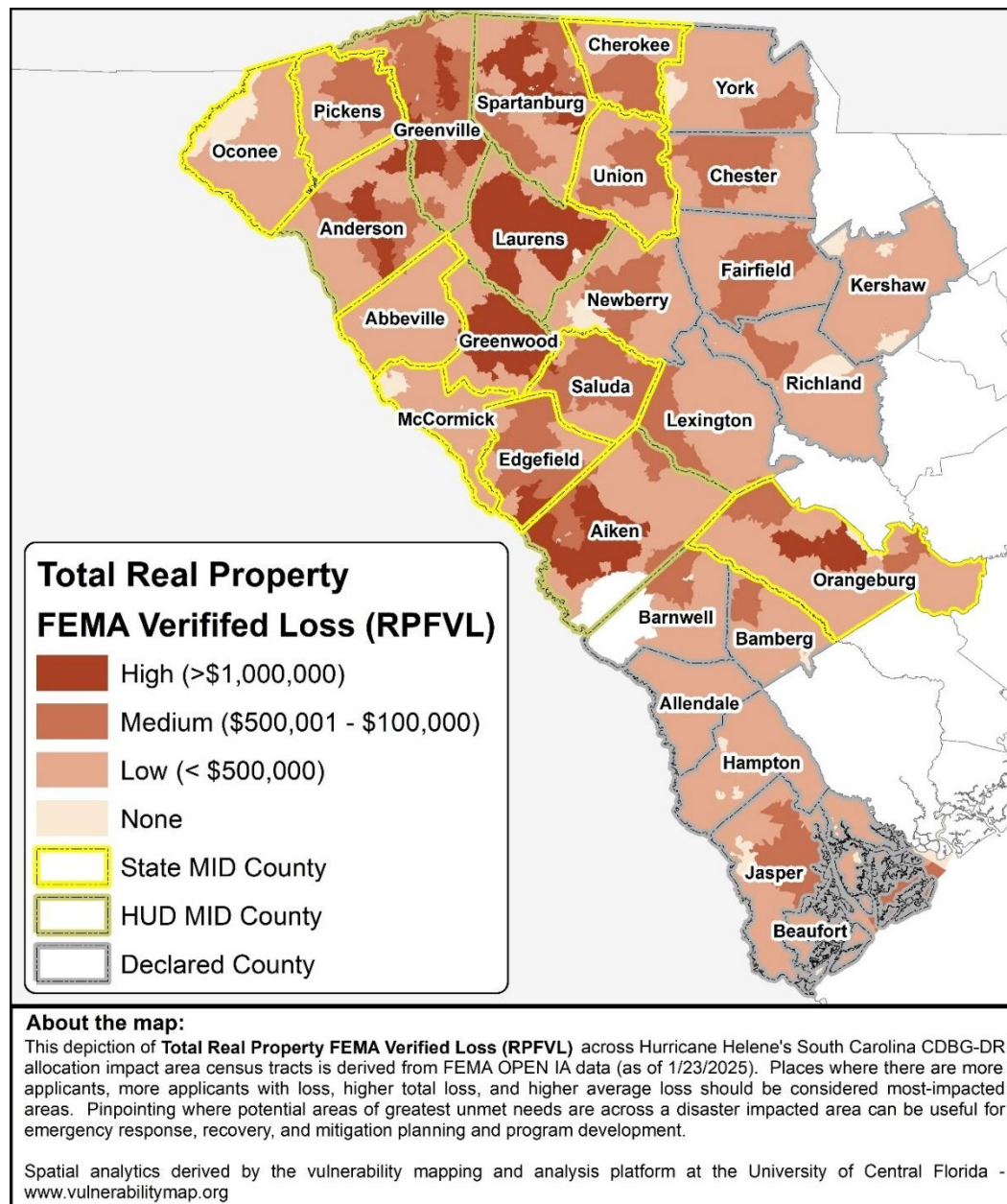


Figure 11: Total Real Property Loss for FEMA Individual Assistance Applicants with Real Property Loss by Zip Code

Here, mapping places by average RPFVL (Figure 11) pinpoints 17 zip codes across 10 counties spanning from the upstate through the midlands (Lexington and Richland). Here, Newberry (n=4), Greenville (n=3), and Anderson, Spartanburg, Laurens, Saluda each with two zip codes are classified as having high average real property loss.

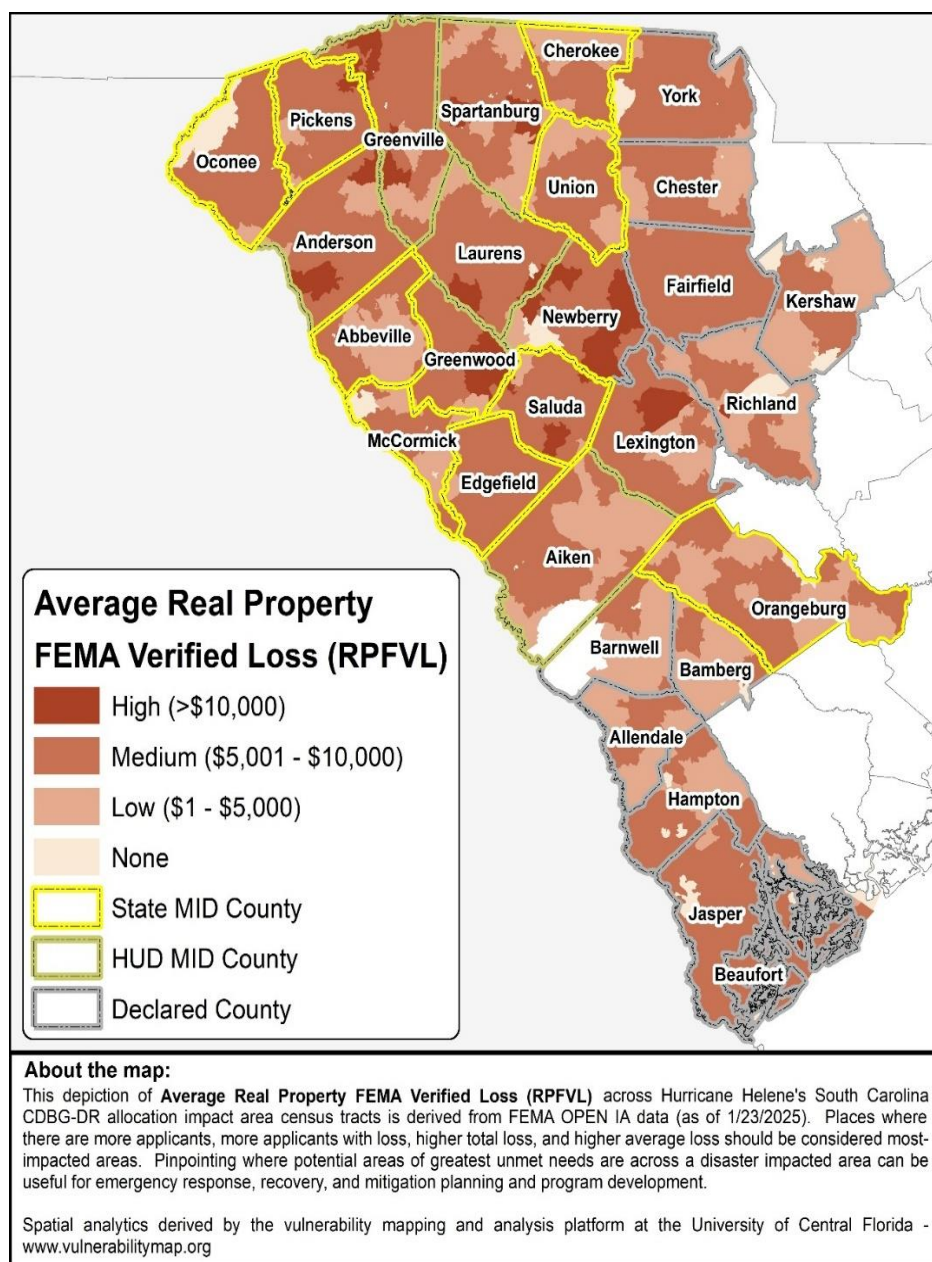


Figure 12: Average Real Property Loss for FEMA Individual Assistance Applicants with Real Property Loss by Zip Code

However, it is important to recognize that FEMA's real property loss estimates as the "total of damage" creates a false ceiling for damage totals that should be the "minimum estimated damage" rather than the total. FEMA's regularly underestimates damage for a variety of reasons, including:

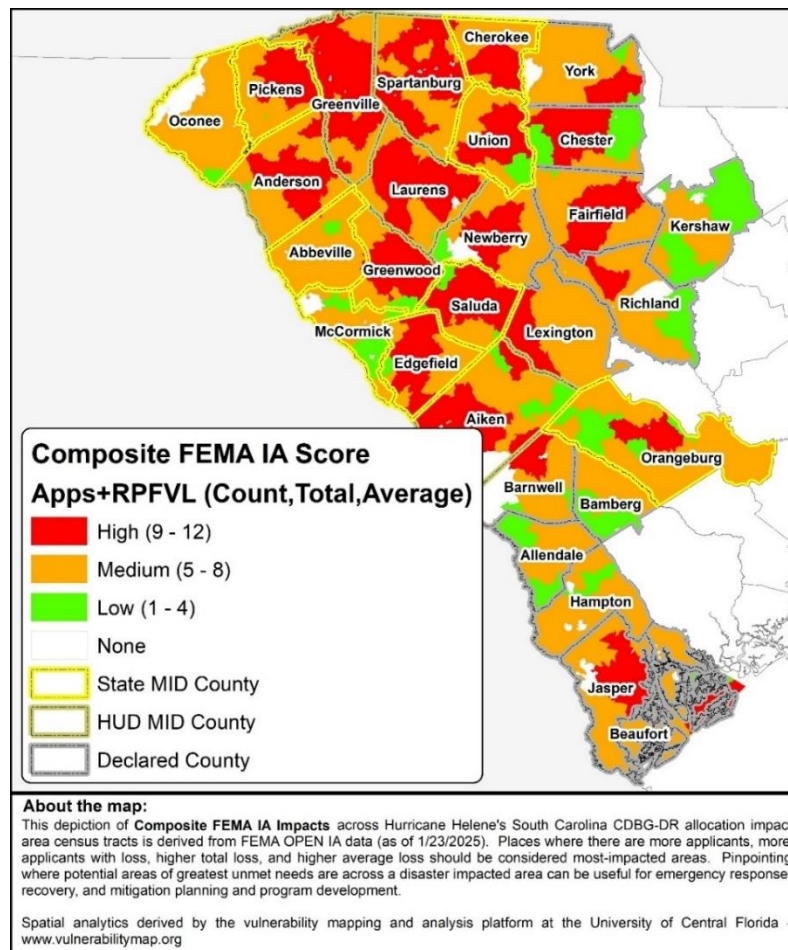
- FEMA only considers essential living spaces in a home²¹ often not accounting for disaster related damages in rooms that are not "regularly occupied";

²¹ An essential living space is a room within a home that serves the function of a bedroom, bathroom, kitchen, and/or living room that is regularly occupied or used by one or more members of the household and requires repair to bring its functionality back to the home (e.g., kitchens are considered essential as long as there is not another undamaged kitchen in the home).

- FEMA’s loss estimates are often lower than Small Business Administration (SBA) estimates for both real property and personal property losses because of the type of assessments undertaken by FEMA and the experience of the “field inspectors”.

As such, FEMA’s estimates of unmet need can result in negative values or zero unmet need when compared against support provided. If, for example, a home’s damage was underestimated by FEMA initially and then estimated properly by an insurance company the difference between what FEMA indicated was damaged and the amount received would be negative. For these reasons, one must recognize that using FEMA’s damage estimates as the total of damage creates a false ceiling for damage totals that should be the “minimum estimated damage” rather than the total.

Accordingly, combining these four perspectives on Helen’s impact provides perhaps the clearest representation of where more people sought help from FEMA, where the inspected damage was located, where that damage was higher (on average), and where there were more damaged housing units. Creating a composite RPFVL score ranging from 0 – 12 clearly indicates the impacts to vast areas of northwest, north central, and central South Carolina. These places (symbolized in red in Figure 13: Composite FEMA Individual Assistance Applicant Score (Applicants + RPFVL Applicants + RPFVL Total + RPFVL Average) contain disaster survivors who had higher damages in greater numbers



than the remainder of the South Carolina AOI.

Figure 13: Composite FEMA Individual Assistance Applicant Score (Applicants + RPFVL Applicants + RPFVL Total + RPFVL Average)

Recognizing that some populations will have a harder time recovering from disaster such as Hurricane Helene than others, it is important to assess the impact data through a different lens that moves beyond simply where the damage was and captures the capacity, or lack thereof, for people and places to recover on their own. Here, The Social Vulnerability Index (SoVI) provides a replicable, science-based and a-political approach to understanding where the populations least able to prepare for, respond to, and rebound from disasters live. Figure 14: Tract level Social Vulnerability Index by category for Hurricane Helene’s South Carolina Area of Interest, provides a visual of social vulnerability (2020) based on Cutter et al. (2003)²² across the AOI.

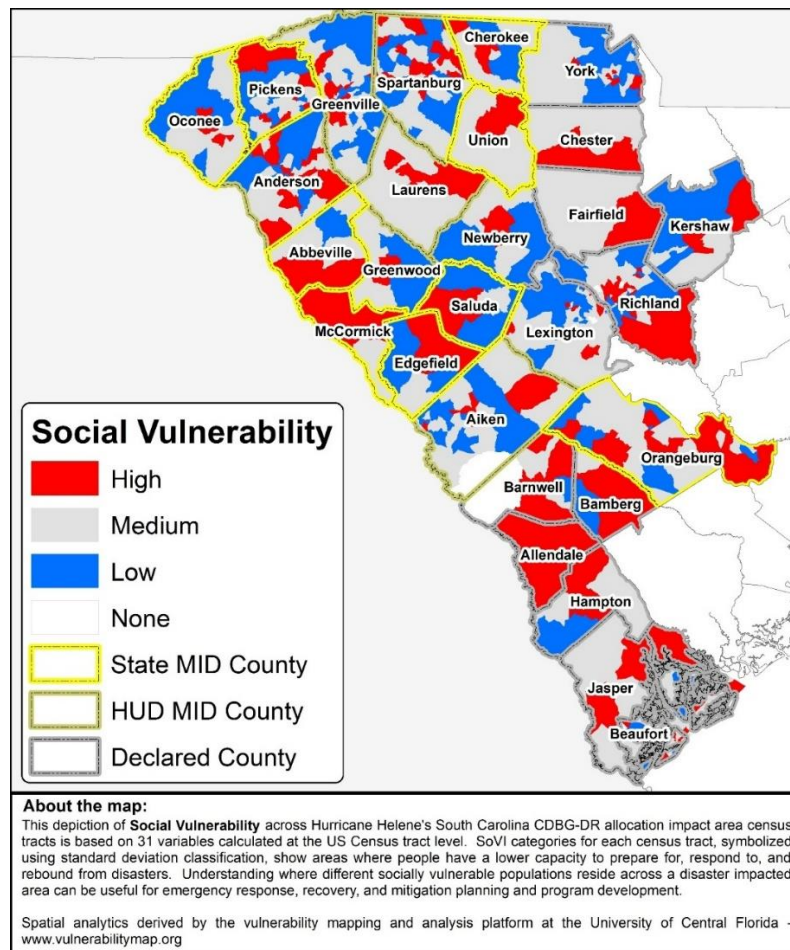


Figure 14: Tract level Social Vulnerability Index by category for Hurricane Helene’s South Carolina Area of Interest

Here, a different pattern begins to emerge where more socially vulnerable census tracts appear both inside urban areas and across large swaths of more rural South Carolina. Because a person/family’s ability to recover is more than simply their income (or LMI level), this perspective on underlying conditions is well suited to support program development that is suited to specific disaster recovery needs of survivors. People living in these areas of high social vulnerability would likely fall into the HUD category of “Most Distressed” because they are so susceptible to shocks such as major disasters and will have difficulty recovering without significant support if they are negatively impacted by an event such as Helene. SCOR’s successful utilization of SoVI for targeting in rural areas has proven to

²² <https://doi.org/10.1111/1540-6237.8402002>

be effective in finding LMI citizens eligible for assistance. This approach has been validated by the results of SCOR's three recent CDBG-DR grants, allowing for timely deployment, completion of construction, and grant closeout.

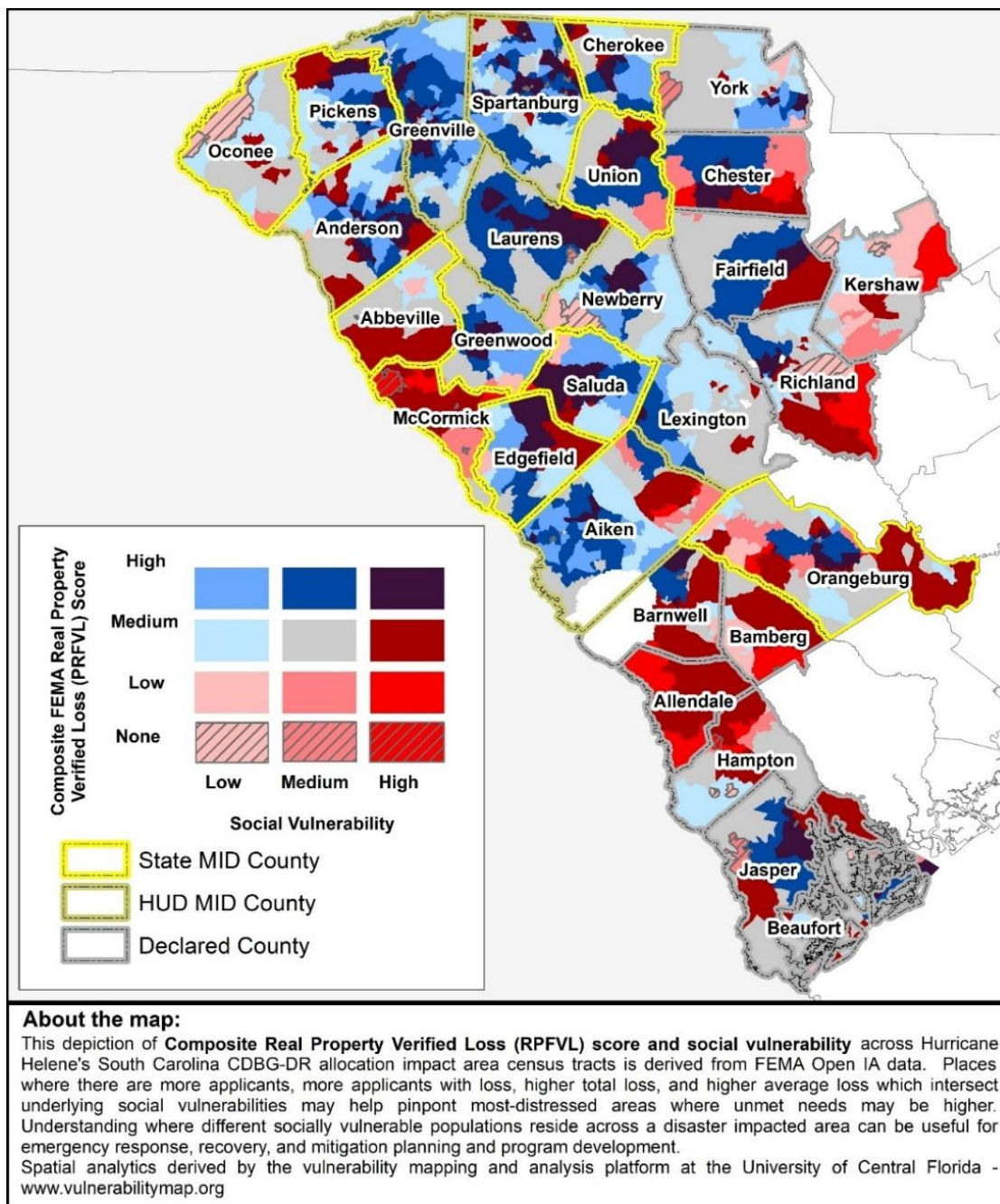


Figure 15: Bivariate map displaying Average Real Property Loss and Social Vulnerability

Combining social vulnerability (Figure 14: Tract level Social Vulnerability Index by category for Hurricane Helene's South Carolina Area of Interest) with the composite RPFVL score (Figure 13: Composite FEMA Individual Assistance Applicant Score (Applicants + RPFVL Applicants + RPFVL Total + RPFVL Average)) creates a bivariate representation of the most-impacted and distressed areas. Here, a focus on dark burgundy (Figure 15) would provide assistance to places with the overall greatest impact and the highest social vulnerability. These places would likely benefit

from rebuilding programs funded through CDBG-DR aimed at supporting full recovery for the most impacted and distressed residents there. Conversely, the medium blue areas show where low social vulnerability intersects with high disaster losses. In areas like these, people likely have the means to help themselves recover but could benefit from matching or incentive programs aimed at making their homes more resilient as they rebuild.

It is also important to contemplate the low-to-moderate income (LMI) population impacted by the disaster. Amongst FEMA Individual Assistance applicants, the pool that were LMI varies across the HUD and Grantee MID areas. 21% of the applicants within the HUD MID were LMI. 16% of the Grantee MID applicants were LMI. These percentages could potentially indicate that the LMI population is underrepresented amongst the FEMA applicants since the total percentage of LMI population is closer to 42% of the total as indicated by Table 5.

Table 5: LMI Population Summary by Area of Interest

Area	Total Population	Total LMI (80% AMI) Persons	Percentage LMI (80% AMI) Persons
State Total	4,956,359	2,075,344	42%
MID Total	2,222,435	923,545	42%
HUD MID Total	811,505	336,990	42%
Grantee MID Total	1,410,930	586,555	42%

Table 6: LMI Populations Impacted by Area of Interest

Area	Total Population (of Disaster Declared Counties)	Total LMI Disaster Applicant Household Composition	Percentage LMI
State Total	3,201,334	447,598	14%
MID Total	1,801,042	350,245	19%
HUD MID Total	1,360,318	280,494	21%
Grantee MID Total	440,724	69,751	16%

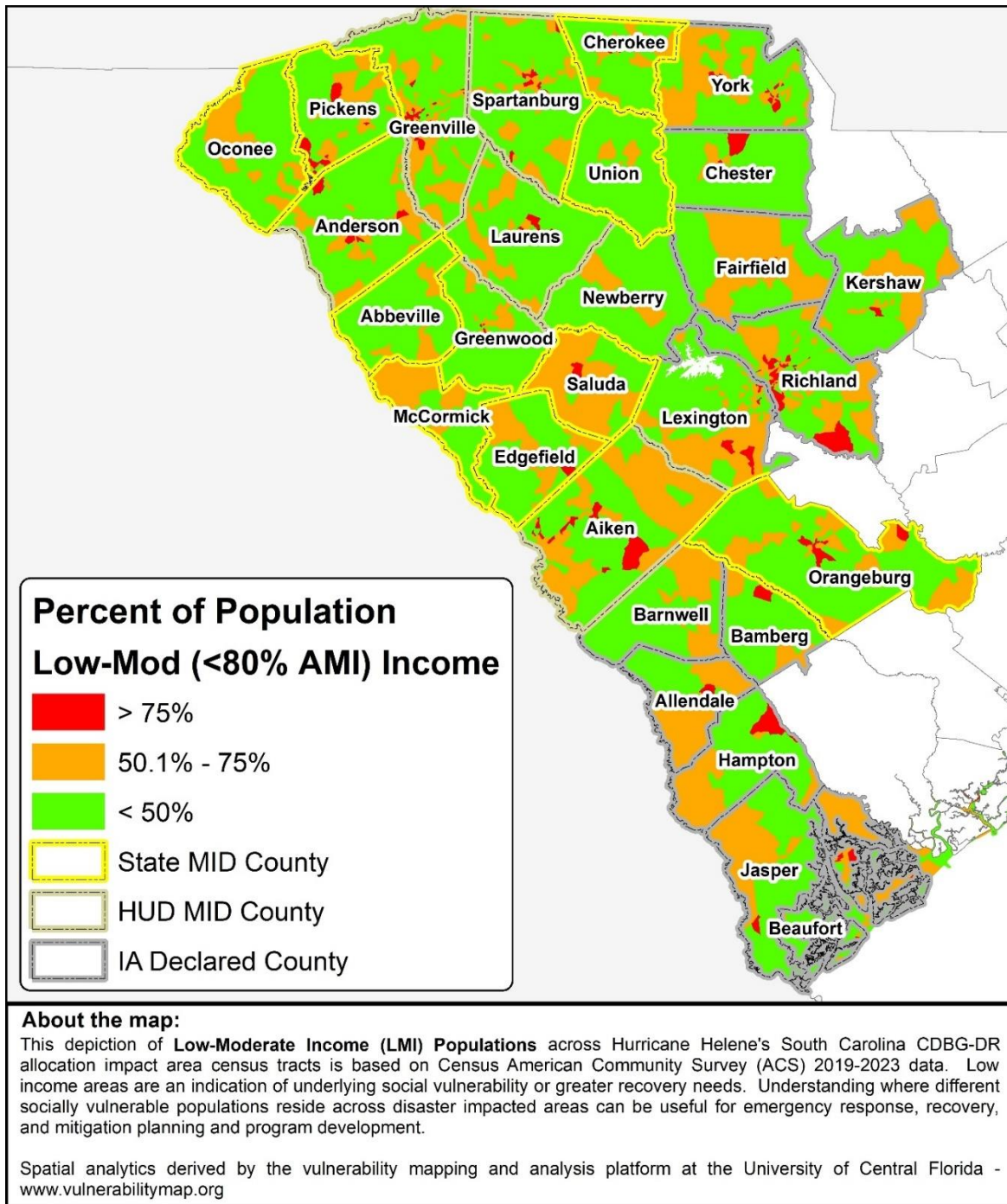


Figure 16: Low-Moderate Income Populations

Incorporating the final layer of low-to-moderate income category provides an effective targeting tool for the implementation of the CDBG-DR programs to achieve the HUD goal of providing a minimum of 70% of the benefit to the LMI community. Figure 17: Bivariate map displaying Average Real Property Loss and LMI Category helps to illuminate where program resources can be targeted to serve the LMI community with the greatest disaster unmet need. By focusing outreach efforts on the burgundy and dark purple areas of the map, the South Carolina Office of Resilience can maximize the benefit to the LMI community.

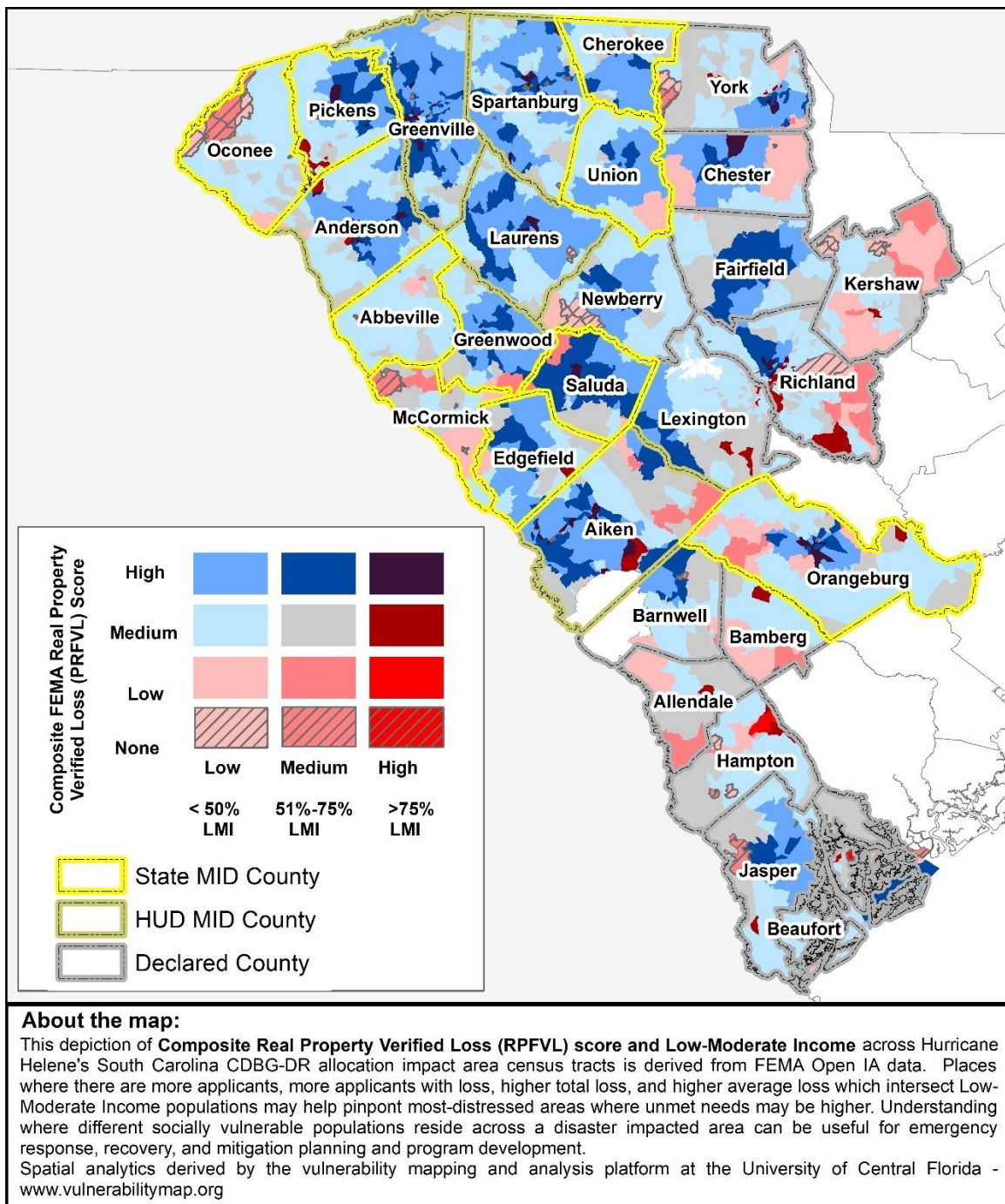


Figure 17: Bivariate map displaying Average Real Property Loss and LMI Category

UNMET NEEDS AND MITIGATION NEEDS SUMMARY

Table 7: Unmet Needs and Proposed Allocations

Eligible Cost Category	Unmet Need	% of Unmet Need	% of Funding to be Expended in HUD and Grantee Identified MID	CDBG-DR Allocation Amount
Administration (5% cap)			100%	\$7,517,700
Planning (15% cap)			N/A	\$0
Rental Housing	\$681,604,258	31%	100%	\$7,500,000
Owner-Occupied Housing	\$1,066,098,968	50%	100%	\$115,725,300
Infrastructure	\$192,811,945	9%	N/A	\$0
Economic Revitalization	\$224,707,732	10%	N/A	\$0
Public Service (15% cap)	\$0	0%	N/A	\$0
Exempt Public Service (no cap)	\$0	0%	N/A	\$0
Total	\$2,165,222,903	100%		

UNMET NEEDS ASSESSMENT

EVALUATING THE IMPACTS OF THE THREE CORE ASPECTS OF RECOVERY

South Carolina evaluated the impacts of Hurricane Helene and the financial support to combat these impacts across the three major sectors as required by the Department of Housing and Urban Development: housing, infrastructure, and the economy. The unmet needs assessment has identified housing unmet needs of \$1,747,703,226 (81%), infrastructure unmet need of \$192,811,945 (9%), and economic unmet need of \$224,707,732 (10%). The total unmet need identified from the impacts of Hurricane Helene is estimated to be \$2,165,222,903 after accounting for a 30% resiliency factor across the three major sectors to account for increased resilience in construction methods.

SUMMARY IMPACT AND UNMET NEED

Table 8: Summary Impact and Unmet Needs by Sector

Summary of Impacts/Support	Housing	Infrastructure	Economy	Total
Amount of Estimated Impact	\$2,888,133,929	\$1,129,469,741	\$606,309,492	\$4,623,913,162
Amount of Funds Available	\$1,140,430,703	\$936,657,796	\$381,601,759	\$2,458,690,258
Unmet Needs (impact-Available Funds) + Resiliency Costs	\$1,747,703,226	\$192,811,945	\$224,707,732	\$2,165,222,903
Percent of Total Unmet Needs	81%	9%	10%	100%

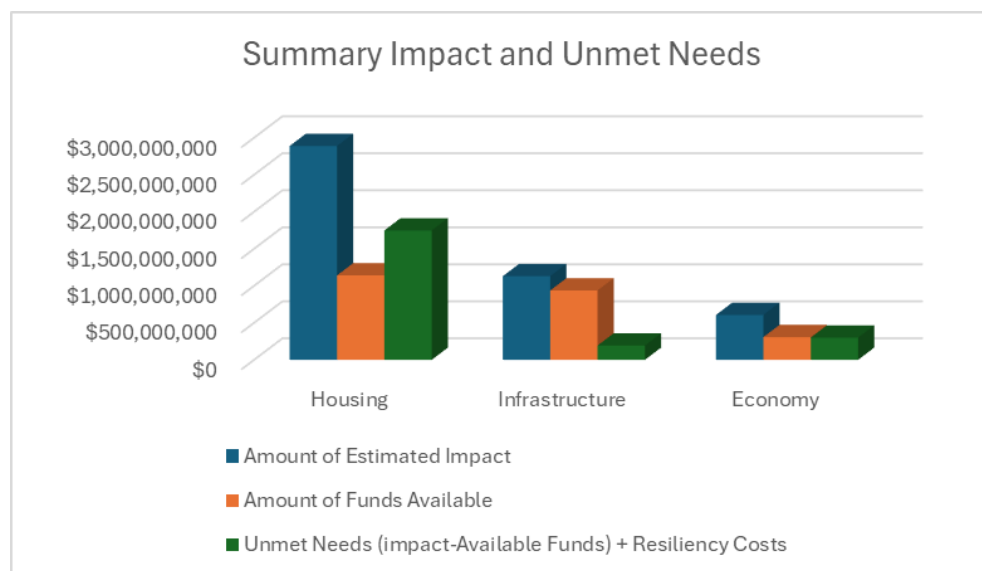


Figure 18: Summary Impact and Unmet Needs by Sector

HOUSING EVALUATION

The following summary provides a breakdown of the housing analysis of the unmet needs assessment. To derive the final unmet needs estimate for housing, the data for 442,683 FEMA registrants was analyzed, representing both owners and renters that applied for FEMA Individual Assistance for all counties that were declared for FEMA Individual Assistance.

Housing unmet need was calculated using the HUD methodology of evaluating FEMA Individual Assistance information broken into five categories. The categories are:

- Minor-Low: Less than \$3,000 of FEMA-inspected real property damage
- Minor-High: \$3,000 to \$7,999 of FEMA-inspected real property damage
- Major-Low: \$8,000 to \$14,999 of FEMA-inspected real property damage and/or 1 to 3.9 feet of flooding on the first floor
- Major-High: \$15,000 to \$28,800 of FEMA-inspected real property damage and/or 4 to 5.9 feet of flooding on the first floor
- Severe: Greater than \$28,800 of FEMA-inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor

Through this lens, the impacts were analyzed to account for an estimated total loss by damage category and home types (mobile homes, single family homes, condos, townhomes, etc.) to arrive at the total housing impact estimate from Hurricane Helene using the HUD multipliers provided in the Federal Register.

To identify the other variable in the equation, all known sources of support were identified to include FEMA payments, SBA loans, property insurance payments, National Flood Insurance Program payments, and other sources of known funding.

Subtracting the sources of housing support from the estimated impacts led to the identified unmet housing need of \$1,747,703,226.

Table 9: Housing Unmet Need Summary

Housing Unmet Needs Summary	
Total Housing Impacts	\$2,888,133,929
Total Housing Support	\$1,140,430,703
Unmet Housing Need (Including Resilience Factors)	\$1,747,703,226

HOUSING UNMET NEED SUPPORTING DATA

Table 10: Summary Housing Impacts and Unmet Needs

Data	Count	Total FEMA or SBA Estimated Property Loss	Average Real Property Loss	Estimated Total Loss (HUD Multiplier)
Minor-Low Damage to FEMA IA Applicants (Mobile Homes)	5,725	\$3,328,503	\$581	\$96,109,392
Minor-Low Damage to FEMA IA Applicants (All Other Home Types)	14,583	7,755,830	\$532	\$425,434,720
Minor-High Damage to FEMA IA Applicants (Mobile Homes)	2,800	13,207,477	\$4,717	\$127,891,867
Minor-High Damage to FEMA IA Applicants (All Other Home Types)	4,530	19,377,084	\$4,278	\$152,884,480
Major-Low Damage to FEMA IA Applicants (Mobile Homes)	844	\$8,143,432	\$9,649	\$65,036,952
Major-Low Damage to FEMA IA Applicants (Houses)	1534	\$15,554,836	\$10,140	\$56,451,200
Major-Low Damage to FEMA IA Applicants (Condos/Apartments/Townhomes)	87	\$154,032	\$1,770	\$3,201,600
Major-Low Damage to FEMA IA Applicants (All Other Home Types)	38	\$133,783	\$3,521	\$1,398,400
Major-High Damage to FEMA IA Applicants (Mobile Homes)	144	\$2,014,137	\$13,987	\$14,178,672
Major-High Damage to FEMA IA Applicants (Houses)	309	\$4,683,350	\$15,156	\$14,199,168
Major-High Damage to FEMA IA Applicants (Condos/Apartments/Townhomes)	35	\$38,607	\$1,103	\$1,608,320
Major-High Damage to FEMA IA Applicants (All Other Types)	12	\$58,211	\$4,851	\$551,424
Severe Damage to FEMA IA Applicants (Mobile Homes)	111	\$6,232,840	\$56,152	\$14,966,574
Severe Damage to FEMA IA Applicants (Houses)	127	\$8,038,401	\$63,294	\$5,835,904
Severe Damage to FEMA IA Applicants (Condos/Apartments/Townhomes)	10	\$2,790	\$279	\$459,520
Severe Damage to FEMA IA Applicants (All Other Types)	58	\$3,775,298	\$65,091	\$2,665,216

Category 1 SBA Derived Damage to Rental Dwellings (Landlords)	0	\$0	0	\$0
Category 2 SBA Derived Damage to Rental Dwellings (Landlords)	2	\$46,331	\$23,166	\$91,351
Category 3 SBA Derived Damage to Rental Dwellings (Landlords)	9	\$364,959	\$40,551	\$693,522
Category 4 SBA Derived Damage to Rental Dwellings (Landlords)	9	\$941,962	\$104,662	\$886,167
Category 5 SBA Derived Damage to Rental Dwellings (Landlords)	4	\$3,488,630	\$872,157	\$539,336
Real Property Insurance Claims	130,627		\$9,377	\$1,224,836,887
Private Flood Insurance Losses	63		\$8,426	\$530,812
Damage to Public Housing	373		\$30,000	\$11,190,000
Total Housing Loss	162,034	\$97,340,493	\$13,711	\$2,221,641,484
Accounting for an additional 30% in funding needed to support rebuilding to higher standards (resilience)				\$2,888,133,929
FEMA payments to repair/replace homes	7,660		\$5,442	\$41,685,409
SBA Loan Support to Rental Properties (Landlords)	9			\$364,174
Real Property Insurance Payments	78,507			\$1,088,650,308
Private Flood Insurance Payments	5		\$106,162	\$530,812
Public housing funds	373			\$9,200,000
Total Support				\$1,140,430,703
Initial Unmet Needs				\$1,081,210,781
Total Unmet Housing Need (Accounting for an additional 30% in funding needed to support rebuilding to higher standards (resilience))				\$1,747,703,226

Across South Carolina's IA declared counties there were nearly 270,000 owner applicants, a majority of which were located in the HUD and Grantee MID areas (Table 1). However, while the HUD MID areas had higher total and average damage indicating that impacted properties were heavily damaged, it was the Grantee MID county areas that had higher numbers of inspected owner-occupied homes with damage. In these places, although the total verified losses did not reach HUD thresholds for MID inclusion, the sheer number of impacted households warrants additional assistance in recovery.

Table 11: FEMA Individual Assistance Summary – Owners

Area	# of Applicants	# of Inspections	# Inspected with Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
State Total	269,410	72,988	3,234	7,659	\$92,309,188	\$28,543
MID Total	228,260	57,133	1,745	5,800	\$71,942,218	\$41,228
HUD MID Total	182,710	44,620	680	4,105	\$54,581,174	\$80,266
Grantee MID Total	45,550	12,513	1,065	1,695	\$17,361,044	\$16,301

Renter impacted households, representing about 39% of all applicants in this disaster, totaled more than 173,000 with a majority located in HUD MID areas (Table). Here however, the average FEMA loss in HUD MID Areas (\$660) was only slightly higher than losses in Grantee MID counties. Statewide, only one-third of those inspected with damage received assistance from FEMA to replaced disaster damaged possessions, leaving more than 7,000 renter survivors with remaining unmet needs.

Table 12: FEMA Individual Assistance Summary – Renters

Area	# of Applicants	# of Inspections	# Inspected with Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
State Total	173,273	36,884	10,357	3,001	\$6,610,594	\$638
MID Total	139,704	28,661	8,215	2,299	\$5,270,910	\$642
HUD MID Total	116,547	23,395	6,547	1,859	\$4,321,213	\$660
Grantee MID Total	23,157	5,266	1,668	440	\$949,697	\$569

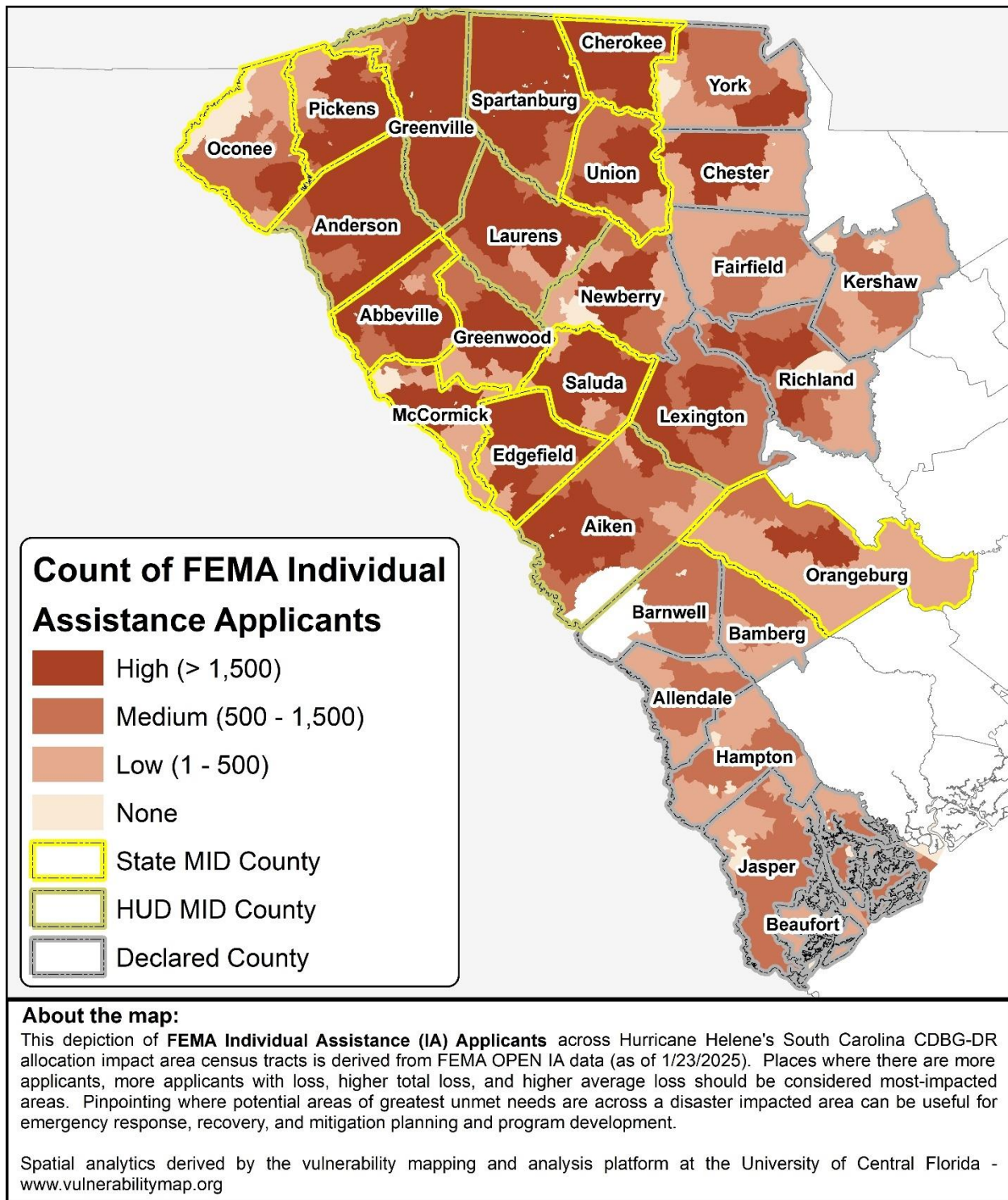


Figure 19: FEMA Individual Assistance Applicants by Zip Code

As a result of FEMA’s low estimated losses in South Carolina, like most disasters, the number of owner-occupied and renter-occupied units decreases as the HUD damage category increases (Table 13 and Table). There were more than 2,600 owner-occupied homes with at least Major-Low damage and another 630 renter units with at least major-low damage across the state - a majority of these located in the HUD MID areas.

Table 13: FEMA Individual Assistance by HUD Damage Category Summary – Owners

County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
State Total	12,342	5,555	2,154	345	180
MID Total	9,968	4,080	1,651	273	151
HUD MID Total	7,250	2,766	1,264	212	123
Grantee MID Total	2,718	1,314	387	61	28

Table 14: FEMA Individual Assistance by HUD Damage Category Summary – Renters

Area	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
State Total	7,966	1,775	349	155	126
MID Total	6,374	1,342	278	118	114
HUD MID Total	5,072	1,054	230	102	99
Grantee MID Total	1,302	288	48	16	15

Taking a closer look at flood specific losses may be useful for understanding the types of impacts the State will need to support with its recovery programs. FEMA data does not indicate if the applicant was inside or outside of the flood zone, however it does indicate if the survivor had water in the home and if the home was damaged. Here, more than 1,000 owners and more than 500 renters had flood damage but did not have flood insurance (Table 15 and Table 16). Again, most of these are located in HUD MID areas, however, more than 225 disaster survivors in Grantee MID areas are among this group of flood victims as well.

Table 15: Summary of FEMA Individual Assistance with flooding but without Flood Insurance

County	Owners	Renters	Total Damage (Real and Personal Property)	Total Repair/Replace Support	Total Personal Property Support	Remaining Unmet Need
State Total	1,032	525	\$9,377,015	\$5,104,025	\$938,328	\$3,334,662
MID Total	853	398	\$7,824,234	\$4,223,828	\$763,827	\$2,836,579
HUD MID Total	675	348	\$6,239,452	\$3,372,532	\$617,584	\$2,249,336
Grantee MID Total	178	50	\$1,584,782	\$851,295	\$146,243	\$587,244

Further investigation into this group pinpointing those disaster survivors who are Low-Moderate income, had flood damage, and did not have flood insurance highlights at nearly 1,000 survivors who will likely have a challenge with recovering from hurricane Helene (Table 16). Here, while a majority (>550) are in HUD MID areas, more than 150 owners and renters are located in Grantee MID areas.

Table 16: Summary of FEMA LMI Individual Assistance with flooding but without Flood Insurance

Area	Owners	Renters	Total Damage (Real and Personal Property)	Total Repair/Replace Support	Total Personal Property Support	Remaining Unmet Need
State Total	556	413	\$5,102,714	\$2,769,062	\$665,378	\$1,668,273
MID Total	427	301	\$3,931,637	\$2,103,783	\$513,484	\$1,314,370
HUD MID Total	306	262	\$2,784,889	\$1,433,285	\$397,094	\$954,510
Grantee MID Total	121	39	\$1,146,748	\$670,499	\$116,390	\$359,859

EMERGENCY SHELTERS, INTERIM, AND PERMANENT HOUSING

Considering homeless individuals in disaster recovery is crucial for communities. Homeless populations are particularly vulnerable during disasters due to their lack of stable housing, which often compounds the impact of such crises. They may not have access to essential resources like food, clean water, and medical care, making it imperative that recovery plans address their unique needs. Including homeless individuals and those continuums of care (COC) who support unhoused population in disaster recovery ensures that Low-to-Moderate Income members of society are not left behind.

Helene impacted all of South Carolina's four (4) CoCs (Figure 20). Across the state, according to the latest available "Point-in-Time" count of homeless individuals, nearly 5,000 people remain unhoused (Table). All of these CoCs have MID counties located in it, making the total number of disaster impacted homeless more than 2,500. (Table).

Table 17: Continuum of Care Summary

CoC Number	CoC Entity	Impacted County	Homeless Count
SC-500	Charleston/Low Country CoC	Beaufort, Hampton, Jasper	404
SC-501	Greenville, Anderson, Spartanburg/Upstate CoC	Abbeville, Anderson, Cherokee, Edgefield, Greenwood, Greenville, Laurens, McCormick, Oconee, Pickens, Saluda, Spartanburg, Union	1,424
SC-502	Columbia/Midlands CoC	Aiken, Allendale, Bamberg, Barnwell, Chester, Fairfield, Lexington, Newberry, Richland, Orangeburg	1,165
SC-503	Sumter City & County CoC	Kershaw	1,060

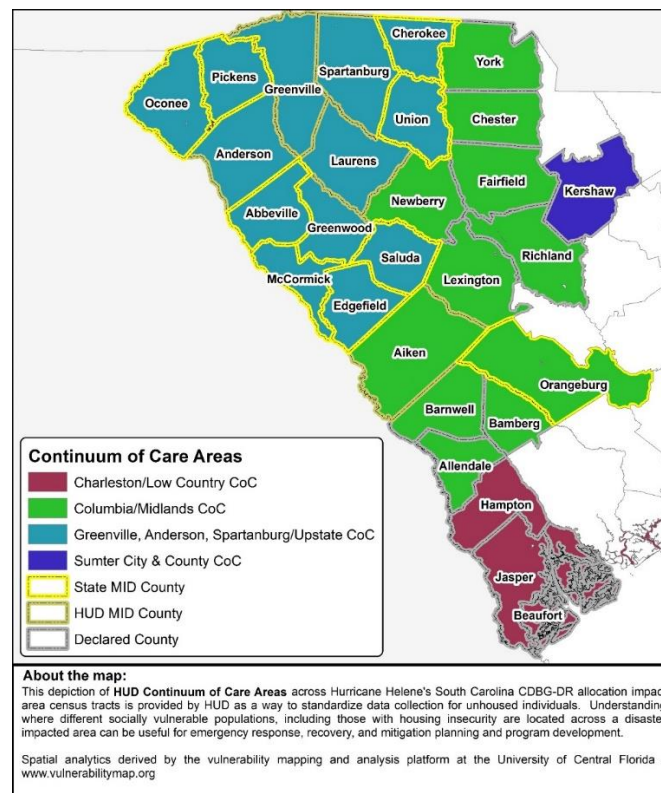


Figure 20: Continuum of Care Areas and Declared Counties

Table 18: Unhoused Population Summary

Unhoused Category	Statewide Count	FEMA Declared Area Count	MID Areas Count
Total Know Homeless (2022)	3,608	3,608	2,250
Emergency Shelter (2023)	2,130	2,130	1,614
Transitional Housing (2023)	584	584	332
Safe Haven Sheltered (2023)	12	12	12
Unsheltered Homeless (2023)	1,327	1,327	585
Total Known Homeless	4,503	4,503	2,589

RENTAL AND OWNER-OCCUPIED SINGLE FAMILY AND MULTIFAMILY HOUSING

Summarized below is the data by county for housing type, owner and rental impacts, and mobile homes throughout the area of interest contemplated within this assessment. The dataset includes the 442,895 FEMA Individual Assistance registrants by housing tenure and type. Summary data across the state, HUD and grantee defined MIDs is available in the housing impact section preceding this section. Aggregate data by county is contemplated for owners versus renters with subsequent analysis by those categories across the five HUD damage categories Table 22 below.

Table 19: FEMA Individual Assistance Applicants by Housing Type

Residence Type	Applicants	% Owner Occupied	% Tenants	% Unknown	% Type
Apartment	55,335	0.04%	99.94%	0.02%	12.49%
Assisted Living Facility	244	0.00%	99.59%	0.41%	0.06%
Boat	104	81.73%	18.27%	0.00%	0.02%
College Dorm	125	0.00%	98.40%	1.60%	0.03%
Condo	2,608	55.52%	44.44%	0.04%	0.59%
Correctional Facility	15	0.00%	100.00%	0.00%	0.00%
House/Duplex	255,449	72.92%	27.04%	0.04%	57.68%
Military Housing	58	0.00%	100.00%	0.00%	0.01%
Mobile Home	73,489	64.27%	35.67%	0.05%	16.59%
Other	41,304	67.82%	32.10%	0.08%	9.33%
Townhouse	11,145	39.60%	60.38%	0.03%	2.52%
Travel Trailer	3,018	63.75%	35.98%	0.27%	0.68%
Unknown	1	100.00%	0.00%	0.00%	0.00%
Total	442,895	60.83%	39.12%	0.05%	100.00%

Table 20: FEMA Individual Assistance by County – Owners

County	# of Applicants	# of Inspections	# Inspected with Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Abbeville	3,865	482	102	50	\$444,880	\$4,362
Aiken	28,361	6,769	103	705	\$8,293,173	\$80,516
Allendale	1,134	402	104	75	\$648,586	\$6,236
Anderson	24,926	5,776	105	478	\$5,945,070	\$56,620
Bamberg	1,228	501	106	121	\$1,091,027	\$10,293
Barnwell	2,122	742	107	111	\$863,906	\$8,074
Beaufort	2,580	1,037	108	207	\$2,227,704	\$20,627
Cherokee	6,183	1,848	109	212	\$1,901,733	\$17,447
Chester	1,451	763	110	110	\$1,242,352	\$11,294
Edgefield	5,571	1,250	111	192	\$2,421,968	\$21,820
Fairfield	1,375	590	112	102	\$1,420,345	\$12,682
Greenville	55,893	14,525	113	1,189	\$17,046,908	\$150,858
Greenwood	11,355	3,511	114	327	\$5,155,378	\$45,223
Hampton	1,876	624	115	108	\$1,003,731	\$8,728
Jasper	1,580	603	116	101	\$1,423,526	\$12,272
Kershaw	1,008	332	117	43	\$349,870	\$2,990
Laurens	10,955	2,997	118	433	\$6,100,576	\$51,700
Lexington	10,208	2,882	119	333	\$3,549,502	\$29,828
McCormick	2,206	498	120	56	\$772,397	\$6,437
Newberry	4,411	1,067	121	162	\$2,017,630	\$16,675
Oconee	4,079	1,212	122	136	\$1,203,099	\$9,861
Orangeburg	4,641	2,834	123	570	\$5,413,026	\$44,008
Pickens	12,380	2,664	124	265	\$2,348,075	\$18,936
Richland	9,363	4,584	125	271	\$2,930,772	\$23,446
Saluda	2,777	680	126	135	\$1,716,106	\$13,620
Spartanburg	51,220	11,042	127	973	\$12,040,069	\$94,804
Union	3,848	1,045	128	79	\$1,139,759	\$8,904
York	2,814	1,728	129	115	\$1,598,020	\$12,388

Table 21: FEMA Individual Assistance by HUD Damage Category by County – Owners

County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
Abbeville	208	23	13	2	0
Aiken	1224	555	249	22	6
Allendale	101	46	19	3	0
Anderson	853	356	128	21	22
Bamberg	117	100	17	2	2
Barnwell	150	86	19	3	0
Beaufort	219	161	51	11	3
Cherokee	374	114	51	4	5
Chester	121	101	24	1	1
Edgefield	316	175	72	13	2
Fairfield	84	85	44	7	2
Greenville	2201	659	368	81	38
Greenwood	561	278	114	14	13
Hampton	108	86	30	2	0
Jasper	106	79	40	10	2
Kershaw	67	23	13	1	1
Laurens	582	328	131	24	19
Lexington	462	276	90	6	4
McCormick	157	52	11	3	3
Newberry	187	112	48	6	4
Oconee	182	80	28	6	3
Orangeburg	613	563	94	9	2
Pickens	466	169	56	11	7
Richland	500	221	73	9	2
Saluda	142	94	46	10	3
Spartanburg	1829	590	274	50	25
Union	260	44	16	3	3
York	152	99	35	11	8

Table 22: FEMA Individual Assistance by County – Renters

County	# of Applicants	# of Inspections	# Inspected with Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Abbeville	1,636	299	94	8	\$34,798	\$370
Aiken	14,153	3,158	983	286	\$598,549	\$609
Allendale	742	150	35	11	\$16,403	\$469
Anderson	14,283	3,006	783	260	\$551,655	\$705
Bamberg	724	159	56	21	\$39,559	\$706
Barnwell	1,255	294	78	19	\$41,155	\$528
Beaufort	1,477	350	104	41	\$71,227	\$685
Cherokee	3,900	887	286	97	\$191,156	\$668
Chester	994	341	112	39	\$65,592	\$586
Edgefield	2,011	429	168	45	\$89,505	\$533
Fairfield	751	227	60	14	\$45,373	\$756
Greenville	44,152	8,326	2,109	546	\$1,373,817	\$651
Greenwood	8,193	1,927	680	225	\$490,775	\$722
Hampton	841	216	65	24	\$39,815	\$613
Jasper	748	212	52	20	\$47,366	\$911
Kershaw	620	129	21	6	\$24,236	\$1,154
Laurens	5,543	1,223	430	110	\$263,556	\$613
Lexington	6,358	1,425	361	110	\$207,332	\$574
McCormick	682	135	56	13	\$27,447	\$490
Newberry	2,565	461	129	47	\$92,624	\$718
Oconee	2,131	535	137	49	\$71,180	\$520
Orangeburg	2,924	1,112	407	98	\$204,994	\$504
Pickens	6,604	1,231	294	92	\$222,358	\$756
Richland	13,327	3,147	801	245	\$480,707	\$600
Saluda	1,061	215	87	18	\$48,058	\$552
Spartanburg	30,223	5,755	1,562	432	\$1,042,861	\$668
Union	2,208	423	139	20	\$60,201	\$433
York	3,167	1,112	268	105	\$168,295	\$628

Table 23: FEMA Individual Assistance by HUD Damage Category by County – Renters

County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
Abbeville	91	3	0	0	0
Aiken	733	201	30	12	8
Allendale	30	4	1	0	0
Anderson	604	125	25	16	13
Bamberg	39	13	2	1	1
Barnwell	65	10	2	1	0
Beaufort	70	26	5	2	2
Cherokee	225	41	9	4	7
Chester	81	26	4	2	0
Edgefield	125	36	3	2	2
Fairfield	46	9	2	3	0
Greenville	1670	295	83	37	26
Greenwood	519	109	26	14	14
Hampton	42	19	1	1	2
Jasper	34	13	2	2	1
Kershaw	15	4	1	0	1
Laurens	338	65	21	5	3
Lexington	277	67	11	5	2
McCormick	44	10	1	1	0
Newberry	92	28	4	4	1
Oconee	91	42	4	0	0
Orangeburg	318	76	11	2	1
Pickens	213	57	14	6	4
Richland	608	153	27	12	1
Saluda	71	11	3	1	1
Spartanburg	1208	259	45	18	35
Union	124	12	3	0	0
York	193	61	9	4	1

Mobile homes can represent a high percentage of the total housing stock across any given area (Figure 21) and have been heavily utilized as an affordable housing option. Unfortunately, mobile homes and their residents have heightened vulnerability during disasters. Often situated in flood-prone or high-risk areas, mobile homes can sustain significant damage, leaving occupants without shelter. Residents may lack the financial resources to rebuild or relocate, making them more dependent on recovery efforts. Prioritizing this group ensures that their specific needs are addressed, such as access to emergency services, temporary housing, and financial assistance. By including mobile home residents in recovery plans, communities can foster support, enhance resilience, and promote a more comprehensive rebuilding process that benefits all.

More than 20% of the state’s mobile homes were impacted by Hurricane Helene (Table 24 and Table 25). This percentage impacted was highest in the HUD MID areas (52%) with Grantee MID areas seeing nearly 40% of their mobile homes damaged.

Table 24: Mobile Homes Impacted Summary

County	Total Number of Mobile Housing Units	Number of Units Impacted	% of Total Impacted Units
State Total	352,784	73,489	21%
MID Total	125,956	57,728	46%
HUD MID Total	75,809	39,595	52%
Grantee MID Total	50,147	18,133	36%

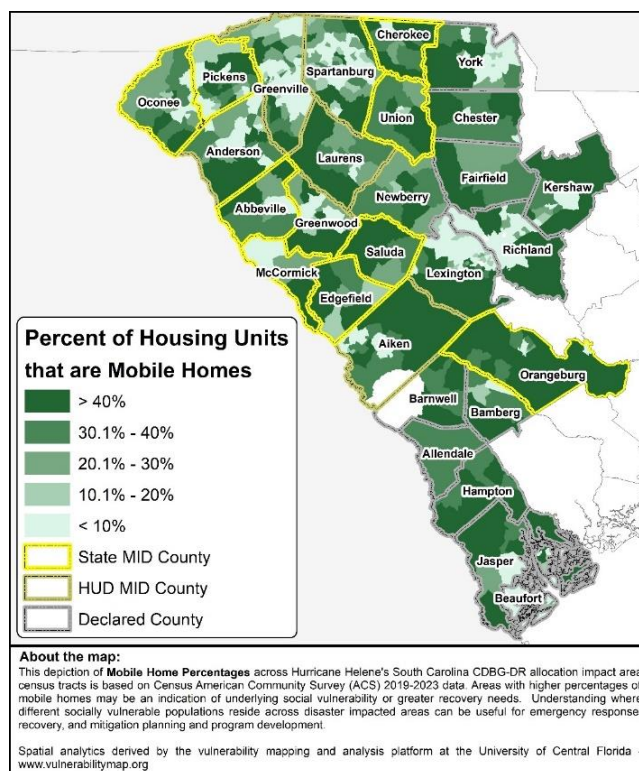


Figure 21: Mobile Homes as a Percentage of Housing Units by Census Tract

Table 25: Mobile Homes Impacted by County

County	Total Number of Mobile Housing Units	Number of Units Impacted	% of Total Impacted Units
Abbeville	2,668	1,383	52%
Aiken	14,395	8,085	56%
Allendale	1,017	519	51%
Anderson	13,530	6,735	50%
Bamberg	1,478	640	43%
Barnwell	3,195	1,286	40%
Beaufort	9,689	1,680	17%
Cherokee	5,984	2,796	47%
Chester	3,307	577	17%
Edgefield	2,873	1,625	57%
Fairfield	2,577	766	30%
Greenville	17,530	8,188	47%
Greenwood	3,678	2,383	65%
Hampton	3,063	1,130	37%
Jasper	3,684	959	26%
Kershaw	6,463	370	6%
Laurens	9,310	4,896	53%
Lexington	21,954	3,890	18%
McCormick	1,152	710	62%
Newberry	4,083	1,809	44%
Oconee	8,633	1,600	19%
Orangeburg	12,863	3,295	26%
Pickens	10,173	4,190	41%
Richland	8,503	1,197	14%
Saluda	2,892	1,136	39%
Spartanburg	17,366	9,308	54%
Union	2,909	1,398	48%
York	10,866	938	9%

Table 26: FEMA Individual Assistance with flooding but without Flood Insurance by County

County	Owners	Renters	Total Damage (Real and Personal Property)	Total Repair/Replace Support	Total Personal Property Support	Remaining Unmet Need
Abbeville	3	0	\$4,047	\$3,748	\$0	\$299
Aiken	33	16	\$197,612	\$87,541	\$9,527	\$100,544
Allendale	1	0	\$929	\$0	\$0	\$929
Anderson	59	14	\$561,991	\$370,933	\$60,277	\$130,782
Bamberg	13	3	\$136,560	\$66,405	\$11,919	\$58,236
Barnwell	3	0	\$40,372	\$17,466	\$0	\$22,906
Beaufort	23	8	\$139,613	\$67,022	\$3,804	\$68,787
Cherokee	30	9	\$304,603	\$196,500	\$16,055	\$92,048
Chester	7	4	\$56,847	\$38,720	\$2,640	\$15,487
Edgefield	12	1	\$125,768	\$108,172	\$9,863	\$7,733
Fairfield	3	5	\$33,807	\$13,019	\$6,599	\$14,189
Greenville	296	184	\$2,514,925	\$1,415,411	\$320,058	\$779,455
Greenwood	50	25	\$508,438	\$181,167	\$51,171	\$276,100
Hampton	3	3	\$14,587	\$12,542	\$367	\$1,678
Jasper	9	5	\$68,796	\$15,077	\$13,276	\$40,444
Kershaw	11	2	\$108,293	\$71,539	\$18,178	\$18,576
Laurens	34	9	\$514,356	\$317,634	\$16,542	\$180,179
Lexington	18	14	\$111,451	\$39,366	\$19,628	\$52,457
McCormick	3	0	\$66,276	\$16,898	\$7,751	\$41,627
Newberry	6	1	\$79,013	\$76,040	\$1,196	\$1,777
Oconee	4	1	\$36,737	\$0	\$1,873	\$34,864
Orangeburg	61	20	\$308,551	\$194,060	\$19,945	\$94,547
Pickens	49	16	\$569,370	\$230,883	\$83,147	\$255,339
Richland	63	68	\$483,542	\$286,892	\$60,227	\$136,423
Saluda	9	1	\$76,523	\$42,204	\$841	\$33,479
Spartanburg	203	100	\$1,942,130	\$999,846	\$160,009	\$782,275
Union	7	2	\$92,907	\$58,831	\$6,769	\$27,307
York	19	14	\$278,971	\$176,108	\$36,667	\$66,196

Table 27: FEMA LMI Individual Assistance with flooding but without Flood Insurance by County

County	Owners	Renters	Total Damage (Real and Personal Property)	Total Repair/Replace Support	Total Personal Property Support	Remaining Unmet Need
Abbeville	2	0	\$3,747	\$3,748	\$0	(\$1)
Aiken	17	15	\$95,808	\$42,705	\$6,771	\$46,332
Allendale	1	0	\$929	\$0	\$0	\$929
Anderson	29	11	\$296,238	\$195,527	\$32,628	\$68,083
Bamberg	8	2	\$60,602	\$33,543	\$11,129	\$15,930
Barnwell	1	0	\$22,907	\$0	\$0	\$22,907
Beaufort	18	6	\$122,458	\$64,889	\$3,154	\$54,416
Cherokee	16	4	\$174,744	\$146,244	\$9,617	\$18,883
Chester	6	4	\$52,097	\$33,970	\$2,640	\$15,487
Edgefield	7	1	\$87,627	\$77,467	\$8,963	\$1,197
Fairfield	3	5	\$33,807	\$13,019	\$6,599	\$14,189
Greenville	121	136	\$1,198,812	\$569,801	\$227,084	\$401,927
Greenwood	21	20	\$162,729	\$63,149	\$28,947	\$70,634
Hampton	2	3	\$14,287	\$12,542	\$367	\$1,378
Jasper	6	4	\$52,532	\$5,778	\$12,104	\$34,650
Kershaw	9	1	\$80,683	\$47,062	\$15,043	\$18,578
Laurens	23	6	\$325,516	\$189,141	\$5,834	\$130,541
Lexington	16	13	\$97,481	\$36,560	\$15,149	\$45,772
McCormick	2	0	\$65,976	\$16,898	\$7,751	\$41,327
Newberry	4	1	\$48,769	\$54,182	\$732	(\$6,144)
Oconee	3	1	\$17,672	\$0	\$933	\$16,739
Orangeburg	48	18	\$246,822	\$167,187	\$19,355	\$60,280
Pickens	33	12	\$432,095	\$166,759	\$62,162	\$203,173
Richland	37	60	\$318,887	\$196,925	\$52,072	\$69,890
Saluda	4	1	\$42,800	\$33,364	\$841	\$8,595
Spartanburg	95	74	\$705,786	\$372,963	\$95,829	\$236,993
Union	6	2	\$75,265	\$58,831	\$6,769	\$9,665
York	18	13	\$265,638	\$166,810	\$32,905	\$65,923

Table 28: Low, Low-Moderate, and LMMI Income Summary – Declared Counties

County	Total Population	Total LMI (80% AMI) Persons	Percentage LMI (80% AMI) Persons
Abbeville	23,705	8,610	36%
Aiken	167,315	68,400	41%
Allendale	7,725	3,585	46%
Anderson	197,680	80,465	41%
Bamberg	13,130	4,780	36%
Barnwell	20,820	9,405	45%
Beaufort	184,709	77,439	42%
Cherokee	218,560	100,525	46%
Chester	14,430	6,290	44%
Edgefield	396,030	169,375	43%
Fairfield	56,270	22,705	40%
Greenville	32,065	12,915	40%
Greenwood	45,025	17,975	40%
Hampton	32,390	12,565	39%
Jasper	36,995	17,020	46%
Kershaw	65,560	29,265	45%
Laurens	30,070	15,000	50%
Lexington	159,555	69,700	44%
McCormick	24,355	10,125	42%
Newberry	22,090	11,515	52%
Oconee	135,120	54,305	40%
Orangeburg	61,575	23,910	39%
Pickens	504,665	199,415	40%
Richland	67,980	27,525	40%
Saluda	17,905	7,800	44%
Spartanburg	339,350	142,235	42%
Union	29,015	12,490	43%
York	65,590	26,010	40%

Table 29: LMI Breakdown for FEMA Applicants by County

County	Total Population (of Disaster Declared Counties)	Total LMI Disaster Applicant Household Composition	Percentage LMI
Abbeville	23,529	4,552	19%
Aiken	169,202	41,940	25%
Allendale	6,889	2,233	32%
Anderson	204,052	37,331	18%
Bamberg	12,386	2,378	19%
Barnwell	20,153	3,698	18%
Beaufort	185,923	6,651	4%
Cherokee	55,206	8,896	16%
Chester	31,979	2,874	9%
Edgefield	24,354	7,327	30%
Fairfield	20,435	3,190	16%
Greenville	524,981	97,315	19%
Greenwood	66,071	16,308	25%
Hampton	17,959	3,187	18%
Jasper	29,166	2,835	10%
Kershaw	66,533	2,114	3%
Laurens	65,857	15,202	23%
Lexington	297,360	20,399	7%
McCormick	8,745	2,321	27%
Newberry	36,806	7,038	19%
Oconee	78,785	5,539	7%
Orangeburg	80,196	9,763	12%
Pickens	124,590	20,814	17%
Richland	390,686	31,702	8%
Saluda	18,738	4,624	25%
Spartanburg	330,155	72,398	22%
Union	26,581	5,915	22%
York	284,017	9,054	3%

PUBLIC HOUSING (INCLUDING HUD-ASSISTED HOUSING) AND OTHER AFFORDABLE HOUSING

Housing Authorities were solicited for Hurricane Helene damages to public housing. Only one, Gaffney Housing Authority (Cherokee County), reported damages. The Gaffney Housing Authority reported damages of approximately \$100,000 to public housing within their authority. No other housing authorities, including SC Housing, reported or had data available on damages to public housing caused by Hurricane Helene.

The South Carolina Housing Trust Fund (HTF) Disaster Assistance Program (DAP) provides funding to local governments for home repairs for low-income homeowners whose properties were damaged by severe weather and not covered by insurance, offering up to \$30,000 per home for eligible repairs. Following Hurricane Helene, DAP identified 373 units in need of repair assistance and provided \$9,200,000 in support to aid in recovery for these units.

Table 30: Public Housing Damage and Support

Applicant	Need Identified (#)	Estimated Impact (Eligible for DAP)	DAP Funds Provided
City of Aiken	50	\$1,500,000	\$848,877
Anderson County	20	\$600,000	\$688,877
City of Bennettsville	55	\$1,650,000	\$1,798,878
Charleston County	30	\$900,000	\$928,877
City of Greenville	20	\$600,000	\$228,877
Greenville County	62	\$1,860,000	\$998,878
Horry County	7	\$210,000	\$163,327
City of North Charleston	7	\$210,000	\$94,327
Rock Hill	37	\$1,110,000	\$518,827
City of Spartanburg	25	\$750,000	\$861,377
Spartanburg County	60	\$1,800,000	\$2,068,878
	373	\$11,190,000	\$9,200,000

Source: Personal communication from the South Carolina Housing Authority

INFRASTRUCTURE EVALUATION

The following summary provides a breakdown of the infrastructure unmet needs analysis utilized in this assessment. To derive the final unmet needs estimate for infrastructure, the South Carolina Emergency Management Division (SCEMD) Public Assistance project submissions across all categories was analyzed to determine the overall immediate infrastructure impact following Hurricane Helene.

The analysis of impacts was compared against the resources made available - the federal cost share for all FEMA Public Assistance projects. The federal cost share for categories A and B, debris removal and emergency services, are covered by the federal government at 100%. Categories C-G of FEMA Public Assistance have an assumed 25% local match requirement which is considered an unmet need. A resilience factor addition of 30% was then added to this figure, as indicated in the supporting data.

Identified support for federal portions of Public Assistance was included as an appropriate offset. Impacts minus known support led to the infrastructure unmet need amount of \$192,811,945, equating to approximately 11% of the total unmet need in response to Hurricane Helene (Table 31).

Table 31: Infrastructure Unmet Need Summary

Infrastructure Unmet Needs Summary	
Total Infrastructure Impacts	\$1,129,469,741
Total Infrastructure Support	\$936,657,796
Unmet Infrastructure Need (Including Resilience Factors)	\$192,811,945

INFRASTRUCTURE NEED SUPPORTING DATA

Table 32: Damages to Public Infrastructure

PA Category	Sum of Approx. Cost	Sum of Federal Share	Sum of Non-Federal Share
A - Debris	\$300,000,000	\$300,000,000	\$0
B - Emergency Measures	\$58,221,960	\$58,221,960	\$0
C - Roads and Bridges	\$70,807,319	\$53,105,489	\$17,701,830
D - Water Control Facilities	\$10,068,952	\$7,551,714	\$2,517,238
E - Building and Equipment	\$13,700,465	\$10,275,349	\$3,425,116
F - Utilities	\$484,840,664	\$363,630,498	\$121,210,166
G - Other	\$13,850,124	\$10,387,593	\$3,462,531
All Categories	\$951,489,484	\$803,172,603	\$148,316,881
TOTAL - without A and B	\$593,267,524	\$444,950,643	\$148,316,881

Table 33: Damages to Public Infrastructure Accounting for Resilience (Increased Cost of Compliance) and Estimated Local Match (Unmet Needs)

PA Category	Estimated PA Cost	30% Resiliency	25% Local Match (Total Unmet Need)
A - Debris	\$300,000,000	\$0	\$
B - Emergency Measures	\$58,221,960	\$0	\$
C - Roads and Bridges	\$70,807,319	\$21,242,196	\$23,012,379
D - Water Control Facilities	\$10,068,952	\$3,020,686	\$3,272,409
E - Building and Equipment	\$13,700,465	\$4,110,140	\$4,452,651
F - Utilities	\$484,840,664	\$145,452,199	\$157,573,216
G - Other	\$13,850,124	\$4,155,037	\$4,501,290
Total	\$951,489,484	\$177,980,257	\$192,811,945

ECONOMIC REVITALIZATION EVALUATION

The following summary provides a breakdown of the economic sector analysis of the unmet needs assessment. To derive the final unmet needs estimate for the economy, data on business disaster impacts was analyzed based on SBA assessed impacts and disaster loans to businesses using the HUD-approved approach of calculating the median real estate and content loss by the following damage categories:

- Category 1: real estate + content loss = below \$12,000
- Category 2: real estate + content loss = \$12,000–\$29,999
- Category 3: real estate + content loss = \$30,000–\$64,999
- Category 4: real estate + content loss = \$65,000–\$149,999
- Category 5: real estate + content loss = \$150,000 and above

For properties with real estate and content loss of \$30,000 or more, the HUD-approved methodology calculates the estimated amount of unmet needs for small businesses by multiplying the median damage estimates for the categories above by the number of small businesses denied an SBA loan, including those denied a loan prior to inspection due to inadequate credit or income (or a decision had not been made), under the assumption that damage among those denied at pre-inspection have the same distribution of damage as those denied after inspection.

Next, impacts to inspected businesses must be considered, both those that accepted the SBA loan and those that refused the SBA loan. Once the data is compiled, the total impact is calculated by adding those businesses that had documented damages from SBA and those businesses who did not receive an inspection from SBA. This led to a total estimated impact of \$606,309,492.

After impacts are estimated, support is calculated by identifying SBA total loans issued, SBA loans rejected by the businesses, known private insurance payments, and payments for commercial National Flood Insurance Program policies. This led to a known support figure of \$381,601,759.

Impacts minus support lead to the unmet economic revitalization need of \$224,707,732 (10% of the total unmet need).

Table 34: Economic Revitalization Unmet Needs Summary

Economy Unmet Needs Summary	
Total Economy Impacts	\$606,309,492
Total Economic Support	\$381,601,759
Total Unmet Economic Need After Accounting for Resilience Factor	\$224,707,732

ECONOMIC REVITALIZATION SUPPORTING DATA

Table 35: Median Inspected Loss by Category

HUD Business Category	Applicants without insurance Approved or Declined with Losses Determined	% of All Businesses with Losses Determined	Total Loss	Median Inspected Loss	Declined businesses without insurance and without an Inspected Loss
Category 1 (<\$12K)	61	4%	\$159,217	\$101	40
Category 2 (\$12K - \$29K)	76	5%	\$1,655,118	\$22,467	50
Category 3 (\$30K - \$64K)	208	13%	\$10,101,127	\$50,114	137
Category 4 (\$65K - \$149,999)	503	31%	\$52,556,173	\$102,600	332
Category 5 (> \$150,000)	774	48%	\$3,005,061,758	\$282,120	511
Total	1622	100%	\$3,069,533,393	\$457,402	1,071

First, the median inspected loss by category was calculated to assign that value to the estimated count of declined businesses which did not receive an inspection. After analyzing the loss data by category for those businesses without insurance with a loss identified by SBA, the median losses by category were determined to be Category 1 - \$101, Category 2 - \$22,467, Category 3 - \$50,114, Category 4 - \$102,600, and Category 5 - \$282,120. These calculations were then multiplied by the appropriate corresponding businesses, which did not receive a loss estimate from SBA because their loan applications were denied due to insufficient credit or income (a total count of 1,249 businesses across the 5 categories). This resulted in an estimated impact across these businesses of \$171,093,639.

Table 36: Summary Economic Impacts and Unmet Needs

Category	Count	HUD Assessed (Estimated) Impact
SBA approved with a verified HUD Category 1 Losses	9	\$40,791
SBA approved with a verified HUD Category 2 Losses	22	\$460,098
SBA approved with a verified HUD Category 3 Losses	66	\$3,186,896
SBA approved with a verified HUD Category 4 Losses	152	\$15,698,880
SBA approved with a verified HUD Category 5 Losses	221	\$287,338,141
SBA declined with a verified HUD Category 1 Losses	20	\$28,265
SBA declined with a verified HUD Category 2 Losses	14	\$314,438
SBA declined with a verified HUD Category 3 Losses	28	\$1,326,182
SBA declined with a verified HUD Category 4 Losses	83	\$8,501,833
SBA declined with a verified HUD Category 5 Losses	100	\$40,081,122
Total Estimated Property Losses		\$150,842,280
Total Estimated Content Losses		\$199,908,635
Estimated additional businesses with impacts and unmet needs (Category 1 Losses)	40	\$4,060
Estimated additional businesses with impacts and unmet needs (Category 2 Losses)	50	\$1,127,450
Estimated additional businesses with impacts and unmet needs (Category 3 Losses)	137	\$6,882,790
Estimated additional businesses with impacts and unmet needs (Category 4 Losses)	332	\$34,076,420
Estimated additional businesses with impacts and unmet needs (Category 5 Losses)	511	\$144,182,801
Total verified loss for all businesses (Estimate)		\$537,024,435
Accounting for an additional 30% in funding needed to support rebuilding to higher standards (resilience)		\$606,309,492
SBA Current Support Accepted	237	\$6,381,409
Estimated SBA Support Not Accepted	233	\$300,343,396
Private Insurance Payouts	2,993	\$74,876,954
Total Support		\$381,601,759
Total unmet business needs estimate		\$155,422,675
Accounting for 30% resilience addition		\$224,707,732

PUBLIC SERVICE EVALUATION

No known Public Service unmet need exists. If South Carolina identifies an unmet need for public service that necessitates funding with the CDBG-DR allocation, this section will be updated to reflect the known unmet public service need.

QUANTIFIED DISASTER IMPACTS AND EXACERBATED PRE-EXISTING NEEDS OF HOUSING, INFRASTRUCTURE, AND ECONOMIC DEVELOPMENT, OTHER FINANCIAL ASSISTANCE, AND REMAINING UNMET NEED

Table 37: Quantified Disaster Impacts and exacerbated Pre-Existing needs of Housing, Infrastructure, and Economic Development, Other Financial Assistance, and Remaining Unmet Need

Cost Categories	A Direct and Indirect Need	B Financial Assistance Budgeted and Obligated	A-B Unmet Need
Rental Housing	\$678,148,339	\$3,455,919	\$681,604,258
Owner-Occupied Housing	\$1,026,974,492	\$39,124,476	\$1,066,098,968
Infrastructure	\$1,129,469,741	\$936,657,796	\$192,811,945
Economic Development	\$606,309,492	\$381,601,759	\$224,707,732
Total	\$4,623,913,162	\$2,458,690,258	\$2,165,222,903

MITIGATION NEEDS ASSESSMENT

Mitigation activities are defined as those that increase resilience and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

STRATEGIC STATEWIDE RESILIENCE AND RISK REDUCTION PLAN

The South Carolina Office of Resilience (the designated administering agency for CDBG-DR funds) is responsible for developing and implementing a Strategic Statewide Resilience and Risk Reduction Plan (Resilience Plan). The Plan identifies major flood risks around the state and potential losses that could occur because of extreme weather events and provides strategies for local governments to implement resilience into their communities in order to mitigate potential flood risks. The Resilience Plan is intended to serve as a framework to guide state investment in flood mitigation projects and the adoption of programs and policies to protect the people and property of South Carolina from the damage and destruction of extreme weather events (S.C. Code Ann. § 48-62-30 et seq.).

The Resilience Plan developed a working definition for resilience in South Carolina as a component of the plan development process. The agency established on the following definition: The ability of communities, economies, and ecosystems within South Carolina to anticipate, absorb, recover, and thrive when presented with environmental change and natural hazards.

STRATEGIC STATEWIDE RESILIENCE AND RISK REDUCTION PLAN GOALS

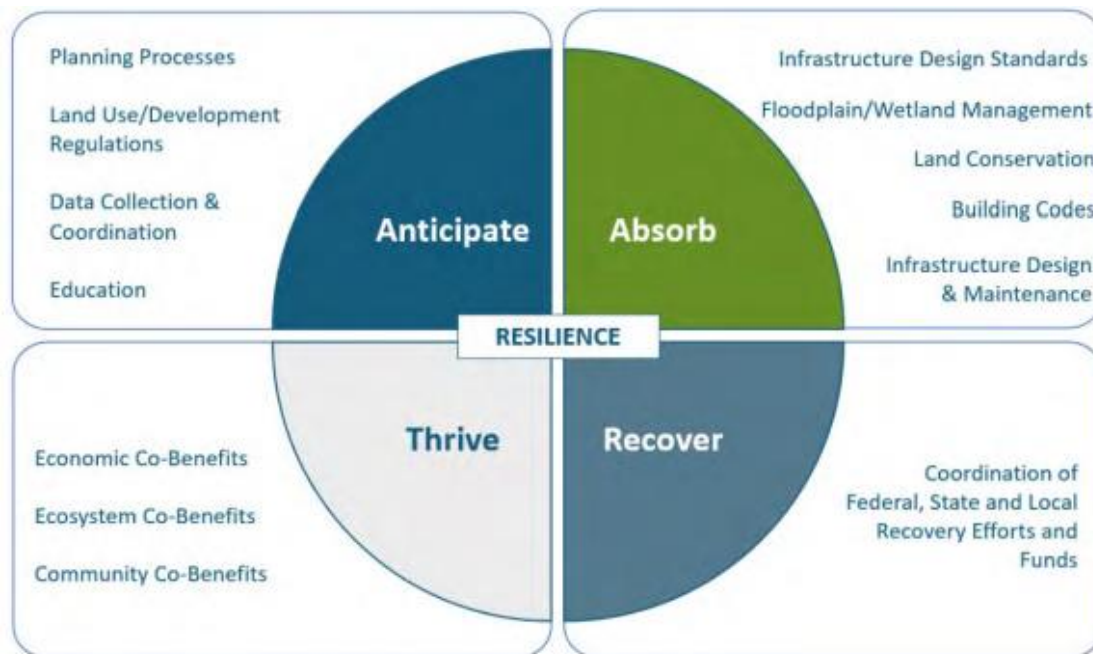


Figure 22: South Carolina Statewide Strategic Resilience and Risk Reduction Plan Goals by Category

The Resilience Plan identified goals across four broad categories: anticipate, absorb, thrive, and recover. These goals have time horizons as established in the plan. Details can be found starting on page 480 of the plan located at: https://scor.sc.gov/sites/scor/files/Documents/FINAL%20RESILIENCE%20PLAN_06282023_compressed.pdf

HAZARD MITIGATION PLAN ANALYSIS

As part of the development of this Action Plan, South Carolina conducted an analysis of the state's FEMA-approved Hazard Mitigation Plan as required under federal guidelines. The statewide plan was last updated in 2023 as required by FEMA (<https://www.scmd.org/em-professionals/plans/hazard-mitigation-plan/>).

RISK-BASED ASSESSMENT OF CURRENT AND FUTURE HAZARDS

South Carolina's risk profile is derived from a detailed risk-based assessment that identifies both current and anticipated hazards. The assessment evaluates a broad range of threats, including:

- **Sea Level Rise & Storm Surge:** Due to its extensive coastline, South Carolina faces risks from rising sea levels and storm surge. These hazards threaten coastal infrastructure and communities, especially in areas where the land is low-lying.
- **Strong Winds & Tornadoes:** High-wind events, including tornadoes and hurricane-induced winds, pose significant threats to buildings, power infrastructure, and transportation networks.
- **Flooding:** Both coastal flooding (from storm surge) and inland flooding (from heavy rainfall and riverine overflow) are major concerns. Enhanced floodplain mapping and drainage studies guide local planning efforts.
- **Extreme Heat & Drought:** Projections indicate increasing periods of extreme heat and prolonged drought, impacting water resources, public health, and agriculture.
- **Wildfire Risk:** Especially in rural and forested regions, drought conditions combined with high temperatures increase the potential for wildfires.
- **Geophysical Hazards:** Although South Carolina is not typically prone to volcanic activity or significant seismic events, the risk-based approach acknowledges that these hazards are part of a comprehensive assessment framework, even if their probability in the region is low.

Beyond these hazards, the South Carolina State Hazard Mitigation Plan has identified hazards based on their probability and consequences. Here, hazards such as earthquakes, radiological releases, and infectious disease are high on the consequence axis (Figure 23) they are lower on the probability axis than hazards such as hurricanes, flooding, tornadoes, winter weather, fires, severe storms, and extreme heat. While efforts to mitigate all hazards identified in this matrix would make South Carolina more resilient, a focus on those more likely to occur AND with higher impacts should they occur would be the most effective use of often scarce mitigation funds. Figure 24 through Figure 40 illustrate the pattern of hazard risk for several high probability/high consequence hazards such as flooding, hurricanes, and tornadoes, several low probability/high consequence hazards such as earthquakes and coastal hazards, and hazards considered climate sensitive with a potential shifting pattern of frequency and a growing severity – especially in terms of human health – such as heat hazards. Understanding the spatial pattern of threat occurrence across the South Carolina Hurricane Helene impacted counties is important for determining the most appropriate mitigation actions aimed at building resilience.

SOUTH CAROLINA RISK PROFILE

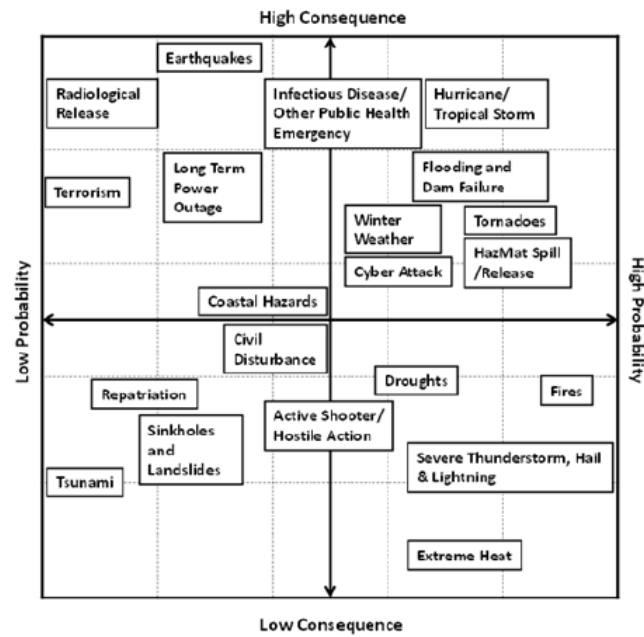


Figure 23: Hazard Probability and Consequence Matrix from South Carolina's 2023 State Hazard Mitigation Plan

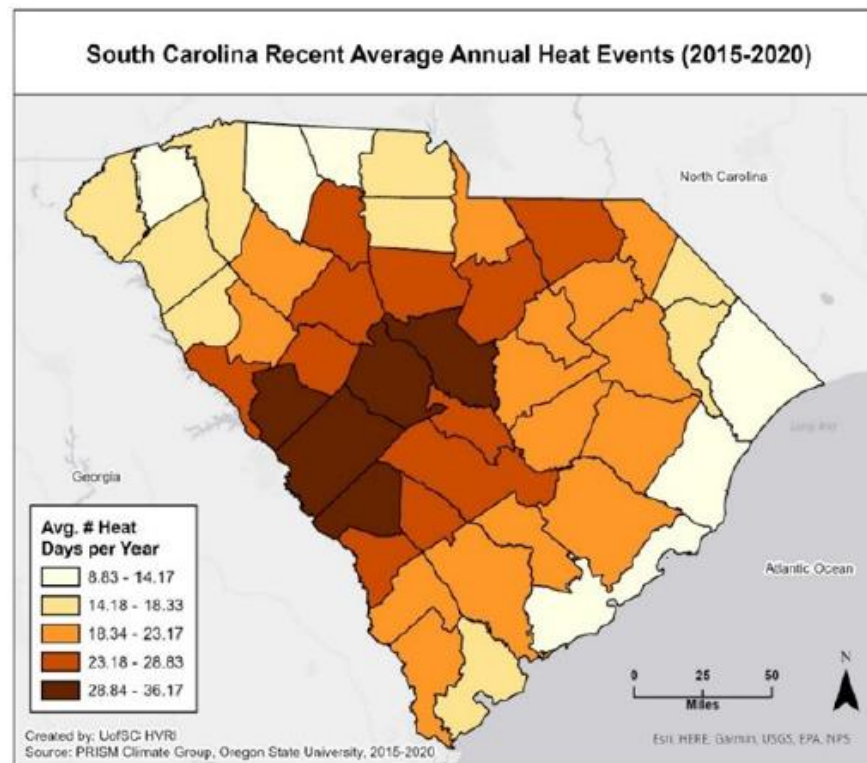


Figure 24: Recent Average Annual Heat Hazard Events in South Carolina Counties, 2015-2020

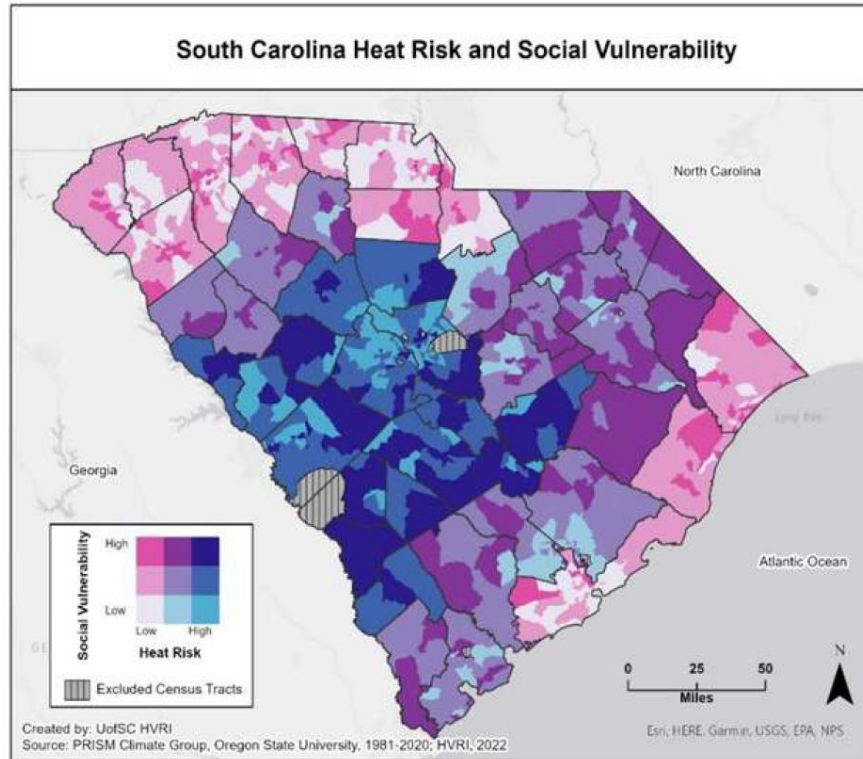


Figure 25: Overall Heat Risk and Social Vulnerability in South Carolina Counties

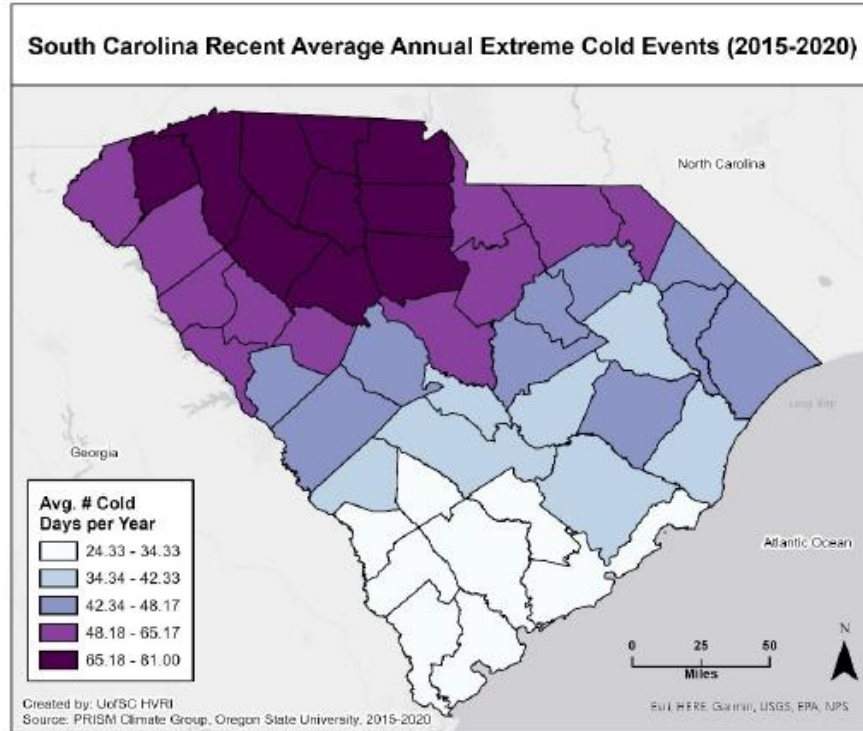


Figure 26: Recent Average Annual Cold Hazard Events in South Carolina Counties, 2015-2020

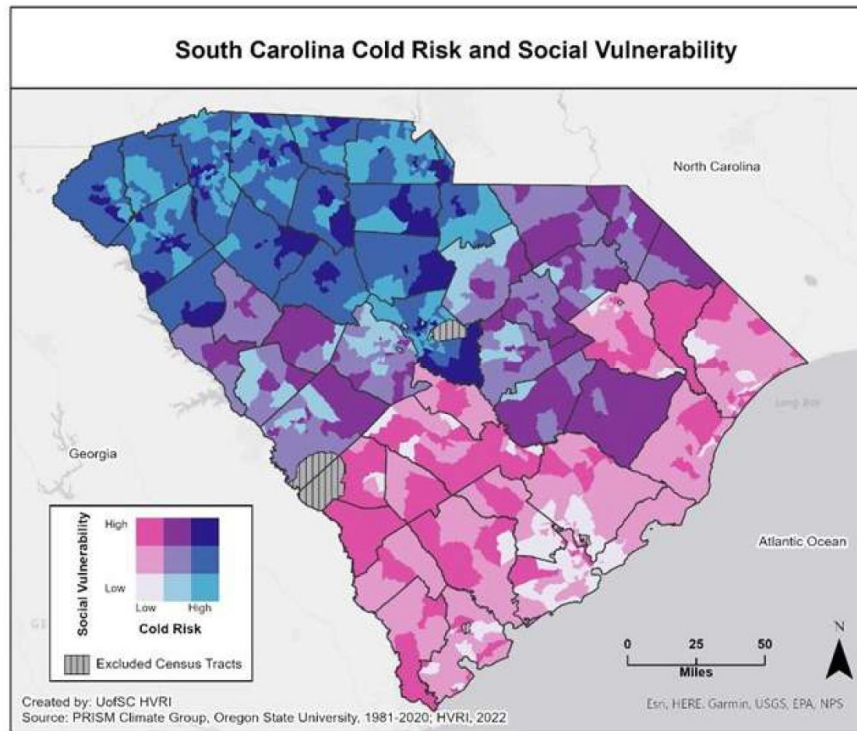


Figure 27: Overall Cold Risk and Social Vulnerability in South Carolina Counties

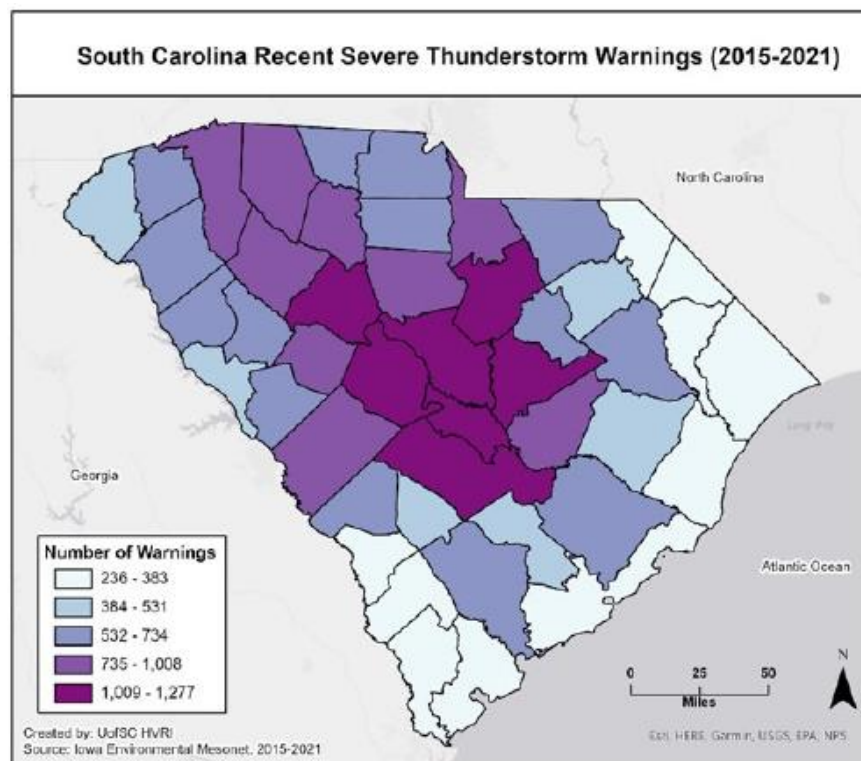


Figure 28: Recent Average Annual Severe Storm/Thunderstorm Warnings in South Carolina Counties, 2015-2020

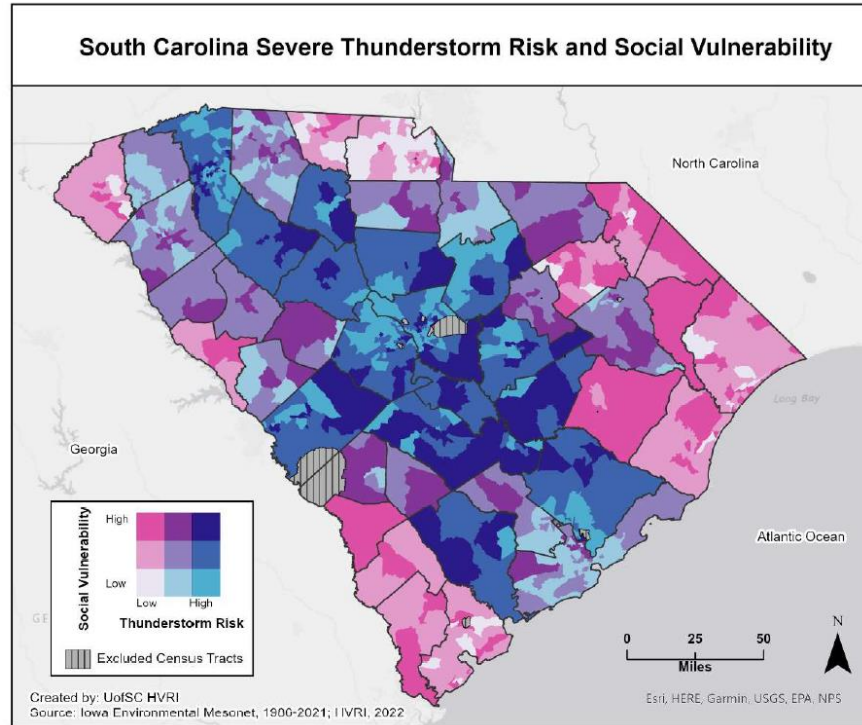


Figure 29: Overall Severe Storm Risk and Social Vulnerability in South Carolina Counties

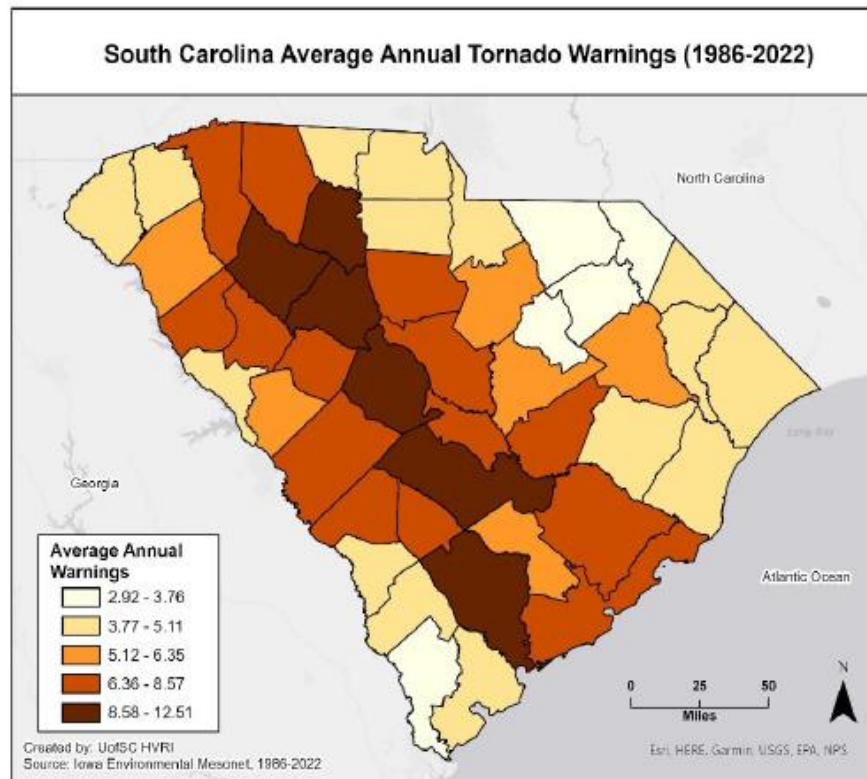


Figure 30: Average Annual Tornado Warnings in South Carolina Counties, 1986-2022

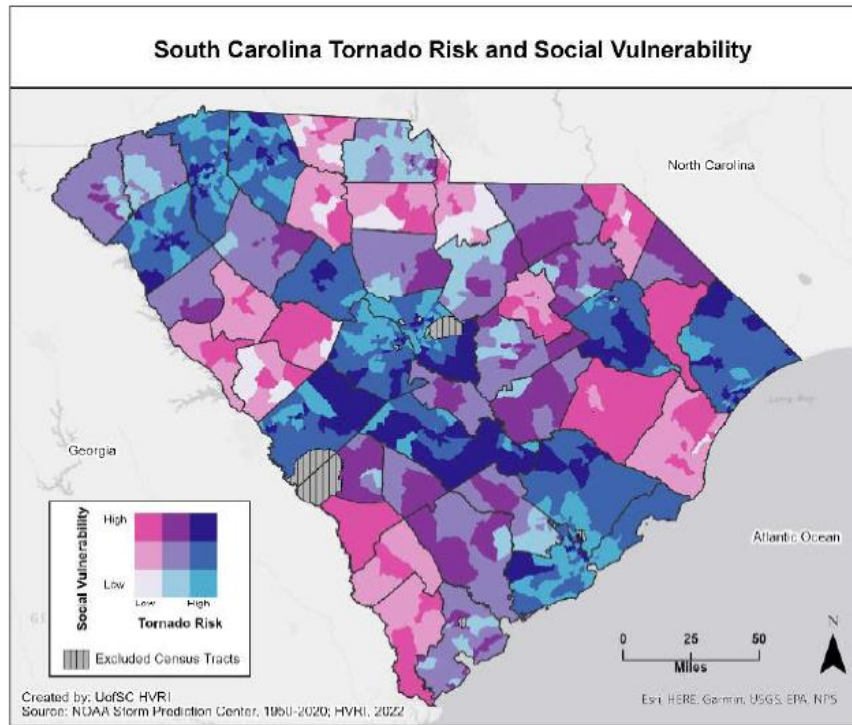


Figure 31: Overall Tornado Risk and Social Vulnerability in South Carolina Counties

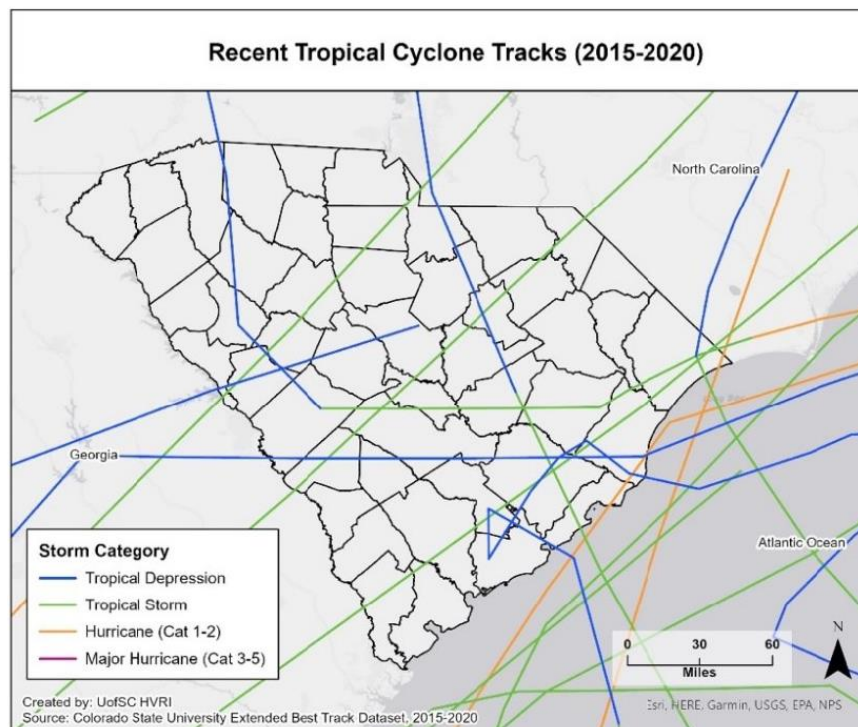


Figure 32: Recent Tropical Cyclone Tracks in South Carolina Counties, 2015-2020

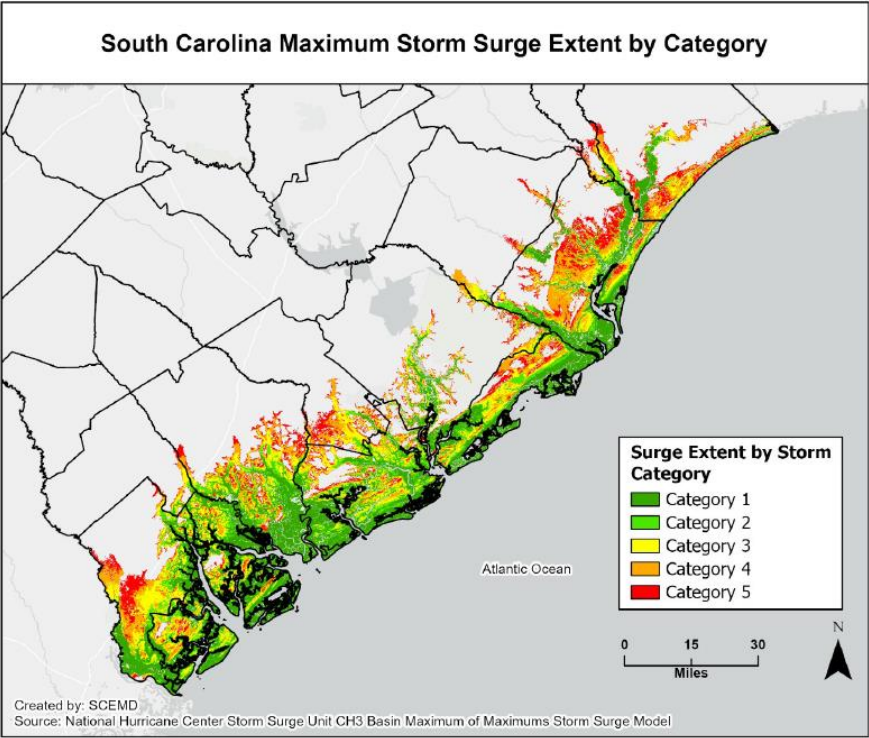


Figure 33: Storm Surge Threat Areas in South Carolina Counties

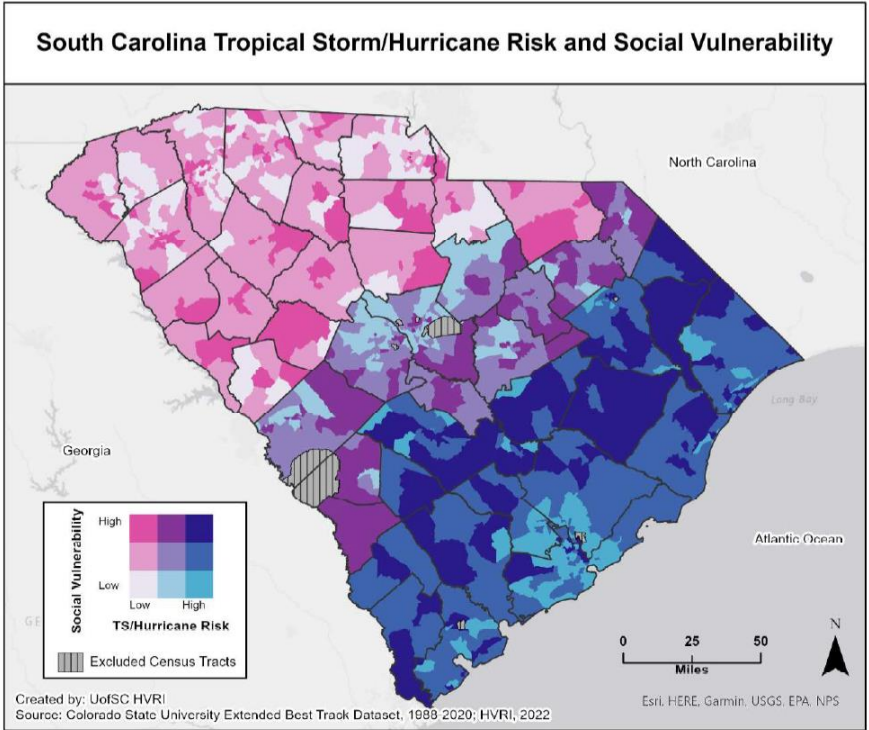


Figure 34: Overall Tropical Cyclone Risk and Social Vulnerability in South Carolina Counties

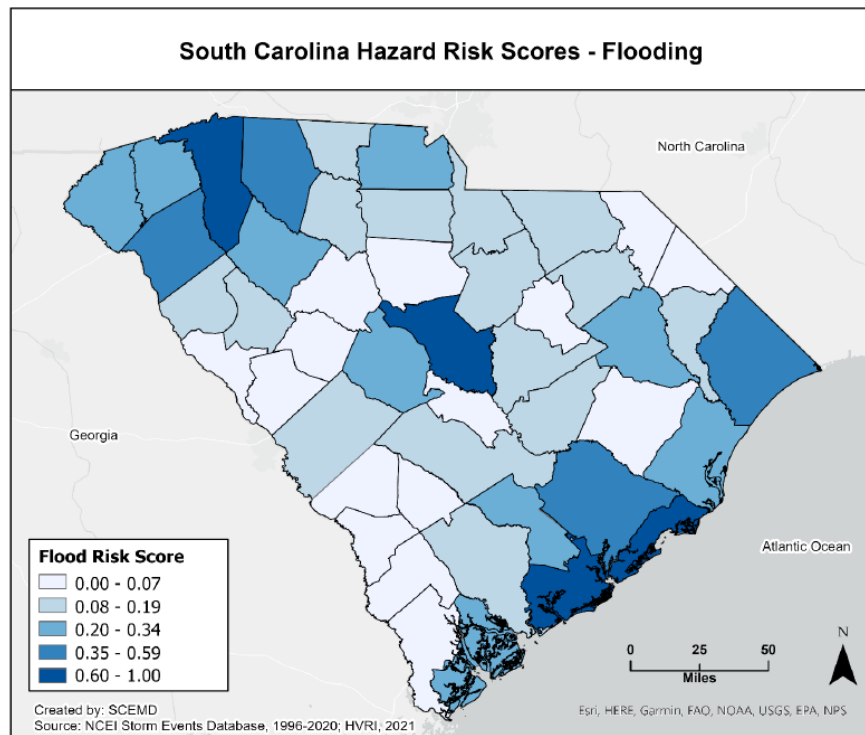


Figure 35: South Carolina Flood Risk by County

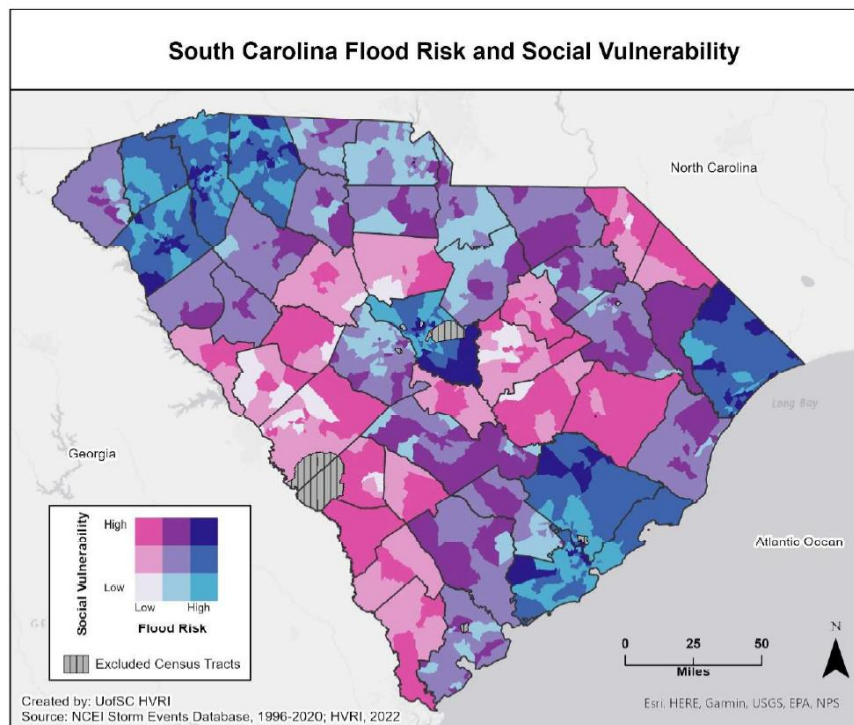


Figure 36: Overall Flooding Risk and Social Vulnerability in South Carolina Counties

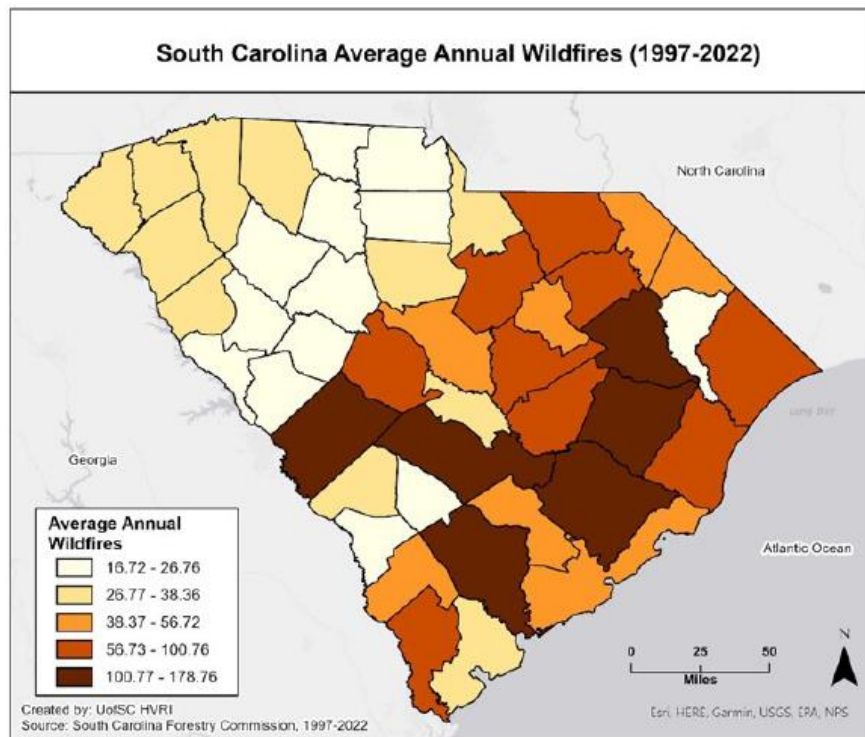


Figure 37: South Carolina Wildfires, 1997-2022

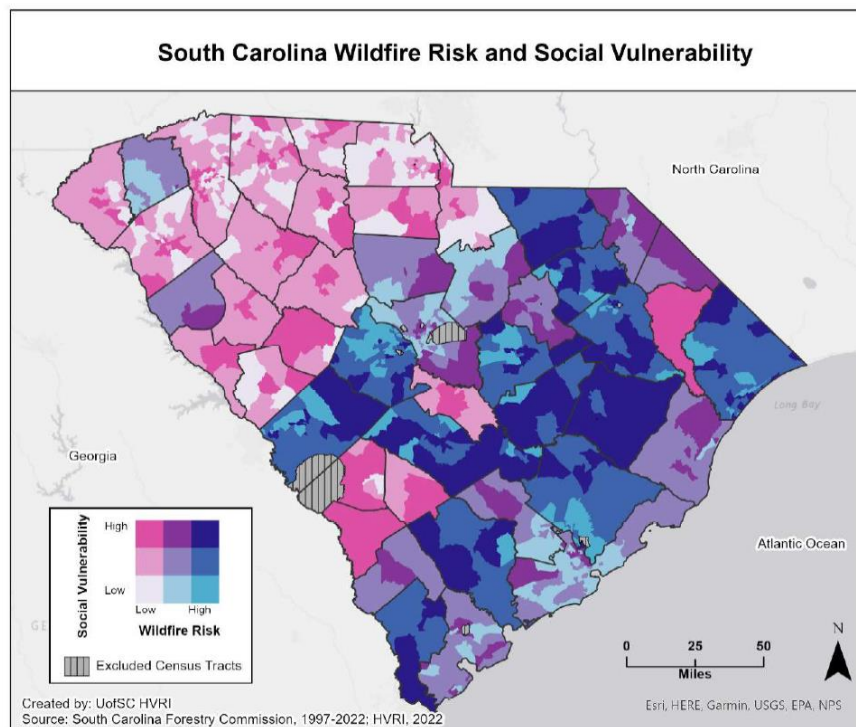


Figure 38: Overall Wildfire Risk and Social Vulnerability in South Carolina Counties

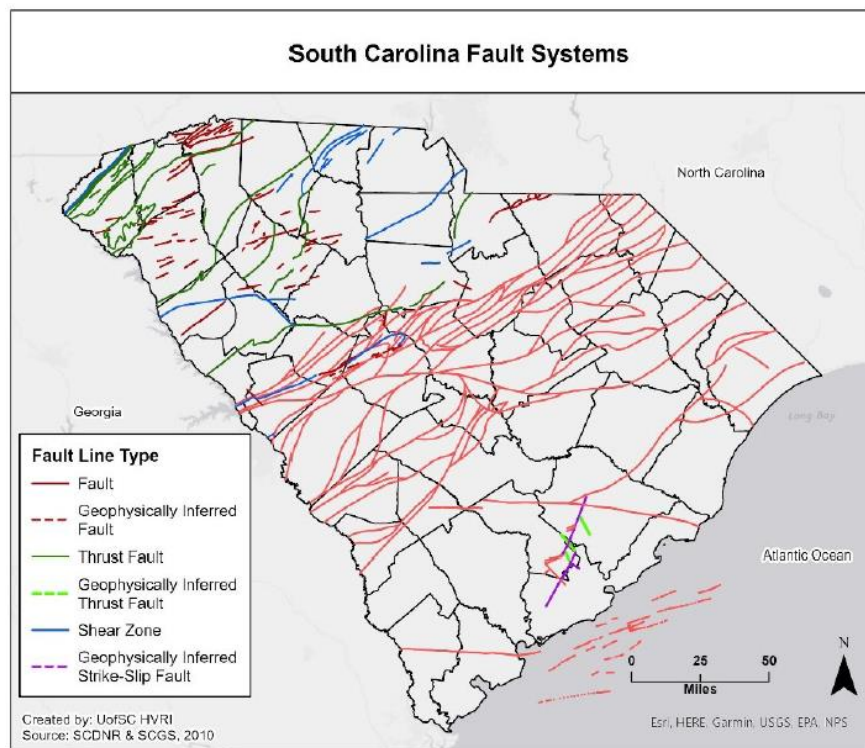


Figure 39: South Carolina Faults

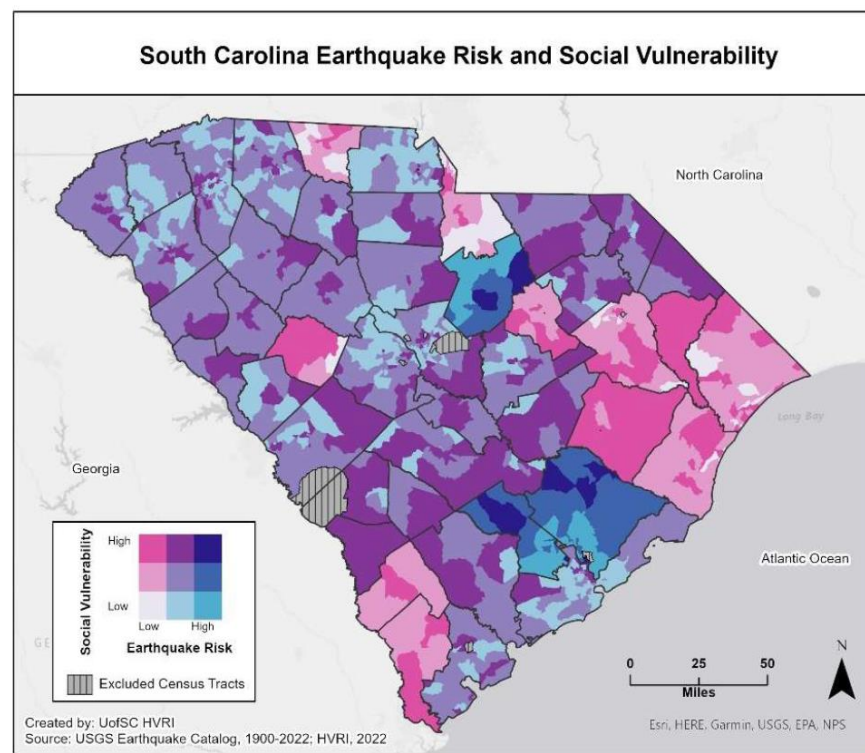


Figure 40: Overall Wildfire Risk and Social Vulnerability in South Carolina Counties

These hazards have been identified through an evaluation of the South Carolina 2023 Hazard Mitigation Plan ²³ which incorporated historical data, considered climate sensitivity, and utilized a vulnerability assessment overlay process to identify the most threatened areas of the state.

SOUTH CAROLINA HAZARD MITIGATION PLAN GOALS

Goal 1: Implement policies and projects designed to reduce or eliminate the impacts of hazards on people and property.

Goal 2: Obtain resources necessary to reduce the impact of hazards on people and property.

Goal 3: Enhance training, education, and outreach efforts focusing on the effects of hazards, importance of mitigation, and ways to increase resilience.

Goal 4: Collect and utilize data, including studies and analyses, to improve policymaking to support hazard resilience and identify appropriate mitigation projects.

Goal 5: Improve interagency coordination and planning to reduce the impact of hazards on people and property.

Goal 6: Enhance policies and compliance to reduce risk and damage, incorporating current trends and projections regarding population growth and climate change.

Goal 7: Maximize use of natural resource protection measures and nature-based solutions as cost-effective means to reduce the impacts of hazards on people, property, and infrastructure.

Goal 8: Pursue and prioritize mitigation actions that include and benefit multiple stakeholders and geographic areas to achieve broad, comprehensive results and leverage available resources.

LEVERAGED FUNDING SOURCES FOR HAZARD MITIGATION

Hazard Mitigation Grant Program (HMGP)

HMGP funds are based on a percentage of the total federal share of funds received by the state as a result of a presidential disaster declaration. HMGP funds are awarded based on the disaster, so they are awarded to the state and are not nationally competitive. The state is able to set the priorities for the funding within the state which can include but not be limited to mitigation action type, area for the work being conducted, and characteristics of the sub applicant.

Building Resilient Infrastructure and Communities (BRIC)

Per Release HQ-25-40 date 4 April 2025, FEMA cancelled the BRIC Program.

Pre-Disaster Mitigation (PDM)

FEMA's standard PDM grant was discontinued in 2020 and was replaced by Building Resilient Infrastructure and Communities (BRIC) grant. Funding was dependent upon Congressional allocation of funds and was nationally

²³ <https://www.scemd.org/media/1713/2023-sc-state-hazard-mitigation-plan.pdf>

competitive. South Carolina still has projects being conducted with PDM funds. The Congressional Community Project Funding PDM program that is available through Congress continues. Projects are submitted through the jurisdiction's member of Congress and typically follow the PDM or BRIC notice of funding opportunity's eligible project types.

Flood Mitigation Assistance (FMA)

FMA funds are allocated every year. Although FMA is a nationally competitive grant, applications are submitted to the state, where they are ranked and prioritized for funding. FMA funds mitigation planning, localized flood reduction projects, and individual mitigation actions such as elevation and acquisition. One must have a NFIP flood insurance policy or show a benefit to policy holders to be eligible for FMA. The required match varies depending on the amount of flood insurance claims.

Community Development Block Grant - Mitigation (CDBG-MIT)

In February 2020, funds became available through the Department of Housing and Urban Development's Community Block Grant program to support recovery and mitigation relate to qualifying disasters in 2015, 2016, and 2017. The purpose of CDBG-Mitigation funding is to increase resilience and provide a stream of funding directly to states with needs from previous disasters. In South Carolina, CDBG-MIT funding is administered by the South Carolina Office of Resilience. A portion of CDBG-MIT is designated for use in the most impacted and distressed (MID) counties within South Carolina.

Of the funding sources listed above, HMGP and PDM funds historically have been used most frequently to implement activities found in the Mitigation Strategy. In recent years, BRIC has replaced PDM, but that continued effort remains doubtful, and CDBG-MIT funds have increased in use because of availability. Other funding opportunities also may be available to conduct mitigation actions.

PRIORITIZING THE CDBG-DR MITIGATION SET-ASIDE

IMPACTS ON HUD-IDENTIFIED AND GRANTEE-IDENTIFIED MID AREAS

HUD-designated and grantee-identified Most Impacted and Distressed (MID) areas are of particular interest here because of the rules governing how CDBG-DR funds are to be spent supporting mitigation activities in these areas only. In many of these at-risk areas, new or continued investment in resilient infrastructure and community lifelines can lead to better outcomes for communities of disaster survivors following future events. The risk-based assessment points to the need for additional mitigation activities.

INFORMING THE USE OF CDBG-DR FUNDS AND OTHER FUNDING SOURCES

The risk-based assessment plays a critical role in guiding the allocation and use of Community Development Block Grant – Disaster Recovery (CDBG-DR) funds. Key aspects include:

- **Prioritization of Investments:** The assessment informs grantees by identifying the most vulnerable areas within the MID regions, thus ensuring that CDBG-DR funds target infrastructure upgrades, housing retrofits, and community facilities that need immediate mitigation measures. For example, funds can be allocated to improve flood defenses, enhance building resilience against high winds, and upgrade energy and transportation networks to withstand extreme weather events.

- **Strategic Mitigation Projects:** Using the risk assessment data, local officials and grantees can design projects that integrate both “hard” engineered solutions (such as sea walls, drainage improvements, and building retrofits) and “soft” measures (like public education programs, community preparedness initiatives, and updated land use planning). This dual approach maximizes the resilience of MID areas.
- **Leveraging Multiple Funding Sources:** In addition to CDBG-DR funds, the risk assessment helps identify opportunities for additional financial support. Other funding sources may include FEMA grants, state funding programs, and private-sector investments. By demonstrating a comprehensive understanding of the hazard landscape and community needs, grantees can better position their projects for multi-agency and multi-source funding collaborations.
- **Cost-Benefit Analysis and Risk Reduction:** The evaluation process provides a basis for conducting cost-benefit analyses that justify the mitigation projects. Investments are prioritized based on their potential to reduce long-term disaster recovery costs and minimize losses during hazard events.

This systematic approach not only directs the use of CDBG-DR funds but also encourages grantees to explore synergistic funding opportunities, thereby creating a robust financial framework for long-term risk mitigation.

ALIGNMENT WITH THE FEMA-APPROVED HAZARD MITIGATION PLAN

The risks and mitigation strategies outlined in the current FEMA-approved state Hazard Mitigation Plan serve as the backbone for South Carolina’s comprehensive risk reduction efforts. Key elements include:

- **Consistency with FEMA Guidelines:** The risk-based assessment and the resulting mitigation actions directly align with FEMA’s methodologies for evaluating hazards and vulnerabilities. This ensures that all mitigation measures are consistent with federal standards and best practices.
- **Data-Driven Decision Making:** The Hazard Mitigation Plan incorporates data from the SC Risk Assessment Summary and other authoritative sources. This data-driven approach ensures that the mitigation strategies are well-informed and reflect both historical trends and future projections.
- **Comprehensive Risk Reduction Framework:** By using the risks identified in the FEMA-approved plan, grantees can ensure that their projects not only meet local and HUD requirements but also integrate seamlessly into a broader statewide strategy for disaster resilience.
- **Interagency Coordination:** The FEMA-approved plan emphasizes the importance of coordinated efforts among state, local, and federal agencies. This coordination is critical for ensuring that mitigation projects receive the necessary support, resources, and technical expertise across jurisdictions.

By anchoring mitigation efforts in the FEMA-approved plan, the state is better positioned to implement sustainable, high-impact projects that address both current vulnerabilities and anticipated future hazards.

South Carolina’s comprehensive risk-based assessment identifies a wide range of current and future hazards—including sea level rise, strong winds, tornadoes, storm surge, flooding, extreme heat, drought, and wildfire risk—with a rigorous methodology that also acknowledges low-probability events such as volcanic activity and earthquakes. The impacts of these hazards are particularly significant in HUD-identified and grantee-identified MID areas, where vulnerable infrastructure and historic underinvestment magnify the risks.

This assessment not only informs the strategic allocation of CDBG-DR funds—ensuring that investments are directed to the most critical needs—but also leverages additional funding sources such as FEMA grants and state programs to create a resilient and financially sustainable mitigation framework. All of these efforts are fully aligned

with the current FEMA-approved Hazard Mitigation Plan, ensuring that South Carolina’s approach to risk reduction is both comprehensive and data-driven.

Through a coordinated, multi-faceted strategy that integrates risk assessment data, targeted funding, and collaborative planning, South Carolina is well-positioned to reduce the impacts of natural hazards and build resilient communities, particularly within the MID areas that need it most.

CONNECTION OF PROPOSED PROGRAMS AND PROJECTS TO UNMET NEEDS AND MITIGATION NEEDS

Pursuant to the Unmet Needs Assessment found in this Action Plan, there remains a total estimated unmet need of \$2,165,222,903 across the FEMA IA declared counties of South Carolina. SCOR considers housing to be, by far, the greatest unmet need, with \$1,747,703,226 (81%) in unmet need. Infrastructure unmet need and the unmet need of the economy are 9% and 10%, respectively, of the total. The FEMA applicants with unmet housing needs are split between owner-occupied (50% of unmet need) and rental housing (31% of unmet need). Owner-occupied unmet housing need comprises \$1,066,098,968 and rental housing comprises \$681,604,258 of the total unmet housing need. 19% of these homeowners and renters are Low-to-Moderate Income citizens (Table 6) and are far less likely to recover fully on their own.

SCOR’s Single-family Home Rehabilitation, Replacement, and Reconstruction program will allow LMI citizens to return to safe, sanitary, secure, and resilient living conditions. As SCOR has shown in its previous CDBG-DR housing programs, returning displaced citizens to their homes changes the landscape of communities, increasing property values and creating generational wealth.

South Carolina suffers from a shortage of affordable rental housing. The Affordable Rental Housing Rehabilitation program will increase affordable rental housing in areas where such housing is severely limited. Rehabilitating rental housing to safe, sanitary, secure, and resilient conditions increases opportunities for renters to live closer to work and family, thereby strengthening the community.

The Voluntary Buyout program will mitigate future real property loss and remove citizens from harm’s way. By purchasing property, in the flood zone, the program will provide funding for citizens to move to a safer property, thereby reducing future response and recovery, and needed Federal funds for both. Voluntary Buyouts offer the added benefit of creating greenspace for citizens to enjoy and will aid in controlling future inundating rainfall.

Employing funding for housing programs will allow for the least able to self-recover the opportunity to recover from the devastating impacts of Hurricane Helene.

The Mitigation set-aside will focus funding on reducing potential riverine and surface flood impacts in the HUD-identified MID areas. This will be accomplished through four categories of activities: flood-reduction infrastructure projects, voluntary housing buyouts, providing the local match funds for FEMA-funded mitigation programs, and planning activities to assist units of general local government (UGLGs) with updating hazard mitigation plans and developing flood-reduction studies for their communities.

MITIGATION SET-ASIDE METHOD OF DISTRIBUTION

In alignment with the Strategic Statewide Resilience and Risk Reduction Plan and current FEMA-approved Hazard Mitigation Plan, the Mitigation set-aside will ensure that assistance is prioritized towards the greatest unmet needs, housing, and infrastructure, as outlined in the Mitigation Needs Assessment. To support the identification

of the best solutions, the Mitigation set-aside will fund Plans & Studies projects. MID areas with an approved FEMA hazard mitigation project may be eligible for SCOR's Federal Funds Match program, which will provide reimbursement of the non-federal cost of the project.

ALLOCATION AND AWARD CAPS

Table 38: Funding Allocation

Funding Allocation					
Eligible Cost Category	Unmet Need	% of Unmet Need	% of Funding Expended in HUD or Grantee MID	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration				\$7,517,700	5%
Planning			N/A	\$0	N/A
Housing	\$1,747,703,226	81%	100%	\$123,225,300	82%
Infrastructure	\$192,811,945	9%	N/A	\$0	N/A
Economic Revitalization	\$224,707,731	10%	N/A	\$0	N/A
Mitigation Set-Aside			100%	\$19,611,000	13%
Totals	\$2,165,222,902			\$150,354,000	100%

FUNDING CRITERIA

SCOR will distribute funding for its CDBG-DR grant via direct implementation, using employees, implementation contractors, sub-contractors, and subrecipients.

GENERAL EXCEPTION CRITERIA

The circumstances for allowing exceptions to maximum award amounts will be detailed in SCOR's Policy Manual and will be limited to cases in which additional funding is required to provide accessibility, accommodation, or provide a safe, sanitary, secure, and resilient home. All exceptions to the funding cap will require approval from SCOR's Special Case Panel, a body composed of agency personnel from various departments.

ADMINISTRATION

Table 39: Administration

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration	\$ 7,517,700	5%
Total	\$7,517,700	5%

SCOR will spend a maximum of 5% of the total CDBG-DR grant award for administration of the grant, as per the Universal Notice. Funding will be used for management, reporting, financial functions, office needs, and other costs incurred in the administration of the grant.

PLANNING

SCOR will spend a \$0 for planning the activities and implementation of the CDBG-DR grant.

Table 40: Planning

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Planning	\$ 0	0 %
Total	\$ 0	0 %

HOUSING PROGRAMS OVERVIEW

Table 41: Housing Programs

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Housing: Single-family Home Rehabilitation, Replacement, and Reconstruction	\$110,725,300	100%
Housing: Affordable Rental Housing Rehabilitation	\$7,500,000	100%
Housing: Voluntary Buyouts	\$5,000,000	100%
Total	\$123,225,300	

SCOR has designated environmental compliance authority and SCOR's Environmental Certification Officer assumes the responsibility for the decision making and completion of the Environmental Reviews per 24 CFR 58.4(b)(2) and 24 CFR 58.18.

HOUSING PROGRAM NUMBER ONE

Program Title: Single-family Home Rehabilitation, Replacement, and Reconstruction

Amount of CDBG-DR Funds Allocated to this Program: \$110,725,300

Eligible Activity: Housing

National Objective: Benefit to LMI Persons

Lead Agency and Distribution Model: SCOR will administer this program with an Implementation Contractor via direct implementation.

Program Description: This program will provide safe, sanitary, secure, and resilient housing for LMI citizens with storm-damaged or destroyed single-family homes. The program will rehabilitate damaged homes, replace or reconstruct (stick-built) destroyed Manufactured Housing Units (MHU), and reconstruct destroyed “stick-built” homes. Temporary Relocation Assistance will be provided if needed. Only owner-occupied homes will be eligible.

Eligible Geographic Areas: HUD-identified and Grantee-identified MID areas

Eligibility:

- Applicant must own and have occupied a single-family home or MHU located within the HUD-identified or Grantee-identified MID areas
- Applicant must be the primary resident of the damaged property (no second homes)
- The property must have documented damage as a result of Hurricane Helene
- One person on the application with an ownership interest in part or in whole on the property must be able to demonstrate U.S. Citizenship or Lawful Permanent Residence
- The homeowner must agree to own the home and use the home as their primary residence for a period of three years after construction as secured through a forgivable promissory note and lien
- If located in a flood plain, the applicant must acquire flood insurance and comply with obligations to notify future owners of flood-insurance requirements

Priority:

- Priority will be given to Applicants who are in the extremely low and very low Area Median Income (AMI) brackets
- Priority will be given to Applicants with a documented disability
- Priority will be given to age-dependent (aged 65 or older, or 17 or below)

	HOUSEHOLD'S (AMI) AREA MEDIAN INCOME CATEGORY		
	30% AMI or BELOW	31% AMI to 50% AMI	51% AMI to 80% AMI
Applicant's Household Includes <i>Either</i> Age Dependent or Disabled	1st Priority	3rd Priority	5th Priority
Applicant's Household Includes Neither Age Dependent nor Disabled	2nd Priority	4th Priority	6th Priority

Figure 41: Priority Matrix

Maximum Amount of Assistance Per Beneficiary: Funding caps, for individual projects, will be as follows:

1. Stick-built Reconstruction	\$225,000
2. MHU Replacement (singlewide)	\$125,000
3. MHU Replacement (doublewide)	\$140,000
4. MHU Rehabilitation	\$15,000
5. Stick-built Rehabilitation	\$75,000

Assistance above the cap will require the approval of SCOR's Special Case Panel.

Maximum Income of Beneficiary: The maximum income of the beneficiary must not exceed 80% of the specific county AMI

Mitigation Measures: Mitigation measures, such as enhanced roofs, continuous load path, impact glass windows, will be specified in all house plans for reconstruction projects. Elevated homes will be considered on an as needed basis. Rehabilitation projects will employ enhanced roofs, impact windows, and continuous load path connections as required by the scope of work.

Reducing Impediments for Assistance: Impediments for assistance will be reduced by:

- Applicants will be assigned a Disaster Case Manager to be their single point of contact
- Providing accessible construction to accommodate applicants with documented mobility
- Outreach and marketing to ensure LMI applicants are aware of the program
- Mobile intake sites and home visits to ensure LMI applicants with transportation issues are served
- Assistance with navigation of ownership (heirs) issues

HOUSING PROGRAM NUMBER TWO

Program Title: Affordable Rental Housing Rehabilitation

Amount of CDBG-DR Funds Allocated to this Program: \$7,500,000

Eligible Activity: Housing

National Objective: Benefit to LMI Persons

Lead Agency and Distribution Model: SCOR will administer this program with an Implementation Contractor via direct implementation

Program Description: This program will provide affordable, safe, sanitary, secure, and resilient rental housing for LMI renters. The program will rehabilitate rental single-family stick-built properties. Property owners (landlords) must agree to a five-year affordability requirement.

Eligible Geographic Areas: HUD-identified and Grantee-identified MID areas

Eligibility:

- Landlord must agree to five-year affordability requirement. The affordability requirement requires the property owner to lease the units to LMI households earning 80% or less of the AMI and to lease the units at affordable rents. Rents must comply with the maximum HUD HOME rent limits. The maximum HUD HOME rents are the lesser of:
 - The fair market rent for existing housing for comparable units in the area as established by HUD under 24 CFR 888.111; or
 - A rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65% of the AMI, as determined by HUD, with adjustments for number of bedrooms in the unit. The HOME rent limits provided by HUD will include average occupancy per unit and adjusted income assumptions.
- Landlord must provide evidence of rent affordability annually
- Landlord must provide evidence of marketing all vacant units annually

Maximum Amount of Assistance Per Beneficiary: Funding cap, for individual projects, is \$75,000 per project. Assistance above the cap will require the approval of SCOR's Special Case Panel.

Maximum Income of Beneficiary: HUD's income limits of 80% AMI will be enforced in the program to ensure LMI tenants

Mitigation Measures: Affordable rental rehabilitation projects will employ enhanced roofs, impact windows, and continuous load path connections as required by the scope of work.

Reducing Impediments for Assistance: Impediments for assistance will be reduced by:

- Applicants will be assigned a Disaster Case Manager to be their single point of contact
- Providing accessible construction to accommodate applicants with documented mobility
- Outreach and marketing to ensure LMI applicants are aware of the program
- Mobile intake sites and home visits to ensure LMI applicants with transportation issues are served
- Assistance with navigation of ownership (heirs) issues

HOUSING PROGRAM NUMBER THREE

Program Title: Voluntary Buyouts

Amount of CDBG-DR Funds Allocated to this Program: \$5,000,000

Eligible Activity: Voluntary Buyouts (Universal Notice III.D.5.h)

National Objective: Benefit to LMI Persons

Lead Agency and Distribution Model: SCOR will administer this program via direct implementation

Program Description: Applicants, within the HUD-identified MID areas, applying for assistance must have suffered documented damage to their housing units as a result of Hurricane Helene. Such documentation may include an inspection report conducted by FEMA, SBA and/or a privately contracted inspector. The primary responsibility is on the citizen to prove that damage was caused by Hurricane Helene. In cases of demonstrable hardship or circumstances, the SCOR may consider utilizing the implementation contractor to conduct an inspection to

determine if the housing unit was damaged as a result of Hurricane Helene. SCOR will utilize pre-disaster market valuation to determine property value. Fair market pricing will be paid for the home up to the maximum amount of assistance (cap). Additionally, a moving incentive, an LMI incentive, and a Market Adjustment incentive to assist the homeowner with relocating to a new home in their community may be offered to assist the applicant in finding a new home. Duplication of Benefits gaps will reduce the award amount.

Eligible Geographic Areas: HUD-identified MID and Grantee-identified MID areas

Eligibility:

- Applicant must own and have occupied a single-family home or MHU located within the HUD-identified or Grantee-identified MID areas
- The home must be located within the 100-year flood plain, as identified by the Tier II environmental review, or within a Disaster Risk Reduction Area as defined by SCOR in its policies and procedures manual.
- Applicant must be the primary resident of the damaged property (no second homes)
- The property must have documented damage as a result of Hurricane Helene
- One person on the application with an ownership interest in part or in whole on the property must be able to demonstrate U.S. Citizenship or Lawful Permanent Residence

Priority:

- Priority will be given to Applicants who are in the extremely low and very low Area Median Income (AMI) brackets
- Priority will be given to Applicants with a documented disability
- Priority will be given to age-dependent (aged 65 or older, or 17 or below)

	HOUSEHOLD'S (AMI) AREA MEDIAN INCOME CATEGORY		
	30% AMI or BELOW	31% AMI to 50% AMI	51% AMI to 80% AMI
Applicant's Household Includes <i>Either</i> Age Dependent or Disabled	1st Priority	3rd Priority	5th Priority
Applicant's Household Includes Neither Age Dependent nor Disabled	2nd Priority	4th Priority	6th Priority

Figure 42: Priority Matrix

Maximum Amount of Assistance Per Beneficiary: Funding cap, for individual projects, is \$400,000 per project. Assistance above the cap will require the approval of SCOR's Special Case Panel.

Maximum Income of Beneficiary: The maximum income of the beneficiary must not exceed 80% of the specific county AMI

Mitigation Measures: Voluntary Buyouts, in and of themselves, are mitigation measures. Removing citizens from harm's way ensures that the property will be removed from future hazardous situations.

Reducing Impediments for Assistance: Impediments for assistance will be reduced by:

- Outreach and marketing to ensure LMI applicants are aware of the program
- Applicants will be assigned a Buyout Case Manager to be their single point of contact
- Mobile intake sites and home visits to ensure LMI applicants with transportation issues are served
- Assistance with navigation of ownership (heirs) issues

MITIGATION SET-ASIDE

MITIGATION SET-ASIDE PROGRAMS OVERVIEW

Table 42: Mitigation Programs

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Mitigation: Infrastructure	\$10,000,000	100%
Mitigation: Voluntary Buyouts	\$8,111,000	100%
Mitigation: Match	\$500,000	100%
Mitigation: Plans & Studies	\$1,000,000	100%
Total	\$19,611,000	

SCOR has designated environmental compliance authority and SCOR's Environmental Certification Officer assumes the responsibility for the decision making and completion of the Environmental Reviews per 24 CFR 58.4(b)(2) and 24 CFR 58.18.

MITIGATION PROGRAM NUMBER ONE

Program Title: Infrastructure

Amount of CDBG-DR Funds Allocated to this Program: \$10,000,000

Eligible Activity: Infrastructure projects that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future flood disasters.

National Objective: LMI Area Benefit

Lead Agency and Distribution Model: SCOR will administer this program via direct implementation.

Program Description: Infrastructure projects mitigate future flood damage associated with riverine and surface flooding. Based on applicant capacity, there may be a local cost share requirement of up to 25% for awarded Hurricane Helene CDBG Mitigation Infrastructure projects.

Eligible Geographic Areas: HUD-identified MID areas

Other Eligibility Criteria: Units of General Local Government (UGLGs) are eligible to apply for infrastructure projects. Projects must demonstrate that the community is in support of the project and that the project can be constructed with the funding requested. The methodology for prioritizing feasible projects is based on a 100-point scale, with a higher point total indicating a more feasible project.

Table 43: Prioritization Table

Prioritization Category	Maximum Points
LMI % Served	20 points
Benefit-Cost Ratio	20 points
Quantity of Flood Risk Reduction	10 points
Quality of Flood Risk Reduction	10 points
Project Design Development	10 points
Community Lifeline Improvements	10 points
Nature-Based Solutions	10 points
Consistency with Plans, Priorities, and Policies	10 points

Maximum Amount of Assistance Per Beneficiary: Funding cap, for individual projects, is \$10,000,000. Assistance above the cap will require the approval of SCOR's Special Case Panel.

Maximum Income of Beneficiary: Not applicable

Mitigation Measures: The development or improvement of infrastructure that results in reduced flood risks in HUD-identified MID areas and their surrounding communities.

Reducing Impediments for Assistance: SCOR will reduce the administrative burden on the UGLG by:

- Procuring the services required to implement the project construction; and
- Partner with the UGLG to monitor and manage the project

Program Title: Voluntary Buyouts

Amount of CDBG-DR Funds Allocated to this Program: \$8,111,000

Eligible Activity: Voluntary Buyouts (Universal Notice III.D. 5. h)

National Objective: Benefit to LMI Persons, LMI Area Benefit, and Urgent Need

Lead Agency and Distribution Model: SCOR will administer this program via direct implementation.

Program Description: SCOR will solicit applications from Units of General Local Government (UGLGs) located in the HUD-identified MID areas eligible for assistance. The UGLG must identify the responsible entity that will take ownership of the parcels once the buyout activity is complete. Buyout applications will be screened using a modified prioritization process like the infrastructure program, with the focus being LMI population served and quantifiable flood reduction. SCOR will utilize pre-disaster market valuation to determine property value. If property ownership changed post disaster, a Current Market Valuation (CMV) will be used. Market pricing will be paid for the home up to the maximum amount of assistance (cap), inclusive of incentives. Housing incentives may be offered to bring the property owner whole if pre-disaster valuations are less than CMV and/or less than purchase price. Additionally, a moving incentive, an LMI incentive, and a Market Adjustment incentive to assist the homeowner with relocating to a new home in their community may be offered to assist the applicant in finding a new home.

Housing assistance awards will be determined after factoring in housing unit value, applicable housing incentives, and any identified Duplication of Benefits (DOB).

Eligible Geographic Areas: HUD-identified MID areas

Other Eligibility Criteria: All beneficiaries will be held to the following criteria as a condition of eligibility:

- Property must be a residential parcel located within the six HUD-identified MID counties;
- One person with an ownership interest in part or in whole, the property owner(s) must be able to demonstrate U.S. Citizenship or Lawful Permanent Residence; and
- Property must be in the Special Flood Hazard Area or floodway as identified on the Flood Insurance Rate Map (FIRM), or pre-FIRM, or in a Disaster Risk Reduction Area as defined by the SCOR in the buyout program policies and procedures manual.

Maximum Amount of Assistance Per Beneficiary: Funding cap for individual projects is \$350,000. Assistance above the cap will require the approval of SCOR's Special Case Panel.

Maximum Income of Beneficiary: The maximum income of the beneficiary must not exceed 120% of the specific county AMI

Mitigation Measures: Voluntary Buyouts, in and of themselves, are mitigation measures that return parcels of land for uses compatible with open space, recreational, natural floodplain functions, wetlands management practices, or ecosystem restoration. Moving citizens from harm's way reduces the loss of life and property damage.

Reducing Impediments for Assistance: Impediments for assistance will be reduced by:

- Eligible UGLGs will have the opportunity to apply for a study to identify properties that will be most feasible for buyouts.
- Outreach and marketing to ensure UGLGs and LMI applicants are aware of the program
- Applicants will be assigned a Mitigation Case Manager to be their single point of contact
- Mobile intake sites and home visits to ensure LMI applicants with transportation issues are served
- Assistance with navigation of ownership (heirs) issues

MITIGATION PROGRAM NUMBER THREE

Program Title: Match

Amount of CDBG-DR Funds Allocated to this Program: \$500,000

Eligible Activity: All activities allowed under CDBG-DR including but not limited to flood control and drainage improvements, including the construction or rehabilitation of stormwater management systems; infrastructure improvements (such as water and sewer facilities); natural or green infrastructure; buyouts or acquisition with or without relocation assistance, housing incentives, demolition activities designed to relocate families outside of floodplains; and Hazard Mitigation Plan updates.

National Objective: LMI Direct Benefit, LM-Buyout, LMI Area Benefit

Lead Agency and Distribution Model: SCOR will administer this program via direct implementation.

Program Description: SCOR will designate funds to match federally funded mitigation grant programs to include the Hazard Mitigation Grant Program (HMGP), Flood Mitigation Assistance (FMA) Program, and any other FEMA federal grant opportunities that focus on flood reduction. Any match funding activities must meet CDBG-DR and FEMA eligibility requirements. Activities may include, but are not limited to, buyouts, structural home elevation, localized flood risk reduction, and infrastructure retrofit. Applicants are required to submit applications to the South Carolina Emergency Management Division for the FEMA HMGP program and submit applications to the South Carolina Department of Natural Resources for the FMA program.

Eligible Geographic Areas: HUD-identified MID areas

Other Eligibility Criteria: Projects must meet both FEMA and HUD requirements to be eligible for funding. Applicants must have an approved application and award letter from FEMA.

Maximum Amount of Assistance Per Beneficiary: Funding cap, for individual projects, is \$100,000. Assistance above the cap will require the approval of SCOR's Special Case Panel.

Maximum Income of Beneficiary: Not applicable.

Mitigation Measures: UGLGs with low financial capacity are more likely to pursue federal funding opportunities, which require a non-federal/local cost share, to improve their access to funding to mitigate flood risks.

Reducing Impediments for Assistance:

- Outreach and marketing to ensure UGLGs are aware of this program
- Partnership with the SC Emergency Management Division and/or SC Department of Natural Resources to ensure projects comply with both HUD and FEMA's program requirements.

MITIGATION PROGRAM NUMBER FOUR

Program Title: Plans and Studies

Amount of CDBG-DR Funds Allocated to this Program: \$1,000,000

Eligible Activity: The development or update of:

- Hazard Mitigation Plans
- Flood Risk Reduction Studies
- Hydrologic and Hydraulic (H&H) Studies
- Infrastructure project design

National Objective: Not applicable

Lead Agency and Distribution Model: SCOR will administer this program via direct implementation.

Program Description: SCOR will provide funding to units of general local governments (UGLGs) located in the HUD-defined MID areas and state agencies for the development or updating of hazard mitigation plans and the development of flood-reduction studies to identify potential projects that could be funded through the infrastructure and/or voluntary buyout programs and for the design of infrastructure projects.

Eligible Geographic Areas: HUD-identified MID areas

Other Eligibility Criteria: Not applicable.

Maximum Amount of Assistance Per Beneficiary: Funding cap, for individual projects, is \$500,000. Assistance above the cap will require the approval of SCOR's Special Case Panel.

Maximum Income of Beneficiary: Not applicable.

Mitigation Measures: UGLGs will have updated hazard mitigation plans, which are required for certain funding opportunities. UGLGs may develop studies or plans to inform mitigation strategies. UGLGs may receive assistance in the design of eligible infrastructure projects. The data collected in the development of these projects will inform future statewide studies and assessments.

Reducing Impediments for Assistance:

- SCOR will procure and manage projects, reducing the administrative burden on eligible UGLGs.

GENERAL INFORMATION

CITIZEN PARTICIPATION

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

To facilitate citizen involvement, South Carolina has laid out target actions to encourage participation and allow equal access to information about the program by all citizens. South Carolina intends to focus outreach efforts to

facilitate participation from individuals of low and moderate income, those with disabilities, those living in slum and blighted areas, and those living in areas identified for recovery through CDBG-DR. SCOR has consulted with local governments, public housing authorities, nongovernmental organizations, the private sector, and other stakeholders and affected parties in the disaster-impacted area to ensure this plan is consistent with regional redevelopment plans.

Affected residents will be notified of the draft Action Plan via public hearings in MID counties, press releases, social media, contacts with neighborhood organizations, and through SCOR's Disaster Case Management (DCM) team, with offices and events across the MID areas. SCOR holds monthly Stakeholders Briefing, well-attended by Volunteers Active in Recovery (VOADs), Long-term Recovery Groups (LTRGs), other State agencies, and citizens.

In addition to citizen involvement, South Carolina encourages the participation of regional and State-wide institutions, especially Volunteer Organizations Active in the Disaster (VOADs).

SCOR will allow a minimum of 30 calendar days for citizens to review and offer comments upon the Action Plan.

CONSULTATION OF DEVELOPING THE ACTION PLAN

Table 44: Partners

Partners Consulted	Describe Consultation
Federal Partners (FEMA, SBA)	SCOR has frequent meetings with FEMA via its Disaster Case Management team and is working with a FEMA Interagency Recovery Coordination group. SCOR has monthly meetings with its HUD representative.
Local/State Government	SCOR frequently engages with SC Emergency Management Division (SCEMD), South Carolina Department of Commerce, the South Carolina Department of Social Services, the SC Department of Natural Resources, and SC Housing with regards to disaster recovery and mitigation. SCOR has participated in a Resilience meeting with such local governments as cities of Mauldin, Fountain Inn, Greenville, Travelers Rest, Simpsonville, Greer, and others.
Indian Tribes	SCOR has met with the Catawba Indian Nation and has plans to meet again. SCOR is incorporating the Catawba Indian Nation into its FEMA-funded disaster case management program.
Nongovernmental organizations	SCOR partners with such NGOs as the One SC Fund, Habitat for Humanity, American Red Cross, The Salvation Army, the United Way Association of South Carolina, United Way of the Midlands, and Catholic Charities of SC to discuss housing solutions across the FEMA IA counties.
Private sector	SCOR has partnered with Google to leverage funds for disaster recovery. Other private sector partners include Dominion Energy, Duke Energy Foundation, and Palmetto Citizens Federal Credit Union.
State and local emergency management agencies that have primary responsibility	SCOR is part of SCEMD's ESF-14 (Housing) group and its Recovery Task Force (RTF) and participates in SCEMD led discussions, exercises, and emergency operations support. SCOR serves with SCEMD on FEMA's Interagency Coordination (IRC) team.

for the administration of FEMA funds	
State Housing Finance Agencies	SCOR engages with SC Housing to leverage funding used to repair and rebuild more disaster damaged and destroyed homes. SCOR's Common Housing Operating Picture (CHOP) initiative partners with and tracks the efforts SC Housing to ensure no duplicative efforts.
Other Stakeholders	SCOR engages with citizens and other partners monthly via its Stakeholders Briefing.
CoCs	SCOR engages with and has a working relationship with United Way of the Midlands, lead agency for the Midlands Area Consortium for the Homeless (MACH). SCOR also engages with SC211, a services referral network administered by United Way Association of SC. SCOR engages with CoCs via its Stakeholders Briefing, Town Halls, presentations, and referrals.
Housing Authorities	SCOR frequently engages with SC Housing as part of the Housing Recovery Support Function (RSF) and Emergency Support Function (Housing – ESF14), wherein SC Housing and SCEMD are the lead agencies, respectively. SCOR discusses affordable housing, housing recovery, and temporary housing on an ongoing basis with SC Housing. SCOR's Chief of Staff and Disaster Recovery Director are members, along with SC Housing staff, of the Post-Disaster Housing Design Work Group. SCOR has consulted with local housing authorities, including Gaffney Housing Authority and Rock Hill Housing Authority, to ascertain their damages and other needs.
Housing Counseling	SCOR partners with SC Legal Services via referrals and SCOR's CDBG-DR Town Halls to provide free legal and housing counseling services to SCOR's CDBG-DR housing program beneficiaries. SCOR refers beneficiaries with heirs issues to SC Legal Services. SCOR provides referrals for HUD-approved counseling agencies in South Carolina, such as Greenville County Human Relations Commission, New America Corporation (Orangeburg), and ReGenesis Community Development Corp (Spartanburg).

PUBLIC COMMENTS

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

- Comment period for the original Action Plan will take place for 30 days after the publication of the Action Plan to the SCOR website. The original Action Plan was posted on the website on 15 May 2025.
- Comment period for Substantial Amendments will take place for 30 days after the publication of the Substantial Amendment to the SCOR website.

PUBLIC HEARINGS

SCOR will hold at least six public hearings in the HUD identified MID areas.

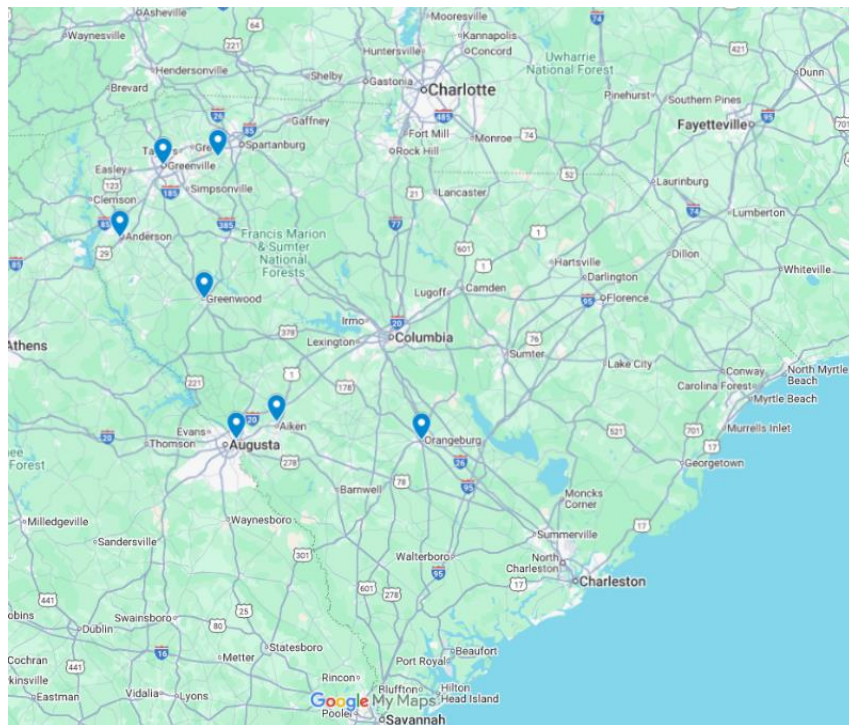
Additionally, SCOR will host virtual conferences with any interested parties, who request information, to discuss the plan prior to submission to HUD for approval. South Carolina has considered any comments or views of citizens received in writing and the responses to those comments are in the Appendix.

ACCESS TO PUBLIC HEARINGS

Individuals who required auxiliary aids or special assistance to view the presentation should contact SCOR (803-896-4215 or contact@scor.sc.gov). Citizens with hearing impairment can call Relay South Carolina at 7-1-1 for assistance.

SCOR was required to hold two public hearings, per the Universal Notice. However, seven public hearings were coordinated, with the intent to provide accessibility for citizens. All public hearings were held in physically accessible facilities, as described below.

- Map of all areas

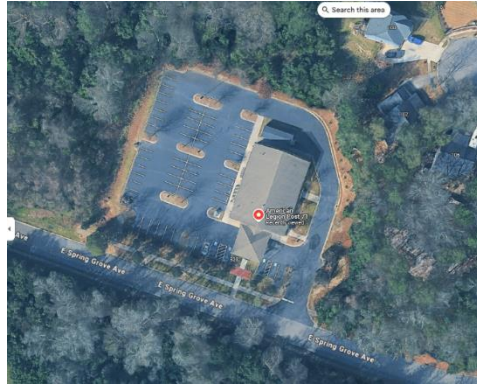


-
- SCOR hosted seven town hall meetings in areas impacted by Hurricane Helene. These locations ranged from urban centers such as downtown Greenville, downtown Orangeburg, downtown Anderson, and North Augusta, to rural locations including Duncan, SC and the Aiken County Government Center.

Aiken County

American Legion Post 71
333 E. Spring Grove Ave.
North Augusta, SC 29841
May 27, 2025

- North Augusta



-
-
- American Legion Post 71, located in the City of North Augusta, is accessible by Interstate 520. The attached photos demonstrate ample parking facilities and a covered, ground-level entryway.

Aiken County Government Center
 1930 University Pkwy
 Aiken, SC 29801
 May 27, 2025

- Aiken



-
- The Aiken County Government Center is located just outside of the City of Aiken's downtown area. Accessible by University Parkway, the complex is centrally located in Aiken County, contains multiple ground-level entrances, and has extensive parking facilities.



Spartanburg County
 Spartanburg Community College Tyger River Campus
 1875 E. Main St.
 Duncan, SC 29334
 June 3, 2025

- Spartanburg



-
- The Spartanburg Community College Tyger River Campus is located in Duncan, SC. Accessible from either Interstate 26 or Interstate 85, the facility has an ADA-compliant entrance and plenty of parking.

Greenville County

Greenville Water Community Room

517 W. Washington St.

Greenville, SC 29601

June 3, 2025

- Greenville



-
- The Greenville Water Community Room is located in downtown Greenville, is served by an adjacent parking garage, and includes entrances both on the sidewalk and connecting the parking garage directly to the building's interior.

Anderson County

Westside Community Center

1100 W. Franklin St.

Anderson, SC 29624

June 10, 2025

- Anderson



-
- The Westside Community Center is located just over one mile outside of Anderson's downtown area. The Center has ample parking and a ramp leading to the main entrance.

Orangeburg County

Orangeburg County Conference Center

1643 Russell St.

Orangeburg, SC 29115

June 10, 2025

- Orangeburg



-
- Located in downtown Orangeburg, the County Conference Center includes two parking lots and accessible entrances.

Greenwood County

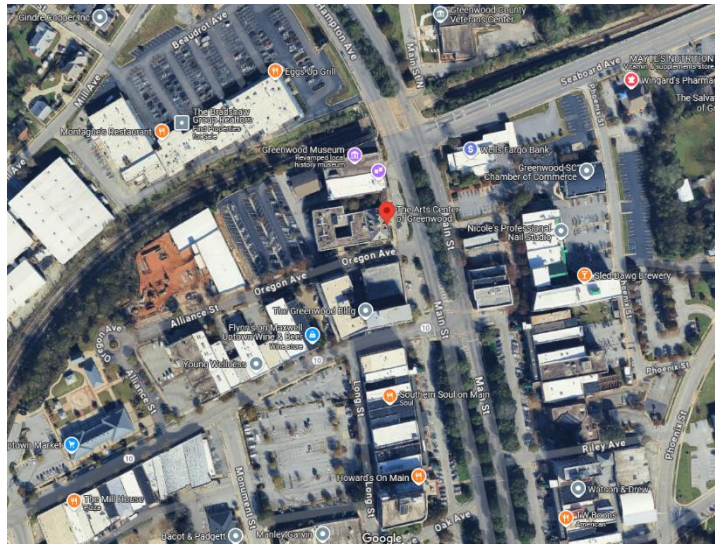
Greenwood Performing Arts Center

110 Main St. N

Greenwood, SC 29646

June 12, 2025

- Greenwood



-
- The Arts Center of Greenwood is centrally located in the downtown area with multiple parking lots within a short walk from the facility. A ramp for accessibility is located along the northern side of the building.

CONSIDERATION OF PUBLIC COMMENTS

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

DISPLACEMENT OF PERSONS OR ENTITIES

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

CITIZEN COMPLAINTS

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

The goal of SCOR and its Constituent Services Team is to provide an opportunity to resolve complaints in a timely manner, usually within 15 business days, as expected by HUD, if practicable, and to provide the right to participate in the process and appeal a decision when there is reason for an applicant to believe their application was not

handled according to program policies. All applications, guidelines, and websites will include details on the right to file a complaint or appeal, and the process for filing a complaint or beginning an appeal.

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

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

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

South Carolina Office of Resilience

Attention: Constituent Services

632 Rosewood Drive

Columbia, SC 29201

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

U.S. Department of Housing and Urban Development

1835 Assembly Street, 13th Floor

Columbia, SC 29201

MODIFICATION TO THE ACTION PLAN

SUBSTANTIAL AMENDMENT

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

- A change in program benefit or eligibility criteria
- An addition or deletion of any allowable activity; or

- A proposed reduction in the overall benefit requirement (70% LMI)
- An allocation or reallocation of more than \$10,000,000; or
- A change in planned beneficiaries; or
- The establishment of an additional Grantee-identified MID area; or
- An update to the submitted Action Plan if the original submission was incomplete as allowed by the Universal Notice.

Citizens will be provided with no less than 30 days to review and provide comment on proposed substantial changes. A summary of all comments received will be included in the final Substantial Amendment submitted to HUD for approval. Final Substantial Amendments approved by HUD will be posted to the Disaster Recovery website.

NON-SUBSTANTIAL AMENDMENT

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

PERFORMANCE REPORTS

In accordance with HUD requirements, SCOR will submit a quarterly Performance Report through the HUD Disaster Recovery Grant Reporting (DRGR) system no later than 30 days following the end of each calendar quarter. Within three days of submission to HUD, SCOR will post each Performance Report on the SCOR website (<https://scor.sc.gov/Helene>). Program Performance Reports will be completed on a quarterly basis until all funds have been expended, all expenditures have been reported, and the grant has been closed.

APPENDICES

APPENDIX A

CERTIFICATIONS

SCOR acknowledges that it will administer the CDBG-DR grant consistent with the following certifications required by Federal statute and regulation.

Certifications Waiver and Alternative Requirement for Action Plan Submission.

- a. **Uniform Relocation Act (URA) and Residential Anti-displacement and Relocation Plan (RARAP)** - SCOR certifies that it:
 - i. Will comply with the acquisition and relocation requirements of the Uniform Relocation Act, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements;
 - ii. Has in effect and is following a RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.
- b. **Authority of Grantee** - SCOR certifies that the Action Plan for disaster recovery is authorized under state and local law (as applicable) and that SCOR, and any entity or entities designated by SCOR, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- c. **Consistency with the Action Plan** - SCOR certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.
- d. **Citizen Participation** - SCOR certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).
- e. **Consultation with Local Governments** - SCOR certifies that it has consulted with all disaster-affected local governments (including any CDBG entitlement grantees), Indian Tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the State.
- f. **Use of Funds** - SCOR certifies that it is complying with each of the following criteria:
 - i. Purpose of the funding. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 et seq.).

- ii. **Maximum Feasibility Priority.** With respect to activities expected to be assisted with CDBG– DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
- iii. **Overall benefit.** The aggregate use of CDBG–DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.
- iv. **Special Assessment.** SCOR will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
 - a. disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or
 - b. for purposes of assessing any amount against properties owned and occupied by persons of moderate income, SCOR certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- g. **Grant Timeliness** - SCOR certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that SCOR has reviewed the requirements applicable to the use of grant funds.
- h. **Order of Assistance** - SCOR certifies that it will comply with the statutory order of assistance listed in Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG–DR assistance for the costs of carrying out the same activity.

Further, as required by Paragraph 64 of HUD’s March 19, 2025, memorandum revising Appendix B of HUD’s Universal Notice issued on January 8, 2025, SCOR hereby provides assurance that it shall comply with the following certifications:

- a. General Certifications at 24 CFR 91.325(a)(1), (3), and (7)
- b. Community Development Block Grant Program Certifications at 24 CFR 91.325(b)(5), (6), and (7).

Benjamin I. Duncan II
Chief Resilience Officer

17 June, 2025
Date

UNMET NEEDS DATA SOURCES

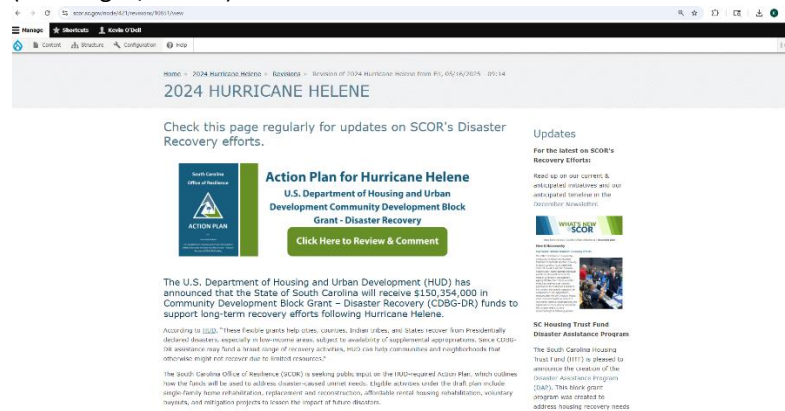
Table 45: Data Sources Used in this Assessment

OPEN FEMA PA Data	https://www.fema.gov/openfema-data-page/public-assistance-funded-projects-details-v1
OPEN FEMA PA Applicant Data	https://www.fema.gov/openfema-data-page/public-assistance-applicants-v1
OPEN FEMA IA Applicant Data	https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1
OPEN FEMA Disaster Declarations	https://www.fema.gov/openfema-data-page/disaster-declarations-summaries-v2
OPEN FEMA Hazard Mitigation Projects	https://www.fema.gov/openfema-data-page/hazard-mitigation-assistance-projects-v3
HUD LMI Data	https://www.hudexchange.info/programs/cdbg/cdbg-low-moderate-income-data
HUD Continuum of Care and Point in Time Count Data	https://www.hudexchange.info/programs/hdx/pit-hic
Public Housing Impacts	South Carolina Housing
SBA Summary Data	https://www.sba.gov/document/report-sba-disaster-loan-data
Grantee Demographics	https://api.census.gov/data/2023/acs/acs5/subject?get=S0101_C01_001E,S0101_C01_002E,S0101_C01_030E,S1810_C02_001E&for=county:xxx&in=state:xx and https://api.census.gov/data/2023/acs/acs5?get=B01001H_001E,B01001I_001E,B01001B_001E,B01001C_001E,B01001D_001E,B01001E_001E&for=county:xxx&in=state:xx
Income Demographics	https://api.census.gov/data/2023/acs/acs5/subject?get=S1901_C01_012E,B19301_001E,B17017_001E,B17017_002E&for=county:xxx&in=state:xx
English Language Proficiency	https://api.census.gov/data/2023/acs/acs5/subject?get=S1601_C01_001E,S1601_C05_001E,S1601_C01_004E&for=county:xxx&in=state:xx
Mobile Home Units	https://api.census.gov/data/2023/acs/acs5/profile?get=DP04_0014E&for=county:xxx&in=state:xx
Rental Units	https://api.census.gov/data/2023/acs/acs5?get=B25127_001E,B25127_045E,B25127_046E,B25127_053E,B25127_060E,B25127_067E,B25127_074E,B25127_081E&for=county:xxx&in=state:xx

COMMENTS AND RESPONSES

As required per the Revised Universal Notice, SCOR presents an accounting of public comments received between May 16, 2025 and June 15, 2025 on its Action Plan. Comments and responses relating to SCOR's Action Plan were collected via SCOR's website, USPS mail, and in person. Notification of the Action Plan and how to provide comments are describe in the records, methods, news stories, press releases, and documents listed below. SCOR maintains records of all public officials, media (print, TV, radio), social media, state agency partners, and neighborhood organizations to which notifications of the action plan, comment methods, and town halls were sent.

- Website (scor.sc.gov/Helene)



-
- SCOR's Hurricane Helene Disaster Recovery webpage prominently announced the action plan was available for review and comment for the entire 30-day public comment period.
- Options available for submitting feedback included:
 - Submitting a feedback form on the website (records of these responses are included in Appendix C of the Draft Action Plan)
 - Sending mail to 632 Rosewood Dr. Columbia, SC 29201
 - Contributing verbal feedback at public meetings (listed on scor.sc.gov/Helene and summarized below)

Meeting Location	Meeting Date	Meeting Time
Charleston Region - Old 7th	May 27th, 2025	2:00PM - 3:00PM
North Augusta	May 27th, 2025	2:00PM - 3:00PM
Alcon County Government Center	May 27th, 2025	2:00PM - 3:00PM
Charleston County Government Center	May 27th, 2025	2:00PM - 3:00PM
Charleston County Government Center	May 27th, 2025	2:00PM - 3:00PM
Charleston County Government Center	May 27th, 2025	2:00PM - 3:00PM
Charleston County Government Center	May 27th, 2025	2:00PM - 3:00PM
Charleston County Government Center	May 27th, 2025	2:00PM - 3:00PM
Charleston County Government Center	May 27th, 2025	2:00PM - 3:00PM
Charleston County Government Center	May 27th, 2025	2:00PM - 3:00PM

- Newsletters
 - Confirmed meetings were announced in SCOR’s weekly Friday Fun(d) Day newsletter sent to our non-profit and Voluntary Organization Active in Disaster (VOAD) partners starting on May 16, 2025
 - May 16, 2025: <https://icont.ac/512R6>
 - May 23, 2025: <https://icont.ac/512Sz>
 - June 6, 2025: <https://icont.ac/513pi>
 - The April/May issue of SCOR’s agency-wide newsletter announced all town hall meetings on May 23, 2025: <https://icont.ac/512SB>
- Emails
 - In each county where a public meeting was held, SCOR sent email notifications to:
 - The County’s legislative delegation
 - Local Officials
 - Print + online media outlets
 - TV stations
 - Radio Stations
 - State Agency partners
 - **All parties contacted by email are recorded by SCOR.**
 - In counties adjacent to those hosting public meetings, SCOR sent email notifications to:
 - State legislators
 - Local officials
 - When different than the hosting county, local media outlets
 - **All parties contacted by email are recorded by SCOR.**
- Phone Calls
 - **All records of phone calls made to municipalities in each county hosting a public meeting are archived by SCOR.**
- Additional Promotion (social media posts & media coverage)
 - **All Meetings**
 - <https://www.sccounties.org/news/hurricane-helene-housing-recovery-and-mitigation-funding>
 - **North Augusta**
 - Promotion
 - https://www.instagram.com/p/DKKfED2PC07/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
 - <https://www.facebook.com/share/p/15deuHsPNN/>
 - Follow up
 - https://www.wfxg.com/news/south-carolina-office-of-resilience-hosts-action-plan-meeting-in-north-augusta/article_cf675f44-b384-43af-8c6b-3e02ade24827.html
 - <https://www.wrdw.com/2025/05/27/how-should-south-carolina-spend-150m-federal-hurricane-aid/> (Also promotes Orangeburg)

- https://www.postandcourier.com/northaugusta/government/150m-federal-aid-south-carolina-aiken-county-longterm-recovery-helene/article_44e85631-032f-45a8-8732-45abe5466a77.html
- **Aiken**
 - Promotion
 - <https://www.facebook.com/share/p/15deuHsPNN/>
- **Greenville**
 - Promotion
 - <https://www.facebook.com/share/p/16QRx2Z7HX/>
 - <https://www.facebook.com/share/p/1FQMQVr9Ad/>
 - <https://www.facebook.com/share/p/16KRi47Zio/>
 - <https://www.facebook.com/share/p/1CTNCAY2am/>
 - <https://www.facebook.com/share/p/1P4CasYzDN/>
- **Spartanburg**
 - Promotion
 - <https://www.facebook.com/share/p/16pxiG9YzE/>
 - https://www.instagram.com/p/DKRvxCUNleJ/?utm_source=ig_web_copy_link
 - <https://www.facebook.com/share/p/1Qr4HiEaEC/>
 - <https://www.facebook.com/share/p/16KRi47Zio/>
 - <https://www.facebook.com/share/p/1AzQTdiu7a/>
 - <https://www.facebook.com/share/p/1P4CasYzDN/>
 - <https://www.facebook.com/share/p/1YpVpZpj7/>
 - <https://www.facebook.com/share/p/15RSq4rY4Y/>
 - Follow up
 - <https://www.facebook.com/share/p/16yaZNpWpa/>
 - <https://www.facebook.com/share/p/1BqrrGzGvZ/>
- **Orangeburg**
 - Promotion

- <https://www.wltx.com/article/weather/hurricane/helene/hurricane-helene-orangeburg-home-repair-aid-meeting-june-2025/101-33910c8e-38c4-4f7e-98f9-da125807b8a7>
- <https://aging.sc.gov/events/public-meeting-hurricane-helene-disaster-recovery-action-plan-input-meeting-june-10-2025>
- <https://www.facebook.com/share/p/1AnLD4ESQ/>
- <https://www.facebook.com/photo?fbid=701597185594610&set=pb.100072330043163.-2207520000>
- <https://www.facebook.com/share/16jd8og73h/>
- <https://www.facebook.com/share/p/18f8tFKXSR/>
- <https://www.facebook.com/share/p/1W2AHix5Et/>
- Follow Up
 - <https://www.wltx.com/article/news/local/street-squad/orangeburg/orangeburg-residents-seek-recovery-aid-after-hurricane-helene-south-carolina/101-ed7ddb39-981e-4ab4-a2ad-f7c1b3855089>
- **Anderson**
 - Promotion
 - <https://www.facebook.com/share/p/19Rf6zahQz/>
 - <https://www.andersoncountysc.org/event/hurricane-helene-disaster-recovery-action-plan-input-meeting/>
 - Follow up
 - <https://www.wspa.com/news/anderson-hosts-hurricane-helene-town-hall-meeting/>
- **Greenwood**
 - Promotion
 - https://www.indexjournal.com/news/greenwood-residents-invited-to-weigh-in-on-150m-storm-recovery-plan/article_49cf207f-decc-49f7-8722-dbe80b4b835f.html
 - https://www.indexjournal.com/news/sc-agency-to-host-town-hall-in-greenwood-on-150m-hurricane-helene-recovery-plan/article_277e5712-1401-4dd5-a801-d7cdde09b101.html
 - <https://aging.sc.gov/events/public-meeting-hurricane-helene-disaster-recovery-action-plan-input-meeting-june-12-2025>
 - <https://www.heregreenwood.com/greenwood-events/>

- <https://www.heregreenwood.com/greenwood-news/>
 - https://www.facebook.com/shares/view?id=709339134820415&overlay=1¬if_id=1749138588209278¬if_t=story_reshare&ref=notif
 - <https://www.facebook.com/share/p/1A8YWgTUxd/>
 - <https://www.facebook.com/share/p/1CBZC3ufH1/>
 - <https://www.facebook.com/share/p/1FM3ijZb9s/>
 - <https://www.facebook.com/share/p/19mqfVjp7V/>
- Follow Up
 - <https://www.facebook.com/share/p/1GTtLkhib3/>

Public Hearings (Town Halls)

Aiken County

American Legion Post 71
333 E. Spring Grove Ave.
North Augusta, SC 29841
May 27, 2025

Aiken County Government Center
1930 University Pkwy
Aiken, SC 29801
May 27, 2025

Spartanburg County

Spartanburg Community College Tyger River Campus
1875 E. Main St.
Duncan, SC 29334
June 3, 2025

Greenville County

Greenville Water Community Room
517 W. Washington St.
Greenville, SC 29601
June 3, 2025

Anderson County

Westside Community Center
1100 W. Franklin St.
Anderson, SC 29624
June 10, 2025

Orangeburg County

Orangeburg County Conference Center
1643 Russell St.
Orangeburg, SC 29115
June 10, 2025

Greenwood County

Greenwood Performing Arts Center
110 Main St. N
Greenwood, SC 29646
June 12, 2025

Public Comments and Responses

#	Comment / Question	SCOR Response
1	The funds should go to help homeowners as well as renters to remove trees that have fallen on their private property from trees that are actually on State/City property. The prices being charged for services and the disapprovals from FEMA as well insurance companies are abysmal.	SCOR's housing program does not allow tree removal with Community Development Block Grant – Disaster Recovery (CDBG-DR) funds unless the home is being repaired or reconstructed by said funds and the tree has fallen on the home or is in danger of falling on the home. SCOR works with Voluntary Organizations Active in Disasters (VOADs) to remove fallen trees from citizens' homes, when alerted to specific situations, and is actively resourcing tree removal VOADs to individuals with downed trees on homes.
2	Why does the allocation to percentage of (unmet) need look low?	Congress appropriates all allocations and had multiple disasters over two years (2023 - 2024) to appropriate.
3	Is there any chance of a supplemental allocation?	A supplemental allocation seems unlikely.
4	How does FEMA factor into the process? What is their exact role?	FEMA provides data for the allocation appropriation and Individual Assistance, but this is an incomplete solution. FEMA can only offer up to a maximum of \$42,500 for disaster repairs or reconstruction.
5	What is the role of faith-based response / quick response?	SCOR coordinates closely with Volunteers Active in Disasters (VOADs) to facilitate immediate recovery efforts.

6	My input is as follows: 1. Underground critical infrastructure, such as power and communication lines 2. Create a ROW beautification/resiliency program and use some funding to seed the program and then budget annually 3. Purchase needed equipment and upgrade equipment that is used during disasters (ie, Emergency Vehicles, chainsaws, lighting, heavy equipment) 4. Work with under-insured property owners to give grant opportunities to repair and return a home to its original condition 5. Create a rainy day fund and use it to match federal, state, and local grant opportunities for infrastructure improvements 6. Work with government officials, developers, and other interested parties to create resiliency in new development and improved development	1. SCOR's unmet needs assessment determined housing to be 81% (\$1.7B) of the total unmet need. There is not adequate funding to restore or improve the power/communications grid. These types of infrastructure typically fall under SCEMD's purview via Public Assistance (PA). 2. SCOR's Housing Program will focus on providing resilient, safe, sanitary, and secure homes for South Carolina's Low-and-Moderate Income (LMI) citizens affected by Hurricane Helene. Other than grass sod to prevent erosion adjacent to the home, the Housing Program will not provide landscaping for homes 3. CDBG-DR funds must be used for recovery efforts from Hurricane Helene. Equipment for future use is not considered disaster recovery. 4. SCOR will work directly with LMI citizens to rehabilitate, replace, or reconstruct their homes with licensed general contractors. Most of these citizens are underinsured or uninsured. SCOR will not provide direct funds to citizens. 5. SCOR will use up to \$500,000 to match federal funds for Units of General Local Government who apply through its Mitigation Match Program. 6. SCOR will use resilient building practices (enhanced roofs, continuous load path, impact windows, etc.) in all its reconstruction projects and in rehabilitation projects wherein the scope is appropriate for such measures.
7	Renewable Water Resources (ReWa) appreciates the opportunity to provide public comment on South Carolina's draft Action Plan for the Community Development Block Grant – Disaster Recovery (CDBG-DR) program for Hurricane Helene. We commend the South Carolina Office of Resilience (SCOR) for its thoughtful, well-structured plan and appreciate the emphasis placed on housing recovery. Ensuring that residents are safely and securely housed is fundamental to disaster recovery, and we applaud the State's leadership on this front. As recovery efforts move forward, we urge the State to also recognize the critical unmet needs that remain in infrastructure, particularly water and wastewater systems. ReWa is a special purpose district responsible for providing wastewater treatment and collection services to over 162,000 customers in the Upstate of South Carolina. Additionally, ReWa serves as a regional steward of water quality, working to protect our local environment and ensure clean water for	SCOR believes that the Housing Program for low-and-moderate income citizens is critical for the overall recovery effort. The \$1.7B in housing unmet need is greater than the Housing unmet need in the three previous disasters, combined, and yet the grant award is less than half of those disasters, cumulatively. The Hurricane Helene CDBG-DR grant, as a percentage of the housing unmet need, is only 8.6% (even less when the Mitigation Set-aside is considered), compared to 39.2% for the 2015 Flooding disaster, 21.8% for 2016 Hurricane Matthew, and 12.5% for Hurricane Florence. As we've discovered in previous disasters, there is woefully too little funding for those least likely to recover without help. Funding for the 2015 Flooding disaster, 2016 Hurricane Matthew, and 2018 Hurricane Florence allowed housing recovery, through SCOR's CDBG-DR programs, for only one third of the over 10,000 applications received. For Hurricane Helene, many low-and-moderate income citizens will go unserved because of lack of funding. SCOR

communities downstream. ReWa serves several of the HUD identified MID areas, including Greenville County, and parts of Anderson, Laurens, and Spartanburg counties. ReWa also serves portions of Pickens County, a grantee MID area. ReWa experienced extensive damage to its infrastructure from Hurricane Helene; damages are still being calculated, but they are currently estimated to be between \$20 and \$30 million. Hurricane Helene has highlighted vulnerabilities across our regional system, and we have identified a portfolio of critical infrastructure projects aimed at strengthening wastewater services and protecting key facilities from future storm impacts. The HMGP projects, totaling over \$40 million in project costs, are eligible for funding through the FEMA Hazard Mitigation Grant Program (HMGP). ReWa is applying for approximately \$30 million in HMGP assistance (federal share), but that funding is not guaranteed and ReWa still must identify over \$10 million in non-federal match to implement them. These HMGP projects will support sewer upgrades and related infrastructure work, protecting nearly 80,000 customers. This need is further exacerbated by the fact that the Building Resilient Infrastructure and Communities (BRIC) program under FEMA was recently canceled. ReWa was selected for award for 4 other projects from the Fiscal Year 2023 cycle of BRIC, representing over \$12 million in federal funding. ReWa was relying on that now canceled funding to mitigate risk to critical wastewater infrastructure, representing additional unmet mitigation needs for ReWa's vast service area. Increasing the State's allocation for infrastructure activities and HMGP match funding through the CDBG-DR program, even at 9% of funding to align with the infrastructure unmet need, would accelerate implementation of these projects and ensure that communities across the Upstate can build back stronger. We also encourage the State to continue considering utilities like ReWa as eligible subrecipients of infrastructure funding, given our regional role and our readiness to implement high-impact projects that directly address disaster-related damage. We are grateful for the leadership shown by SCOR and appreciate the opportunity to contribute to	believes that housing recovery for LMI citizens is the best use of the CDBG-DR funding. There is Match and Plans & Studies funding available through the Mitigation Set-aside allocation (\$19,611,000 as directed by the Allocation Announcement Notice 90 FR 4759, which is 13% of the grant). Under the Action Plan, units of general local government (UGLG), councils of governments, counties, and state agencies are eligible applicants for mitigation projects. Special purpose districts such as utilities are not eligible applicants. However, coordination with eligible UGLGs in your area of operation may be a possibility. Potential resources may also be available through the South Carolina Rural Infrastructure Authority, South Carolina Emergency Management Division's Safeguarding Tomorrow Revolving Loan Fund, and by contacting your Congressional delegation.
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	the planning process. ReWa looks forward to continued collaboration and welcomes the chance to share additional information as needed.	
8	Who will be the Implementation Contractor?	The Implementation Contractor is not known yet but will be selected via a competitive procurement process
9	Can the 90-day MIT application period be used to apply for forming a Resilience Plan?	Yes, a Resilience Plan is an appropriate use of the MIT set-aside funds.
10	How can I share data with SCOR?	Data can be shared by contacting any member of the SCOR Disaster Recovery team, the Disaster Case Management Team, or via SCOR's Common Housing Operating Picture initiative.
11	Where do you get your contractors?	SCOR will procure and manage an Implementation Contractor to administer the housing programs. The Implementation Contractor will employ general contractors to perform the rehabilitations, replacements, and reconstructions.
12	Do you have big builders willing to except less money for more homes?	SCOR uses a fixed cost and standard home plans for reconstructed homes in order to provide more cost reasonable homes for citizens.
13	How does affordable rental (program) work?	SCOR will repair rental units for landlords who agree to keep the rent affordable for five years.
14	Does the affordable rental program repair multi-family dwellings?	At this time, only single-family homes will be considered for affordable rental repair.
15	When do you anticipate opening the 90-day application period for mitigation projects?	SCOR anticipates opening the 90-day application period this fall, so that communities will have advance notice and be able to prepare.
16	Are (mitigation) application requirements on SCOR's website?	Pending HUD approval of SCOR's action plan, requirements will be posted to SCOR's website soon. Requirements will be similar to SCOR's CDBG-MIT programs.
17	Where do you get manufactured housing units (MHUs)?	Once assigned, general contractors contract directly with manufacturers for MHUs which meet SCOR's HQS standards.
18	Is there an application we would need to fill out to obtain these additional funds or since we're already registered with FEMA for the event it would be automatic?	There is a separate application for our upcoming housing program, in which homes will be rehabilitated, replaced, or reconstructed. FEMA does not have a "common application" which connects to funding from FEMA and from the Department of Housing and Urban Development as well. Our Disaster Case Management Team can be reached at 803-898-2511 should you wish to apply for the housing program or other unmet needs.

19	How do you find pockets of rural communities?	From citizen intelligence and the faith-based communities. We ask citizens at town halls, DCM intakes, and other informational meetings in communities.
20	When a disaster happens, what is the timeline to recovery?	SCOR follows the timeline and deadlines set by HUD, per the Universal Notice and AAN, for Action Plan submittal, Financial Certifications submittal, Housing Policies submittal, etc. Generally, recovery can begin with CDBG-DR funds one to two years from the disaster and full expenditure of funds is required within six years of a grant agreement.
21	How was the grant amount (\$150M) determined?	HUD determines all CDBG-DR grant amounts. Please see the Allocation Announcement Notice (AAN) 90 FR 4759 for more information on the allocation of funding.
22	What are the eligibility requirements for the Housing Program?	SCOR's Action Plan and Housing Policies and Procedures detail all eligibility requirements. Generally, applicants must have owned and resided in the home at the time of the disaster, must be a U.S. Citizen, and must be of Low-to-Moderate income (LMI).
23	Is SCOR connected to FEMA? Do we handle FEMA funds?	SCOR receives data from FEMA that is helpful for SCOR's HUD CDBG-DR recovery programs. SCOR is not connected to FEMA's individual assistance programs. However, please note that SCOR's Disaster Case Management (DCM) Program is funded by a FEMA grant.
24	How long does it take to receive assistance?	SCOR will submit its Action Plan after the 30-day public comment period. HUD has up to 45 days to approve the Action Plan. Once the Action Plan and Financial Certifications are approved by HUD, a grant agreement can be signed and funding will be available. SCOR will immediately begin assisting homeowners through its CDBG-DR grant at that time. SCOR will begin assisting citizens this year.
25	How does income eligibility work?	SCOR's Action Plan and Housing Policies and Procedures detail all eligibility requirements. HUD requires 70% of funds to be used for Low-to-Moderate income (LMI) citizens. SCOR will serve 100% LMI citizens. Income is based on Adjusted Gross Income (Federal Form 1040). Tax returns, pay stubs, Social Security forms, retirement forms, etc. may be used to determine income eligibility.
26	The application window for the mitigation application period was announced at yesterday's meeting. Smaller municipalities will need more	SCOR will extend the application period from the stated dates in the Town Hall presentations. Although dates are not part of the action plan, this comment is posted as informational.

	time to identify projects and complete applications.	
27	I believe that some of the money should be used to take down old trees near homes that would pose a hazard to homes if they were to fall. We have one next to our house that need to come down, but we do not have the money to have it taken down. It is hanging on the power lines, but Duke says it is not their problem. Please consider doing this for the people who cannot pay to have them removed but want to make sure their homes are protected.	SCOR's housing program does not allow tree removal with Community Development Block Grant – Disaster Recovery (CDBG-DR) funds unless the home is being repaired or reconstructed by said funds and the tree has fallen on the home or is in danger of falling on the home. SCOR works with Voluntary Organizations Active in Disasters (VOADs) to remove fallen trees from citizens' homes, when alerted to specific situations, and is actively resourcing tree removal VOADs to individuals with downed trees on home.
28	Can you help with infrastructure improvements?	Yes, SCOR's MIT Set-aside Infrastructure program is available for cities, towns, counties, councils of government, and state agencies to apply during the open application period.
29	Is the housing program only for flooded homes?	No, all homes (in the HUD or Grantee-identified counties) are potentially eligible for the housing program if they received any type of damage related to Hurricane Helene.

Amendment 1

Public Comments and Responses

We received public comments that were requests for individual assistance but non-responsive and non-pertinent to the nature and substance of the proposed amendment. The commenter has been referred to our Disaster Case Management Program.

Amendment 2

Public Comments and Responses

We received public comments that were requests for individual assistance but non-responsive and non-pertinent to the nature and substance of the proposed amendment. The commenter has been referred to our Disaster Case Management Program.