



## SECTION 7. RESPONSE TO PUBLIC COMMENTS

Richland County's CDBG-DR Action Plan was published on the flood recovery website ([www.rcgov.us/floodrecovery](http://www.rcgov.us/floodrecovery)) on Friday August 26<sup>th</sup> to solicit public comments. A summary of all comments received along with Richland County's responses are provided below.

**Comment:** There appears to be a typographical error on page 32 under the "CDBG Eligibility and National Objective" section. The second sentence refers to the SFHRP, but should refer to SRRP.

**Response:** This is a typographical error and has been corrected.

**Comment:** It appears that the columns in Table 1 do not add up to the totals listed.

**Response:** This is a typographical error and has been corrected.

**Comment:** In Section 3.2 "Basis for Funding Allocations" the plan describes administration costs as the costs to set up and manage the recovery programs. Is the list of provided inclusive of all work that will be paid for with the Administration money?

**Response:** The list of all tasks necessary to accomplish the delivery of CDBG-DR programs is quite extensive and varies between programs. Therefore, the list included in the Action Plan is not all-inclusive. We have updated the language in the plan to modify tasks listed and to clarify that the list includes, but is not limited to, the listed tasks.

**Comment :** Per the committee meeting today: Page 34 of the Action plan, Section 3.4.3 indicates that 16 homes will be assisted with the HMGP buyout match. I think this is a typographical error. Shouldn't this be 63?

**Response:** We have verified the number of projected projects to be served and updated accordingly.

**Comment:** For the rental program, a requirement should be that the landlord/owner must prove that they were denied traditional funding sources.

**Response:** We have re-evaluated the program criteria and updated the plan to include this requirement.

**Comment:** For the rental program, the maximum number of loans that any one landlord/owner should be able to receive from the program should be reduced from 4 to 1.

**Response:** We have evaluated this suggestion and revised the guidelines to indicate that only one loan will be available per property owner.



**Comment:** For the rental program, 100% of the benefit for this program should be to LMI individuals.

**Response:** This program is already designed so that 100% of the benefit will go to LMI individuals.

**Comment 5:** Twenty-eight properties assisted is a very low number. We would like to see more than 28 homes for renters assisted

**Response:** Twenty eight units is all that will be assisted with the current funding level of \$2,000,000 and assuming that each of the 28 rental homes assisted will require the full funding cap per unit. Twenty eight units is therefore, the target number of units to be served. Should some of the rehabilitation work not require the full funding cap per unit, funds will be available to assist additional rental units. The program funding levels will be evaluated throughout the project delivery and the final number of assisted units will be determined based on funds available.

**Comment:** How is this information being distributed to the rural communities with no internet access? Churches are the main source of information in some of these communities. What are you doing to make sure that this information is distributed widely to reach those in the rural areas?

**Response:** The County is using the Public Information Officer to distribute public service announcements. Information is posted to the flood recovery website, [www.rcgov.us/floodrecovery](http://www.rcgov.us/floodrecovery). The County is developing a targeted outreach plan for digitally disconnected communities that will be implemented to get the word out when the programs open for intake. We have conducted ten (10) public outreach meetings across the County that were all publicized. We have conducted four (4) stakeholder meetings with civic and business organizations that were all publicized. County Councilmen have also publicized these events within their districts. Social media publicity has also been engaged.

**Comment:** For the rental program, when assisting structures with 2-4 units, should be required that the entire structure must have the same owner (single owner must own all units in the structure).

**Response:** As designed, the rental program currently will require that the entire structure to be assisted will be owned by the same owner(s)--i.e, every unit within the structure must be owned by a single owner.

**Comment:** On page 33, under the "Grant Size Limits" section, the first sentence indicates that the maximum award cap is based on the number of bedrooms. However the next sentence indicates that the award will depend on the storm damage to the structure.

**Response:** This was a typographical error and has been corrected to read: " Award amounts under the Small Rental Rehabilitation Program will depend upon the amount of storm damage and the cost of rehabilitation up to the maximum award amount ."



**Comment:** In the rental program, it says “Single Family, detached dwellings only are eligible for assistance and must contain between one and four bedrooms. Condominiums, townhomes, duplexes, triplexes or four-plexes, mobile homes, recreational vehicles, and boats are not eligible.” We have many small rental properties where an owner may live in one unit and rent out the rest of their units in their structure. Restricting rental properties to single family detached dwellings will mean that many people won’t even have the opportunity to apply.

**Response:** The funding for all of our housing programs is extremely limited. Richland County understands that the funds available will not be enough to assist every property owner. Currently we anticipate serving 28 properties under the rental program. However, we have reconsidered our position on eligible structure types to accommodate properties that are duplexes, triplexes and quadplexes. These will be eligible structure types if the units are all under a common roof, all units are owned by the same owner(s), and 100% of the units serve LMI individuals. The exception to the 100% rule will be where one unit in the structure is owner-occupied. The owner-occupied unit will not be required to be LMI unless the owner vacates the unit and turns it into a rental unit. Condos, townhomes, mobile homes, recreational vehicles and boats are still not eligible structure types under this program. The rehabilitation cap amount applies to the entire structure and will not be increased on a per unit basis.