

STATE OF NORTH CAROLINA ACTION PLAN

U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant-Disaster Recovery (CDBG-DR) Funding in Response to Hurricane Helene

FEBRUARY 18, 2025



Table of Contents:

1	Executive Summary	7
1.1	Overview.....	7
1.2	Disaster Specific Overview	9
1.2.1	Most Impacted and Distressed Areas	14
1.2.1.1	Most Impacted and Distressed (MID) Areas.....	14
1.2.1.2	Grantee-Identified MID.....	16
1.2.1.3	Overview of Impacts of Qualifying Disaster.....	16
1.2.2	General Matters	17
1.2.2.1	Management of Helene Recovery Efforts.....	17
1.2.2.2	Relationship of Helene Recovery to HUD Consolidated Plan	18
1.2.2.3	Use of State CDBG-DR Funds in the City of Asheville	19
1.2.2.4	CDBG-DR Website	19
1.3	Unmet Needs, Mitigation Needs, and Fair Housing and Civil Rights Assessment Summary.....	20
2	Unmet Needs Assessment	22
2.1	Evaluate the Impacts of Three Core Aspects of Recovery.....	22
2.2	Housing.....	26
2.2.1	Emergency Shelters and Interim and Permanent Housing	32
2.2.2	Rental and Owner-Occupied Single Family and Multifamily Housing	33
2.2.3	Public Housing, HUD-Assisted Housing, and Other Affordable Housing	33
2.3	Infrastructure.....	36
2.3.1	Electrical, Gas, Water, Sewer, Waste, and Telecom Infrastructure	36
2.3.2	Roads and Bridges	38
2.4	Economic Revitalization	41
3	Mitigation Needs Assessment	44
3.1	North Carolina Enhanced Hazard Mitigation Plan	45
3.1.1	Current Mitigation Efforts by the State of North Carolina.....	45
4	Fair Housing and Civil Rights Data Collection	55
4.1	Populations with Limited English Proficiency	56
4.2	Persons Belonging to Protected Classes.....	58
4.3	Persons by Housing Tenure	60
4.4	Persons Belonging to Vulnerable Populations.....	61
4.5	Persons Belonging to Historically Distressed and Underserved Communities.....	65
4.6	Indigenous Populations and Tribal Communities	70
4.7	Racially or Ethnically Concentrated Areas of Poverty	71
4.8	Low- and Moderate-Income Population Estimates	72

5 Connection Between Proposed Programs and Projects and Unmet Needs, Mitigation Needs, and Fair Housing and Civil Rights Assessments	74
5.1 Allocation and Award Caps.....	74
5.2 Funding Criteria	76
5.2.1 Administration.....	76
5.2.2 Planning.....	76
5.2.3 Housing.....	76
5.2.3.1 Reconstruction and Rehabilitation of Owner-Occupied Housing.....	77
5.2.3.2 Workforce Housing for Ownership	83
5.2.3.3 Multifamily Construction and Repair Program.....	85
5.2.4 Infrastructure	89
5.2.4.1 Community Infrastructure Program	89
5.2.5 Economic Revitalization	91
5.2.5.1 Commercial District Revitalization.....	92
5.2.6 Public Services	94
5.2.7 CDBG-DR Mitigation Set-Aside	94
6 General Information	96
6.1 Citizen Participation	96
6.1.1 Consultation in Developing Action Plan.....	96
6.1.2 Public Comments.....	99
6.1.3 Public Hearings	99
6.1.4 Citizen Complaints.....	100
6.1.5 Modifications to the Action Plan.....	100
6.1.5.1 Substantial Amendments.....	100
6.1.5.2 Non-Substantial Amendments.....	101
7 Appendix.....	102
7.1 Certifications.....	102
7.2 Waivers.....	104
7.3 Summary of and Response to Public Comments	104
7.4 North Carolina Community Helene Questionnaire.....	107
7.5 Standard Form 424.....	109

Cover Photo: Old Toe River Rd., Avery County, NC. October 23, 2024. Credit: North Carolina Department of Transportation (NCDOT)''

Table of Figures:

Figure 1: View of Biltmore Avenue in Asheville, NC (Buncombe County) on September 28, 2024, looking south toward Swannanoa River. Credit: NCDOT.....	10
Figure 2: Map of Western North Carolina Showing Major Highways and Features.....	11
Figure 3: Estimated Rainfall Totals Due to Helene.....	12
Figure 4: Counties Covered by the FEMA Disaster Declaration for Helene.....	13
Figure 5: Helene MID Areas	15
Figure 6: Housing Foundation Damage, US Route 64, Bat Cave, NC. October 10, 2025.	26
Figure 7: Bank and Road Erosion, NC Route 9, Buncombe County, NC October 8, 2024 (Credit: NCDOT).....	36
Figure 8: Photo of Damaged Private Access Road, Henderson County, October 9, 2024. Credit: NCDOT	39
Figure 9: Poverty Branch Road, Madison County, September 29, 2024. Credit: NCDOT.	41
Figure 10: Aftermath of Helene-Triggered Mudslide, September 28, 2024 (Credit: NCDOT).....	44
Figure 11: Flood Damage along US Route 64, Bat Cave, NC, October 10, 2024. Credit: NCDOT	55
Figure 12: North Carolina Analysis of Impediments to Fair Housing Choice	56
Figure 13: Percent of Population with LEP (by County)	57
Figure 14: Spanish Speakers at Home by County (Over Age 5)	57
Figure 15: Diversity Index Map at County Level in North Carolina.....	60
Figure 16: Social Vulnerability in North Carolina Counties with a Major Disaster Declaration.....	63
Figure 17: Social Vulnerability Index in the Declared Disaster Area.....	64
Figure 18: Map of OZs in Western North Carolina.....	66
Figure 19: Map of CDFI Investment Areas	67
Figure 20: Map of NCDOC County Tiers for Economic Development Purposes	69
Figure 21: Percent American Indian and Alaska Native Alone or in Combination, Total Population by County: 2020	70
Figure 22: Counties with R/ECAP Census Tracts	72
Figure 23: County Level LMI Population Percentages	73

Table of Tables:

Table 1: CDBG-DR Program Allocation and Funding Thresholds	8
Table 2: HUD- and State-Identified MID Areas	14
Table 3: Helene Damage and Needs Estimated by Sector (in Millions).....	16
Table 4: Unmet Needs and Proposed Allocations	20
Table 5: LMI Analysis - Federal Declared Disaster Areas	24
Table 6: Housing Damage and Necessary Investment Estimates (in Millions)	27
Table 7: MHUs Impacted by Disaster.....	31
Table 8: Point-in-Time (PIT) Count – Type of Shelter.....	32
Table 9: Housing Tenure	33
Table 10: PHAs Serving Counties Covered by DR 4827-NC.....	33
Table 11: Assisted Housing Impacted by the Disaster	34
Table 12: Hazard Type and Key Impacts	47
Table 13: Race by Statewide, Disaster Declaration, and Combined MID Areas	58
Table 14: Key Age Demographics by Statewide, Disaster Declaration, and Combined MID Areas.....	59
Table 15: Disability by Statewide, Disaster Declaration, and Combined MID Areas	59
Table 16: Housing Tenure by Statewide, Disaster Declaration, and Combined MID Areas	60
Table 17: Demographic Snapshot of Disaster-Impacted Counties	61
Table 18: Summary of Historically Distressed and Underserved Communities	69
Table 19: Indigenous Populations and Tribal Communities	70
Table 20: R/ECAPs by Statewide, Disaster Declaration, and Combined MID Areas	71
Table 21: CDBG-DR Program Allocation and Funding Thresholds	74
Table 22: Grantee Administration Activities Overview.....	76
Table 23: Grantee Planning Activities Overview.....	76
Table 24: Housing Programs Overview	77
Table 25: Reconstruction and Rehabilitation of Owner-Occupied Housing Details	77
Table 26: Application Phasing Criteria for R&R Applicants.....	81
Table 27: Workforce Housing for Ownership Details	83
Table 28: Competitive Framework - Workforce Housing for Ownership Program	84
Table 29: Multifamily Construction and Repair (MCR) Program Details	85
Table 30: Competitive Framework – Multifamily Construction and Repair Program	88

Table 31: Infrastructure Programs Overview.....	89
Table 32: Community Infrastructure (CI) Program Details	89
Table 33: Competitive Framework – Community Infrastructure Program.....	91
Table 34: Economic Revitalization Programs Overview.....	91
Table 35: Commercial District Revitalization (CDR) Program Details	92
Table 36: Competitive Framework – Commercial Revitalization Program.....	93
Table 37: CDBG-DR Mitigation Set-Aside Programs Overview	94
Table 38: Grantee CDBG-DR Mitigation Set-Aside Programs Overview	95
Table 39: Action Plan Consultation Efforts	97
Table 40: Hearing Details	99
Table 41: Action Plan Public Comment Log	104

DRAFT

1 Executive Summary

1.1 Overview

The United States Department of Housing and Urban Development (U.S. HUD) announced that the State of North Carolina (the State) will receive \$1,428,120,000 in funding to support long-term recovery efforts following Hurricane Helene (FEMA DR-4827-NC) through the North Carolina Department of Commerce (NCDOC). 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 allocated to address remaining unmet needs in western North Carolina counties impacted by Helene.

To meet disaster recovery needs, the statutes 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 allow for a more rapid recovery. HUD allocated \$1,428,120,000 in CDBG-DR funds to the State in response to DR-4827-NC, through the publication of a notice in the [Federal Register \(FR\)](#), [Vol. 90, No. 10, January 16, 2025]. This allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2025 (Division B of the American Relief Act, 2025, Public Law 118-158, December 21, 2024).

The [Federal Register \(FR\)](#) is the official journal of the U.S. government. It provides legal notice of administrative rules and notices and Presidential documents in a comprehensive, uniform manner. The FR is published every Federal working day and contains Federal agency regulations, proposed rules and public notices, executive orders, proclamations, and other presidential documents.

The State notes that on January 24, 2025, President Donald J. Trump signed [Executive Order \(EO\) 14181](#), entitled “Emergency Measures to Provide Water Resources in California and Improve Disaster Response in Certain Areas.” Section 5 of EO 14181 is labeled “Additional Actions to Help North Carolina Families” and subsection 5(b) directs the Secretaries of HUD and the Department of Homeland Security (DHS), working through the Federal Emergency Management Agency (FEMA), to provide an Integrated Federal Housing Strategy and Implementation Plan “that expedites options for housing relief to survivors displaced by Hurricane Helene.”

The State sees the rapid development of the State of North Carolina Action Plan for HUD CDBG-DR Funding in Response to Hurricane Helene (Action Plan) and its strong focus on housing recovery needs as responsive to the President’s call to expedite housing options. We look forward to working with our federal partners in both developing the strategy and obtaining quick approval of this Action Plan to the benefit of Helene survivors and impacted communities throughout western North Carolina.

Table 1 below reflects NCDOC's allocation of CDBG-DR funds across key recovery areas:

Table 1: CDBG-DR Program Allocation and Funding Thresholds¹

Eligible Cost Category	CDBG-DR Allocation Amount	Percent of CDBG-DR Allocation	Estimated Percentage to CDBG-DR Mitigation Set-Aside	Estimated Percentage to HUD-Identified MID Area*	Estimated Percentage to Overall LMI Benefit**
Administration (5% cap)	\$71,406,000	5%			
Planning (15% cap)	\$0	N/A	N/A		
Rental Housing	\$191,340,000	13.40%	9.74%	90%	100%
Owner-Occupied Housing	\$860,734,000	60.27%	16.23%	90%	100%
Infrastructure	\$193,500,000	13.55%	9.63%	90%	80%
Economic Revitalization	\$111,140,000	7.78%	8.38%	80%	80%
Public Services (15% cap)	\$0	N/A	N/A	N/A	N/A
Exempt Public Services (No cap)	\$0	N/A	N/A	N/A	N/A
CDBG-DR Mitigation Set-Aside ²	\$186,277,000	13.04%	100%	86.30%	86.90%
TOTAL³	\$1,428,120,000	100%	13.04%	86.30%	86.90%
Percent of Total	100%	100%	100%	86.30%	86.90%

*MID refers to Most Impacted and Distressed.

**LMI refers to Low- and Moderate Income.

To frame the discussion in this Action Plan, readers should be aware of the overall structure of the CDBG-DR program. CDBG-DR is not a permanently authorized program and exists only when Congress appropriates funding for the initiative. Since it is not a permanently authorized program, CDBG-DR does not have standing regulations in the [Code of Federal Regulations](#) (CFR) but is implemented through FR notices that specify waivers and alternative requirements and implement requirements. The FR notices do leverage, where appropriate, regulations for the annual CDBG program which can be found at [24 CFR 570](#) and also conveys waivers and alternative requirements that HUD has opted to apply to these funds.

¹ HUD's Universal Notice Action Plan Guide and Template (no longer available on HUD website) has three similar, but not identical, versions of this table. NCDOC has altered its presentation for clarity while still providing key information sought by HUD.

² The Mitigation allocation represents 15% of HUD's estimated unmet need for the State. When the mitigation amount is divided by the full allocation (unmet need plus mitigation) it equals 13.04% of the full allocation.

³ Estimated aggregate percentages to MID area and for LMI benefit are weighted based on funding allocations and program projections.

On January 8, 2025, HUD issued its [Universal Notice](#), which will govern the \$12 billion of CDBG-DR funding appropriated by Public Law 118-158. The Universal Notice works in tandem with an [Allocation Announcement Notice](#) (AAN), published in the FR on January 16, 2025, which formally made the allocation of \$1.428 billion of CDBG-DR funding to the State for Helene recovery purposes. The AAN has an applicability date of January 21, 2025, which is important as it is the starting date for various timelines identified in the Universal Notice.

NCDOC has been advised that HUD is likely to issue revisions to the Universal Notice to improve its alignment with policies of the Trump Administration as those policies have evolved since January 20, 2025. NCDOC will work to address and/or incorporate those revisions into the Action Plan as quickly as possible once they are public. It is NCDOC's analysis that the changes will not significantly impact two critical components of the Action Plan, namely the unmet needs analysis (Section 2) and the descriptions of programs to be funded (Section 5). Rather than wait for the release of the Universal Notice revisions by HUD, NCDOC has prepared this Action Plan consistent with the guidance reflected in the Universal Notice and is proceeding to the public comment stage to begin the long road to recovery from Helene in the best interest of disaster survivors and their communities.

Beyond the Universal Notice, NCDOC also prepared this Action Plan using a document entitled "Universal Notice Action Plan Guide and Template, Version 1.0)" that was posted to the HUD website on or about January 17, 2025. This document has since been removed from the [HUD's CDBG-DR Universal Notice webpage](#). NCDOC did download a version of the plan guide/template and adopted many of its approaches as the Universal Notice has not yet been changed and there is no substitute available as of February 17, 2025. NCDOC does note that the document describes itself as a "supplemental tool" and an "optional resource" for grantees to use in developing their action plans and NCDOC has substantially followed it as an outline. NCDOC did note several inconsistencies in tables presented in the plan guide/template and has attempted to reconcile those situations in favor of consistency of presentation and clarity of data. These instances are footnoted where they occur in the Action Plan.

1.2 Disaster Specific Overview⁴

Hurricane Helene reached the State on Friday, September 27, 2024, bringing historic rainfall, strong winds, and tornadoes generated by the storm. On that day, former Governor Roy Cooper requested a Major Disaster Declaration from the federal government for 39 North Carolina counties and the Eastern Band of Cherokee Indians. On September 28, 25 counties in the State were declared a major disaster by former President Biden under provisions of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act or P.L. 93-288), approving Individual and Public Assistance (IA and PA) for these counties as

⁴ Much of the damage and unmet need information reflected in this Action Plan was initially developed as part of a December 2024 report for the North Carolina Office of State Budget and Management (OSBM). The complete report can be viewed at [Hurricane Helene Damage and Needs Assessment](#). The content of the OSBM report has greatly assisted in the rapid preparation of the Action Plan and is gratefully acknowledged.

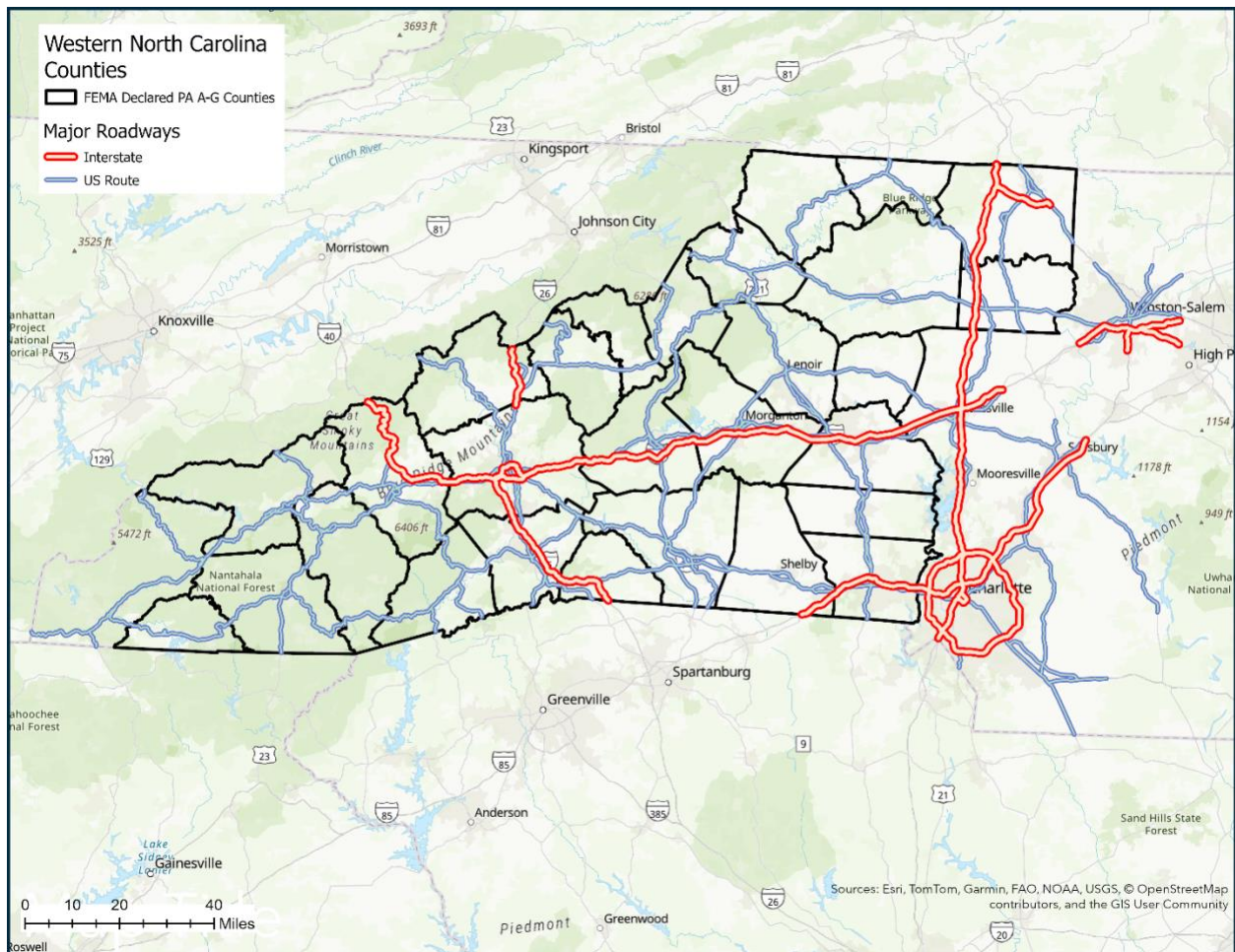
well as the Eastern Band of Cherokee Indians. On October 5, two additional North Carolina counties were declared eligible for federal IA, followed by twelve more on October 16.

Figure 1: View of Biltmore Avenue in Asheville, NC (Buncombe County) on September 28, 2024, looking south toward Swannanoa River. Credit: NCDOT



The impact of Helene was substantially to the west of the Interstate 77 corridor which bisects the State from north to south. Within the western portion of the State, rainfall was focused along the spine of the Blue Ridge Mountains as they run southwest from the Virginia-Tennessee-North Carolina border area to the North Carolina-South Carolina-Georgia border area. The following map highlights this portion of the State.

Figure 2: Map of Western North Carolina Showing Major Highways and Features



The following two maps present the concentrated nature of the rainfall associated with Helene and the areas of the State directly and severely impacted by the aftermath. The first map shows the estimated rainfall totals for western North Carolina associated with Helene. The second map indicates the counties covered by the FEMA major disaster declaration and eligibility for FEMA IA and PA.

Figure 3: Estimated Rainfall Totals Due to Helene

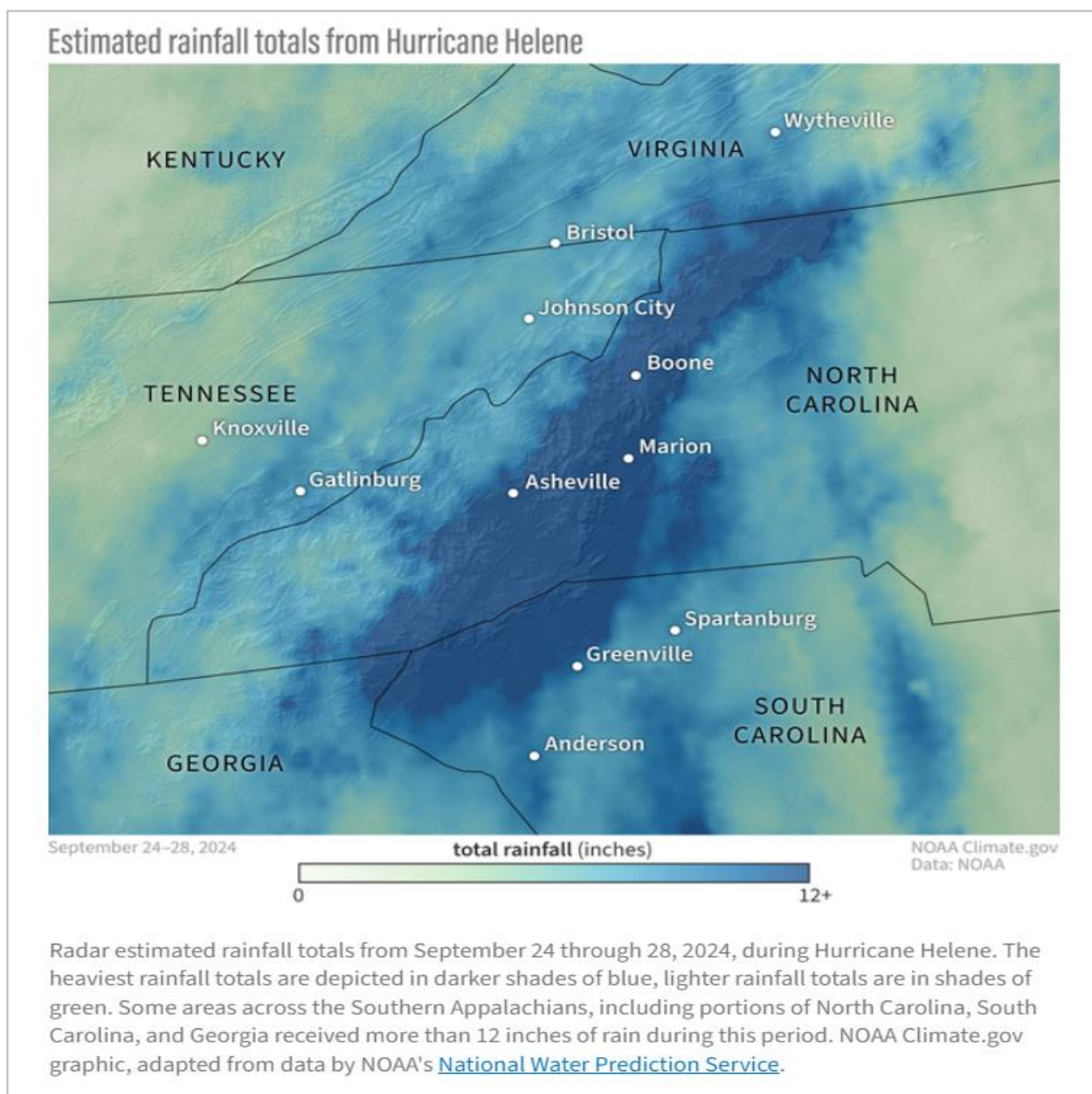
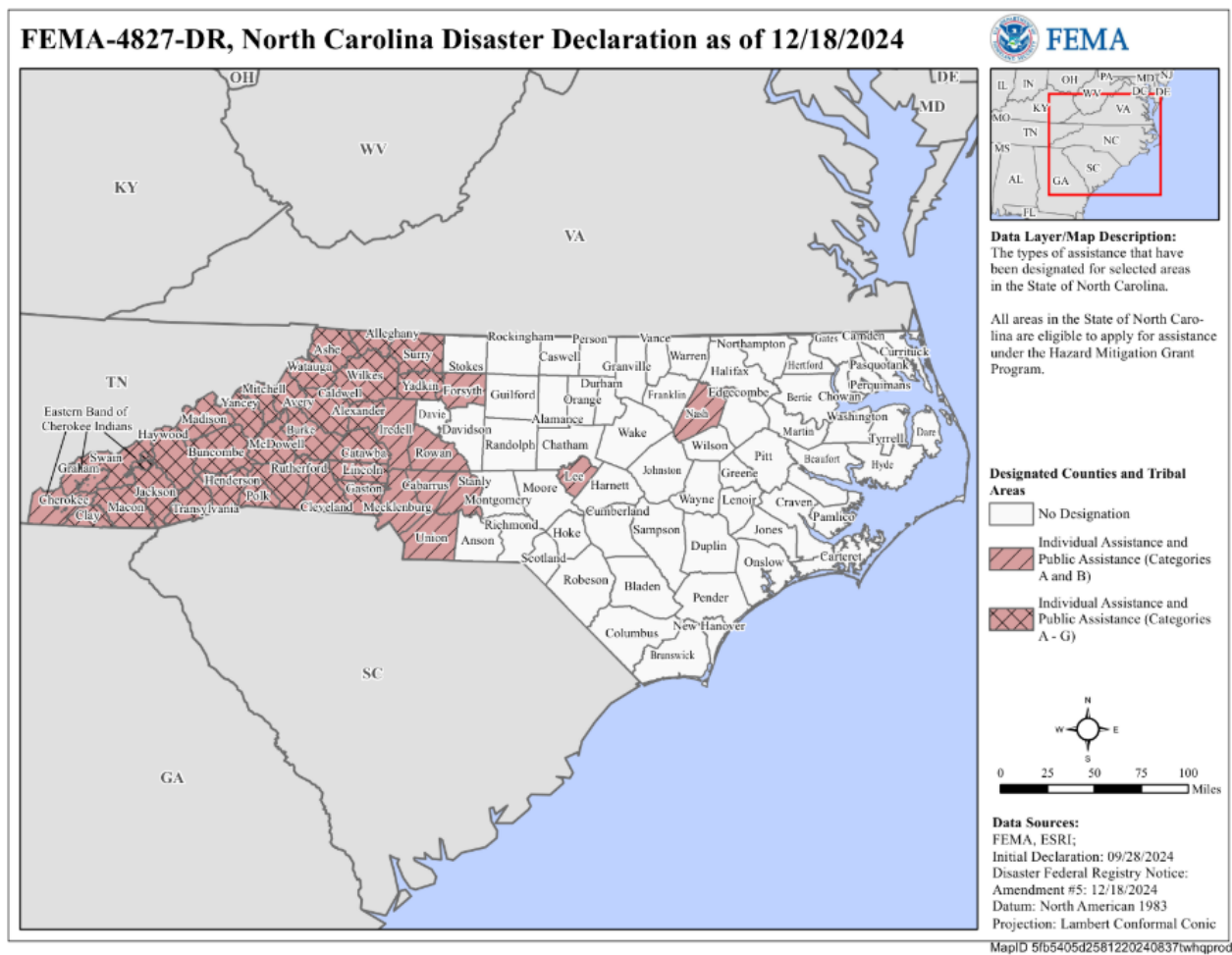


Figure 4: Counties Covered by the FEMA Disaster Declaration for Helene



1.2.1 Most Impacted and Distressed Areas

HUD's Universal Notice requires that at least 80% of CDBG-DR funds be used to address unmet needs or mitigation activities in the HUD-Identified Most Impacted and Distressed (HUD-Identified MID) area(s). In its AAN, HUD identified its MID area for the State at the county level and, in some cases, specific zip codes within counties. HUD also permits the State to identify additional areas as its own MID (State-Identified MID) but no more than 20% of the funds may be spent in the State-identified MID area. Collectively, the HUD-Identified and State-Identified MID areas are referred to as the Combined MID area throughout the Action Plan. Table 2 below identifies the various MID areas.

1.2.1.1 Most Impacted and Distressed (MID) Areas

Table 2: HUD- and State-Identified MID Areas

Disaster Summary	
Qualifying Disaster:	DR-4827-NC (Tropical Storm Helene)
HUD-Identified MID Areas:	Full Counties: Ashe; Avery; Buncombe; Burke; Haywood; Henderson; McDowell; Mitchell; Rutherford; Transylvania; Watauga; Yancey Full Counties Based on HUD-Identified zip code: Caldwell (zip code 28645); Cleveland (zip code 28150); Madison (zip code 28753); Polk (zip code 28782) Partial Counties Based on HUD-Identified zip code: Mecklenburg (zip code 28214)
State-Identified MID Areas	Full Counties: Alexander, Alleghany, Cabarrus, Catawba, Clay, Gaston, Jackson, Lincoln, Macon, Surry, Swain, Wilkes, Yadkin

The above table reflects several decisions made by NCDOC pursuant to the AAN and the Universal Notice. First, NCDOC has opted to expand the HUD-Identified MID to include the entirety of four (4) counties in which HUD had identified a single zip code as an MID area. These four counties are: Caldwell, Cleveland, Madison, and Polk. Thus, funds expended for projects and activities in these counties will count toward the HUD-imposed requirement that at least 80% of CDBG-DR funds be expended in the HUD-Identified MID area.

Second, while HUD also identified a single zip code in Mecklenburg County as MID, NCDOC will not expand the HUD-Identified MID area to the entire county.

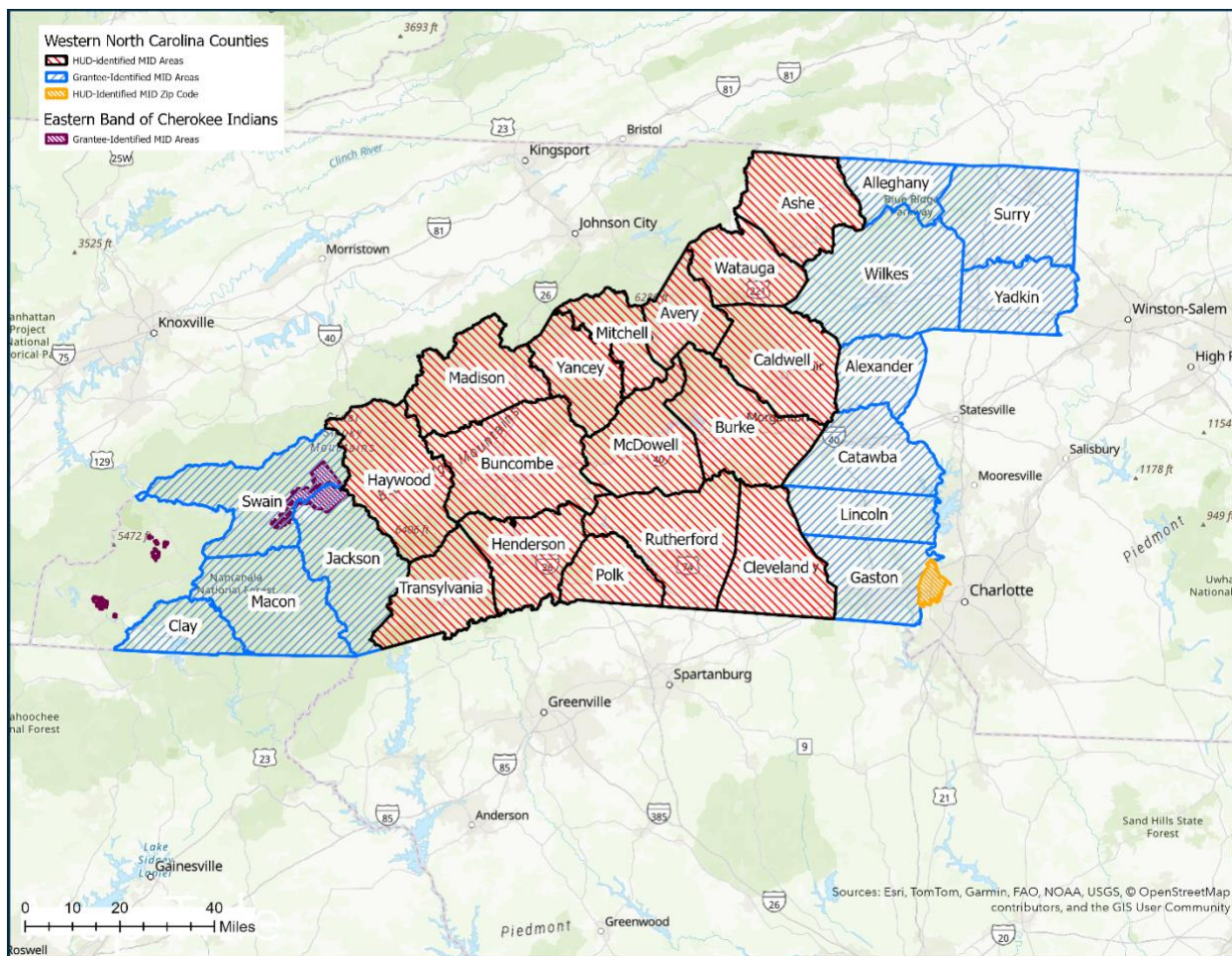
Central to these two decisions is the fact that Mecklenburg County has not been designated by FEMA, as of February 6, 2025, to receive aid for permanent reconstruction activities under Categories C through G of FEMA's PA program. The County has only been authorized to receive emergency and debris removal assistance under Categories A and B. The four counties that have been fully included in the HUD-Identified MID based on the zip codes have all been designated by FEMA to receive PA assistance for Category A through G. NCDOC sees this distinction as indicating a greater need for long-term recovery assistance in those four counties.

FEMA PA Categories C through G are:

- C – Roads and bridges
- D – Water control facilities
- E – Buildings and equipment
- F – Utilities
- G - Parks, recreational, and other facilities

The following map provides a graphic illustration of the Helene-impacted area, including identification of the MID areas.

Figure 5: Helene MID Areas



1.2.1.2 Grantee-Identified MID

The Universal Notice also authorizes grantees to designate additional areas as the State-Identified MID area. NCDOC hereby designates as the State-Identified MID all other counties that FEMA has designated to receive both IA and PA across Categories A through G. Counties meeting these criteria as of January 20, 2025, are listed in the table above as the State-Identified MID. All State-Identified MID counties shall only be able to apply for assistance consistent with specific program requirements as listed in section 5 of this Action Plan, keeping in mind that the State must use at least 80% of its CDBG-DR funds (including mitigation set-aside funds) in the HUD-Identified MID area.

1.2.1.3 Overview of Impacts of Qualifying Disaster

Damage across western North Carolina due to Helene is substantial and widespread. Table 3 below is from a report prepared by the North Carolina Office of State Budget and Management (OSBM) and reflects estimates of damage and needs across multiple economic sectors (amounts are expressed in millions). The estimated total losses to the State associated with Helene exceed \$57 billion, and necessary recovery investments will likely produce a substantial drag on the region's economy for years into the future.

Table 3: Helene Damage and Needs Estimated by Sector (in Millions)

Category	Direct	Indirect/ Induced	Subtotal	Strengthening and Mitigation	Total
Economy	\$9,845	\$5,595	\$15,440	\$435	\$15,875
Housing	\$13,454	-	\$13,454	\$1,926	\$15,380
Utilities & Natural Resources	\$5,267	-	\$5,267	\$1,695	\$6,962
Transportation	\$8,962	\$100	\$9,062	\$1,280	\$10,342
Agriculture	\$3,903	\$782	\$4,685	\$209	\$4,894
Government & Recovery	\$1,512	\$2,685	\$4,197	\$214	\$4,411
Education	\$697	\$165	\$862	\$70	\$932
Health & Human Services	\$723	\$79	\$802	\$19	\$821
Tribal & Federal Lands ⁵					
Helene Total	\$44,363	\$9,406	\$53,769	\$5,848	\$59,617

⁵ While OSBM has been in communication with the Eastern Band of Cherokee Indians, they had not yet completed damage assessments as of December 2024. Further, OSBM has not included direct damage to federal lands in this assessment, as assessment and recovery work will be completed by the federal government.

The key takeaway from this table is that 30% of the total direct damage across all economic sectors arises from damage associated with housing and this fact drives the NCDOC's use of its allocated CDBG-DR funding as there are few federal financial resources to assist with housing recovery efforts. HUD, in its analysis of unmet needs, does not take the expansive view reflected in the OSBM report and uses data that considers only narrow segments of unmet need in the areas of housing, infrastructure, and economic revitalization. In light of these issues, NCDOC's position is that it is imperative to contribute in a significant way to housing recovery in western North Carolina and is proposing a set of programs that devote approximately 74% of available CDBG-DR funding, or \$1.052 billion, toward that goal.

With respect to housing needs, the OSBM report provided the following high-level information based on FEMA IA and American Community Survey (ACS) data available as of early December 2024.

- An estimated 274,900 households will ultimately apply for FEMA IA, and **more than 153,000 households have been approved for some level of assistance** as of February 7, 2025.
- Approximately 73,700 homes are expected to be found to have suffered damage and more than **8,800 have been verified as having major damage or have been destroyed**.
- Single-family homes, manufactured homes, and duplexes account for a majority of affected residential structures.⁶ This fact will be a principal influence upon the State's allocation of CDBG-DR funds.
- The overall need for housing assistance is estimated to be \$15.4 billion.
- This includes **\$12.7 billion due to residential structure damage**, which will change as FEMA conducts further on-the-ground assessments.
- According to Census ACS data, one in four or 138,000 mobile homes in the State were in counties under a major disaster declaration.
- Mobile homes were more prevalent as a share of all housing units in counties covered by the major disaster declaration. About 15.4% of housing units in those counties were mobile homes compared to 12% in the rest of the State.
- Displaced residents will need transitional and short-term housing, personal property replacement, and other assistance.

1.2.2 General Matters

1.2.2.1 Management of Helene Recovery Efforts

Governor Josh Stein took office as the 76th Governor of North Carolina on January 1, 2025, and he has designated the NCDOC to administer the CDBG-DR funding allocated to the State in response to the impacts of Hurricane Helene. NCDOC has experience working with CDBG funding as it is the recipient of

⁶ December 2024 Report for the NC OSBM, Page 32

the annual State CDBG program funding from HUD (\$42.2 million in fiscal year (FY) 2024) and will leverage that experience to provide a foundation for Helene CDBG-DR implementation efforts.

To provide an unwavering focus on Helene recovery efforts, Gov. Stein has taken several steps.

- First, he has established a new Division of Community Revitalization (DCR) within NCDOC to manage CDBG-DR funding, oversee the rebuilding of homes destroyed or damaged by Helene, and coordinate and lead efforts to revitalize the economy of western North Carolina.
- Second, DCR will work in conjunction with the newly established Governor's Recovery Office for Western North Carolina (GROW NC), which will provide a cross-agency vision for Helene recovery efforts, coordinate the response of those agencies, and deploy the expertise and innovation necessary for a swift and robust recovery effort.
- Third, Gov. Stein has created the Governor's Advisory Committee on Western North Carolina Recovery (the Committee), the membership of which includes more than two dozen public and private sector representatives from across western North Carolina. This committee will meet monthly and advise on strategies to address the needs of communities affected by Helene in areas such as housing, infrastructure, small business, and others related to the rebuilding of western North Carolina. The establishment of this multifaceted effort demonstrates Gov. Stein's understanding that successful recovery efforts require a high level of on-going attention and engagement at the executive level and that business as usual will be inadequate to fully meet recovery needs arising from the damage inflicted by Helene. Further, NCDOC's quick development of this Action Plan is a component of the State's overall effort to accelerate recovery work in the spring of 2025.

To advance this effort, Gov. Stein is seeking funding from the North Carolina Legislature for various recovery activities and NCDOC has the intention of treating at least some portion of those expenses as pre-agreement costs to be repaid through CDBG-DR funds. Consistent with the requirements of the Universal Notice, NCDOC will identify programs where pre-agreement cost reimbursement may be involved. NCDOC and, more specifically, DCR will have responsibility for the Helene-related CDBG-DR funding. Activities and programs funded with CDBG-DR provided in response to hurricanes Matthew (2016) and Florence (2018) will be seen to completion and closeout by the North Carolina Office of Recovery and Resilience (NCORR), but NCORR will have no role in management and oversight of the Helene recovery effort.

1.2.2.2 Relationship of Helene Recovery to HUD Consolidated Plan

As the lead agency for annual formula funding provided to the State by HUD's Office of Community Planning and Development (CPD), NCDOC submits to HUD the State's five-year Consolidated Plan and Annual Action Plan (the Consolidated Plan) as required by 24 CFR 91. The Universal Notice at section III.B.6. provides time-limited waivers related to the consolidated planning process that are effective for 24

months (through January 16, 2027). Within this timeframe, grantees are directed to update consolidated plans to reflect disaster-related needs. The State's existing five-year Consolidated Plan covers the period 2021 to 2025, and the process to update the plan will begin later in 2025, in anticipation of the submission to HUD of a new plan in the second quarter of calendar year 2026. When undertaking this update, NCDOC will ensure that Helene-related recovery needs are reflected in that Consolidated Plan, thereby meeting the Universal Notice requirements.

1.2.2.3 Use of State CDBG-DR Funds in the City of Asheville

Concurrent with the allocation of \$1.4 billion in CDBG-DR funding to the State, HUD announced a separate CDBG-DR allocation of \$225,010,000 directly to the City of Asheville, North Carolina (the City). Pursuant to the AAN, the City must spend 100% of its funds to address unmet needs and mitigation activities within its HUD-Identified MID area, which is the entire city.

The City is located within Buncombe County, which is part of the State-Identified MID area, and this fact raises the question of whether State CDBG-DR funds should be expended in Asheville. NCDOC has had productive discussions with City officials regarding this issue, and a framework for coordinated action is currently being developed. The area of coordination most likely to emerge will be with respect to housing reconstruction and rehabilitation. NCDOC will devote more than \$800 million of its CDBG-DR funds to this effort across the Helene-impacted area and will have economies of scale that the City is unlikely to achieve with a much smaller program. In anticipation of coordinated action with the City, NCDOC establishes that it may expend its CDBG-DR funds in Asheville and may do so in support of eligible activities, such as activities subject to pre-agreement cost provisions of the Universal Notice.

1.2.2.4 CDBG-DR Website

The CDBG-DR language in the Disaster Relief Supplemental Appropriations Act, 2025, requires that each grantee establish and maintain a comprehensive disaster recovery website. NCDOC has established and will host the website for the Helene CDBG-DR allocation and URL is: commerce.nc.gov/recovery

This webpage CDBG-DR page will ultimately include and reflect the information required by HUD's guidance in section III.B.8. of the Universal Notice. This will include the Action Plan and subsequent amendments, program application information, a portal for applicants to track the progress of their applications, program guidance, procurement contracts, quarterly performance reports, and other pertinent information.

1.3 Unmet Needs, Mitigation Needs, and Fair Housing and Civil Rights Assessment Summary

Table 4 below provides the overview of the State’s \$1.428 billion allocation of CDBG-DR funding across programs that begin to address the damaging impacts of Hurricane Helene. As the available CDBG-DR funding is less than the State’s estimated unmet recovery needs, it is targeted in three ways:

- First, to principally deliver benefit to individuals, households, and communities with the fewest resources to recover, pursuant to a federal statutory requirement that at least 70% of all funds be expended for activities that benefit low- and moderate-income (LMI) individuals;
- Second, to target at least 80% of those expenditures in the HUD-Identified MID areas; and
- Third, the directive of the federal appropriation law which directly references the “restoration of housing and infrastructure, economic revitalization, and mitigation...”.

While the need to comply with these fundamental requirements establishes outer boundaries for use of the funds, the State has substantial latitude in the mix of specific programs, funding levels for activities, and overall implementation. The choices reflected herein are informed not just by data on damage but also by consultation with and feedback from impacted individuals, communities, institutions, and other stakeholders. The framing for these choices can be found in subsequent sections of this Action Plan.

Table 4: Unmet Needs and Proposed Allocations⁷

Eligible Cost Category	CDBG-DR Allocation Amount	Percent of CDBG-DR Allocation	Estimated Percentage to CDBG-DR Mitigation Set-Aside	Estimated Percentage to HUD-Identified MID Area	Estimated Percentage to Overall LMI Benefit
Administration (5% cap)	\$71,406,000	5%			
Planning (15% cap)	\$0	N/A	N/A		
Rental Housing	\$191,340,000	15.33%	9.74%	90%	100%
Owner-Occupied Housing	\$860,734,000	60.27%	16.23%	90%	100%
Infrastructure	\$193,500,000	13.55%	9.63%	90%	80%
Economic Revitalization	\$111,140,000	7.78%	8.38%	80%	80%

⁷ This table is a reiteration of Table 1.

Eligible Cost Category	CDBG-DR Allocation Amount	Percent of CDBG-DR Allocation	Estimated Percentage to CDBG-DR Mitigation Set-Aside	Estimated Percentage to HUD-Identified MID Area	Estimated Percentage to Overall LMI Benefit
Public Services (15% cap)	\$0	N/A	N/A	N/A	N/A
Exempt Public Services (No cap)	\$0	N/A	N/A	N/A	N/A
CDBG-DR Mitigation Set-Aside ⁸	\$186,277,000	13.04%	100%	86.30%	86.90%
TOTAL⁹	\$1,428,120,000	100%	13.04%	86.30%	86.90%
Percent of Total	100%	100%	100%	86.30%	86.90%

The restoration of housing for both renters and homeowners in Helene-impacted areas is the State's highest priority as more than 8,827 units have been determined by FEMA IA data to meet HUD's definition of "most impacted." The actual number of seriously damaged or destroyed by Helene is expected to be much higher as inspections are conducted. Self-assessments documented in the FEMA IA data show 26,585 units described as major damage or destroyed.

Rehousing North Carolinians is a necessity to both keep smaller, rural communities in the western part of the State viable and to sustain an economy that depends significantly upon tourism and agriculture. In conjunction with housing restoration, the State will assist property owners in addressing repairs to private roads and bridges by providing mitigation funding to ensure public safety access and that future severe weather events do not trigger similar damage.

While infrastructure needs are significant, a substantial portion of permanent repair and reconstruction costs will be covered by FEMA's PA program, which will cover 90% of those costs. To help address the required 10% state/local cost share under the PA program, the North Carolina Legislature has already provided \$250 million for non-federal cost share needs. Beyond these needs, NCDOC is proposing a community infrastructure program to address needs which may be outside the scope of FEMA's PA program.

As western North Carolina has many small and rural communities, restoring downtown areas and commercial districts in a resilient manner in those communities will be a critical activity. To recreate focal points for regional commercial activity, the State will be reserving funding for this purpose as well.

⁸ The Mitigation allocation represents 15% of HUD's unmet need for the State. When the mitigation amount is divided by the full allocation (unmet need plus mitigation) it equals 13.04% of the full allocation.

⁹ Estimated aggregate percentages to MID area and for LMI benefit are weighted based on funding allocations and program projections.

2 Unmet Needs Assessment

2.1 Evaluate the Impacts of Three Core Aspects of Recovery

The Helene-impacted region of western North Carolina accounts for approximately 23% of the State's gross domestic product (GDP), and Hurricane Helene left significant, long-term impacts on that portion of the State. In addition to the devastating loss of life, the storm seriously damaged or destroyed more than 8,800 homes and damaged tens of thousands more. Millions of North Carolinians lost access to critical services like water, sewer, electricity, telecommunications, and healthcare facilities. Thousands of miles of roads and bridges were damaged, cutting communities off and limiting egress for residents and entrance by essential response and recovery teams. The region's economy has suffered a severe blow, threatening livelihoods and the long-term viability of communities.

Estimates of damage and needs as of December 13, 2024, are more than \$59.6 billion across the State, including \$44.4 billion of direct damage, \$9.4 billion of indirect or induced damage, and \$5.8 billion of potential investments for strengthening and mitigation. Five categories comprise close to 90% of estimated direct and indirect damage: Economy, Housing, Utilities and Natural Resources, Transportation, and Agriculture.

The damage attributable to Helene is roughly three and a half times the \$16.7 billion impact of Hurricane Florence upon the State in 2018.

Helene produced severe or catastrophic impacts on homes and essential services and those impacts can be summarized as follows:

- **Large-scale damage to homes:** Helene is expected to have damaged more than 73,000 homes, with many thousands having experienced severe or catastrophic impacts.
- **Disruption of life-sustaining services:** Helene damaged or destroyed sewage and water treatment systems in multiple communities and 44 emergency response facilities. The storm resulted in the evacuation of 145 healthcare facilities (including hospitals; nursing homes; and adult, family, mental health, and community health facilities) across western North Carolina.
- **Impacts to transportation and utilities:** Entire communities lost access to core services and communication. The storm caused damage to roads and bridges at more than 6,900 sites, forcing traffic closures, including on I-40. Landslides and flooding cut residents off from outside help and communication.

Some of Helene's impacts that may be particularly long-lasting include:

- **Delay in return-to-business:** With the loss of essential services, utilities, and transportation corridors came long-term cessations in operations for businesses across western North Carolina. The complexity of restoring infrastructure has directly slowed the reopening of businesses and has

impaired access to key customer bases. In turn, businesses face challenges to their survival, which may have significant impact on the region's communities.

- **Multi-year damage:** Key centers of production and revenue generation in industries such as agriculture and tourism experienced impacts that are likely to last for years (e.g., damage to nursery plants, which will need multiple seasons to regrow; damage to backcountry infrastructure and natural landscapes at State and national parks, which may not return to 'normal' for years). The longevity of this damage is likely to slow rebuilding and may make it more challenging for communities to recover, retain residents, and attract visitors.
- **Substantial uninsured home and property losses:** Helene damaged thousands of structures, including many residences. Unlike in coastal areas, most homeowners do not carry flood insurance. This coverage gap will dramatically reduce private financial resources for recovery. Increased costs to complete recovery and mitigate future harm
- **Increased construction costs:** Several factors are impacting construction costs. First, construction costs have risen significantly since COVID-19. Second, the need to work in rugged, highly sloped terrain adds cost across the board to construction design, materials, and implementation. Third, multiple recovery efforts from concurrent natural disasters across the Southeast may lead to higher-than-normal costs than for disaster recovery.
- **Opportunity for strengthening and mitigation:** Unprecedented damage and impact to the State have led to calls for strengthening and mitigation to prevent future disasters of this magnitude from happening again. Part of this effort will focus on ensuring more durable access to small, rural communities and individual homes by strengthening privately-owned roads and bridges.

These challenges complicate the comprehensive damage and needs assessment due to:

- **Impaired access:** Large-scale flooding and landslides caused extensive damage to transportation infrastructure in the region. The extensive road damage has at times slowed aid and hindered damage assessments of many of western North Carolina's more isolated communities. Road construction crews have worked tirelessly to make it safe for first responders and inspectors to move in and out on a limited set of transportation corridors.
- **Difficulty of communication:** Helene caused significant damage to communications infrastructure in western North Carolina. These impacts were amplified by damaged transportation infrastructure, which has slowed network restoration by service providers, and the region's mountainous topography, which limited the range and quality of connections provided by temporary solutions. The resulting severe, prolonged communications disruption has limited the ability of first responders and inspectors to communicate across and outside the region.
- **Disparate nature of communities:** Many affected communities and residences are spread far apart and isolated by western North Carolina's mountainous terrain. This is evidenced by the region's relatively low population density. Counties in the major disaster declaration that experienced greatest rainfall have an average population density of 156 residents per square mile, compared to 169 per

square mile in Florence-affected counties and 223 per square mile for the State as a whole. The lower population densities in western North Carolina have consequences for CDBG-DR program and policies choices as there is a distinct need to respond to the needs of a widely dispersed population living in difficult to access terrain. This fact becomes a driver of the decision to devote substantial CDBG-DR mitigation funding to address property access via private roads and bridges.

Table 5: LMI Analysis - Federal Declared Disaster Areas¹⁰

County	Non-MID Total LMI Persons	Non-MID Total Population	Non-MID Percent LMI	Combined MID Total LMI Persons	Combined MID Total Population	Combined MID Percent LMI
Alexander	13,960	35,940	38.84%	0	0	0%
Alleghany	5,440	10,940	49.73%	0	0	0%
Ashe	0	0	0%	10,245	26,565	38.57%
Avery	0	0	0%	6,400	13,985	45.76%
Buncombe	0	0	0%	105,645	252,700	41.81%
Burke	0	0	0%	39,635	87,390	45.35%
Cabarrus	83,300	209,830	39.70%	0	0	0%
Caldwell	0	0	0%	34,755	81,060	42.88%
Catawba	55,965	155,930	35.89%	0	0	0%
Cherokee	12,975	27,965	46.40%	0	0	0%
Clay	4,465	11,100	40.23%	0	0	0%
Cleveland	0	0	0%	41,760	95,995	43.50%
Forsyth	155,370	367,500	42.28%	0	0	0%
Gaston	111,495	219,215	50.86%	0	0	0%
Graham	3,705	8,395	44.13%	0	0	0%
Haywood	0	0	0%	24,210	61,380	39.44%
Henderson	0	0	0%	44,800	114,925	38.98%
Iredell	70,140	177,625	39.49%	0	0	0%
Jackson	18,190	39,705	45.81%	0	0	0%
Lee	24,020	60,140	39.94%	0	0	0%
Lincoln	33,185	83,840	39.58%	0	0	0%

¹⁰ The HUD-Identified MID includes five zip codes: 28645 (Caldwell County), 28150 (Cleveland County), 28753 (Madison County), 28214 (Mecklenburg County), and 28782 (Polk County). Source: [HUD ACS 5-year 2016-2020 Low- and Moderate-Income Summary Data](#)

County	Non-MID Total LMI Persons	Non-MID Total Population	Non-MID Percent LMI	Combined MID Total LMI Persons	Combined MID Total Population	Combined MID Percent LMI
Macon	14,025	34,815	40.28%	0	0	0%
Madison	0	0	0%	9,245	20,530	45.03%
McDowell	0	0	0%	10,260	22,505	45.59%
Mecklenburg	433,880	1,020,925	0%	29,060	58,965	49.28%
Mitchell	0	0	0%	5,255	14,625	35.93%
Nash	34,935	92,245	37.87%	0	0	0%
Polk	0	0	0%	6,845	20,375	33.60%
Rowan	55,280	136,580	40.47%	0	0	0%
Rutherford	0	0	0%	29,550	65,530	45.09%
Stanly	21,645	59,945	36.11%	0	0	0%
Surry	31,645	70,945	44.60%	0	0	0%
Swain	5,910	13,940	42.40%	0	0	0%
Transylvania	0	0	0%	12,780	32,715	39.06%
Union	80,690	233,425	34.57%	0	0	0%
Watauga	0	0	0%	25,875	49,670	52.09%
Wilkes	28,110	67,440	41.68%	0	0	0%
Yadkin	16,070	37,255	43.14%	0	0	0%
Yancey	0	0	0%	7,440	17,725	41.97%
Total	1,314,400	3,175,640		436,320	1,018,915	

2.2 Housing

Figure 6: Housing Foundation Damage, US Route 64, Bat Cave, NC. October 10, 2025.



Data regarding housing damage and recovery needs arising from the impact of Helene continues to accrue more than four months after the disaster declaration. The housing portion of this unmet needs assessment (UNA) relies upon data available as of early December 2024, roughly 10 weeks after Helene struck. It is further informed by data available from FEMA arising from registrations for its Individuals and Households (IHP) or IA Program.

The FEMA IA data will continue to evolve as the application deadline for Helene-related assistance is currently March 8, 2025. With more than 153,000 IA applications approved as of February 7, 2025, it is thought that the majority of registrations have already taken place. However, NCDOC will continue to monitor IA registration throughout the Action Plan public comment period and will update information in the Action Plan as necessary.

Concurrently, the State is awaiting delivery of a Housing Impact Assessment (HIA) done by the Federal Housing Recovery Support Function (RSF) pursuant to the [National Disaster Recovery Framework](#) (NDRF). The Housing RSF is one of six RSFs, and HUD is the coordinating agency for the Housing RSF. The mission of the Housing RSF is to:

- Support efforts to address pre- and post-disaster housing issues;
- Facilitate delivery of federal resources to implement housing solutions;
- Support activities to assist local, state, and tribal governments in the reconstruction and rehabilitation of damaged and destroyed housing; and
- Support efforts to develop new, accessible permanent housing options.

The Housing RSF Assessment will be particularly valuable in outlining Helene’s impact upon the assisted housing stock in western North Carolina and impacts upon vulnerable populations including, but not limited to, the pre-storm homeless, elderly, and those having access and functional needs. It will also identify key considerations for a broad, effective housing recovery effort. Again, NCDOC will incorporate information from the Housing RSF Assessment into the Action Plan when it becomes available during the public comment period.

While NCDOC expects to receive information that will aid in creating a more refined picture of housing damage, this much is clear: Helene caused extensive damage to the western North Carolina housing stock. The following initial estimates with respect to housing damage and recovery needs are from the OSBM report of December 2024:

Table 6: Housing Damage and Necessary Investment Estimates (in Millions)

Category	Damage & Needs			Necessary Investments			
	Direct	Indirect/ Induced	Total	Expected Federal	Expected Private	State Funded as of 12/12/24	Unfunded
Residential*	\$12,700	-	\$12,700	\$4,771	\$2,650	\$20	\$5,259
Transitional Sheltering	\$11	-	\$11	\$11	-	-	-
Public Assistance	\$143	-	\$143	\$128	-	-	\$15
Other Needs Assistance**	\$600	-	\$600	\$450	-	-	\$150
Sub-Total	\$13,454	-	\$13,454	\$5,360	\$2,650	\$20	\$5,424
Strengthening & Mitigation	\$1,926	-	\$1,926	\$1,419	-	-	\$507
Total	\$15,380	-	\$15,380	\$6,779	\$2,650	\$20	\$5,931

*Includes Housing Assistance from FEMA.

**Includes assistance to repair or replace vehicles and other personal property.

The scope for housing repair estimates includes:

- Residential housing: single-family, multi-family, rental residences, public housing, and supportive housing (including subsidized affordable housing);
- Transitional sheltering;
- Housing for individuals with disabilities, individuals experiencing homelessness, and individuals with severe mental illness; and,
- IA and PA payments, with additional non-housing assistance, such Other Needs Assistance (ONA) and other FEMA programs, separated out.

These estimates include damage to housing structures, registered motor vehicles, personal property, and buildable land but exclude losses from private, non-residential buildings or government buildings. In developing these estimates, OSBM relied primarily on Individual Assistance claims data and housing data from the U.S. Census Bureau's ACS.

The takeaway from Table 6 is that the estimated housing damage plus necessary investments for mitigation and resilience is \$6.779 billion. OSBM projected that \$4.771 billion of that amount would be available from federal resources, most notably CDBG-DR. The reality is that North Carolina was allocated \$1.428 billion in CDBG-DR by HUD, which is only 30% of the identified unmet need for housing. In proposing to allocate \$1.052 billion or 74% of its CDBG-DR allocation for housing recovery, NCDOC will seek to assist as many low- and moderate-income households as possible with their housing needs while still reserving 20% of funds for infrastructure and economic development needs and supporting the long-term oversight of these funds by using 5% for administrative costs.

- **Residential Damage:** OSBM forecasted the total damage to residential structures using FEMA IA data through December 2, and scaling to project the total damage based on comparisons to Florence claims through the first three months and total claims. OSBM estimates \$12.7 billion in residential damage, including both single- and multi-family housing.
- **FEMA Assistance:** OSBM analyzed FEMA IA data published on December 2. The deadline to apply for FEMA IA has been extended to March 8, 2025, so OSBM projected the number based on the currently known number of applications.
- **FEMA IA:** To estimate impacted households, OSBM reviewed IA claims presently submitted and projected the number of total applications received based on this data. OSBM estimates between 25,000 and 30,000 households receiving housing assistance through IA.
- **FEMA ONA:** FEMA publishes daily data on approved ONA funds, which cover immediate housing and life needs, vehicles, essential household items, other personal property, and disaster-related funeral or child-care costs, with the other IA data. OSBM estimates 147,000 households will receive ONA, projecting from that daily data.

- **FEMA PA:** FEMA will reimburse housing-related expenditures through PA related to emergency protective measures and public housing facilities. This projection includes public housing authorities' units and government programs that house certain populations, like Transitions to Community Living. Currently available PA data only includes approved payments for a small percentage of applicants. OSBM scaled PA assistance from Hurricane Florence based on comparisons in storm damage to estimate FEMA PA for Hurricane Helene recovery.
- **Small Business Administration Loans:** The federal residential funding also includes disaster loans for homeowners and renters through the Small Business Administration (SBA). The SBA application window for physical property damage has been extended through February 6, 2025. OSBM projected the final recipients, 13,900 households, and total loan amount based on an average anticipated loan of \$74,100 by scaling the number of approved applicants and average loan from Hurricane Florence. The scaling factor was calculated by first projecting the Hurricane Helene FEMA IA home-damage inspection data to estimate the total number of inspection-verified damaged homes and the average damage per home. OSBM compared this estimate to the Hurricane Florence IA home-damage numbers and averages to determine the scaling factor.
- **Private Insurance:** OSBM used insurance coverage levels from IA data and Hurricane Florence to project the residential damage that private insurance would cover. This analysis divided potential claims into those with flood damage and all other claims. The initial IA data shows that 5.2% of those with verified flood damage had flood insurance, and OSBM applied the percentage of damage that insurance covered following Hurricane Florence for all other claims. OSBM then reviewed preliminary Department of Insurance (DOI) and National Flood Insurance Program (NFIP) data to determine average loan amounts for those two categories. OSBM then scaled IA applications to account for the fact that insurance claims exceeded IA applications. OSBM estimates that private insurance will approve \$2.65 billion in residential claims.
- **Transitional Sheltering:** This estimate includes both FEMA PA and HUD Rapid Unsheltered Survivor Housing (RUSH) program needs.
 - FEMA PA will reimburse 100% of transitional sheltering costs in designated counties for the first six months following Hurricane Helene. At its peak on October 4th, counties in western North Carolina opened 22 shelters serving 1,162 occupants. The need for transitional sheltering has dropped significantly since that time. OSBM estimated the total cost of sheltering based on the number of occupants in disaster shelters. Using an American Red Cross (ARC) estimate of cost per occupant, OSBM estimates a transitional sheltering cost of \$10.8 million over the first six months of recovery, which FEMA will fully cover, to serve roughly 16,905 displaced residents in shelters.
 - HUD's RUSH program provided the State with \$3 million in October 2024; North Carolina has requested an additional \$7 million from this program but has not received that funding as of February 7, 2025. This estimate does not include participation in FEMA's Transitional Sheltering

Assistance (TSA), an IA program that helps victims displaced from and unable to live in their pre-disaster residence.¹¹

Certain characteristics of the housing supply in western North Carolina create challenges for hurricane recovery and rehousing displaced individuals, such as:

- **Seasonal Housing:** In the 39 declared counties, seasonal housing represents approximately 10% of the total housing stock, with a range of less than 1% in many of the Piedmont counties to nearly 45% in Avery County. Statewide, seasonal housing is only 3.9% of the housing stock.
- **Vacant Units:** In the 39 declared counties, 7.3% of total housing units are designated as ‘vacant-other’ according to ACS data. Often, housing units designated as ‘vacant-other’ are indicated as such due to condition, foreclosure, or other legal reasons, or for personal/family reasons and cannot easily or quickly be reincorporated into the occupied housing stock. Statewide, vacant-other units are only 4.6% of total housing units.
- **Uninsured/Underinsured:** Based on ACS one-year estimates for homeowner insurance costs, over 13% of homeowners in the State are uninsured or underinsured. County data is only available for counties with a population greater than 65,000, providing data for 44 counties, 20 of which are in the Helene disaster area. These counties have a slightly higher rate of un- or underinsurance compared to the 24 non-disaster area counties (13.1% and 12.5%). Individuals who are uninsured or underinsured will be more reliant on FEMA and State programming.
- **Flood Insurance:** Of the IA applications submitted as of early December 2024, only 5.2% of households have flood insurance. This will create an increased gap in flood-related damage.
- **Affordable Housing:** In disaster-declared counties, 40.8% of households earn less than 80% of the area median income (AMI), so affordable housing is a key issue for this population. Already 55.4% of low-income households experience cost-burdened housing. Public housing authorities, whose eligible damage FEMA would reimburse, serve 2% of residents in this region.

As noted earlier, manufactured housing units (MHUs) (often referred to as mobile homes) represent a substantial proportion of the housing stock in the counties covered by the major disaster declaration for Helene (DR-4827-NC). The following table uses FEMA data available as of January 20, 2025, to provide a summary of MHU damage on a county-by-county basis.

¹¹ December 2024 Report for the NC Office of State Budget and Management (OSBM) Page 33

Table 7: MHUs Impacted by Disaster¹²

County	Number of Units	% of Total Units in County	Remaining Unmet Needs
Alexander County	301	7.53%	\$159,769
Alleghany County	110	8.94%	\$24,622
Ashe County	690	24.13%	\$937,124
Avery County	678	40.77%	\$2,669,504
Buncombe County	10,099	62.93%	\$13,057,173
Burke County	2,875	38.15%	\$1,151,260
Cabarrus County	38	0.78%	\$0
Caldwell County	1,380	22.62%	\$614,421
Catawba County	710	7.71%	\$97,003
Cherokee County	8	0.22%	\$0
Clay County	12	1.35%	\$3,701
Cleveland County	2,569	32.04%	\$508,568
Forsyth County	8	0.14%	\$0
Gaston County	998	11.54%	\$173,991
Graham County	26	1.89%	\$11,560
Haywood County	1,689	28.62%	\$2,801,121
Henderson County	4,258	50.41%	\$4,374,266
Iredell County	132	1.31%	\$51,664
Jackson County	425	9.57%	\$124,631
Lee County	14	0.36%	\$10,469
Lincoln County	528	8.46%	\$152,890
Macon County	190	4.40%	\$94,412.
Madison County	980	38.67%	\$644,441
McDowell County	2,980	55.24%	\$3,658,499
Mecklenburg County	127	1.76%	\$141,817
Mitchell County	890	62.94%	\$1,247,808

¹² Source: [OpenFEMA Dataset: Individuals and Households Program – Valid Registrations](#)

County	Number of Units	% of Total Units in County	Remaining Unmet Needs
Nash County	17	0.24%	\$0
Polk County	711	56.47%	\$263,436
Rowan County	58	0.56%	\$31,378
Rutherford County	2,882	53.32%	\$909,076
Stanly County	12	0.35%	\$0
Surry County	73	0.96%	\$127,526
Swain County	122	5.66%	\$67,798
Transylvania County	941	37.16%	\$992,802
Union County	44	1.06%	\$0
Watauga County	685	25.90%	\$1,246,227
Wilkes County	576	7.74%	\$256,554
Yadkin County	23	0.64%	\$14,575
Yancey County	1,124	49.98%	\$2,881,736
Total	39,983		\$39,501,822

2.2.1 Emergency Shelters and Interim and Permanent Housing

Table 8: Point-in-Time (PIT) Count – Type of Shelter¹³

Estimate Type	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Statewide Area Estimate	5,034	1,259	3,443	9,754
FEMA Disaster Declaration Area Estimate	3,784	951	2,337	6,853
Combined MID Area Estimate	2,225	582	1,730	4,541

¹³ Source: Combined MID area omits Charlotte/Mecklenburg and Winston-Salem/Forsyth CoCs. PIT and HIC Data 2007 – 2023
<https://www.hudexchange.info/resource/3031/pit-and-hic-data-since-2007/>

2.2.2 Rental and Owner-Occupied Single Family and Multifamily Housing

Table 9: Housing Tenure¹⁴

Tenure	Areawide Estimate	Areawide %	Disaster Area Estimate	Disaster Area %	Combined MID Estimate	Combined MID %
Homeowner	2,778,672	100%	1,177,155	42.36%	546,439	19.67%
Renter	1,408,252	100%	579,227	41.13%	215,806	15.32%

2.2.3 Public Housing, HUD-Assisted Housing, and Other Affordable Housing

Public housing authorities, whose eligible damage FEMA would reimburse, serve 2% of residents in this region. The State expects to receive PA funding from FEMA to address damage to public housing authority (PHA) units and other housing-related government programs.

Thirty (30) PHAs have been identified as serving communities in the Helene-impacted area. This census is based on information available on HUD's website which provides contact information for PHAs in the State. These PHAs have a mix of Annual Contribution Contract (ACC) units, Housing Choice Vouchers (HCVs), and Project-Based Vouchers.

Table 10: PHAs Serving Counties Covered by DR 4827-NC

Four Square Community Action (Andrews)	Mars Hill Housing Authority (Mars Hill)
Andrews Housing Authority (Andrews)	Madison County Housing Authority (Mars Hill)
Housing Authority of City of Asheville (Asheville)	Marshall Housing Authority (Marshall)
Belmont Housing Authority (Belmont)	Morganton Housing Authority (Morganton)
Northwestern Regional Housing Authority (Boone)	Housing Authority of the Town of Mount Airy (Mount Airy)
Brevard Housing Authority (Brevard)	Housing Programs of the Town of Murphy (Murphy)
Macon Program for Progress (Franklin)	North Wilkesboro Housing Authority (North Wilkesboro)
Gastonia Housing Authority (Gastonia)	Isothermal Planning & Development Commission (Rutherfordton)
Hendersonville Housing Authority (Hendersonville)	City of Shelby, Department of Housing (Shelby)
Western Piedmont Council of Governments (Hickory)	Spruce Pine Housing Authority (Spruce Pine)

¹⁴ Source: 2023 ACS 5-year Estimates DP04: <https://data.census.gov/table?q=DP04%20all%20counties%20within%20north%20carolina>

City of Hickory Public Housing Authority (Hickory)	Statesville Housing Authority (Statesville)
Hot Springs Housing Authority (Hot Springs)	Valdese Housing Authority (Valdese)
Kings Mountain Housing Authority (Kings Mountain)	Waynesville Housing Authority (Waynesville)
Lenoir Housing Authority (Lenoir)	Mountain Projects, Inc. (Waynesville)
Lincolnton Housing Authority (Lincolnton)	Caswell County Housing Assistance Program (Yanceyville)

Affordable housing: In disaster-declared counties 40.8% of households earn less than 80% of the AMI, so affordable housing is a key issue for this population. Already 55.4% of low-income households experience cost-burdened housing.

Table 11: Assisted Housing Impacted by the Disaster¹⁵

County	Total Housing Choice Vouchers	Total Impacted Housing Choice Vouchers	Total LIHTC Units ¹⁶	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units
Alexander County	176	176	120	0	0
Alleghany County	209	209	96	0	0
Ashe County	293	293	166	0	0
Avery County	294	294	116	0	0
Buncombe County	2,828	2,828	2,509	0	0
Burke County	462	462	456	371	371
Cabarrus County	629	629	1,505	174	174
Caldwell County	490	490	637	158	158
Catawba County	940	940	1,016	0	0
Cherokee County	191	191	66	134	134
Clay County	176	176	0	0	0
Cleveland County	535	535	821	422	422
Forsyth County	3,410	3,410	3,940	1,696	1,696
Gaston County	1,395	1,395	1,937	96	96
Graham County	96	96	64	0	0

¹⁵ Sources: Housing Choice Vouchers: <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::housing-choice-vouchers-by-tract/about>; LIHTC Properties: <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::low-income-housing-tax-credit-properties-1/about>; Public Housing Units: <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::public-housing-developments-1/about>

¹⁶ LIHTC refers to Low Income Housing Tax Credits, a federal tax incentive that promotes development of affordable housing.

County	Total Housing Choice Vouchers	Total Impacted Housing Choice Vouchers	Total LIHTC Units ¹⁶	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units
Haywood County	702	702	238	100	100
Henderson County	478	478	499	0	0
Iredell County	650	650	1,151	577	577
Jackson County	392	392	153	0	0
Lee County	432	432	801	268	268
Lincoln County	153	153	292	250	250
Macon County	294	294	254	0	0
Madison County	182	182	90	197	197
McDowell County	255	255	234	0	0
Mecklenburg County	7,628	7,628	11,251	111	111
Mitchell County	423	423	78	84	84
Nash County	558	558	938	363	363
Polk County	90	90	66	0	0
Rowan County	711	711	1,033	194	194
Rutherford County	250	250	426	151	151
Stanly County	82	82	573	200	200
Surry County	319	319	565	300	300
Swain County	106	106	72	0	0
Transylvania County	183	183	224	163	163
Union County	295	295	104	173	173
Watauga County	213	213	161	0	0
Wilkes County	781	781	349	192	192
Yadkin County	146	146	108	0	0
Yancey County	415	415	154	0	0

2.3 Infrastructure

Figure 7: Bank and Road Erosion, NC Route 9, Buncombe County, NC October 8, 2024 (Credit: NCDOT)



2.3.1 Electrical, Gas, Water, Sewer, Waste, and Telecom Infrastructure

The electrical, gas, water, sewer, waste, and telecom infrastructure of western North Carolina services about three million residents and 500,000 businesses. The geography of this area creates unique challenges for pipes, wires, transmission and pumping stations, and related equipment as it must span terrains that are uniquely susceptible to natural disaster and especially difficult to repair or rebuild (e.g., equipment traversing destroyed bridges or alongside high slopes; infrastructure that spans long distances to service low population density areas, etc.).

The total damage and need impact is estimated to be nearly \$7 billion. This is based on reports of damage from the NC Department of Environmental Quality (DEQ), NC Department of Natural and Cultural Resources (DNCR), municipal-owned electrical membership organizations, electrical cooperatives, private electricity and gas providers, and the Federal Communications Commission (FCC). ¹⁷

The direct damage and needs estimate is comprised of:

- **\$1 billion** in damage to the electrical wiring and electrical infrastructure facilities of 25 municipal-owned systems, seven cooperative-owned electrical systems, and Duke Energy Carolinas and Duke Energy Progress (collectively referred to in this report as Duke Energy) in a region serving nearly two million households;
- **\$100 million** in damage to local parks, and erosion to riparian buffers and trail networks across the State;
- **\$41 million** in damage to gas lines impacting 400 customers and 10 retail propane locations that were severely damaged or destroyed resulting in the loss of 5,000 propane tanks;
- **\$205 million** in damage to 29 public and private high hazard dams and 13 mining sites;
- **\$3.7 billion** in damage to 163 water and sewer systems and hundreds of miles of impacted distribution pipes across more than 24 impacted towns in affected counties;
- **\$128 million** in damage at up to 400 facilities maintaining hazardous waste and 50 million cubic yards of debris, including 10 million cubic yards of curbside vegetative and construction / demolition waste needing to be recycled or disposed of in landfills;
- **\$100 million** in damage to telecommunications and internet infrastructure, including submerged substations, thousands of downed utility poles, and downed transmission towers, covering a region with over 70 independent telecommunications and internet providers; and
- **\$1.7 billion** in funding to make infrastructure and technology upgrades to secure a more resilient western North Carolina. ¹⁸

The financial toll of the disaster remains staggering, with nearly \$7 billion in total damage and needs. OSBM estimates that the federal government and private sector will cover \$6 billion of this total, leaving \$730 million still unfunded, even after considering the State's investments to date.¹⁹

OSBM projects that private businesses will bear more than \$1.2 billion in damage costs, drawing from multiple funding sources. Duke Energy, for instance, will shoulder the burden of restoring its infrastructure and will finance the repair costs by issuing storm bonds to cover over \$900 million in expenses. These funds will go towards replacing nearly 2,000 transformers, more than 12,000 power poles, and other critical infrastructure devastated by the storm. In western North Carolina, gas providers will rely on a

¹⁷ December 2024 Report for the NC Office of State Budget and Management (OSBM) Page 47

¹⁸ December 2024 Report for the NC OSBM, Page 48

¹⁹ December 2024 Report for the NC OSBM, Page 49

combination of insurance and their internal pipeline integrity mechanisms to manage their \$41 million in repair costs.

Private stormwater system owners are expected to handle \$100 million in damage through private insurance claims wherever possible, minimizing public burden. Meanwhile, uninsured private stormwater system owners, including Homeowner Associations (HOAs), will either absorb the repair costs or pass them along to their customers in the form of higher fees over time. Similarly, telecommunications providers facing damage will likely absorb an estimated \$100 million in repair costs upfront, then shift those expenses to consumers through rate hikes where feasible.²⁰

2.3.2 Roads and Bridges

Hurricane Helene has severely impacted approximately 5,000 miles of State-maintained roads across the affected area in western North Carolina, including several major national interstates and arterial routes that serve as critical transportation corridors. The North Carolina Department of Transportation (NCDOT) has found damage to 674 bridges and 712 culverts. Western North Carolina has 25% more public bridges than the State average, with the percentage of private bridges likely even higher due to the terrain and population density.

The terrain in this region is especially challenging, as it is mountainous with an elevation on average two to three times that of the Piedmont, which complicates road and bridge repairs. Western North Carolina also includes a significant number of privately maintained roads, with municipal and private roads making up 48% of all roads in the region compared to 41% for the State as a whole. This higher proportion of non-State infrastructure adds further complexity to recovery efforts. The following outlines the methodology used to estimate transportation needs resulting from Hurricane Helene. Estimates are based on data provided by government agencies, damage models, historical data, and trends. The total transportation impact is estimated at \$10.3 billion, the vast majority of which is anticipated to be covered by federal funding sources.

Of this total need, the NCDOT highway and bridge system is projected to require \$6 billion in repairs and replacements. Once major repair and replacement projects are underway, NCDOT will require substantial cash flow support while awaiting federal reimbursements. The Department's existing cash reserves are already committed to routine operations and ongoing programs, making additional financial resources essential to ensure long-term sustainability and the continued functionality of vital infrastructure.

Structures in scope for transportation estimates include:

- Public roads, bridges, tunnels, and sidewalks maintained by the State;
- Municipal roads, bridges, tunnels, and sidewalks;

²⁰ December 2024 Report for the NC Office of State Budget and Management (OSBM) Page 56

- Private roads, bridges, and culverts;
- Public transit, including bus systems;
- Rail and rolling stock; and
- Ports and airports.

Private Roads and Bridges – The OSBM’s Disaster Recovery section has extrapolated data from previous storms, such as Tropical Storm Fred, to estimate the impact on private infrastructure in counties affected by Hurricane Helene. OSBM used this to estimate the potential number of affected private roads and bridges across counties hit by Hurricane Helene and scaled up the impact based on North Carolina Emergency Management (NCEM) advice on the severity of the damage relative to previous events. Private roads make up almost half of all roads in the region – more than 7,000 private roads, bridges, and culverts have been damaged.

While FEMA has already approved funding for over 3,000 minor repairs, significant support will be needed for larger repair and replacement projects. The unique nature of the mountainous terrain in western North Carolina presents additional challenges requiring specialized approaches to road and bridge repair, and the figure below is indicative of the terrain and issues faced in establishing and maintaining access to homesites via private roads and bridges. Note the steep incline of the road and the fact that there is significant washout along the edges of the road.

Figure 8: Photo of Damaged Private Access Road, Henderson County, October 9, 2024. Credit: NCDOT



Key issues of concern for repair of Helene-related infrastructure damage include:

- **Construction costs:** The assessment for infrastructure damage conservatively assumes construction costs will be 15% higher than estimated due to a shortage of available construction services and/or an increase in the cost of raw material and labor driven by multiple concurrent disasters across the Southeast. Experience from Hurricanes Matthew, Katrina, Harvey, and Florence, and Superstorm Sandy suggests similar shortages drove construction costs 8-20% higher in the aftermath of the event.²¹ In addition, Hurricane Helene construction costs are likely to be driven up by the continued impact of the pandemic recovery and more difficult terrain.
- **Damage Magnitude:** Proportional damage numbers, e.g., percent of roads damaged or destroyed, from county severity classification and inspection of locations with higher flooding, landslides, and road incidents.
- **Hazard Mitigation Costs:** The damage to road and bridge infrastructure across the Helene-impacted area is substantial, and hazard mitigation measures will be necessary to reduce future risks and long-term costs. OSBM estimates that \$1.7 billion will be needed for infrastructure and technology upgrades across Western North Carolina, including improvements to strengthen transportation, utilities, and other critical systems. Of this total, \$1.28 billion is expected to be allocated for hazard mitigation efforts specifically related to roads and bridges. This estimate was calculated by applying OSBM-reported mitigation cost factors, which range from 10% to 30% of total repair and replacement costs, to the \$6 billion in state-maintained road and bridge damage, \$1.38 billion in municipal road network damage, and \$460 million in private road and bridge damage. Using midpoint values within these ranges, a conservative estimate of \$1.28 billion was determined.

²¹ December 2024 Report for the NC OSBM, Page 19

2.4 Economic Revitalization

Western North Carolina is forever changed in the wake of the devastating impacts of Hurricane Helene, significantly impacting the area's economy. Thousands of businesses in the region suffered damage from rushing flood waters, landslides, wind, and falling trees. Even businesses spared from direct damage were often cut off from workers and customers due to washed-out roads or being unable to open due to extended outages of electricity, water, sewer, and communications.

Figure 9: Poverty Branch Road, Madison County, September 29, 2024. Credit: NCDOT.



The findings of this analysis confirm that the economic devastation from Hurricane Helene is unparalleled in modern State history: nearly \$16 billion in total impact. The total includes an estimated \$3 billion in damage to business and non-profit property, including structures, equipment, and vehicles; plus \$435 million in needs for hazard mitigation; and more than \$12.4 billion in economic loss from reduced business revenue, resulting in billions of dollars less income for workers and business owners. OSBM estimates payments from private insurance, federal grants and subsidized loans, State funding, unemployment insurance, and other assistance will cover about \$3 billion of the \$16 billion total damage and needs.

Most of the damage from Hurricane Helene was concentrated in the western third of the State. Western North Carolina is home to scenic parks and cultural attractions that drive tourism and support local

hospitality, retail, and restaurant businesses. Seasonal tourism surrounding “peak leaf season” in fall is particularly important in many of the counties most affected by Helene, with local businesses regularly citing the relative importance of October to annual revenue. The mountains receive nearly 30% of annual visitor spending in fall and early winter, totaling more than \$2 billion in western North Carolina during the prior fall season.

Several counties within the affected region rely on arts, entertainment, recreation, accommodation, and food services for 5% or more of total employment, much higher than the 1-3% share for those industries in most other areas of the State. Of the 100 counties in the State, 39 are eligible for FEMA IA. Those counties:

- Make up 45% of the State’s total GDP (20% excluding Mecklenburg and Forsyth Counties);
- Host 115,237 separate employer business establishments (46% of which have five or fewer employees);
- Are home to an additional 384,000 “mom and pop” businesses with no employees and \$18.7 billion in receipts;
- Had an average unemployment rate of 3.3% in 2023, lower than the State average of 3.5%.
- Are home to unique businesses that play major roles in supplying products for specific industries, including Baxter International in McDowell County, an intravenous (IV) fluid manufacturer whose North Carolina plant supplies 60% of IV fluids nationwide, and quartz mining operations in Spruce Pine, which supply most of the world’s high-purity quartz for semiconductors and other technologies worldwide.²² Following Hurricane Helene, some businesses have begun to clean up and reopen after initial disruptions but face obstacles to complete recovery, particularly in the hardest-hit counties.²³

Although regional unemployment data lags the effects of major disaster events, initial unemployment claims in the State in the week after Hurricane Helene spiked to more than three times the average in 2024 thus far. Although unemployment in the region was, on average, lower than the State unemployment rate before the storm, the unemployment rate in the affected region rose to a range of 6% to 9% in the month after Hurricane Helene struck.

As of December 4, FEMA provided more than 138,000 households with housing and other assistance related to the effects of Hurricane Helene, totaling approximately \$264 million in support. FEMA assistance to families helps sustain local consumer spending, which helps businesses that remain open but are experiencing lower sales from a lack of out-of-town visitors.

²² NPR. “A tiny town just got slammed by Helene. It could massively disrupt the tech industry.” October 1, 2024. <https://www.npr.org/2024/09/30/nx-s1-5133462/hurricane-helene-quartz-microchips-solar-panels-spruce-pine>

²³

FEMA reported that over 90% of gas stations, grocery stores, and pharmacies in the area affected by Helene had resumed conducting transactions by October 13. These locations represent key consumer staples, and spending levels in these stores were nearing pre-Helene levels. Other businesses, however, are operating far below pre-Helene levels.

AGRICULTURAL ECONOMIC IMPACTS

Economic damage in the agricultural sector due to Helene is estimated at \$4.9 billion. The direct damage and needs estimate is \$4.1 billion, comprising farm infrastructure, machinery, and equipment damage; crop, forestry, and trout farm losses; stream debris removal and stabilization needs; agricultural land restoration needs; wildfire risk response; and mitigation efforts. Livestock, dairy, and poultry producers experienced significant infrastructure damage but limited animal losses.

There is an estimated additional \$783 million in indirect and induced impacts from crop losses. In addition to these economic “ripple effects” from crop losses, the disruption of the peak tourism season in the region will have substantial, but unquantified, impacts on agricultural businesses. Agritourism and direct-to-consumer sales are a significant part of the agricultural economy in western North Carolina. Federal funding requests estimated insurance coverage, and State appropriations to date are expected to cover \$1.6 billion of the damage, leaving \$3.3 billion unfunded.

Agricultural production in the mountains tends to be predominantly small, diverse operations. As of 2022, U.S. Department of Agriculture – National Agricultural Statistics Service (USDA-NASS) survey data indicates there were approximately 18,600 farms in the 37 western counties impacted by Hurricane Helene. This western region is also home to large fresh produce farms. The region’s proximity to large population centers in the Southeast and its cooler mountain climate allow it to grow cool season crops near large markets.²⁴

Agricultural production in the region is primarily specialty crops with limited federal crop insurance coverage. The Greenhouse, Nursery, and Floriculture sector is the largest sector of the farming community with annual revenues of over \$400 million. Nursery and vegetable produce operations were particularly devastated by Hurricane Helene. Many of these businesses are located in low-lying areas that suffered the worst flooding and swift water destruction. The majority of vegetable, nursery, and sod crops in these locations were lost. Initial estimates indicate that over 80% of plant nurseries were destroyed and inventories can take one to eight years to re-establish.

Beyond the immediate production losses, for the agricultural community to recover, significant remediation efforts are needed to restore farmland, pasture, and forestland from the effects of high winds, landslides, extreme erosion, sediment deposits, and stream redirection.

²⁴ Of the 39 FEMA-designated counties, Lee and Nash are excluded from this analysis as they were only impacted by tornadic activity.

3 Mitigation Needs Assessment

Figure 10: Aftermath of Helene-Triggered Mudslide, September 28, 2024 (Credit: NCDOT)



Western North Carolina also includes a significant number of privately maintained roads and bridges, with municipal and private roads making up 48% of all roads in the region compared to 41% for North Carolina as a whole. This higher proportion of non-state-maintained infrastructure adds further complexity to recovery efforts. The Office of State Budget and Management's (OSBM) Disaster Recovery section has extrapolated data from previous storms, such as Tropical Storm Fred, to estimate the impact on private infrastructure in counties affected by Hurricane Helene. OSBM used this to estimate the potential number of affected private roads and bridges across counties hit by Hurricane Helene and scaled up the impact based on Emergency Management advice on the severity of the damage relative to previous events.

Private roads make up almost half of all roads in the region – more than 7,000 private roads, bridges and culverts have been damaged. While FEMA has already approved funding for over 3,000 minor repairs, significant support will be needed for larger repair and replacement projects. The unique nature of the mountainous terrain in western North Carolina presents additional challenges requiring specialized approaches to road and bridge repair. Still, the state expects \$350 million from this source to cover the gap between FEMA PA funds and the total costs of restoring access to isolated homes.

3.1 North Carolina Enhanced Hazard Mitigation Plan

The [North Carolina Enhanced Hazard Mitigation Plan](#) (Enhanced HMP), updated in 2023, is a comprehensive, federally approved framework designed to identify and address the State's most significant hazards. Developed collaboratively by State agencies, local governments, and key stakeholders, including EM professionals and environmental organizations, the Enhanced HMP serves as the foundation for guiding mitigation priorities and strategies statewide. The 2023 update reflects new data, emerging risks, and lessons learned from recent disasters, aligning with FEMA's hazard mitigation planning requirements and serving as a critical resource for reducing the impact of natural and human-made disasters.

The Enhanced HMP outlines key priorities, including enhancing community resilience, reducing vulnerabilities in infrastructure and housing, and supporting at-risk populations. This mitigation section builds on the Enhanced HMP's foundation by tailoring strategies to address the impacts of Hurricane Helene, leveraging recent findings from updated damage assessments and integrating targeted recommendations to address unmet needs in housing, infrastructure, and public health.

3.1.1 Current Mitigation Efforts by the State of North Carolina

The State has developed a range of mitigation programs to address North Carolina's most pressing vulnerabilities. These initiatives are aligned with the goals of the Enhanced HMP and focus on reducing risks, building community resilience, and improving infrastructure. By prioritizing data-driven strategies and leveraging State and federal resources, these programs aim to address specific hazards while promoting equitable and sustainable recovery efforts.

FLOOD RESILIENCY BLUEPRINT

Led by the NCDEQ, [the North Carolina Flood Resiliency Blueprint](#) (the Blueprint) aims to identify and prioritize flood mitigation projects across the State. It provides tools to assist local governments in floodplain management, risk assessments, and implementation of nature-based solutions. Recent projects include comprehensive flood modeling in high-risk counties and the establishment of community-level flood action plans. More information is available at: <https://www.deq.nc.gov/energy-climate/flood-resiliency-blueprint>

NATURAL INFRASTRUCTURE FLOOD MITIGATION PROGRAM

[The Natural Infrastructure Flood Mitigation Program](#) (NIFMP), administered by NCDEQ, emphasizes using ecological approaches to mitigate flood risks in key watersheds. Projects include wetland restoration, stream bank stabilization, and the implementation of green infrastructure in urban areas to reduce runoff. The program has successfully funded initiatives that simultaneously improve water quality and reduce

flooding. Additional details can be found at: <https://www.deq.nc.gov/about/divisions/mitigation-services/natural-infrastructure-flood-mitigation-program>

LAND AND WATER FUND FLOOD RISK REDUCTION GRANT PROGRAM

The North Carolina Land and Water Fund's (NCLWF's) Flood Risk Reduction Grant Program's focuses on economically distressed areas, providing grants for designing and implementing flood mitigation projects. Under the auspices of the NC DNCR, the NCLWF continues to prioritize resources for underserved communities and has funded projects such as levee repairs and stormwater management enhancements. More information is available at: <https://nclwf.nc.gov/>

GOLDEN LEAF FOUNDATION FLOOD MITIGATION PROGRAM

The Flood Mitigation Program, operated by the non-profit [Golden Leaf Foundation](https://www.goldenleaf.org/), offers grants of up to \$250,000 for public stormwater infrastructure and flood control projects. Examples include the construction of retention basins in urban areas and upgrades to drainage systems in flood-prone regions. The program directly supports communities at risk of frequent flooding by enhancing their infrastructure resilience. Program details can be accessed at: <https://www.goldenleaf.org/grantseekers/flood-mitigation-program/>

HAZARD MITIGATION ASSISTANCE PROGRAMS

Administered by [North Carolina Emergency Management](https://www.ncdps.gov/our-organization/emergency-management/) (NCEM), this suite of programs includes the Hazard Mitigation Grant Program (HMGP), Building Resilient Infrastructure and Communities (BRIC) program, and Flood Mitigation Assistance (FMA) grant program. These programs provide critical funding for long-term mitigation measures, such as elevating homes, reinforcing public buildings, and improving drainage infrastructure. More information is available at: <https://www.ncdps.gov/our-organization/emergency-management/hazard-mitigation>

EMERGENCY MANAGEMENT DISASTER RELIEF AND MITIGATION FUND

The \$15 million Emergency Management Disaster Relief and Mitigation Fund, administered by [NCEM](https://www.ncdps.gov/our-organization/emergency-management/), supports technical assistance (TA) and disaster relief with a focus on underserved populations. It aims to close gaps in recovery and mitigation efforts by ensuring resources are available to communities most in need. Recent allocations have included support for rural areas to develop emergency response capabilities and integrate hazard mitigation into local planning efforts. More details can be found at: <https://www.ncdps.gov/our-organization/emergency-management/hazard-mitigation>.

PRIORITY HAZARDS IDENTIFIED IN THE NORTH CAROLINA ENHANCED HMP

[The State's Enhanced HMP](#) identifies the hazards that pose the most significant risks to communities across the State. These hazards are prioritized not only based on their potential to disrupt daily life and cause extensive damage but also on their impact on public safety and long-term resilience. By serving as

a foundational document, the Enhanced HMP ensures that mitigation strategies align with the State’s overarching goals to protect people, property, and critical infrastructure. Central to this prioritization is the Priority Risk Index (PRI), a systematic tool used to evaluate and rank hazards. The PRI assigns numerical scores to hazards based on five key factors: probability, impact, spatial extent, warning time, and duration. Higher PRI scores indicate greater risk, with scores closer to 3.0 reflecting more severe threats compared to lower scores closer to 1.0, which denote less significant risks. This scoring system ensures that the State focuses its mitigation efforts on the most critical hazards. Historical data from the National Weather Service (NWS) Storm Events Database (<https://www.ncdc.noaa.gov/stormevents/>) complements this prioritization by providing empirical evidence on the frequency, severity, and impact of past events.

Table 12: Hazard Type and Key Impacts

Hazard Type	Fatalities	Injuries	PRI Score	Key Characteristics
Hurricanes and Coastal Storms	59	31	2.8	High winds, storm surges, and inland flooding
Flooding	173	37	2.8	Flash flooding and riverine flooding
Severe Weather Events	178	2,581	2.9	Tornadoes, thunderstorms, hail, and lightning
Wildfires	0	0	1.8	Increasing due to climate trends
Climate Change	54	209	2.5	Contributes to extreme weather events

HURRICANES AND COASTAL STORMS

Mitigation strategies for hurricanes and coastal storms focus on enhancing evacuation procedures, reinforcing coastal infrastructure, and promoting flood-resistant construction practices. Programs like the HMGP and BRIC provide critical funding for these efforts. Mitigation strategies include enhancing evacuation procedures, reinforcing coastal infrastructure, and promoting flood-resistant construction practices.

FLOODING

To address the recurring threat of flooding, the State prioritizes stormwater management, floodplain preservation, and infrastructure improvements. Initiatives such as the Blueprint and NIFMP emphasize nature-based solutions and community-level flood mitigation planning.

SEVERE WEATHER EVENTS

Mitigation strategies for severe weather include public awareness campaigns, advanced early warning systems, and adherence to storm-resistant building codes. These measures aim to reduce the impacts of tornadoes, thunderstorms, and hail on communities and infrastructure.

WILDFIRES

The State's wildfire mitigation strategies focus on forest management, community outreach on fire prevention, and strategic fuel reduction practices. These efforts aim to minimize wildfire risks while protecting ecosystems and residential areas. Working through the Carolina Land and Lakes Resource Conservation and Development Council (Carolina Land & Lakes), a majority of counties encompassed by the Helene major disaster declaration are beneficiaries of [Community Wildfire Defense Grant](#) funding under the Bipartisan Infrastructure Law (BIL) and are updating expired Community Wildfire Protection Plans (CWPPs) or developing their first CWPPs.

WEATHER-RELATED HAZARDS AND ADAPTATION

Mitigation efforts focus on strengthening community resilience to extreme weather events through risk reduction strategies, resilient infrastructure, and adaptation measures. These initiatives help address hazards such as extreme heat, cold, and flooding by enhancing infrastructure durability and reducing long-term vulnerabilities.

IMPACTS OF HURRICANE HELENE ON THE STATE

The following findings draw upon two key documents that analyze the impacts of Hurricane Helene and provide insights into the vulnerabilities and unmet needs across the State. These documents include the Saint Bernard Project Preliminary Unmet Needs Assessment (SBP PUNA), developed by the Saint Bernard Project (SPB), which assesses housing and infrastructure impacts, and the OSBM report from December 2024, which provides a comprehensive evaluation of the economic, infrastructural, and community-level damages. Together, these reports form the basis for identifying critical gaps and priorities in mitigation efforts.

HOUSING DAMAGE

Hurricane Helene caused severe damage to LMI housing in affected counties, particularly in rural and coastal regions, leaving many unable to return to their homes for prolonged periods. The SBP PUNA documents that over 30% of impacted households experienced displacements lasting over six months

since Hurricane Helene impacted North Carolina. Families often relocated multiple times due to limited housing availability, compounding economic and emotional stress. Recovery challenges were particularly acute in rural areas where affordable housing stock was already limited, underscoring the need for targeted investments in housing resilience. Strategies such as retrofitting homes, elevating structures, and implementing acquisition programs for repetitive loss properties are critical. Funding programs like HMGP and CDBG-DR can support these efforts.

CRITICAL INFRASTRUCTURE

Key infrastructure such as transportation networks, water supply, and electricity systems suffered extensive damage during Hurricane Helene. Rural areas experienced power outages that lasted over 21 days, severely disrupting daily life and economic activity. Transportation disruptions further delayed emergency response and supply chains. Infrastructure assessments revealed that 70% of the damaged systems were constructed before 1980, highlighting the pressing need for modernization and improved resilience standards. Coordination with housing strategies is essential, as infrastructure resilience directly supports housing stability.

COMMUNITY DISPLACEMENT

Displacement following Hurricane Helene disproportionately affected historically underserved populations. Migration from high-risk zones to urban centers placed additional strain on public services and housing in these areas. The SBP PUNA emphasizes that these migrations often led to long-term socioeconomic disparities, with displaced individuals facing barriers to stable employment and access to essential services. Addressing displacement requires integrated housing and community support programs.

ECONOMIC IMPACT

The OSBM report estimates total economic damages from Hurricane Helene at billions of dollars, with significant losses in agriculture and fisheries. Crop failures due to prolonged flooding reduced annual revenues by 38% in some counties, crippling local economies and leaving many small farmers without viable recovery paths. Small businesses faced similar challenges, with an average of 45% reporting revenue losses post-disaster. Investment in resilient housing and economic recovery programs is vital to stabilizing these communities.

HEALTH AND SAFETY

Public health crises emerged in the aftermath of Hurricane Helene, including spikes in waterborne diseases and increased mental health challenges. Rural healthcare facilities reported a 150% increase in patient volumes, straining limited resources. Long-term mental health impacts were particularly pronounced among displaced populations, with a 30% increase in reported cases of anxiety and

depression in impacted areas. Enhancing healthcare capacity and integrating health-focused elements in housing recovery plans are recommended.

CORRELATION AND SYNTHESIS

The findings from the SBP PUNA, the OSBM report, and the PRI rankings reveal overlapping vulnerabilities that highlight critical areas for intervention. Housing and infrastructure are particularly susceptible to damage from hurricanes and flooding. Vulnerable populations are disproportionately impacted, amplifying pre-existing socioeconomic disparities. Furthermore, economic and public health consequences stress the need for integrated mitigation strategies that address immediate recovery and long-term resilience.

Recommendations for Mitigation Strategies:

The recommendations below are derived from the Enhanced HMP and OSBM Hurricane Helene Report.

One category of major need – addressing mitigation and resilience through repairs to private roads and bridges - cuts across both the housing resilience and the infrastructure categories outlined below. Western North Carolina includes a significant number of privately-owned roads, bridges, and culverts that provide access to individual housing units or small clusters of houses.

The current estimate of private road and bridge projects to be addressed could be as high as 7,000. FEMA has been addressing the need for permanent repair if the repair is such that a temporary approach would fail to provide the requisite level of safety or emergency access. On this point, FEMA approved funding for over 3,000 minor repairs as of December 2024, but significant support will be needed for larger repair and replacement projects.

However, for many individuals who will qualify for CDBG-DR assistance to rebuild or repair a home, providing access is a critical component of returning them to their homes and they almost uniformly lack the resources to address road and/or bridge repairs. Further, NCDOC has an interest in mitigating against the possibility that a future flood event could again eliminate their ability to move out of harm's way.

OSBM originally projected that \$350 million in CDBG-DR funding would be necessary to address needs associated with rebuilding these critical links for homeowners. The reality is that NCDOC will be unable to devote more than \$130 million to the effort and proposes to make this investment as part of its overall mitigation strategy.

1. Enhancing Housing Resilience

- Improve safety for resident through mitigation and resilience investments that strengthen roads and bridges providing access to housing units that are difficult to access.
- Implement stricter building codes focused on hurricane and flood resistance, as emphasized in the HMP.

- Expand funding for retrofitting existing housing and developing affordable, resilient housing stock.
- Promote acquisition programs for repetitive loss properties and support elevation projects in flood-prone areas, aligning with OSBM recommendations.

Example: Retrofitting homes in high-risk areas could yield a 4:1 return on investment by preventing future damages.

2. Upgrading Infrastructure

- Prioritize investments in stormwater management systems, transportation resilience, and utility redundancy, consistent with HMP goals.
- Establish regional hubs for emergency services to ensure faster response times, as highlighted in OSBM analyses of infrastructure weaknesses.

3. Supporting Vulnerable Communities

- Allocate resources for community-based recovery programs to address systemic inequities, a focus of both the HMP.
- Ensure housing strategies are inclusive by targeting investments in underserved areas, as noted in OSBM's assessment of displacement impacts.

Example: Overlaying social vulnerability indices with flood-prone areas highlights critical zones requiring immediate mitigation efforts.

4. Creating Economic Recovery Programs

- Provide grants and low-interest loans to support small businesses and key sectors like agriculture, addressing economic vulnerabilities outlined in the OSBM report.
- Establish a State-backed insurance pool to ensure quicker financial recovery, connecting economic stability to housing recovery efforts.

5. Strengthening Emergency Preparedness

- Invest in modernized early warning systems and real-time monitoring technologies, aligning with HMP strategies for disaster preparedness.
- Expand training programs for local EM personnel, with a focus on protecting housing and infrastructure during disasters.

6. Integrating Public Health Measures

- Strengthen healthcare infrastructure in rural areas to handle surge capacity, a recommendation supported by OSBM findings on post-disaster health impacts.
- Launch mental health support initiatives and public awareness campaigns on disaster preparedness, integrating health considerations into housing recovery plans.

Resiliency Efforts: The recovery investments afford an opportune time to efficiently introduce building, infrastructure, and technology upgrades that will ensure that future storms do not cause the same level of destruction, better safeguarding both public safety and economic stability. Four categories of resiliency efforts have been identified: Water Infrastructure Resiliency & Interconnections Fund (\$500 million), Stormwater Systems Resiliency (\$60 million), Dams Repairs & Overtopping Study (\$760 million), and Natural Resource Stewardship (\$375 million). Providing resiliency funding for water systems to interconnect to neighboring water systems supports communities with a backup option should a water system go offline for an extended period.

Due to the terrain in western North Carolina, interconnections that are more common in the rest of the State tend not to exist in the impacted region. DEQ estimates a need of \$500 million for interconnections between water and wastewater systems to join two water sources or systems allowing water to be transferred between them. Bolstering stormwater and dam resilience will curb against future catastrophic flooding. Before Hurricane Helene, there was already a high need for repair and upgrades to dams and stormwater systems across the region. DEQ estimates a need of \$60 million for stormwater measures for further resiliency, such as wet ponds, bioretention cells, infiltration systems, stormwater wetlands, sand filters, and permeable pavement.

DEQ estimates an additional need of \$760 million to assess and repair high-hazard dams that pose a substantial threat to the health, safety, and welfare of downstream residents and businesses. The renovations for resiliency measures previously made on the North Fork Dam stopped even more catastrophic damage from impacting communities, and additional dams across western North Carolina need to implement similar resiliency measures. DEQ estimates a total of \$375 million needed to increase natural resource resiliency. Part of this is a need of \$15 million for flood mitigation projects to prepare for future storms through the NIFMP within the Division of Mitigation Services and an additional \$20 million to protect water quality, wildlife habitat, and provide open space through DEQ's Stewardship Program.

DEQ also identified \$40 million in mapping needs, as Hurricane Helene caused over 2,000 landslides in western North Carolina, with 260 of them damaging multiple homes or posing an imminent threat to residents. Last, DEQ requires an estimated \$300 million for future-flood resiliency projects in eight river basins, including Hiwassee, Little Tennessee, Savannah, French Broad, Broad River, Catawba, Watauga, and New River, Yadkin-Pee-Dee.²⁵

EXPERIENCE USING CDBG FUNDING FOR MITIGATION PURPOSES

The State has experience using CDBG funding for mitigation purposes as it received CDBG-Mitigation (CDBG-MIT) funding in the wake of Hurricanes Matthew (2016) and Florence (2018). The State received a total of \$202 million of CDBG-MIT funding for these events and has implemented a series of programs and activities that address HUD's requirements for qualifying mitigation expenditures. These programs and

²⁵ December 2024 Report for the NC OSBM, Page 52

activities are outlined below, and the State will leverage the experience gained with this portfolio to inform and improve its delivery of mitigation actions as part of the Helene recovery.

- **Strategic Buyout Program** – This program designates Disaster Risk Reduction Areas (DRRAs) in areas that are particularly vulnerable to property damage from future disasters and provides funding for the purchase of eligible properties in DRRAs.
- **Infrastructure Recovery Program** – This program provides funding to repair, replace, rebuild, make more resilient, or improve public facilities that were damaged by Hurricanes Florence and Matthew, and engages in public service activities that support community recovery. Projects are prioritized based on their ability to reduce risk and loss of life and property during future disasters and to improve resilience for underserved communities and vulnerable populations.
- **Public Housing Restoration Fund** – This fund provides funding to rehabilitate, repair, or replace PHA properties that were negatively affected by Hurricanes Florence and Matthew. Funds are also used to address unmet recovery long term and mitigation, or to make facilities more resilient from future storm events.
- **Affordable Housing Development Fund** – The Affordable Housing Development Fund was established to create new housing stock in a way that is more responsive to the needs of the recovering community while mitigating the effects of potential future hazards through resilient design and planning.
- **Homeownership Assistance Program** – This program allows for up to \$20,000 in down payment assistance for eligible applicants and up to \$30,000 for applicants who are first-generation homebuyers, plus up to 5% in reasonable and customary closing costs incurred by first-time buyers to move to areas that would be more resilient to potential future hazards.
- **Code Enforcement and Compliance Support Program** – To account for the increased demand for code enforcement due to increased construction work associated with mitigation activities, the Code Enforcement and Compliance Support Program identifies deteriorated or deteriorating areas and provides funding and resources to carry out code enforcement activities necessary to complete disaster recovery in those areas.

Further, the State has undertaken or completed the following CDBG-MIT funded resilience planning and TA activities:

- **Regions Innovating for Strong Economies and Environment (RISE) Regional Resilience Portfolio Program** - [RISE](#) supported resilience in storm-impacted regions of the State by providing TA to partners to support vulnerability assessments, identify priority risk reduction actions, and enhance resilience.
- **NC Resilience Exchange** - [The NC Resilience Exchange](#) is an online resource for data, case studies, guidance, and funding opportunities for NC communities. The site provides local leaders with

information about how hazards will affect their communities and resources to plan and implement projects to address those risks.

- **Heat Action Plan Toolkit** - [The Heat Action Plan Toolkit](#) was developed by the State Climate Office (SCO) of North Carolina and the Carolinas National Oceanic and Atmospheric Administration (NOAA) Climate Adaptation Partnership (CAP) for use by local governments to reduce the human health impacts of extreme heat events and increasing temperatures.
- **Eastern NC Community Floodprints** - CDBG-DR and CDBG-MIT planning funds have been deployed to develop landscape planning “floodprints” for MID communities affected by Hurricanes Matthew and Florence.
- **NC Resilient Coastal Communities Program (RCCP)** - This State, local, and private partnership provided partial funding for TA and financial assistance to help local communities overcome barriers in coastal resilience and adaptation planning, and to boost local government capacity in the State’s 20 coastal counties.
- **Statewide Probable Maximum Precipitation Study for North Carolina** - NCDEQ is supporting a study of the probable maximum amount of precipitation at a location for a given duration that is meteorologically possible (the “worst case” scenario for rain or snow). This updated data will support watershed and resilience planning by helping governments and other entities plan for the design, location, and relocation of water infrastructure — such as dams, culverts, and drainage networks — and ensure safety and functionality.
- **NIFMP and Nature-Based Flooding Solution** - NCDEQ is using planning funds to develop the NIFMP.
- **Atlas 14 Rainfall Statistics Update** - NCDOT is supporting actions to update the NOAA’s “Atlas 14” precipitation intensity, duration, and frequency estimates. This data is used by the public and private sectors for infrastructure design purposes.
- **Regional Precipitation Frequency Estimates and Data System** – Updates the Statewide Intensity-Duration-Frequency (IDF) curves to account for climate change projections and quantify future climate-related risks.
- **Downscaled Climate Projection Development** – The SCO is developing a suite of climate projections at smaller spatial scales, such as single watersheds, for use by local and regional stakeholders.

4 Fair Housing and Civil Rights Data Collection

Figure 11: Flood Damage along US Route 64, Bat Cave, NC, October 10, 2024. Credit: NCDOT



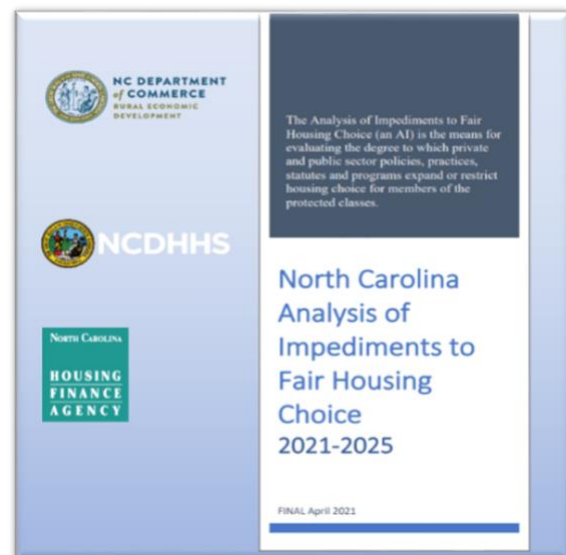
The following section provides fundamental demographic information sought by HUD in development of the fair housing and civil rights assessment outlined in the Universal Notice.

Central to this discussion is NCDOT's record of compliance with the statutory requirements for CDBG (and, by extension, CDBG-DR) grantees to affirmatively further fair housing (AFFH) even as the underlying regulatory standards have been changed several times since 2015. NCDOT, as North Carolina's designated agency to administer State CDBG formula funding, has annually submitted an AFFH certification as part of its Action Plan. NCDOT is submitting a separate AFFH certification with this Action Plan as required by the Universal Notice and will use its CDBG-DR funds in a manner that aligns with AFFH.

In support of that certification, NCDOC has continued to maintain a current [Analysis of Impediments to Fair Housing](#) (AI), although it is no longer a specific regulatory requirement. The most recent update to the AI was in April 2021 as part of the preparation and submission of the five-year Consolidated Plan covering the period of 2021-2025. This document sets a foundation for NCDOC's approach to compliance with the AFFH requirements as they apply to the CDBG-DR allocation in response to Helene.

Note that neither NCDOC nor NCORR has received any findings or concerns from HUD in recent years with respect to implementation of fair housing and civil rights laws and regulations applicable to CDBG, CDBG-DR, or CDBG-MIT funding. As required by section III.A.2.a. of the Universal Notice, NCDOC will include descriptions and information in program-level policies and procedures that address HUD's required fair housing and civil rights concerns.

Figure 12: North Carolina Analysis of Impediments to Fair Housing Choice



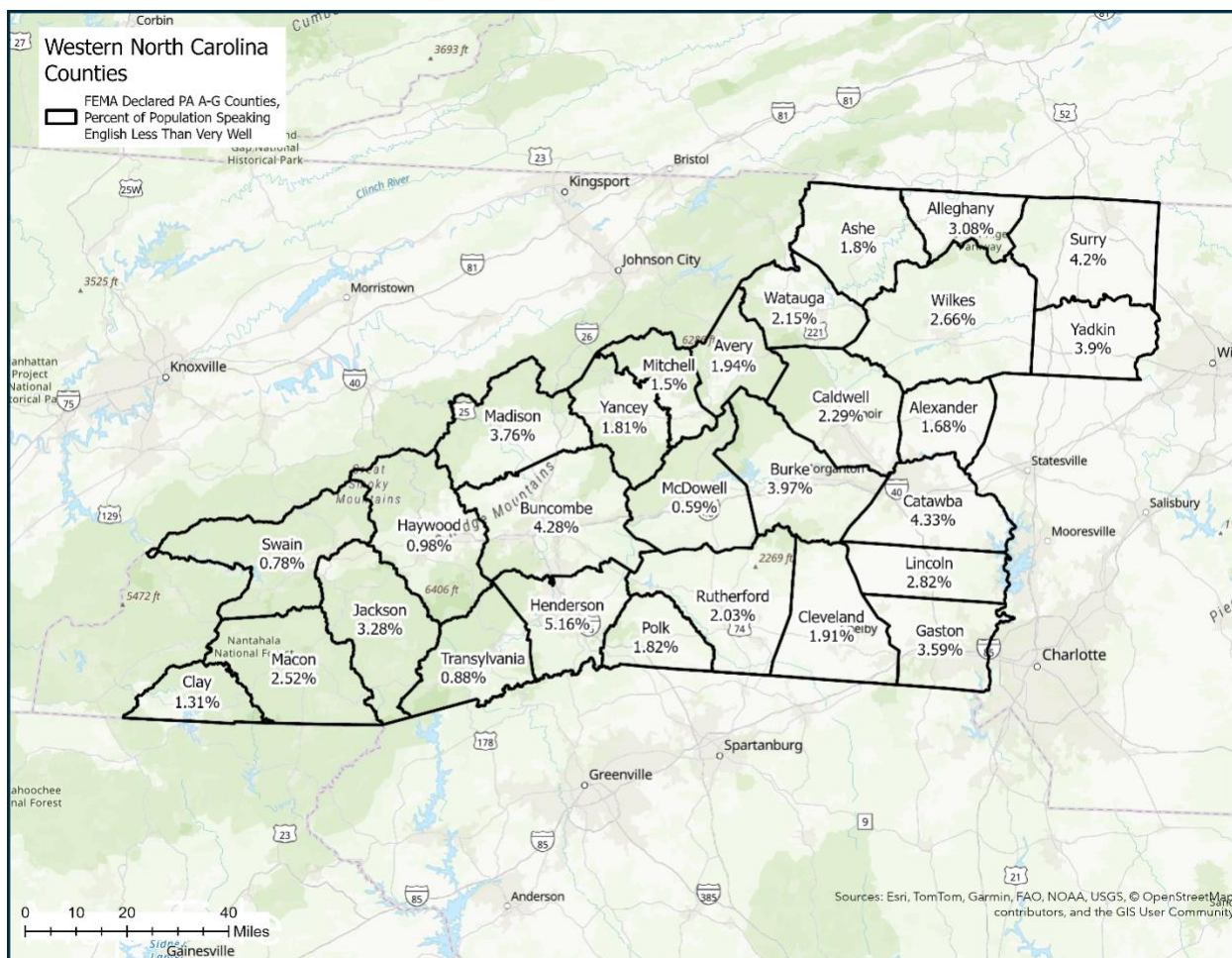
4.1 Populations with Limited English Proficiency

Figure 13 below provides the percent of the population that has limited English proficiency (LEP) for each county included in the Combined MID area. Note that of the 28 counties covered by the Combined MID, only two (2) counties exceed 5% of their population identified as having LEP: Henderson (5.16%) and Mecklenburg (9.81%). Of these two, Henderson County is the only county completely within the HUD-Identified MID area while only one zip code within Mecklenburg is part of the HUD-Identified MID area. A county-by-county list of population with LEP is included in the Appendix section of the Action Plan.

The reality in western North Carolina is that, to an overwhelming degree, English is the language spoken in households, only a low single-digit percentage of households speak Spanish as a primary language, and other languages are far less prevalent. This fact is represented by Figure 14 (below) prepared by the State Demographer and located on the OSBM website.²⁶

²⁶ [Language Characteristics of North Carolina's Population | NC OSBM](#)

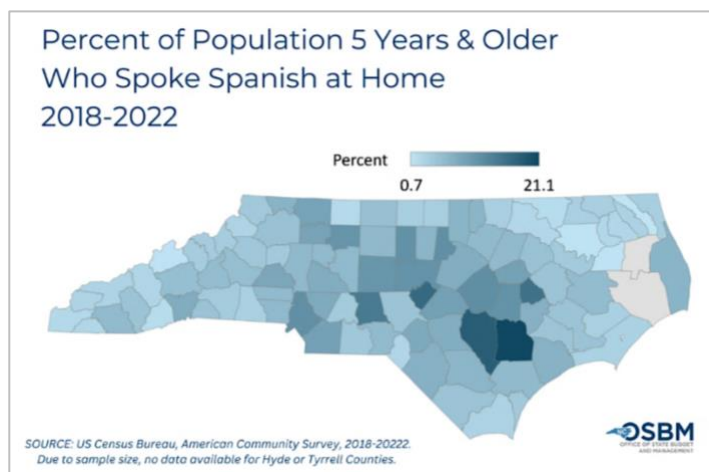
Figure 13: Percent of Population with LEP (by County)



According to the OSBM webpage on the language characteristics of the State's population, languages other than Spanish are far less prevalent across North Carolina as a whole and appear to be very limited in the western North Carolina counties within the Combined MID area.

NCDOC has reviewed HUD's [LEP guidance](#) and, in the interest of availing itself of the "safe harbor" to avoid compliance findings under Title VI of the Civil Rights Act of 1964, NCDOC will publish "vital

Figure 14: Spanish Speakers at Home by County (Over Age 5)



documents,” such as the Action Plan, in Spanish. To govern actions regarding language accessibility, NCDOC will develop and post a language access plan to its CDBG-DR website.

Throughout this section, NCDOC has opted to relabel certain columns in tables for clarity. NCDOC interprets HUD as desiring a cascading set of data from the state level to the counties covered by the FEMA disaster declaration to the Combined MID area. This is how NCDOC approached the data analysis and is presented as such. In other tables, rather than provide a list of census tracts or zip codes, NCDOC presents census tracts or zip codes within the Combined MID area as these are the areas that will benefit from the CDBG-DR funding.

4.2 Persons Belonging to Protected Classes

The Fair Housing Act (42 U.S.C. 3601-19) establishes seven protected classes and the Universal Notice identifies them as: race, color, national origin, religion, sex (including sexual orientation and gender identity), familial status, and disability. NCDOC has compiled and analyzed data regarding protected classes to help shape programs that include effective ways to use CDBG-DR funding to avoid perpetuating disparities and reduce inequities as communities recover.

The primary use of CDBG-DR funds will be for the reconstruction and rehabilitation of owner-occupied housing and the program is designed not only to prioritize households at or below 60 percent of AMI, but the initial pass will incorporate a focus on elderly households; households with individuals under 18; households with disabled individuals; and households that have accessibility needs. This prioritization speaks significantly to the needs of protected classes in the Helene-impacted area and, most specifically, in both the Combined MID area. Table 13 provides information on racial composition of North Carolina and the Helene-impacted area consistent with guidance in the Universal Notice.

Table 13: Race by Statewide, Disaster Declaration, and Combined MID Areas²⁷

Demographic	Statewide Area Estimate	Statewide Area Percent	Disaster Declaration Area Estimate	Disaster Declaration Area Percent	Combined MID Area Estimate	Combined MID Area Percent
White or Caucasian	6,695,587	100%	3,012,042	44.99%	1,533,665	22.91%
Black or African American	2,178,329	100%	744,818	34.19%	143,887	6.61%

²⁷ Source: 2023 ACS 5-Year Estimate DP05: <https://data.census.gov/table?q=DP05%20all%20counties%20within%20north%20carolina>

Demographic	Statewide Area Estimate	Statewide Area Percent	Disaster Declaration Area Estimate	Disaster Declaration Area Percent	Combined MID Area Estimate	Combined MID Area Percent
American Indian or Alaska Native	110,873	100%	24,286	21.90%	13,762	12.41%
Asian	333,844	100%	135,551	40.60%	27,587	8.26%
Native Hawaiian or Other Pacific Islander	6,153	100%	2,006	32.60%	802	13.03%
Other	1,259,554	100%	525,666	41.73%	171,882	13.65%
Total Population	10,584,340	100%	4,444,369	41.99%	1,891,585	17.87%

Table 14: Key Age Demographics by Statewide, Disaster Declaration, and Combined MID Areas²⁸

Demographic	Statewide Area Estimate	Statewide Area Percent	Disaster Declaration Area Estimate	Disaster Declaration Area Percent	Combined MID Area Estimate	Combined MID Area Percent
Under 5 Years Old	598,313	100%	245,414	41.02%	93,127	15.56%
Over 65 Years Old	1,787,027	100%	760,561	42.56%	395,704	22.14%

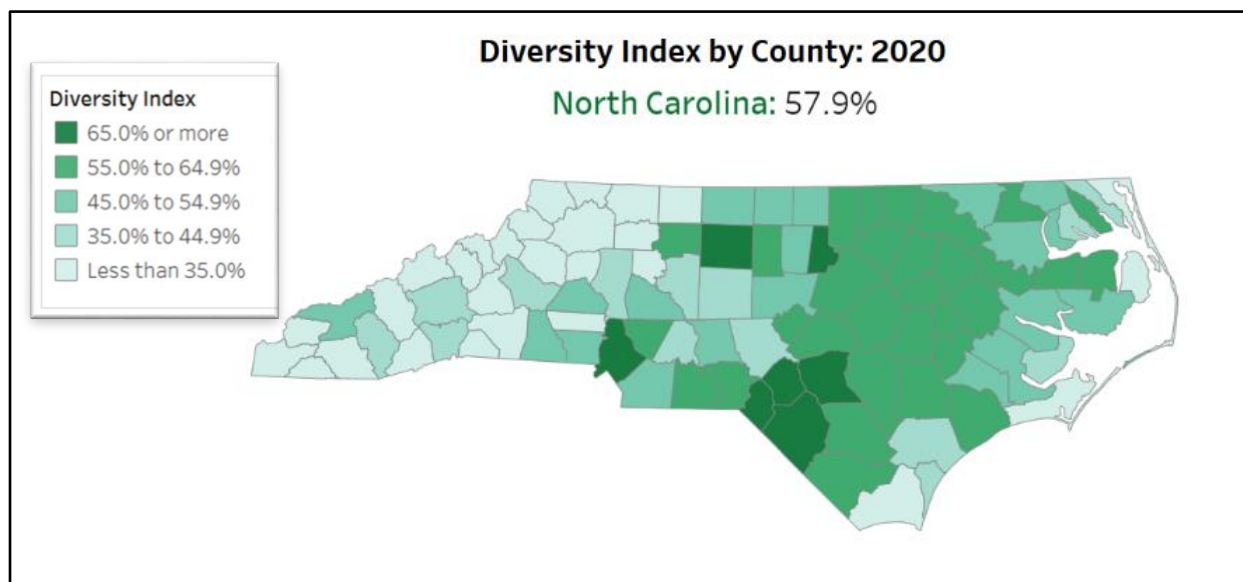
Table 15: Disability by Statewide, Disaster Declaration, and Combined MID Areas

Demographic	Statewide Area Estimate	Statewide Area Percent	Disaster Declaration Area Estimate	Disaster Declaration Area Percent	Combined MID Area Estimate	Combined MID Area Percent
Populations with a Disability	1,386,506	100%	568,106	40.97%	5,249	21.45%

²⁸ Source: 2023 ACS 5-Year Estimate DP05: <https://data.census.gov/table?q=DP05%20all%20counties%20within%20north%20carolina>

The next map (Figure 15) provides a graphic confirmation that the counties of western North Carolina are the least diverse part of the state, meaning that those counties have the highest percentage of population that identifies as White or Caucasian.

Figure 15: Diversity Index Map at County Level in North Carolina



4.3 Persons by Housing Tenure

Table 16: Housing Tenure by Statewide, Disaster Declaration, and Combined MID Areas²⁹

Housing Tenure	Statewide Area Estimate	Statewide Area Percent	Disaster Declaration Area Estimate	Disaster Declaration Area Percent	Combined MID Area Estimate	Combined MID Area Percent
Homeowners	2,778,672	100%	1,177,155	42.36%	546,439	19.67%
Renters	1,408,252	100%	579,227	41.13%	215,806	15.32%

Housing tenure describes the split of households as homeowners and renters. Of all homeowners in North Carolina, 1,177,155 homeowners are in the disaster declared area (42.36% of all homeowners in North Carolina) and 546,439 homeowners are in the combined MID area (19.67% of all homeowners in North Carolina). Of all renters in North Carolina, 579,227 renters are in the disaster declared area (41.13% of all renters in North Carolina) and 215,806 renters are in the combined MID area (15.32% of all renters in North Carolina).

²⁹ Source: 2023 ACS 5-year [B25003: Tenure - Census Bureau Table](#)

4.4 Persons Belonging to Vulnerable Populations

For purposes of the Universal Notice, HUD identifies the following groups as vulnerable populations: 1) persons at risk of homelessness; 2) older adults; 3) persons with disabilities; 4) survivors of domestic violence, dating violence sexual assault, or stalking; 5) persons with alcohol or substance-abuse disorder; 6) persons with HIV/AIDS and their families; or 7) public housing residents. The following information outlines some characteristics of these populations in western North Carolina.

- **People experiencing homelessness:** Approximately 4,600 individuals in disaster declared areas were unhoused as of 2022. Individuals experiencing homelessness are often more at risk and vulnerable during hurricanes due to limited resources and community connections.
- **People with disabilities:** Approximately 12.8% of individuals in western North Carolina identify as having a disability. Individuals with disabilities may not have the flexibility to relocate and may be more impacted by disaster-related challenges.
- **Aging population:** In the State, 17.5% of the population is 65 or older. While across all declared counties, this same statistic holds, 32 of the 39 FEMA-declared counties have a percentage aged 65+ above this Statewide average, ranging up to 33%. Excluding Mecklenburg, Union, Cabarrus, Watauga, and Iredell – the only counties with less than 17% of the population aged 65+, the average increases to 20.6%. Older individuals are more likely to be on a fixed income and experience additional disaster-related challenges.

Table 17: Demographic Snapshot of Disaster-Impacted Counties³⁰

Demographics	
Medicaid	• Almost 1.4 million people enrolled in Medicaid
Uninsured	• 11.7% uninsured (over 400,000 people) • Approximately 33% of uninsured fall below 138% of poverty line
Disabled	• 15% of population over the age of 18 (over 500,000 people)
Public Assistance	• 11.6% of households receive USDA Food and Nutrition Service (FNS) benefits (over 200,000)
Elderly	• 18% over age 65 (over 800,000) • 30% of households have at least one person over the age of 65 (over 525,000)

³⁰ Source: OSBM Report, P. 107

Over 40% of the State's population lives in the 39 counties (including Mecklenburg) covered by the FEMA IA declaration for Helene and more than 12% of residents in this region live in poverty, and slightly more than 20% live below 150% of the poverty line. Western North Carolina has a higher percentage of older residents than the rest of the State and, given its rural nature and low population densities, many residents may have issues easily accessing health care and social services. Over 40% of the State's Medicaid population live in the area.

Under normal circumstances, these residents often rely on a combination of government-subsidized health and human services for food, medical care, and housing assistance. In the wake of Helene, emergency assistance programs such as the Disaster Supplemental Nutrition Assistance Program (D-SNAP) and temporary housing shelters have become important forms of assistance until residents can return to their homes. Nearly two in ten individuals were food insecure prior to Helene, and many of those people lack the capacity to easily recover from such a devastating event.

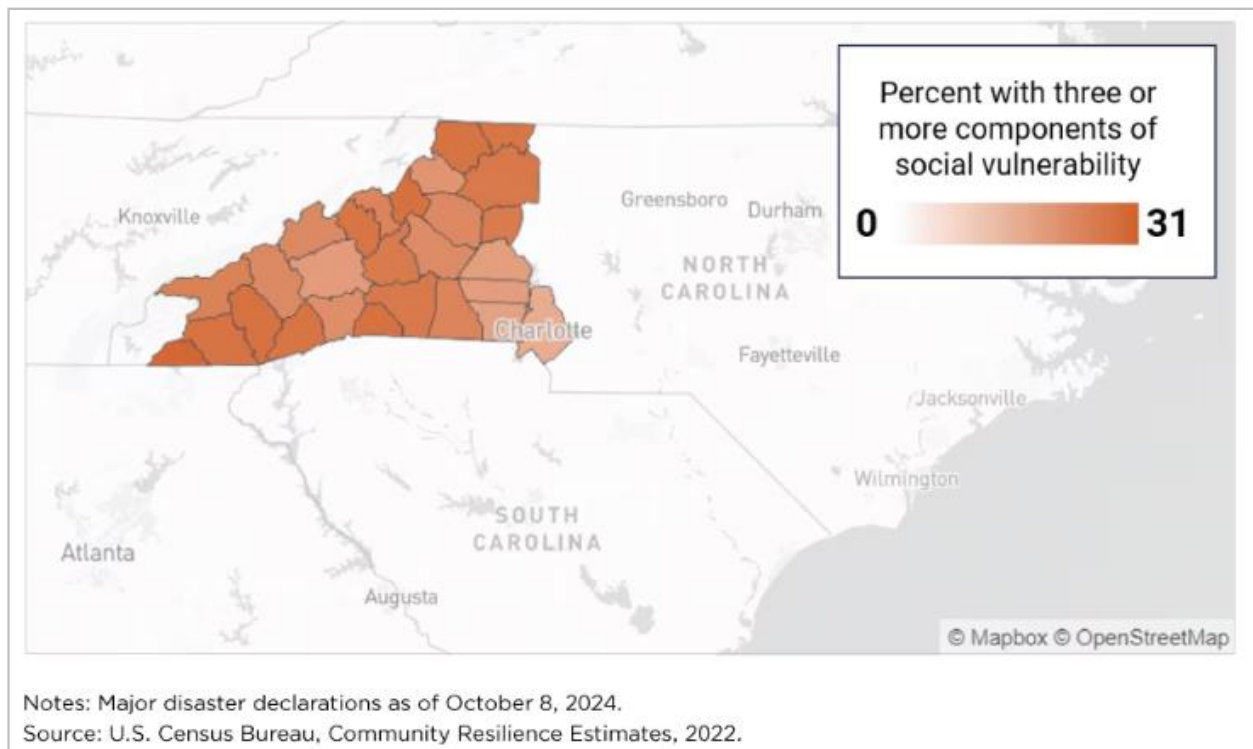
Finally, research has shown that natural disasters negatively impact mental health. This is driven by both newly induced post-traumatic stress disorder among disaster survivors and, for existing mental health patients, a higher likelihood that their access to needed care is disrupted and that underlying issues are worsened.

The article "Hurricane Helene" from the U.S. Census Bureau reports that approximately 577,000 individuals (20.2%) in the 27 counties which were declared major disaster areas after Hurricane Helene faced high social vulnerability to disasters.³¹ These counties, along with a tribal area also impacted by the disaster declaration, experienced severe flooding, widespread power outages, property damage, and loss of life when Helene reached western North Carolina. Thousands of homes were destroyed, many of which lacked flood insurance coverage. The article includes a figure illustrating the counties under a disaster declaration, with darker shading indicating a higher proportion of people at high social vulnerability. Social vulnerability is the susceptibility of social groups to the adverse impacts of natural hazards that results in disproportionate death, injury, loss, or disruption of livelihood. Rural areas were especially impacted, with ten (10) of the 27 counties being predominantly rural (having 80% or more of their population in rural areas according to the 2020 Census).

Reader Note - The cited Census Bureau article has a posted date of October 11, 2024. The article focused on the 27 counties that were covered by the FEMA disaster declaration (DR-4827-NC) as of that date. Additional counties were subsequently added to the declaration.

³¹ [Hurricane Helene's Impact on the Socially Vulnerable in North Carolina](#)

Figure 16: Social Vulnerability in North Carolina Counties with a Major Disaster Declaration

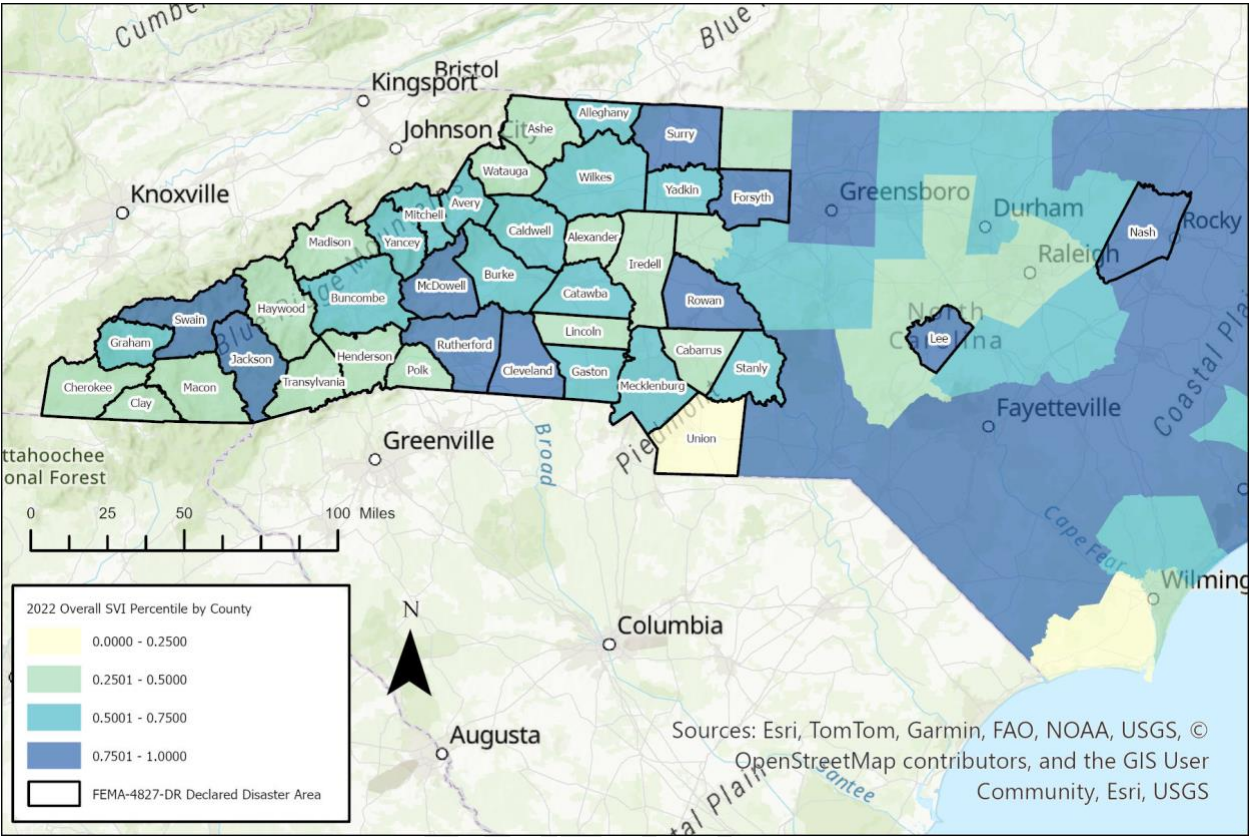


In addition, the article highlights several facts:

- Counties with a major disaster declaration tended to have higher shares of adults aged 65 and older. Outside of Mecklenburg County, 21.9% of adults in disaster counties were age 65 or older compared to 17.4% in other counties.
- 15.9% of the population in disaster-declared counties (excluding Mecklenburg) had a disability versus 13.5% in non-disaster counties, and the population in Mecklenburg had even lower levels of people with disabilities.
- More than 34,000 mobile homes are in State counties under a major disaster declaration. Mobile homes were more prevalent as a share of all housing units in counties with a major disaster declaration. Excluding Mecklenburg County, which has very few mobile homes, about 15.4% of housing units in those counties were mobile homes compared to 12% in the rest of the State.

Figure 17 below shows the overall Social Vulnerability Index (SVI) for disaster declared counties in the State. The ten (10) counties with the highest percentile of SVI (.75 to 1.0) are considered to have a high proportion of households with the least amount of resources to recover from a disaster. Additionally, all but one county is above the lowest quartile overall SVI compared to rest of the U.S.

Figure 17: Social Vulnerability Index in the Declared Disaster Area



4.5 Persons Belonging to Historically Distressed and Underserved Communities

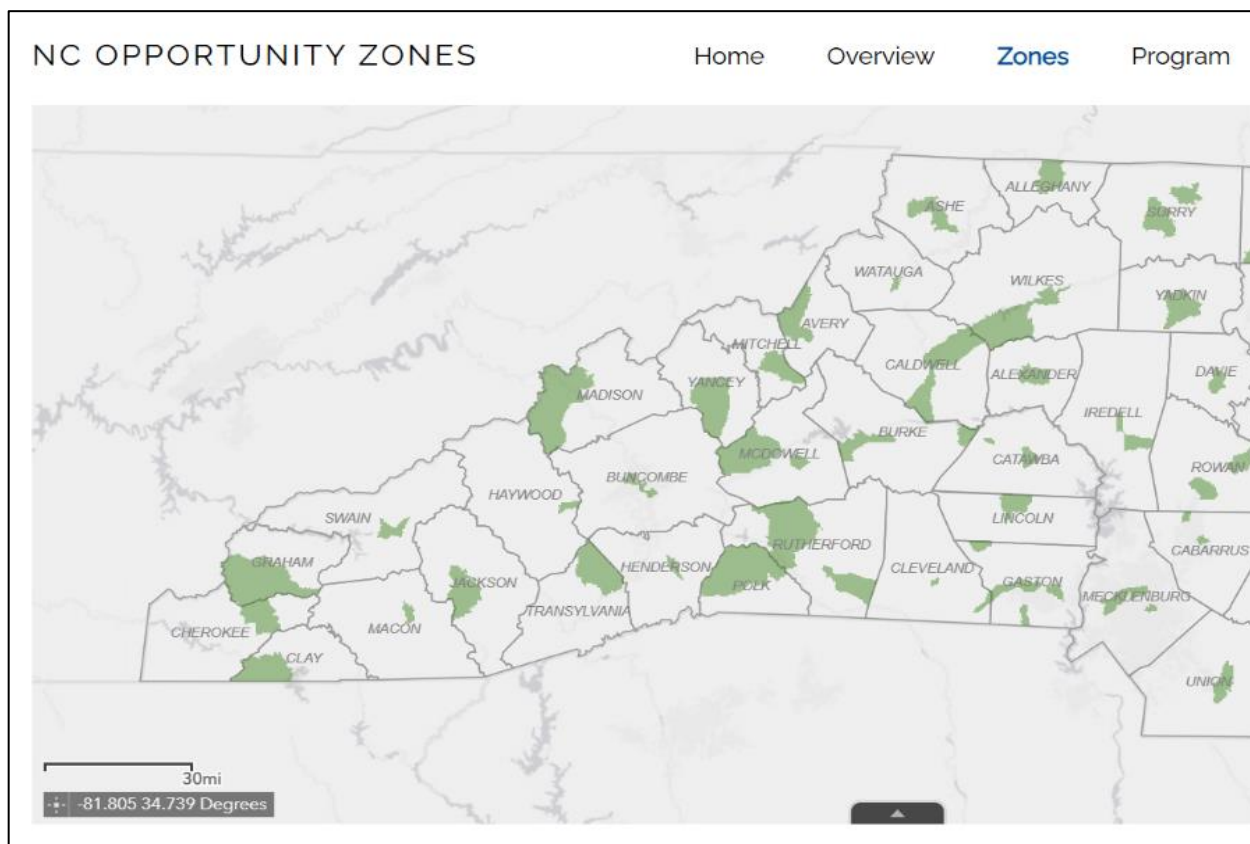
NCDOC has evaluated historically distressed and underserved communities in the Helene-impacted area using the criteria highlighted by HUD in the Universal Notice and supporting materials. Below is a summary of that evaluation.

- **Promise Zones** – All federal Promise Zones were designated between 2014 and 2016 with the goal of streamlining local access to resources across agencies and delivering comprehensive support and TA. The [Promise Zone webpage](#) on HUD’s official website indicates that there are no federally-designated Promise Zones in the State.
- **Community Disaster Resilience Zones (CDRZ)** – To identify CDRZs, FEMA used National Risk Index datasets and, in response, provides a geographic focus for financial and TA from public, private, and philanthropic agencies and organizations for the planning and implementation of resilience projects. The [FEMA CDRZ Viewer](#) indicates that there are no CDRZs in the State counties covered by the Stafford Act major disaster declaration for Helene (DR-4827-NC).
- **Neighborhood Revitalization Strategy Areas (NRSA)** – NRSA’s are a construct used in the Entitlement CDBG program to facilitate implementation of housing, public service, and economic development activities in distressed neighborhoods. NCDOC surveyed the websites of the eleven (11) CDBG entitlement jurisdictions in the Helene-impacted area³², and none of those jurisdictions indicated that they use the NRSA designations in their annual CDBG programs. Further, NCDOC does not use the corollary Community Revitalization Strategy Area (CRSA) in its administration of the annual State CDBG program.
- **Opportunity Zones (OZ)** – NCDOC coordinates the State’s OZ program for the 252 designated OZs. Every county covered by the Helene disaster declaration (DR-4827-NC) has at least one OZ. The State had just over 1,000 low-income census tracts to consider for OZ qualification and followed these guiding principles:
 - An open submission process.
 - Opportunity for all: Aim for at least one OZ in every county.
 - Accommodate as many submissions as possible: Aim to allow each county 25% of their total low-income tracts.
 - Prioritize local recommendations and development goals.
 - Prioritize state industrial site development initiatives.

³² The CDBG Entitlement jurisdictions in the Helene-impacted area are Asheville, Charlotte, Concord, Gastonia, Hickory, Kannapolis, Lenoir, Mooresville, Morganton, Salisbury, and Mecklenburg County.

The map below effectively indicates the distribution of the 74 census tracts in western North Carolina that have an OZ designation.

Figure 18: Map of OZs in Western North Carolina³³



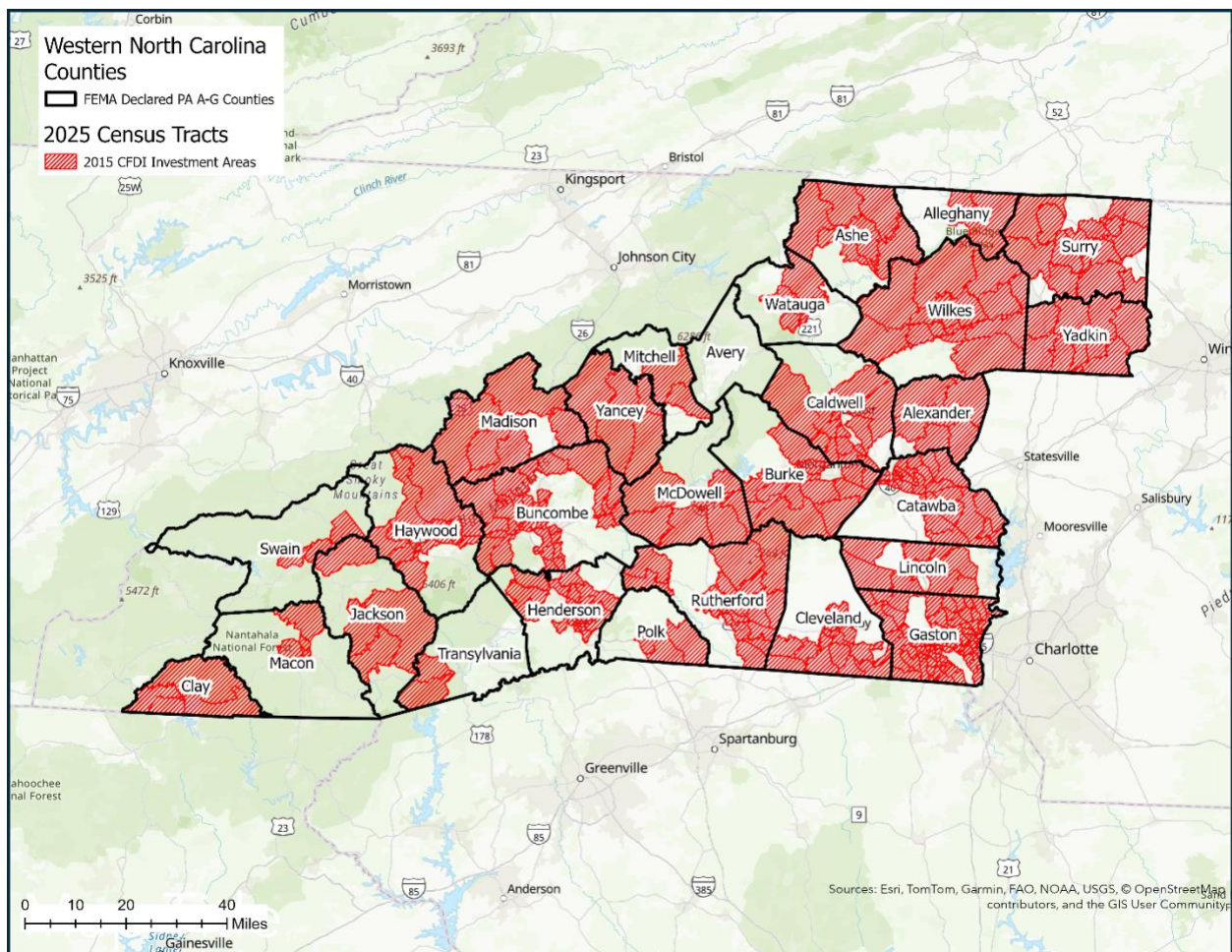
- **Areas Meeting Community Development Financial Institution (CDFI) Investment Area Designation Criteria** – CDFIs are qualified and regulated by the U.S. Treasury Department (Treasury) and are intended to expand economic opportunity for underserved people and communities by supporting the growth and capacity of a national network of community development lenders, investors, and financial service providers. CDFIs operate in Investment Areas (usually predicated on census tracts) that are defined by at least one of the following criteria:
 - Has a population poverty rate of at least 20%;
 - Has an unemployment rate 1.5 times the national average;
 - For a metropolitan area, has a median family income (MFI) at or below 80% of the greater of either the metropolitan or national metropolitan MFI;
 - For a non-metropolitan area, has an MFI at or below 80% of the greater of either the statewide or national non-metropolitan MFI;

33 Source: [North Carolina Department of Commerce - Opportunity Zones](#)

- Is wholly located within an Empowerment Zone or Enterprise Community³⁴; or
- Has a county population loss greater than or equal to 10% between the two most recent census periods for metro areas or 5% over the last five years for non-metro areas.

Using the CDFI Fund's available data set, NCDOC can identify a total of 456 census tracts that qualify as CDFI Investment Areas across the counties covered by DR-4827-NC. This is an expansive set of census tracts and the distribution of these census tracts is shown below in Figure 19. NCDOC's analysis is that the CDFI Investment Area designation is so pervasive across western North Carolina that it provides limited utility in attempting to target CDBG-DR funds.

Figure 19: Map of CDFI Investment Areas



³⁴ While HUD-administered Empowerment Zone and Enterprise Community program effectively ended in 2014, the designations appear to continue to be used for CDFI qualification purposes.

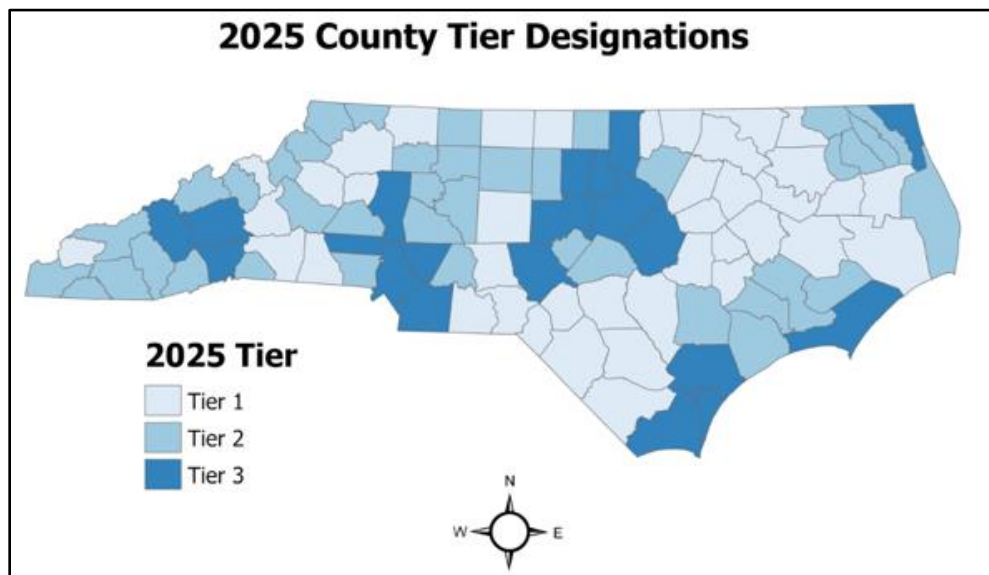
- **Difficult Development Areas (DDAs)** - As the OZ and CDFI approaches yield dozens of areas that are distressed under the terms of the Universal Notice, NCDOC has sought other criteria which may help to further refine the targeting of assistance to communities across western North Carolina. One such measure is HUD's DDA designation which identifies areas with high construction, land, and utility costs relative to area median gross income. This designation helps attract Low Income Housing Tax Credit (LIHTC) projects to the DDA by providing enhanced tax benefits to projects located in the DDA, thereby making those projects more attractive to investors.

Two counties in western North Carolina have DDA designations by HUD for 2025: Avery and Transylvania. In addition, there are seven (7) DDAs in the Asheville Metro Fair Market Rent (FMR) area and are designated by zip codes: 28704; 28732; 28759; 28790; 28801; 28803; and 28804. Additional DDAs are in the Iredell County Metro FMR area (zip codes 28036 and 28117) and the Hickory/Lenoir/Morganton Metropolitan Statistical Area (MSA) (zip code 28673 and 28682). Finally, there are six DDAs in the Charlotte-Concord-Gastonia Metro FMR area: 28705; 28079; 28202; 28203; 28204; and 28277. NCDOC will leverage these designations to target certain programs to the benefit of the DDA areas.

- **Qualified Census Tracts (QCTs)** - Similarly, NCDOC will examine the use of the QCT concept to also target CDBG-DR funding to areas of need. QCTs are defined as areas where at least half of households have incomes less than or equal to 60% of AMI or a poverty rate of 25% or higher. Counties in the Combined MID have QCTs, representing approximately 86 census tracts based on HUD's 2025 data. NCDOC believes this designation holds value for targeting CDBG-DR funds to historically distressed communities and will seek to incorporate it within overall constraints on the use of the funds.
- **State County Distress Designations** - Beyond these federal designations, NCDOC maintains a Development Tier Rating for counties within the State. The designations, which are mandated by State law, determine a variety of State funding opportunities to assist in economic development. This process assigns each county to a designation of Tier One (most distressed), Tier Two, or Tier Three (least distressed) based on an evaluation of the following factors:
 - Average unemployment rate;
 - Median household income;
 - Percentage growth in population; and
 - Adjusted property tax base per capita.

The map below indicates the tiering designations for 2025.

Figure 20: Map of NCDOC County Tiers for Economic Development Purposes³⁵



Based on this information, the following counties within the Combined MID area have been rated as “most distressed”: Alexander, Caldwell, Cleveland, McDowell, Mitchell, Rutherford, Surry, and Wilkes.

An evaluation of these disparate data points provides the impression that western North Carolina has areas evidencing economic distress but such conditions are not present across the entirety of the region. Challenges are more likely to stem from the lack of population density and the difficulty of attracting investment due to limitations on the size of the available workforce.

Table 18: Summary of Historically Distressed and Underserved Communities

Distressed Communities	Statewide Estimate	Statewide Percent	FEMA Disaster Declaration Area Estimate	FEMA Disaster Declaration Area Percent	Combined MID Estimate	Combined MID Percent
Tribal Area – Eastern Band of Cherokee (population)	16,004	100%	10,080	62.98%	8,885	55.52%
Opportunity Zones (# of designated census tracts)	252	100%	114	45.24	71	28.17%

³⁵ Source: [County Distress Rankings \(Tiers\) | NC Commerce](#)

4.6 Indigenous Populations and Tribal Communities

The State is home to more than 130,000 Native American and Alaska Native³⁶ individuals, making it the state with the second-largest tribal population east of the Mississippi River. The following map illustrates that approximately 3% of the State's population identifies as American Indian or Alaska Native, either alone or in combination with other races. Among the counties within the Combined MID area, Swain County is the most significant as it has an estimated 29.4% of its population identifying as American Indian or Alaska Native.

Figure 21: Percent American Indian and Alaska Native Alone or in Combination, Total Population by County: 2020³⁷

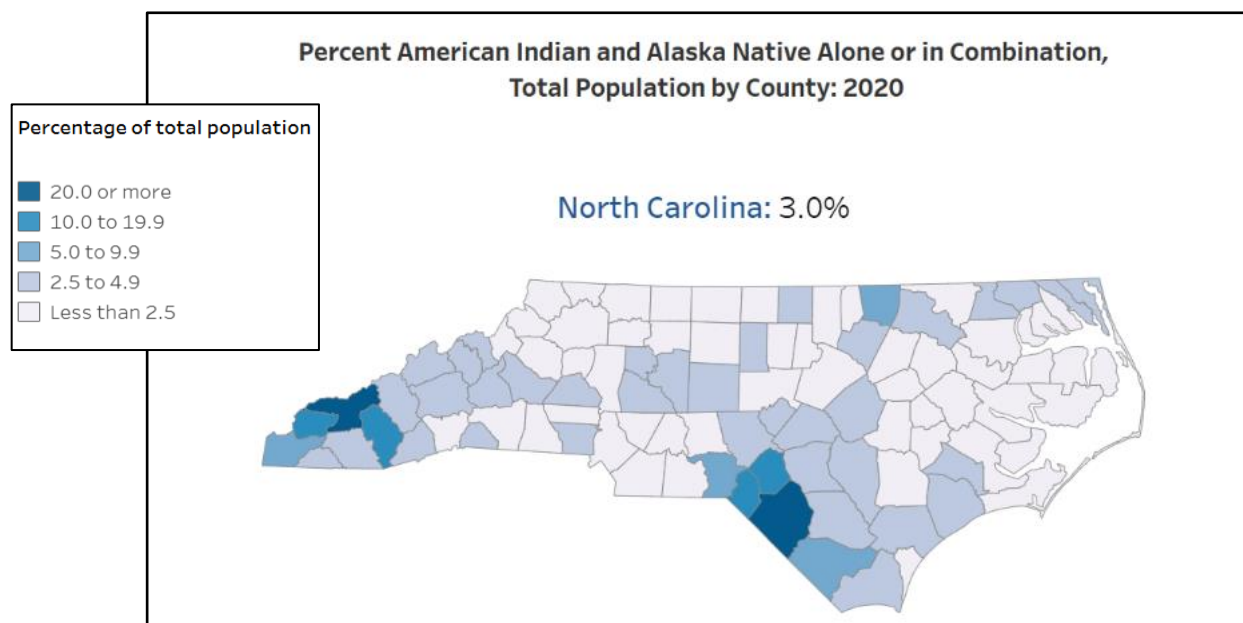


Table 19: Indigenous Populations and Tribal Communities³⁸

Indigenous Populations and Tribal Communities	Statewide Estimate	Statewide Percent	FEMA Disaster Declaration Area Estimate	FEMA Disaster Declaration Area Percent	Combined MID Estimate	Combined MID Percent
American Indian and Alaska Native	130,032	100%	32,062	24.66%	11,951	9.19%

³⁶ Note on data – The Census Bureau aggregates its data for Native Americans and Alaska Natives. No claim is made by NCDoc as to any significant Alaska Native population in western North Carolina.

³⁷ Source: [NORTH CAROLINA: 2020 Census](#)

³⁸ Source: <https://linc.osbm.nc.gov/pages/tribal-nc/?flg=en-us>

4.7 Racially or Ethnically Concentrated Areas of Poverty

To assist communities in identifying Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs), HUD has developed

the following definition of R/ECAPs: census tracts where both racial/ethnic minority populations and poverty levels are significantly higher than the broader county. HUD defines R/ECAPs as census tracts where:

- 40% or more of individuals live below the poverty line.
- 50% or more of the population identifies as a racial or ethnic minority.

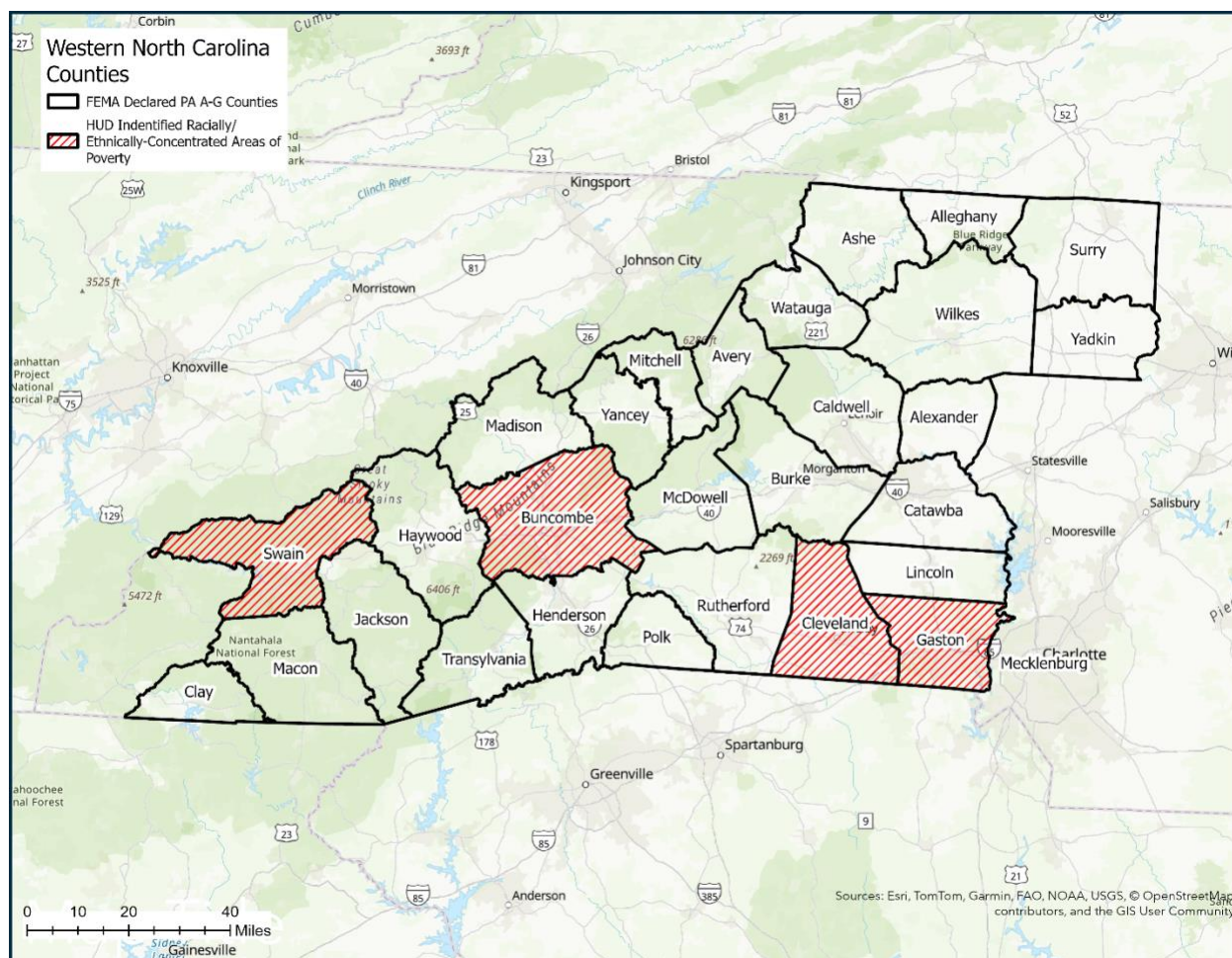
R/ECAPs are predominately located in five of the twenty-eight (28) counties in the Combined MID area, specifically in Buncombe, Cleveland, Gaston, Mecklenburg, and Swain (see Table 20). We note, however, that the Mecklenburg County zip code, which is included in the HUD-Identified MID area, is not located in one of the county's R/ECAP census tracts, so we have not included Mecklenburg in the data summary for the Combined MID area. Table 20 does identify the census tracts which are the R/ECAPs in the other four counties.

Table 20: R/ECAPs by Statewide, Disaster Declaration, and Combined MID Areas

R/ECAPs	Statewide Estimate	Statewide Percent	FEMA Disaster Declaration Area Estimate	FEMA Disaster Declaration Area Percent	Combined MID Estimate	Combined MID Percent
101 Census Tracts Statewide	299,445	100%				
24 Census Tracts FEMA Disaster Declaration Area			60,803	20.31%		
4 Census Tracts (CT) Combined MID Area					12,030	4.02%
Buncombe CT					3,552	1.19%
Cleveland CT					3,010	1.01%
Gaston CT					585	0.20%
Swain CT					4,883	1.63%

According to data from the ACS and HUD, these areas exhibit some of the highest levels of concentrated poverty and racial/ethnic concentrations in North Carolina.³⁹ In some of these counties, persons in poverty exceed 17% with some median household incomes below \$56,000 – lower than the State’s overall median income of approximately \$70,000.⁴⁰

Figure 22: Counties with R/ECAP Census Tracts⁴¹



4.8 Low- and Moderate-Income Population Estimates

The following map provides a county-by-county display of LMI population percentages. It reflects the fact that it may be difficult, in some instances, to fund infrastructure and mitigation activities with CDBG-DR funds and still achieve the LMI area benefit test given the sparse population in some counties. NCDOT will

³⁹<https://hudgis-hud.opendata.arcgis.com/datasets/HUD::racially-or-ethnically-concentrated-areas-of-poverty-r-ecaps-2020/explore?filters=eyJTVFVURV90QU1FljpbIk5vcnRoiENhcm9saW5hll19&location=35.485287%2C-79.185418%2C7.73>

⁴⁰ U.S. Census Bureau QuickFacts: North Carolina

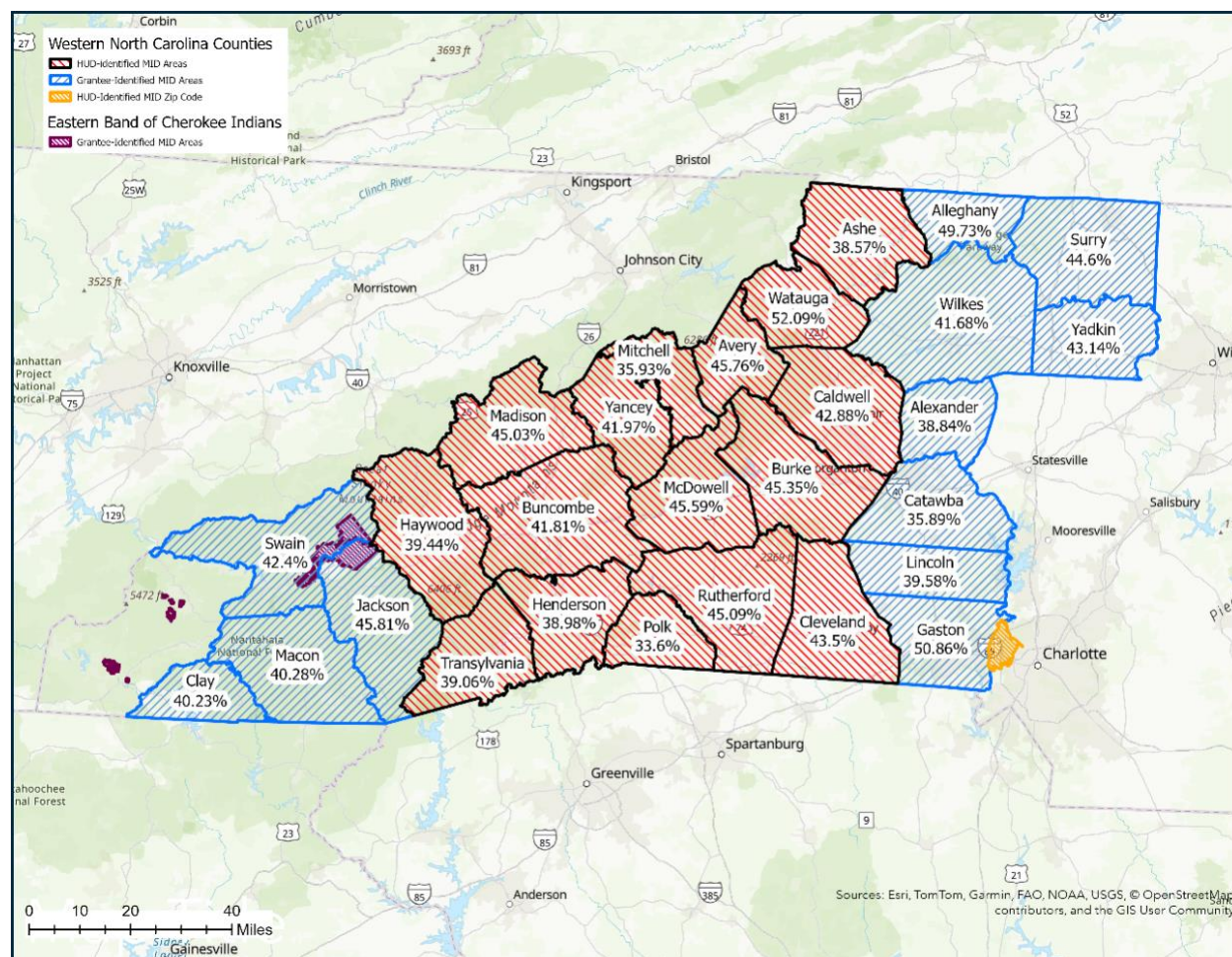
⁴¹ Source: [Racially or Ethnically Concentrated Areas of Poverty \(R/ECAPs\) | HUD Open Data Site](#)

closely examine the latitude offered by HUD in section III.D.6.f. of the Universal Notice regarding the LMI area benefit test to determine whether it offers a substantive opportunity to advance infrastructure and mitigation improvements in Helene-impacted areas. This waiver and alternative requirement is a distinct departure from standard CDBG policy in that it will permit grantees to count toward the overall LMI benefit requirement funds expended for infrastructure activities by multiplying the total project cost (CDBG-DR plus all other funds) by the percent of LMI persons in the project service area.⁴²

Detailed information regarding HUD’s LMI data can be accessed at:

[ACS 5-Year 2016-2020 Low- and Moderate-Income Summary Data - HUD Exchange](#)

Figure 23: County Level LMI Population Percentages



⁴² The amount to be counted may not exceed the total CDBG-DR investment.

5 Connection Between Proposed Programs and Projects and Unmet Needs, Mitigation Needs, and Fair Housing and Civil Rights Assessments

5.1 Allocation and Award Caps

The NCDOT is the lead agency and responsible entity for administering \$1,428,120,000 in CDBG-DR funds allocated for Helene recovery efforts. CDBG-DR funds available to address unmet needs will be allocated to basic program categories pursuant to the table below.

Table 21: CDBG-DR Program Allocation and Funding Thresholds

Eligible Cost Category	CDBG-DR Allocation Amount	Percent of CDBG-DR Allocation	Estimated Percentage to CDBG-DR Mitigation Set-Aside	Estimated Percentage to HUD-Identified MID Areas	Estimated Percentage to Overall LMI Benefit
Administration (5% cap)	\$71,406,000	5%			
Planning (15% cap)	\$0	N/A	N/A		
Rental Housing	\$191,340,000	13.40%	9.74%	80%	90%
Owner-Occupied Housing	\$860,734,000	60.27%	16.23%	90%	90%
Infrastructure	\$193,500,000	13.55%	9.63%	80%	80%
Economic Revitalization	\$111,140,000	7.78%	8.38%	80%	80%
Public Services (15% cap)	\$0	N/A	N/A	N/A	N/A
Exempt Public Services (No cap)	\$0	N/A	N/A	N/A	N/A

Eligible Cost Category	CDBG-DR Allocation Amount	Percent of CDBG-DR Allocation	Estimated Percentage to CDBG-DR Mitigation Set-Aside	Estimated Percentage to HUD-Identified MID Areas	Estimated Percentage to Overall LMI Benefit
<i>CDBG-DR Mitigation Set-Aside⁴³</i>	\$186,277,000	13.04%	100%	80%	80%
TOTAL ⁴⁴	\$1,428,120,000	100%	13.04%	84.83%	82.26%
Percent of Total	100%	100%	100%	84.83%	82.26%

At a minimum, 70% of program funds must meet the LMI National Objective. The flagship Reconstruction and Rehabilitation program will prioritize very low- and low-income households, with the greatest prioritization for households with incomes less than 60% of AMI. Households with income at or above 120% of AMI will not be eligible for this program.

The State is procuring an implementation vendor to assist with the implementation of the operation of intake centers for program applicants. This vendor will be procured with an emphasis and goal of ample outreach and program accessibility. In partnership with this vendor, the State will develop a comprehensive outreach campaign and, where applicable and feasible, may provide accessibility and transportation services and mobile outreach centers to ensure all households have equal opportunity and support to complete a pre-application survey, and will provide additional assistance to those invited to formally apply.

Additionally, households with one or more of the following characteristics will be prioritized and invited to apply in the earliest applicable phase: households with members 62 and older, households with children under the age of 18, and households with special needs or special accommodation requirements (disabled). The state believes that these considerations create a fair prioritization system and serves the spirit and fact of AFFH.

The Workforce Housing Program will be 100% targeted to LMI individuals, including the elderly. The housing ownership opportunities created by this program will also serve vulnerable populations and reduce the risk of homelessness by funding developments to serve LMI households.

⁴³ The Mitigation allocation represents 15 percent of HUD's unmet need for the State. When the mitigation amount is divided by the full allocation (unmet need plus mitigation) it equals 13.04 percent of the full allocation.

⁴⁴ Estimated aggregate percentages to MID area and for LMI benefit are weighted based on funding allocations and program projections.

5.2 Funding Criteria

5.2.1 Administration

NCDOC allocates \$71,406,000 of the total CDBG-DR award for administrative costs associated with the life of the grant. This represents the maximum amount permissible for administrative costs per the CDBG-DR appropriation language of Public Law 118-158 and HUD's requirements under the Uniform Notice. NCDOC advises HUD that it may seek to recover pre-award and/or pre-application costs related to administrative expenses consistent with the guidance provided by Section III.B.14. of the Universal Notice. Such costs may be incurred back to the date of the presidential disaster declaration date (September 28, 2024, for DR-4837-NC).

Table 22: Grantee Administration Activities Overview

Eligible Cost Category	CDBG-DR Allocation Amount	Percent of CDBG-DR Allocation
Administration Total	\$71,406,000	5%
TOTAL	\$71,406,000	5%

5.2.2 Planning

NCDOC is opting not to provide CDBG-DR funding under this allocation for planning activities. The State's goal is to provide the maximum amount possible for recovery activities given the discrepancy between estimated unmet needs and the CDBG-DR award. Due to the limited initial appropriation, the State will seek to promote planning activities related to recovery by using available State resources and leveraging key partners across the State.

Table 23: Grantee Planning Activities Overview

Eligible Cost Category	CDBG-DR Allocation Amount	Percent of CDBG-DR Allocation (May not exceed 15%)
Planning Programmed TOTAL	\$0	0%
TOTAL	\$0	0%

5.2.3 Housing

The State proposes implementing a series of housing programs to address housing damage caused by Hurricane Helene. These programs will address needs across the housing spectrum, specifically the homeowner, small rental, and larger multifamily segments. Within these programs, there will be the opportunity to address several key priorities expressed by HUD in the Universal Notice, notably supporting

public housing and other assisted units. To the extent that special-needs assistance housing has been impacted by Helene, those units may also be eligible for assistance for reconstruction and repair funding.

Table 24: Housing Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	Percent of CDBG-DR Allocation
Reconstruction and Rehabilitation (R&R) for Owner-Occupied Units	\$807,354,000	56.53%
Workforce Housing for Ownership	\$53,380,000	3.74%
Multifamily Construction Program	\$191,340,000	13.40%
Housing Programmed TOTAL	\$1,052,074,000	73.67%
TOTAL	\$1,052,074,000	73.67%

5.2.3.1 Reconstruction and Rehabilitation of Owner-Occupied Housing

Table 25: Reconstruction and Rehabilitation of Owner-Occupied Housing Details

Program Title	Reconstruction and Rehabilitation of Owner-Occupied Housing
Total Budget/CDBG-DR Allocation	\$807,354,000 (including \$130,393,900 for mitigation)
Eligible Activities Referenced to Title I of Housing and Community Development Act of 1974 (42 USC 5305(a)) or HUD FR Notice issued January 8, 2025	\$5305(a)(1) – Acquisition \$5305(a)(3) – Code Enforcement \$5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing \$5305(a)(5) – Removal of Architectural Barriers \$5305(a)(7) – Disposition \$5305(a)(8) – Public Services \$5305(a)(11) – Relocation Payments \$5305(a)(13) – Administrative Costs \$5305(a)(14) – Assistance to Non-Profit Entities \$5305(a)(15) – Assistance to Neighborhood-Based Organizations \$5305(a)(20) – Housing Services \$5305(a)(24) – Direct Assistance for Homeownership Activities \$5305(a)(25) – Tornado Shelters \$5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction - FR Notice -- New Housing Construction - FR Notice – Mitigation

Program Title	Reconstruction and Rehabilitation of Owner-Occupied Housing
National Objective(s) - Referenced To 24 CFR 570, Subpart I and/or HUD FR Notice issued January 8, 2025	• LMI Benefit through Housing - 24 CFR 570.483(b)(3) • Urgent Need (UN) - 24 CFR 570.483(d)
Lead Agency and Distribution Process	• NCDOC will oversee the program with contractor support. • Distribution process will be direct implementation.
Program Description	• Program will provide grants for reconstruction or rehabilitation of owner-occupied units seriously damaged or destroyed by the effects of Hurricane Helene. See detailed description following this table.
Eligible Geographic Area	• Priority will be for seriously damaged or destroyed units in the HUD-Identified MID areas with the State-Identified MID areas having a secondary priority.
Other Eligibility Criteria	• Application intake will be staged based on household income level, beginning with households at or below 60% AMI.
Maximum Amount of Assistance per Beneficiary	• Grant of up to \$375,000 for reconstruction/rehabilitation including mitigation actions.
Maximum Income of Beneficiary	• 120% of AMI
Mitigation Measures	• Mitigation will be key component of reconstruction and rehabilitation efforts as road and bridge access to isolated properties will be funded to maintain public safety entry and exit. Elevation of properties will be eligible as mitigation and other property-specific measures. Mitigation represents approximately \$130.4 million of the total budget for this program.
Reducing Barriers for Assistance	• Case management services will be provided to applicants. Housing counseling and certain legal services will also be available. The staged application process and related outreach will include a focus on low-income homeowners.

The cornerstone of post-Helene housing recovery will involve the reconstruction and rehabilitation (R&R) of owner-occupied, single-family units across counties covered by the HUD-Identified MID designation. The R&R program will prioritize homeowners that have major damage to their housing unit or a unit that has been destroyed (as both are defined by HUD in the Universal Notice or AAN) with the opportunity to have their homes reconstructed or rehabilitated consistent with applicable code requirements. The program may also provide mitigation funding for:

- Measures designed to protect residents and structures against predictable hazards given their location; and
- Replacement or repair of private roads and bridges that provide access to housing being reconstructed or rehabilitated.

NCDOC advises HUD that it may seek to recover pre-award and/or pre-application costs related to administrative and construction-related expenses under the R&R program consistent with the guidance provided by Section III.B.14. of the Universal Notice. Such costs may be incurred back to the date of the

presidential disaster declaration date (September 28, 2024, for DR-4837-NC). NCDOC is hopeful of obtaining access to State funds in the second calendar quarter of 2025 to begin work through the R&R program. This will enable progress in addressing housing unmet need in the 2025 construction season.

NCDOC will use contractors to manage and complete the construction process for homeowners approved for funding through the R&R program. With the assistance of staff and contractors, the State will work with a pool of qualified contractors assigned to repair, reconstruct, or replace damaged properties; applicants will not select their own contractors. The program will pay contractors directly, and no funds will be paid to homeowners. Applicants will be required to enter into agreements with NCDOC setting forth the terms and conditions of the program.

Maximum awards under the R&R program may include funding to implement mitigation and resilience actions, including elevation, restoration, and improvement of private roads and bridges, which reduce the risks to inhabitants and protect the public investment in the reconstructed units. NCDOC emphasizes the fact that the aggressive topography of western North Carolina can make access to home sites impossible without private roads and bridges. To effectively address this problem, the State will use a substantial portion of the mitigation set-aside funding (\$130.4 million of \$186.3 million) to mitigate against the possibility that LMI homeowners receiving assistance under the R&R program will face similar access problems in the future and ensure access and egress for public safety purposes.

NCDOC views this approach to mitigation as consistent with guidance provided in section III.D.4. of the Universal Notice which defines mitigation activities as “those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, or damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.” Further, this provision instructs grantees “to incorporate mitigation measures when carrying out activities to construct, reconstruct, or rehabilitate residential or non-residential buildings.” NCDOC interprets the investment in resilient private roads and bridges in this mountainous region to be within the scope of this definition and directive.

Construction standards will be a combination of requirements. The fundamental standard will be the North Carolina Building Code (NC Code). The [2024 Revision of the NC Code](#) will go into effect on July 1, 2025, and for purposes of the R&R program, all construction funded by the R&R program will be subject to the 2024 Revision as all components of the 2024 Revision are accessible on the State Fire Marshall’s website via the link above. Any additional municipal building requirements will apply to construction in that jurisdiction. Finally, construction will comply with standards imposed by HUD in its Universal Notice, most notably its Green Building Standards for all reconstruction of residential buildings and for all reconstruction of substantially damaged residential buildings (i.e., where repair costs exceed 50% of replacement or reconstruction cost).

All housing units assisted through the R&R program (and related mitigation and access assistance) shall either provide benefit to LMI persons through housing (LMI Housing) or meet Urgent Need (UN) criteria

as outlined, respectively, at 24 CFR 570.483(b)(3) and 24 CFR 570.483(d) and modified by the Universal Notice. While NCDOC does not anticipate widespread use of UN National Objective under the R&R program, it may be a necessary, for example, in situations to ensure housing is reconstructed or rehabilitated for vulnerable populations that are over the 80% AMI threshold; promote more complete recovery of small rural communities; or address other anomalies that could halt the provision of assistance to households that lack the resources to recover from the impacts of Helene. In instances where NCDOC uses the UN National Objective to qualify assistance under the R&R program, NCDOC will comply with the requirements of section III.B.2.(iii) of the Universal Notice and document how the activity responds to the urgency, type, scale, and location of the disaster-related impact described in the UNA.

All housing activities will address unmet housing needs in counties encompassed by the Combined MID area and will ensure that all participants in the program can demonstrate that damage to the home can be tied back to damage from Hurricane Helene.

Recognizing that the funds allocated to the R&R program will likely not address all needs, at-risk and vulnerable populations with the greatest needs will be prioritized. At a minimum, at least 70% of program funds must be expended for R&R activities that meet the criteria for the LMI Housing National Objective, but NCDOC is projecting that level to be at least 90%.

To ensure effective pursuit of LMI benefit in the R&R program, NCDOC will prioritize very low- and low-income households, with the highest prioritization for households with incomes less than 60% of AMI. As a secondary criterion, households with one or more of the following characteristics will be prioritized and invited to apply in the earliest applicable phase: households with members 62 and older; households with children under the age of 18; and households having accessibility needs or individuals with documented disabilities.

The State believes that these considerations create a fair prioritization system and effectively address statutory and regulatory provisions implementing the AFFH requirement as well as the related certification.

Applications will be accepted for households between 80 and 120% AMI, but they will be in the final phases and would need to be qualified as meeting the UN National Objective. Households with income at or above 120% of AMI will not be eligible for this program under any circumstance.

NCDOC is procuring an implementation contractor to assist with the implementation of the R&R Program and the operation of intake centers for program applicants. This contractor will be procured with an emphasis and goal of ample outreach and program accessibility. In partnership with this contractor, NCDOC will develop a comprehensive outreach campaign and, where applicable and feasible, may provide accessibility and transportation services to ensure eligible households can apply.

NCDOC is implementing an application process designed to ensure compliance with HUD’s overlapping requirements that at least: 1) 80% of the funds be expended in the HUD-Identified MID area; and 2) 70% of funds be expended for activities that benefit LMI persons. Given these requirements, NCDOC will first invite applications from households in the HUD-Identified MID area and will prioritize those applications based on household income and subsequently on characteristics described above. Accuracy of all information provided by potential applicants through the application process will be verified by NCDOC or its contractor.

Table 26: Application Phasing Criteria for R&R Applicants

Phase	Priority	MID Status	Percent of AMI	Is any member of the household: under 18, over 62, disabled, or has accessibility needs?
Phase 1	1	HUD	< 60%	Yes
	2	HUD	< 60%	No
	3	HUD	60% - 80%	Yes
	4	HUD	60% - 80%	No
Phase 2	1	State	<60%	Yes
	2	State	<60%	No
	3	State	60-80%	Yes
	4	State	60-80%	No
Phase 3	1	HUD	80% - 120%	N/A
	2	State	80% - 120%	N/A

NCDOC will closely monitor the application portal and may choose not to accept remaining potential applicants to apply or place remaining applicants on hold until prioritized household applicants are fully processed and their needs addressed.

The treatment of MHUs under the R&R program is substantially guided by HUD’s [Notice CPD-2023-10](#), entitled “Use of Community Development Block Grant (CDBG) Funds in Support of Housing,” and issued on October 26, 2023. Several key takeaways from the Notice include the statement that purchases of MHUs that are part of a community’s permanent housing stock are eligible as acquisition or direct homeownership assistance; that land acquisition for placement of the MHU is permissible; and that grantees may consider supporting tenant acquisition of an MHU community as part of an overall strategy.

Wherever possible, NCDOC shall work to replace severely damaged MHUs or MHUs located on the owner’s property with stick-built or modular housing units of appropriate size based on household size and other factors. This approach is grounded in the idea that the additional marginal cost associated with a permanent structure is justified given the ability to incorporate additional resilience and mitigation

measures, provide greater value appreciation for the owner, and better address site-specific topographical considerations.

In instances where a destroyed or severely damaged MHU is located on leased land, NCDOC may opt to provide the MHU owner with a stick-built or modular unit on property acquired under the R&R program. In either instance, NCDOC may opt to replace a damaged/destroyed MHU with another MHU based upon a site review and consultation with the homeowner.

Applicants to the R&R program will be required to provide information regarding all assistance received for recovery purposes as required by section 312 of the Stafford Act. Any funds found to be duplicative will be deducted from the CDBG-DR award prior to the disbursement of the award amount. A review of potential duplication of benefits (DOB) is necessary for all CDBG-DR funded activities as this assistance is intended to supplement—not replace—other public, private, and non-profit sector resources that have already been provided for the same need or loss and are legally required to constitute a duplicative source of financial assistance.

NCDOC will issue uniform policy guidance which will govern DOB process applicable to all CDBG-DR funded programs described in this Action Plan, and that policy guidance will be available on its disaster recovery website.

Homeowners assisted under this program are required to maintain homeownership and primary residency of the assisted property for a minimum period of three years beginning at the time construction is completed. During this time, NCDOC has the right to request documentation for proof of occupancy to ensure the applicant has continued owning and residing in the home for the required three-year period. The total grant award must be repaid, at a prorated amount, if the homeowner is determined to be out of compliance before the three-year occupancy period has expired.

A second home is defined in the Universal Notice as a home that is not the primary residence of the owner, a tenant, or any occupant at the time of the disaster or at the time of application for CDBG-DR assistance. Second homes, vacation residences, and short-term, seasonal, and vacation rental properties are not eligible for assistance under the R&R Program. Applicants who purchased or moved into a damaged property after the date of FEMA's major disaster declaration for Helene in North Carolina are not eligible for assistance under this program.

The funds awarded under the R&R program may not be used for the following actions:

- Forced mortgage payoffs.
- Compensation payments.
- Temporary housing assistance benefits, including mortgage and rental assistance.
- Reconstruction of housing units in a designated floodway.

NCDOC shall prepare detailed operating policies and procedures for the R&R program which will both provide greater definition on points highlighted herein and serve as working guidance for the implementation of the program.

5.2.3.2 Workforce Housing for Ownership

Table 27: Workforce Housing for Ownership Details

Program	Workforce Housing for Ownership
Total Budget/CDBG-DR Allocation	• \$53,380,000 (including \$9,313,850 for mitigation)
Eligible Activities Referenced to Title I of Housing and Community Development Act of 1974 (42 USC 5305(a)) or HUD FR Notice issued January 8, 2025	• §5305(a)(1) – Acquisition • §5305(a)(3) – Code Enforcement • §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing • §5305(a)(5) – Removal of Architectural Barriers • §5305(a)(7) – Disposition • §5305(a)(8) – Public Services • §5305(a)(11) – Relocation Payments • §5305(a)(13) – Administrative Costs • §5305(a)(14) – Assistance to Non-Profit Entities • §5305(a)(15) – Assistance to Neighborhood-Based Organizations • §5305(a)(20) – Housing Services • §5305(a)(24) – Direct Assistance for Homeownership Activities • §5305(a)(25) – Tornado Shelters • §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction • Universal Notice - New Housing Construction – Section III.D.5.a.
National Objective(s) - Referenced to 24 CFR 570, Subpart I and/or HUD FR Notice issued January 8, 2025	• LMI Benefit through Housing - 24 CFR 570.483(b)(3)
Lead Agency and Distribution Process	• NCDOC will be lead agency with contractor support. • Process will be competitive application.
Program Description	• Fund construction of units for purchase by LMI households. See description following this table for complete description. Approach may include repurposing of existing buildings.
Eligible Geographic Area	• Program will provide homeownership opportunities in HUD-Identified MID area with 100% of funds to be expended for construction of units to be purchased by LMI households.
Other Eligibility Criteria	• Eligible applicants will include local governments, public, private, or non-profit organizations, and Community Development Housing Organizations (CHDOs)/Community Based Development Organizations (CBDOs).

Program	Workforce Housing for Ownership
Maximum Amount of Assistance per Beneficiary	Awards of \$2 million to \$5 million in the form of a grant to eligible applicants to undertake development of workforce housing for ownership purposes. Proposed developments must be in HUD-Identified MID area with 100% of funds to expended in HUD-Identified MID area.
Maximum Income of Beneficiary	Purchasers must be at or below 80% AMI.
Mitigation Measures	Application scoring will include criteria focused on mitigation and proposed projects must incorporate mitigation actions as appropriate based on evident risks.
Reducing Barriers for Assistance	Developers shall price units to be affordable to LMI households.

There is a distinct need within the HUD-Identified MID counties for additional homeownership opportunities that are affordable to broader segments of the workforce to incentivize them to remain in western NC following Helene and to partially remedy inadequate housing production in past years across western NC. The term “workforce,” as used under this program, refers to households up to 80% of AMI.

To address this need, the Workforce Housing for Ownership (WHO) program will fund development of workforce housing units for ownership. Qualified local governments, public, private, or non-profit organizations, and Community Development Housing Organizations (CHDOs)/Community Based Development Organizations (CBDOs) may be eligible to apply for WHO program funds.

NCDOC anticipates conducting only one application round in 2026 for the WHO program. The competitive criteria will reflect HUD’s standard approach to competitive programs outlined in the HUD Grants Management Handbook (HUD Handbook 2210.17) and summarized below. NCDOC will further define these criteria when it issues the notice of funding opportunity (NOFO) for the WHO Program.

Table 28: Competitive Framework - Workforce Housing for Ownership Program

Criteria	Weight
Capacity of the Applicant	10%
Community Need for Workforce Housing	20%
Soundness of Approach	40%
Leverage of Other Resources	20%
Achieving Results	10%
TOTAL	100%

For clarity purposes, HUD and the public are advised that 100% of WHO Program funds will be expended in the Combined MID area and that 100% of funds will be expended for units to be purchased by qualifying LMI individuals.

NCDOC will make exceptions to the maximum award amounts, when necessary, to comply with federal accessibility standards or to reasonably accommodate persons with disabilities.

Scoring criteria will be described in the NOFO documents and will incorporate concepts focused on project site; development team experience; project readiness; resilient and/or innovative design components; community need; value of the CDBG-DR investment; level of community engagement; unit and income mix; and the leveraging of partnerships.

If funds remain after the initial selection round, any subsequent round will also be competitive consistent with criteria used in the initial round.

5.2.3.3 Multifamily Construction and Repair Program

Table 29: Multifamily Construction and Repair (MCR) Program Details

Program	Multifamily Construction and Repair Program
Total Budget/CDBG-DR Allocation	• \$191,340,000 (including \$18,627,700 for mitigation)
Eligible Activities Referenced to Title I of Housing and Community Development Act of 1974 (42 USC 5305(a)) or HUD FR Notice issued January 8, 2025	• §5305(a)(1) – Acquisition • §5305(a)(3) – Code Enforcement • §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing • §5305(a)(5) – Removal of Architectural Barriers • §5305(a)(7) – Disposition • §5305(a)(8) – Public Services • §5305(a)(11) – Relocation Payments • §5305(a)(13) – Administrative Costs • §5305(a)(14) – Assistance to Non-Profit Entities • §5305(a)(15) – Assistance to Neighborhood-Based Organizations • §5305(a)(20) – Housing Services • §5305(a)(24) – Direct Assistance for Homeownership Activities • §5305(a)(25) – Tornado Shelters • §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction • FR Notice - New Housing Construction - Section III.D.5.a. • FR Notice – Mitigation

Program	Multifamily Construction and Repair Program
National Objective(s) - Referenced To 24 CFR 570, Subpart I and/or HUD FR Notice issued January 8, 2025	• LMI Benefit through Housing - 24 CFR 570.483(b)(3) • UN – 24 CFR 570.483(d)
Lead Agency and Distribution Process	• NCDOC with underwriting support • Small project component – open window • Large project component - Competitive application process
Program Description	• Program will restore housing and promote development of new multifamily housing in the Combined MID area and will focus benefit on LMI groups by imposing affordability requirements on new construction. Funding will be via competitive process. Funding will be split between small projects (7 or fewer units) and large projects (8 or more units).
Eligible Geographic Area	• Projects must be in Combined MID area.
Other Eligibility Criteria	• Eligible applicants will include private developers, local governments, public or non-profit organizations, and CHDOs/CBDOs.
Maximum Amount of Assistance per Beneficiary	• Suballocation is approximately 30% for small projects (\$57.4 million) and 70% (\$133.94 million) for large projects. • Small projects – Grants of a minimum of \$250,000 to a maximum of \$1,500,000 • Large projects - Grants of a minimum of \$500,000 to a maximum of \$10 million to eligible applicants
Maximum Income of Beneficiary	• 80% of AMI for occupants for units to qualify as providing LMI benefit
Mitigation Measures	• Project proposals should include mitigation measures and include distinct cost breakout in funding request.
Reducing Barriers for Assistance	• NCDOC will establish requirements for the number of accessible units and deeply affordable units based on project size.

The Multifamily Construction and Repair (MCR) Program seeks to reconstruct, rehabilitate, or construct the rental housing stock in a way that is responsive to the needs of Helene-impacted communities. The program will fund reconstruction/rehabilitation activities and new construction and will entertain applications from two categories of projects: small projects having seven or few units and large projects having eight or more units. Projects may be either single structures or may involve multiple structures in proximity to one another.

The small project component will provide a priority for projects in the HUD-Identified MID area and will adopt an “open application window” for qualifying projects, meaning that applications may be submitted at any time so long as funding remains available. NCDOC is suballocating approximately 30% or \$57,400,000 of the total allocation for small projects. To implement this program, NCDOC will require

property owners/applicants to use contractors selected to participate in the single-family R&R program to assure effective cost and quality control. NCDOC will assign a contractor to a project upon submission of a pre-application.

Each award will be calculated using consistent program construction and award calculation standards, which are summarized further in this section and will be detailed in the program guidelines. The maximum amount of grant assistance will be \$1,500,000 per project, including any mitigation costs, while the minimum will be \$250,000. NCDOC may make exceptions to the maximum award when necessary, to comply with federal accessibility standards or to reasonably accommodate persons with disabilities.

Because each award will be evaluated based on a necessary and reasonable scope of work (SOW) and cost of materials using industry standard cost estimating software, comparative market analysis, or price per square foot and/or review of multiple construction bids, NCDOC anticipates that on average, most awards will be lower than the maximum award.

For this program, the NCDOC will prioritize applications from property owners who owned the property as of September 28, 2024, the date of the Helene major disaster declaration.

For the large project component (eight or more units), eligible applicants will be multifamily property owners and developers including, but not limited to:

- For-profit entities;
- Non-profit organizations;
- Public sector partners, such as local governments, PHAs, and other designated public agencies;
- CHDOs; and
- CBDOs.

The large project component will be suballocated 70% or \$133,940,000 of the total allocation for the program. The program structure will be competitive in nature and NCDOC will conduct multiple rounds to select projects for funding. Proposals will be evaluated and selected pursuant to project application processes issued by NCDOC via NOFOs. Each NOFO will establish the details for application associated deadlines, selection criteria, and the award process.

NCDOC will consult with the North Carolina Housing Finance Agency (NCHFA) regarding projects that may seek or have been awarded LIHTCs. NCDOC will implement a funding priority for projects located in Difficult Development Areas (DDAs) and Qualified Census Tracts (QCTs) within the Combined MID area regardless of whether the project is receiving LIHTCs. In designing the large project criteria, NCDOC will design such efforts in consultation with NCHFA.

The definition NCDOC will use for affordable rent is the same as the HOME Investment Partnerships Program (HOME) definition. These rental limits are updated periodically and are calculated by metro area

or county. The affordable rent limits methodology is available at <https://www.huduser.gov/portal/datasets/HOME-Rent-limits.html>, and specific affordable rent limits are updated annually. Units created or rehabilitated using CDBG-DR funds for rent must not exceed these rent limits, based on the geographic location and bedroom size of the unit. New construction project will be obligated to a 20-year affordability period, again using HOME criteria.

NCDOC will evaluate proposals and prioritize proposals for projects which are located within the HUD-Identified MID area. New construction and rehabilitation must occur outside of the HUD-defined floodplain, or where floodplain designation is peripheral and distinct from the location of any planned development activity for the project.

NCDOC anticipates conducting multiple application rounds over the next several years for the large project component of the program. The competitive criteria will reflect HUD's standard approach to competitive programs outlined in the HUD Handbook 2210.17 and summarized below. NCDOC will further define these criteria in its forthcoming policies and procedures and will repeat those criteria when it issues the NOFO for the program.

Table 30: Competitive Framework – Multifamily Construction and Repair Program

Criteria	Weight
Capacity of the Applicant	10%
Community Need for Multifamily Housing	20%
Soundness of Approach	40%
Leverage of Other Resources	20%
Achieving Results	10%
TOTAL	100%

The above categories will incorporate the following criteria which will be further outlined in program NOFO:

- Site location and suitability;
- Proposer capacity;
- Affordability structures, with a preference for projects with units set aside to serve Extremely Low Income and Very Low Income populations;
- Proposals with units and amenities set aside for those with disabilities or for special needs populations;
- The total development cost versus the CDBG-DR share of that cost;

- Proposal feasibility;
- Proposed development's Readiness to Proceed;
- Coordination with resiliency and disaster recovery planning and/or design; and
- Proposals or solutions which present innovative and leveraged approaches to the affordable housing problem after disaster.

Specific prioritization for the selection of projects will be published prior to the launch of applications.

5.2.4 Infrastructure

Table 31: Infrastructure Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	Percent of CDBG-DR Allocation
Community Infrastructure Program	\$193,500,000	13.55%
Infrastructure Programmed TOTAL	\$193,500,000	13.55%

5.2.4.1 Community Infrastructure Program

Table 32: Community Infrastructure (CI) Program Details

Program	Community Infrastructure Program
Total Budget/CDBG-DR Allocation	• \$193,500,000 (including \$18,627,700 for mitigation)
Eligible Activities Referenced to Title I of Housing and Community Development Act of 1974 (42 USC 5305(a)) or HUD FR Notice issued January 8, 2025	• §5305(a)(1) – Acquisition • §5305(a)(2) – Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements • §5305(a)(3) – Code Enforcement • §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing • §5305(a)(5) – Removal of Architectural Barriers • §5305(a)(7) – Disposition • §5305(a)(9) – Non-Federal Match • §5305(a)(11) – Relocation Payments • §5305(a)(13) – Administrative Costs • §5305(a)(14) – Assistance to Non-Profit Entities • §5305(a)(15) – Assistance to Neighborhood-Based Organizations • §5305(a)(25) – Tornado Shelters • §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction

Program	Community Infrastructure Program
National Objective(s) - Referenced to 24 CFR 570, Subpart I and/or HUD FR Notice issued January 8, 2025	• LMI Benefit on Area Basis, Housing, or Creation/Retention of Jobs • Elimination of Slums and Blight (both area and spot basis) • UN
Lead Agency and Distribution Process	• NCDOC will administer the program. • Process will be competitive application for local governments.
Program Description	• Provides funding for infrastructure projects that will help impacted communities become more resilient to current and future natural hazards.
Eligible Geographic Area	• Eligible applicants (local governments) must be located in HUD or State-Identified MID counties, and projects will be required to document link to disaster recovery needs.
Other Eligibility Criteria	• N/A
Maximum Amount of Assistance per Beneficiary	• Maximum of \$15,000,000 for eligible projects with floor of \$500,000.
Maximum Income of Beneficiary	• N/A
Mitigation Measures	• Applicants must identify specific mitigation actions as part of the basic application and include costs in the funding request.
Reducing Barriers for Assistance	• NCDOC will establish program criteria that guide eligible applicants to investments that benefit historically underserved communities.

The Community Infrastructure (CI) Program will deploy CDBG-DR funding to aid local governments by funding:

- “Stand-alone” projects, which may be funded with up to 100% CDBG-DR funding, and are necessary to address identified unmet disaster recovery needs arising from the impact of Helene in communities and counties that are not funded by other federal recovery; and
- Improvements to FEMA-assisted PA or HMGP funded projects, if such improvements improve resiliency, useful life, or otherwise provide a housing recovery benefit or long-term housing need not covered by the PA or HMGP portion of the project.

This competitive program provides funding for infrastructure projects that will help impacted communities become more resilient to current and future natural hazards. The program will require mitigation components to be included within the scope(s) of awarded projects to advance long-term resilience. Applicants will be asked to itemize costs and benefits when submitting applications for funding, in accordance with program requirements to be outlined by NCDOC. Proposed activities must also consider local plans and policies; reduce future risk to the recovering jurisdiction or municipality; and include an analysis of how multiple sources of funds may be leveraged to complete the project.

In evaluating applications, NCDOC will consider a variety of projects such as:

- Projects which demonstrate adaptable and reliable technologies to guard against premature obsolescence;
- Projects with a substantial amount of other funding available;
- “Shovel ready” projects;
- Projects which provide greater benefit to housing recovery; and
- Projects which serve LMI and/or vulnerable populations will be favored in the scoring criteria.

NCDOC anticipates conducting only one application round for the CI program. The competitive criteria will reflect HUD’s standard approach to competitive programs outlined in the HUD Handbook 2210.17 and summarized below. NCDOC will further define these criteria when it issues the NOFO for the program.

Table 33: Competitive Framework – Community Infrastructure Program

Criteria	Weight
Capacity of the Applicant	10%
Community Need for Infrastructure Financing	20%
Soundness of Approach	40%
Leverage of Other Resources	20%
Achieving Results	10%
TOTAL	100%

NCDOC will review projects for CDBG-DR and program eligibility and will select projects based on scoring and ranking approaches that are in alignment with NOFO and application processes.

5.2.5 Economic Revitalization

Table 34: Economic Revitalization Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	Percent of CDBG-DR Allocation
Commercial District Revitalization	\$111,140,000	7.78%
Economic Revitalization Programmed TOTAL	\$111,140,000	7.78%

5.2.5.1 Commercial District Revitalization

Table 35: Commercial District Revitalization (CDR) Program Details

Program	Commercial District Revitalization
Total Budget/CDBG-DR Allocation	• \$111,140,000 (including \$9,313,850 for mitigation)
Eligible Activities Referenced to Title I of Housing and Community Development Act of 1974 (42 USC 5305(a)) or HUD FR Notice issued January 8, 2025	• §5305(a)(1) – Acquisition • §5305(a)(2) – Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements • §5305(a)(3) – Code Enforcement • §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing • §5305(a)(5) – Removal of Architectural Barriers • §5305(a)(7) – Disposition • §5305(a)(9) – Non-Federal Match • §5305(a)(11) – Relocation Payments • §5305(a)(13) – Administrative Costs • §5305(a)(14) – Assistance to Non-Profit Entities • §5305(a)(15) – Assistance to Neighborhood-Based Organizations • §5305(a)(17) – Assistance to For-Profit Entities • §5305(a)(25) – Tornado Shelters • §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction
National Objective(s) - Referenced to 24 CFR 570, Subpart I and/or HUD FR Notice issued January 8, 2025	• LMI Benefit through Area Benefit – 24 CFR 570.483(b)(1) • LMI Benefit through Creation/Retention of Jobs - 24 CFR 570.483(b)(4) • Elimination of Slum/Blight under either area or spot blight criteria – 24 CFR 570.483(c) • UN – 24 CFR 570.483(d)
Lead Agency and Distribution Process	• NCDOC will implement the program with contract support. • Process will be competitive approach.
Program Description	• Program will provide grants to local governments or non-profit organizations to carry out revitalization activities in commercial areas covered by the Helene major disaster declaration (DR-4827-NC).
Eligible Geographic Area	• Initial stage will provide priority for communities within the HUD-Identified MID area that have commercial areas that were damaged by Helene. Second stage will be open to businesses in all counties covered by the Helene major disaster declaration (DR-4827-NC).
Other Eligibility Criteria	• NCDOC and subrecipients will work within HUD’s applicable Guidelines and Objectives for Evaluating Project Costs and Financial Requirements for assistance to for-profit businesses.

Program	Commercial District Revitalization
Maximum Amount of Assistance per Beneficiary	Up to \$10,000,000 with floor of \$500,000.
Maximum Income of Beneficiary	N/A
Mitigation Measures	5% of the CDBG Mitigation set aside will be reserved for use with activities and projects funded under this program.
Reducing Barriers for Assistance	NCDOC will provide priority consideration for applications from historically underserved communities within both the HUD-Identified and State-Identified MID areas.

NCDOC is establishing the Commercial District Revitalization (CDR) program for eligible local governments and non-profit organizations to revitalize designated commercial districts damaged by Hurricane Helene. Encouraging economic opportunities, while supporting the recovery of commercial areas, is essential to ensuring that commercial tenants, customers, and jobs are restored. By facilitating the return of commercial districts and businesses to profitability, jobs will be created or retained within the community and residents will continue to have access to the products and services they need within their local community.

NCDOC must focus its investment in the HUD-Identified MID area and will structure the application process to provide a priority for eligible applicants in that area. Eligible uses of funds under the CDR will include, but not be limited to:

- Acquisition, demolition, site preparation, or rehabilitation of commercial structures carried out by a subrecipient;
- Assistance to small businesses for rehabilitation and physical improvements to their places of business; and
- Facade improvements to private or public structures in commercial areas.

Note that CDBG-DR funds may not be used under this program for the purpose of acquiring property through the exercise of eminent domain authority.

NCDOC anticipates conducting two application rounds for the CDR program. The competitive criteria will reflect HUD's standard approach to competitive programs outlined in the HUD Handbook 2210.17 and summarized below. NCDOC will further define these criteria when it issues the NOFO for the program.

Table 36: Competitive Framework – Commercial Revitalization Program

Criteria	Weight
Capacity of the Applicant	10%
Community Need for Commercial Area Investment	20%

Criteria	Weight
Soundness of Approach	40%
Leverage of Other Resources	20%
Achieving Results	10%
TOTAL	100%

NCDOC will review applications for CDBG-DR and program eligibility and will select projects based on scoring and ranking approaches that are in alignment with NOFO and application processes.

5.2.6 Public Services

NCDOC will not fund or implement any stand-alone public service programs as part of this Action Plan. However, NCDOC may opt to provide specific public services as part of the delivery of the three housing recovery programs identified in section 5.2.3. above.

5.2.7 CDBG-DR Mitigation Set-Aside

Table 37: CDBG-DR Mitigation Set-Aside Programs Overview

Eligible Cost Category	Percent of Funding to Combined MID	CDBG-DR Mitigation Set-Aside Allocation Amount	Percent of CDBG-DR Mitigation Set-Aside
Planning (15% cap)	0%	\$0	0%
Housing	73.67%	\$158,335,450	85%
Infrastructure	13.55%	\$18,627,700	10%
Economic Revitalization	7.78%	\$9,313,850	5%
TOTAL⁴⁵	95%	\$186,277,000	100%
Mitigation Funds Not Allocated	-	\$0	0%
GRAND TOTAL (Recovery + Mitigation + Unallocated)	-	\$186,277,000	100%

⁴⁵ Exclusive of \$71,406,000 (5%) for State administrative costs.

The CDBG-DR Mitigation Set-Aside, pursuant to HUD’s Allocation Announcement Notice, is \$186,277,000. These funds have been allocated to each of the five programs described through this section and will be integrated into projects and activities funded through those programs. NCDOC’s approach is consistent with HUD’s directive to ensure that funded projects and activities incorporate mitigation and resilience components. It is not NCDOC’s intention to operate a stand-alone mitigation program and, as a result, there are no individual mitigation programs. The table below reflects the spread of the Mitigation Set-Aside funding across housing, infrastructure, and economic revitalization programs.

Table 38: Grantee CDBG-DR Mitigation Set-Aside Programs Overview

Eligible Cost Category	CDBG-DR Mitigation Set-Aside Allocation Amount	Percent of CDBG-DR Allocation for LMI Benefit	Does this Program Have Tie Back to Helene Related Damage?
Homeowner Reconstruction/Rehabilitation Program	\$130,393,900	70%	Yes
Workforce Housing for Ownership	\$9,313,850	5%	Yes
Multifamily Construction Program	\$18,627,700	10%	Yes
Community Infrastructure Program	\$18,627,700	10%	Yes
Commercial District Revitalization	\$9,313,850	5%	Yes
TOTAL	\$186,277,000	100%	

6 General Information

6.1 Citizen Participation

NCDOC invites and encourages citizen participation in the Action Plan development process and subsequent amendments with a focus on outreach to LMI persons, historically disadvantaged communities, and protected classes identified by the Civil Rights Act. This approach is consistent with NCDOC's existing citizen participation plans related to annual CDBG funding and prior CDBG-DR awards to the State related to Hurricanes Matthew and Florence.

NCDOC will advertise opportunities for comment on the Action Plan through various State and local resources. Additionally, NCDOC will work with Councils of Government throughout western North Carolina ensure that local voices are heard through local forums. NCDOC is committed to ensuring that all populations impacted by the storm are aware of and have equal access to information about the programs to assist in the recovery from Hurricane Helene. Through in-person meetings, outreach events, and online and traditional media, NCDOC has publicized existing programs, will publicize changes to such programs, and has conducted outreach efforts throughout the storm impacted areas.

NCDOC will post its full Citizen Participation Plan to the CDBG-DR website at [Disaster Recovery | NC Commerce](#).

6.1.1 Consultation in Developing Action Plan

NCDOC has undertaken a broad outreach program to obtain feedback on unmet needs in the Helene-impacted area. Consistent with HUD's guidance in the Universal Notice, NCDOC developed a survey tool which was distributed to several hundred entities across the state in late January. This collection of interested parties spans not only the list identified by HUD (see Table 39: Action Plan Consultation Efforts below) but goes well above and beyond HUD's expectations. The survey approach enabled NCDOC to gather broader and more valuable feedback than would have been possible with a series of in-person or teleconference meetings.

The survey tool (included as Appendix 7.4 to this Action Plan) identified a series of issues to help frame unmet needs across western North Carolina and provided respondents with multiple responses as well as the opportunity to provide additional contextual feedback. NCDOC will retain the full set of responses and have them available for inspection by HUD and other interested parties. The survey indicates a low level of satisfaction among respondents regarding the current state of housing supply in their community following Hurricane Helene. On this point, 121 responses collectively yielded a satisfaction level of 3 out of 10 (with 10 being the highest level). Similarly, when respondents were asked about the current state of housing conditions in their communities, the satisfaction level crept up to 4 out of 10. When respondents were presented with a list of potential programs and asked to rank them in importance from

1 to 7 (1 being most important), housing reconstruction and rehabilitation were seen as the most important needs, but it is important to note that housing-oriented programs occupied the top four spots followed by an infrastructure improvement program.

Overall, NCDOC's proposed program is highly reflective of the feedback received during this consultation effort with more than \$1.052 billion to be dedicated to housing needs and \$193.5 million for infrastructure needs. These two areas account for 87% of the State's CDBG-DR allocation of \$1.428 billion.

NCDOC's approach to consultation is that it is a team effort and the agency has collectively sought information from across the full spectrum of Governor Stein's team since he took office on January 1, 2025. NCDOC does not see itself as operating in vacuum and seeks to leverage the multiple discussions of the Governor's team on issues that will directly or indirectly impact the success of initiatives funded through CDBG-DR. The composite nature of this information has been invaluable in development of the Action Plan and look forward to sustaining these discussions as the program moves toward implementation.

Table 39: Action Plan Consultation Efforts

Partner Consulted	Consultation Description
Federal Partners	The Governor's Office and NCDOC are working closely with FEMA as it is tasked with leading the Federal response and recovery effort. Other key Federal partners have included HUD, the US Army Corps of Engineers, US Department of Transportation, and the Environmental Protection Agency and State officials are in regular contact across a range of critical issues as activity moves from response to long-term recovery. Further, Gov. Stein has been in regular contact with the State's congressional delegation to provide information and ensure coordination in joint efforts to obtain necessary assistance from Federal agencies.
State/Local Government	Fifty-three (53) local governments responded to NCDOC's survey and offered feedback on recovery needs. NCDOC and other senior staff also provided a presentation in early 2025 to local officials on the broad outlines of the Action Plan. Further, the Governor established an advisory council on western North Carolina recovery and a significant proportion of its members are local elected leaders. The council provides local officials with a direct conduit to express ideas and opinions to senior state leadership. The full cross-section of state leadership conducts daily calls with local officials regarding recovery needs and this daily contact is of great value in understanding community-level needs and desires. Of note is the evolving working relationship with two of the most hard-hit jurisdictions, the city of Asheville and Buncombe County. The Governor's team has also been active in sharing information with members of the General Assembly to assure better coordination that has been the case with recent disaster recovery efforts.

Partner Consulted	Consultation Description
Indian Tribes	NCDOC has had high level discussions with leadership of the Eastern Band of the Cherokee on tribal needs arising from the impacts of Helene. Additional outreach will be conducted as the Action Plan moves toward implementation and the state team can better focus on ensuring that tribal leadership has the information necessary to make informed decisions about CDBG-DR opportunities that can benefit tribe members.
Private Sector	The Governor and senior leadership are focused daily on the needs of private sector entities as they attempt to recover from the impacts of Helene. It is difficult to describe the breadth of these conversations and feedback received but the need to re-establish business operations and ensure that jobs are created and retained for residents of western North Carolina is one of the key recovery priorities along with launching housing reconstruction efforts.
State and Local EM Agencies that have primary responsibility for administering FEMA funds	The Governor's Office, NCEM and NCDOC work closely together to coordinate activities and federal and state funding streams for Helene recovery. These agencies have a longstanding partnership and history of working together on disaster recovery and traditional government projects. Beyond the interaction at the state level, NCDOC is working with NCEM to improve its profile with local emergency management as there have been only limited number of instances over time when NCDOC and local EM officials have interacted.
Agencies that manage local Continuums of Care (CoC)	NCDOC has contacted leadership for the four CoCs that serve most of the Helene-impacted area. This effort has been slow to yield results but NCDOC is committed to further conversations to better understand homeless assistance needs that have been exacerbated by the damage Helene has caused to the region's housing stock.
Public Housing Authorities (PHAs)	PHAs were included in the survey but collectively they provided only a limited number of responses and have expressed only limited recovery needs. NCDOC intends to promote its multifamily and infrastructure programs with PHAs to ensure that they are well informed of the funding options that may be available to them to repair and improve their properties and the public housing experience.
HUD-Approved Housing Counseling Agencies	Senior leadership has had conversations with the North Carolina Housing Coalition, which is the regional HUD-approved intermediary for North and South Carolina. In this role, they provide technical assistance to the network of local housing counseling providers across the state.
Other Stakeholders	As part of the survey, NCDOC contacted an array of groups and 45 non-governmental organizations submitted responses.

6.1.2 Public Comments

NCDOC takes seriously the need to collect and evaluate public comments offered on the draft Action Plan and subsequent amendments. The collected comments and responses are included at the end of the section of the Action Plan, following section 6.1.5.

6.1.3 Public Hearings

Since the amount allocated by HUD to NCDOC exceeds \$500 million, NCDOC is required to conduct at least three public hearings on the draft Action Plan in the HUD-Identified MID area as required by section III.D.1.b. of the Universal Notice. NCDOC will work with Councils of Government (CoGs) throughout western North Carolina to facilitate these hearings. The details of these hearings are provided below:

Table 40: Hearing Details

Date	Council of Government (COG) Host	Location	Time (EST)
February 18	Foothills	Isothermal Community College, Business Sciences Building, Room 15 286 ICC Loop Rd, Spindale, NC 28160	2:00-4:00pm
February 21	Southwestern	Haywood County Historic Courthouse, 2nd floor, 215 N Main Street, Waynesville, NC	10:00am-12:00pm
February 24	Land of Sky	Office of Land of Sky Regional Council, 339 New Leicester Highway, Suite 140, Asheville, NC 28806	11:30am-2:30pm
February 25	High Country	468 New Market Blvd, Boone, NC	10:00am-12:00pm
February 27	Western Piedmont	Western Piedmont Council Office, 1880 2nd Avenue NW, Hickory, NC 28601	1:30-3:30pm
February 28	Centralina	Centralina Regional Council Office, 10735 David Taylor Dr Ste 250, Charlotte, NC 28262	

Each of these hearings will be conducted in accordance with the public hearing standards outlined in the Universal Notice, including:

- Geographic balance;
- Physical accessibility;

- Alternative methods of product/information delivery;
- Times and location of convenience to potential beneficiaries;
- Accommodation for persons with disabilities; and
- Access for persons with LEP.

Information on these points will be disseminated in the Combined MID area in advance of the hearing dates.

6.1.4 Citizen Complaints

NCDOC shall provide a written response to every complaint relative to CDBG-DR within fifteen (15) working days of receipt. NCDOC will execute its Appeals Process in response to appeals received and will require subrecipients to adopt a similar process. The process will enable appeals and further review from another level. All subrecipients will be required to develop an appeals and complaint procedure to handle all complaints or appeals from individuals who have applied for or have an interest in CDBG-DR funding.

A written appeal may be filed when an individual is dissatisfied with program policies, eligibility, level of service, or other issues. The appeal shall include a statement of facts and circumstances regarding the situation as well as any supporting documentation that substantiates the claim. Materials related to the appeal may be submitted to NCDOC via email at helene.recovery@commerce.nc.gov. NCDOC will review the submitted materials and provide the appellant with a written response, which may be by email. If NCDOC denies the appeal, the final step in the internal appeals process is to appeal to the Secretary of the NCDOC. In programs that serve individual applicants, applicants may appeal their award determinations or denials that are contingent on program policies. However, it should be noted that the NCDOC does not have the authority to grant an appeal of a statutory, regulatory, or HUD-specified CDBG-DR requirement.

6.1.5 Modifications to the Action Plan

6.1.5.1 Substantial Amendments

NCDOC identifies the following criteria which constitute a substantial amendment:

- A change in program benefit or eligibility criteria;
- The addition or deletion of an activity or program; or
- An allocation or reallocation of \$28.562 million or more. This threshold represents 2% of the total CDBG-DR allocation.

Pursuant to section I.C.6.a of the Universal Notice, NCDOC will make substantial amendments available for public comment for no less than 30 days. Amendments will be posted online at [Disaster Recovery | NC Commerce](#). Following the public comment period, NCDOC will address comments received and then

submit the substantial amendment for HUD's review and approval. NCDOC will address any question and make any revisions sought by HUD and, once the amendment is approved, immediately act to implement the amendment. Every amendment to the Action Plan (substantial and non-substantial) will be numbered sequentially, cited in the Action Plan change log, posted on the NCDOC's CDBG-DR website, and consolidated into the Action Plan.

6.1.5.2 Non-Substantial Amendments

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the threshold for substantial amendment thresholds noted above and does not require posting for public comment. NCDOC will notify HUD five (5) business days before the change is effective. All amendments will be numbered sequentially, cited in the Action Plan change log, and posted to the Action Plan as available on the CDBG-DR website.

DRAFT

7 Appendix

7.1 Certifications

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

- a. Compliance with Anti-discrimination Laws—NCDOC certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–3619), and implementing regulations.
- b. Affirmatively Further Fair Housing—NCDOC certifies it will affirmatively further fair housing.
- c. Uniform Relocation Act and Residential Anti-displacement and Relocation Plan—NCDOC certifies that it: (1) will comply with the acquisition and relocation requirements of the Uniform Act, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements; (2) 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.
- d. Anti-Lobbying—NCDOC certifies its compliance with the restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- e. Authority of Grantee—NCDOC certifies that the Action Plan for disaster recovery is authorized under State and local law (as applicable) and that NCDOC, and any entity or entities designated by NCDOC, 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.
- f. Consistency with the Action Plan—NCDOC certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.
- g. Section 3—NCDOC certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.
- h. Citizen Participation—NCDOC 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).

i. Consultation with Local Governments – NCDOC 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.

j. Use of Funds—NCDOC certifies that it is complying with each of the following criteria:

(1) 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.).

(2) 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.

(3) 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.

(4) Special Assessment. NCDOC 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, NCDOC certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

k. Excessive Force—NCDOC certifies that it has adopted and is enforcing the following policies, and, in addition, State grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing:

(1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and

(2) A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

l. Grant Timeliness—NCDOC 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 NCDOC has reviewed the requirements applicable to the use of grant funds.

m. Lead-Based Paint—NCDOC certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.

n. Environmental Requirements—NCDOC certifies that it will comply with environmental requirements at 24 CFR part 55 (as applicable) and 24 CFR part 58.

o. Compliance with Laws—NCDOC certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

p. Order of Assistance—NCDOC 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.

7.2 Waivers

NCDOC does not request any waivers as part of the initial submission of this Action Plan for Disaster Recovery but may seek waivers via independent submission of such requests at any time.

7.3 Summary of and Response to Public Comments

Table 41: Action Plan Public Comment Log

Comment Received	NCDOC Response
1.	
2.	
3.	
4.	
5.	
6.	
7.	

Comment Received	NCDOC Response
8.	
9.	
10.	
11.	
12.	
13.	
14.	
15.	
16.	
17.	
18.	
19.	
20.	
21.	
22.	
23.	
24.	
25.	
26.	
27.	
28.	
29.	
30.	
31.	
32.	
33.	
34.	
35.	

Comment Received	NCDOC Response
36.	
37.	
38.	
39.	
40.	
41.	
42.	
43.	
44.	
45.	
46.	
47.	
48.	
49.	
50.	
51.	
52.	
53.	
54.	
55.	
56.	
57.	
58.	
59.	
60.	
61.	
62.	
63.	

Comment Received	NCDCOC Response
64.	
65.	
66.	

7.4 North Carolina Community Helene Questionnaire

Below are the questions that were used in collecting feedback from individuals and community level organizations as part of NCDOC's consultation effort.

1. What type organization do you represent?
2. What County (or counties) does your organization represent? Select all that apply.
3. On a scale from 0 to 10, How would you rate the current state of housing supply in your community following Hurricane Helene? 0 being extremely poor, 10 being the excellent.
4. On a scale from 0 to 10, How would you rate the current state of housing conditions in your community following Hurricane Helene? 0 being extremely poor, 10 being excellent.
5. On a scale from 0 to 10, How would you rate the economic climate in your community following Hurricane Helene? 0 being extremely poor, 10 being excellent.
6. Have any particular populations in your community been underserved in the recovery process from Hurricane Helene?
7. Please rank these programs 1-7, 1 being the most important to your community, 7 being the least:
 - Homeowner Repair/Reconstruction Program: Direct repair to Helene damaged homes as well as reconstruction of homes that were completely destroyed.
 - Workforce Housing for Ownership.
 - Small Rental Repair: Reconstruction/rehabilitation of small rental properties with seven or fewer units.
 - Multi-Family: Program to reconstruct, rehabilitate or construct new rental housing stock.
 - Community infrastructure program: Fund projects that are necessary to address identified unmet disaster recovery needs in communities and counties that are not funded by other federal recovery programs.
 - Business Sustainment Grants: The Business Sustainment Grant (BSG) Program addresses the distinct needs of the thousands of small businesses and microenterprises by rapidly providing funding that will enable them to retain employees and sustain operations as the western North Carolina economy recovers from the aftermath of Hurricane Helene.

- Commercial District Revitalization: Assist small and rural communities in addressing recovery needs in local commercial districts in effort to retain jobs and shopping/service opportunities for residents.
8. Not-including state and nationally-led programs, are there any ongoing locally-organized disaster recovery initiatives in your community?
 9. Are there any additional unmet needs resulting from Hurricane Helene?

DRAFT

7.5 Standard Form 424

OMB Number: 4040-0004
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
* 1. Type of Submission: ☐ Preapplication ☐ Application ☐ Changed/Corrected Application * 2. Type of Application: ☐ New ☐ Continuation ☐ Revision * If Revision, select appropriate letter(s): * Other (Specify): 		
* 3. Date Received: Completed by Grants.gov upon submission. 4. Applicant Identifier: 		
5a. Federal Entity Identifier: 		5b. Federal Award Identifier:
State Use Only:		
6. Date Received by State:		7. State Application Identifier:
8. APPLICANT INFORMATION:		
* a. Legal Name:		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 		* c. Organizational DUNS:
d. Address:		
* Street1: Street2: * City: County/Parish: * State: Province: * Country: USA: UNITED STATES * Zip / Postal Code:		
e. Organizational Unit:		
Department Name: 		Division Name:
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: * First Name:		
Middle Name:		
* Last Name:		
Suffix:		
Title:		
Organizational Affiliation: 		
* Telephone Number:		Fax Number:
* Email:		

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

11. Catalog of Federal Domestic Assistance Number:

CFDA Title:

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant:	* b. Program/Project:
Attach an additional list of Program/Project Congressional Districts if needed.	
	Add Attachment Delete Attachment View Attachment
17. Proposed Project:	
* a. Start Date:	* b. End Date:
18. Estimated Funding (\$):	
* a. Federal	
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .	
☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
☐ c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
☐ Yes ☐ No	
If "Yes", provide explanation and attach	
	Add Attachment Delete Attachment View Attachment
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)	
☐ ** I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix:	* First Name:
Middle Name:	
* Last Name:	
Suffix:	
* Title:	
* Telephone Number:	Fax Number:
* Email:	
* Signature of Authorized Representative:	* Date Signed: