

CDBG-DR Training Session II

Application Readiness Training: Tie-Back, National Objectives, and Compliance Essentials

August 19, 2025
9 am



Welcome and Purpose

HELENE CDBG_DR Grantee Readiness Training (GRT) Session 2 Agenda

The purpose of this session is to offer two morning sessions that will provide an in-depth examination of HUD CDBG-DR grant requirements. The afternoon will offer the opportunity to discuss with the Renew NC Programs (Community Infrastructure, Economic Revitalization, and Multifamily Housing), which will launch grant applications later this year.



Thank you to our partners!

Agenda

9:15 am- Noon

HUD Grantee Policy and Procedure Requirements Preapplication

9:15 – 10:30

Part 1

Dee Taylor, Association of County Commissioners

- Documenting Tieback
- Documenting National Objective
- Q&A/ Best Practices

10:30 am– 10:45 am

Break

10:45 – 12

Part 2

Dee Taylor, Association of County Commissioners

- Understanding and Guidance on HUD Project Cost (Planning, Administrative, and Delivery)
- HUD Preliminary Environmental Review Requirement
- Documenting and Understanding DOB
- Q&A/ Best Practices

Noon to 12:30 pm

Networking/Lunch

- Grab lunch, network, check in to work, and get seated by 12.30 to re-engage.

12:30 – 1:15

Program Update

Renew NC CDBG-DR Program Directors

- Each program gives a brief overview, timeline updates

1:30 pm

Walkthrough Assessment

Emily Quinlan, Director of Economic Revitalization

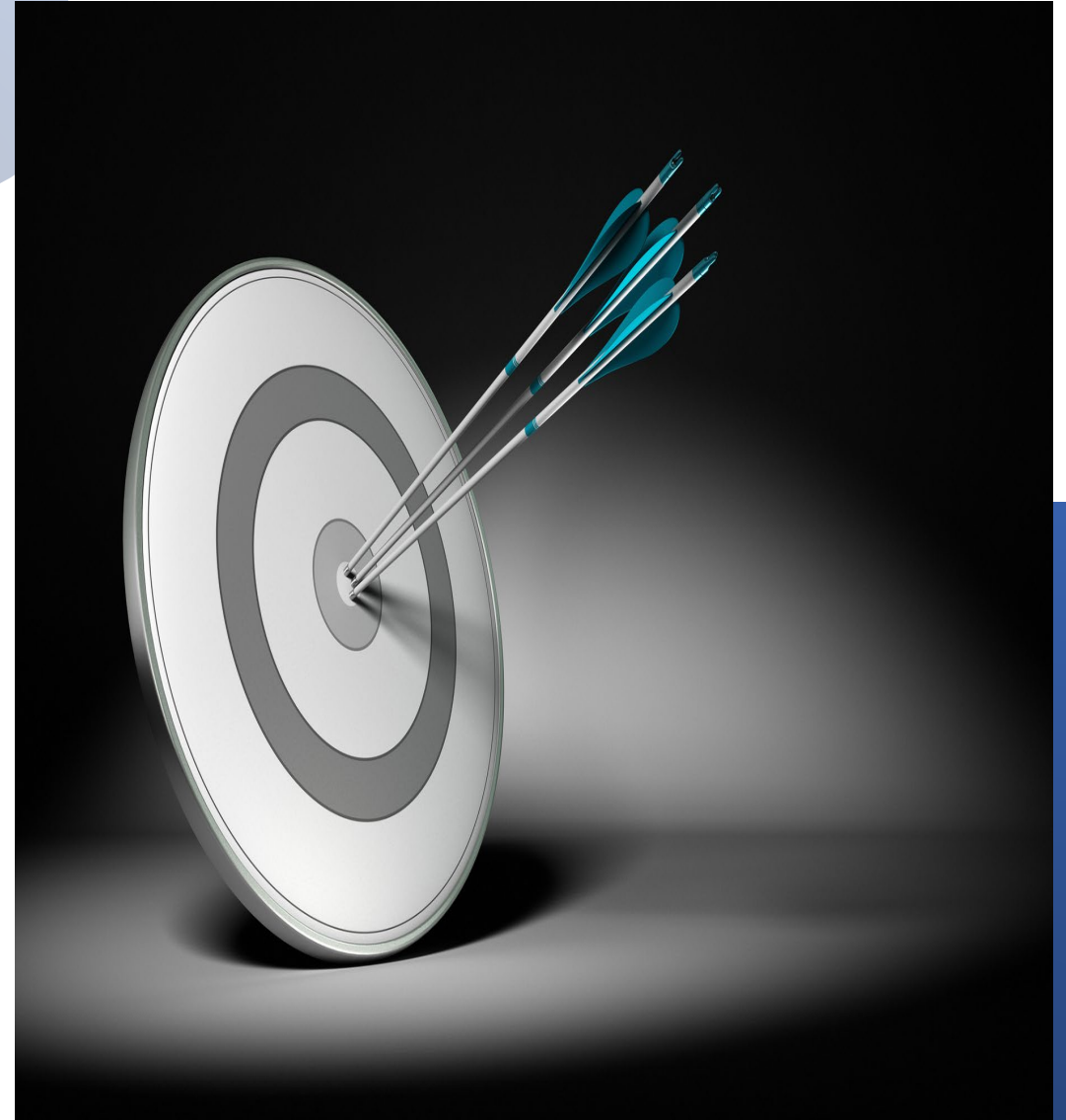
- Q&A
- Sign UP for 1-on-1

House Rules

- **Mics are muted**
- **Online Attendees**
 - Name and organization in the chat
- **Site Facilitators**
 - Will drop questions into the Q&A
 - There will be opportunities to acknowledge questions
 - A comprehensive Q&A will go out after this training
- **BE NICE!**

Objectives

- ✓ Recap: CDBG-DR Threshold Requirements
- ✓ Understanding Tie-Back
- ✓ Understanding HUD's National Objectives
- ✓ Understanding the Environmental Review Process
- ✓ Understanding Duplication of Benefits
- ✓ Understanding Administrative, Planning, and Project/Activity Delivery Costs
- ✓ CDBG-DR Point of Contacts
- ✓ Resources



Why Discuss These Requirements Now?

- Prepares You for State's Project Assessment
- Builds a Strong Foundation Before Applications Open
- Clarifies Questions Around Project Eligibility
- Reduces Risk of Project Rejection
- Helps You Gather Documentation Early
- Supports Long-Term Capacity

Disclaimer:

The scenarios and exercises in this presentation are provided for training purposes only and are intended to illustrate potential approaches to documenting tie-back, meeting CDBG-DR national objectives, understanding environmental review requirements, avoiding duplication of benefits, and distinguishing between administrative, planning, and activity delivery costs. Actual determinations of eligibility, compliance, and funding approval will depend on the specific facts, documentation, and justification provided in the project application. Final approval or denial rests with the North Carolina Department of Commerce (NCDOC), Division of Community Revitalization (DCR), and is subject to HUD requirements, applicable federal and state regulations, and the State's Action Plan.

CDBG vs. CDBG-DR

Program	Community Development Block Grant (CDBG)	CDBG–Disaster Recovery (CDBG-DR)
Mission	Provide flexible funding to address ongoing community development needs, primarily benefiting low- and moderate-income (LMI) persons.	Support long-term recovery and resilience after presidentially declared disasters, with a focus on LMI benefit where possible.
Focus Area	Housing, public infrastructure, economic development, public facilities.	Disaster-related housing repair/replacement, infrastructure recovery, economic revitalization, mitigation.
Funding Distribution Method	Ongoing program with annual allocations.	Supplemental funding tied to specific disasters.
Key Differences	No disaster tie-back required.	Must demonstrate tie-back to the declared disaster event.

Recap from Session I Training

What is CDBG-DR & Threshold Requirements



- CDBG-DR is a HUD-administered disaster recovery funding.
- Supports long-term recovery in Presidentially-declared disaster areas.



Tie-Back

Documented link (directly or indirectly) between a CDBG-DR activity and damage or impacts from the declared disaster.



HUD/State MID Area

Project must be located within a HUD or State-identified Most Impacted and Distressed Area (MID)



National Objective

Project must meet one of three CDBG National Objectives.



Documenting Disaster Tie-Back and Mitigation

Documenting Tie-Back

Link the Project to the Impact

Tie-Back Type	Description	Examples	Documentation
Direct	Clear, documented connection between damage caused by the disaster and the project.	<ul style="list-style-type: none">• To repair flood damage from Tropical Storm Helene• Rebuilding pump station that failed on Sept. 24, 2025 due to Tropical Storm Helene	<ul style="list-style-type: none">• Engineering report showing disaster-related failure• FEMA damage assessments• Photos (before and after disaster, if available) of impacted site• Insurance claims/statements• Local/state emergency reports
Indirect	Addresses vulnerabilities or weaknesses made apparent by the disaster or improves resilience to similar future events.	<ul style="list-style-type: none">• To prevent future failure based on flood impacts• Mitigates future storm damage from Helene-related flooding	<ul style="list-style-type: none">• Hazard mitigation plan• Post-disaster assessments• Vulnerability studies• Engineering assessments recommending upgrades based on observed conditions

Example of Direct Impact to an Apartment Complex

Project: Rehab a multifamily rental complex that suffered substantial damages by Tropical Storm Helene.

Tie-Back Type: Clearly replaces housing lost due to the disaster.

Sample Documentation:

- FEMA records showing the property was damaged/destroyed
- Photos (before and after)
- Local building inspection reports declaring units uninhabitable

Justification:

Constructing new multifamily rental units to replace those destroyed by strong winds during the disaster.



Example of Indirect Impact to an Apartment Complex

- **Project:** Construction of a new resilient multifamily housing to address post-disaster loss of rental stock and accommodate displaced residents.
- **Tie-Back Type:** Addresses housing shortage caused by the disaster's impacts on the local rental market.
- **Examples of Documentation:**
 - Post-disaster housing needs assessment showing rental vacancy rates dropped after the disaster
 - County recovery plan identifying shortage of affordable rentals as a disaster-related issue
 - Market study demonstrating unmet need due to loss of rental stock in affected areas
 - Hazard mitigation plan showing need for resilient design
- **Justification:** Developing new multifamily rental housing to replace market capacity lost post disaster, ensuring resilient, affordable housing for displaced LMI households.

Actual Project of Indirect Tie-back: New Construction- Multifamily Housing

McArthur Park (Fayetteville)
Multiple funding including CDBG-DR



Documenting Tie-Back Take Away

Definition: Every CDBG-DR activity must have a clear, documented connection to the impacts of the specific disaster(s) covered in the Action Plan.

Two paths to tie-back: Direct Impact will show an activity that repairs, replaces, or restores something damaged or destroyed by the disaster. Indirect/Resiliency Impact will show an activity that addresses a vulnerability or failure revealed by the disaster to prevent similar future damage.

Scope and location matter: Work must be in a disaster-impacted county or area unless the Action Plan allows otherwise.

The connection must be explicit: Clearly explain in the project file *how and why* the activity addresses a disaster-related impact.

Tie-back is separate from National Objective compliance: You must meet both requirements.

The State and HUD will question weak tie-back cases: If the disaster link is vague or only loosely related, funding eligibility is at risk.

Documenting Tie-Back Take Away (Cont'd)

Support Documentation

Examples:

- Provide maps, photos, and written justifications
- Include official declarations and funding gap summaries
- GIS map showing affected area overlayed with proposed project location
- Storm path maps
- LMI maps (to show disproportionately impacted LMI areas)
- Unmet need analysis



Apply the Principle: Tie-Back To Potential Project

1. Has a potential project been identified in any one of the project areas as defined in the State action plan:
 - Multifamily housing
 - Workforce Housing
 - Community Infrastructure
 - Economic Revitalization
2. Can the direct tie-back or an indirect tie-back be clearly identified?
3. Can the direct or indirect tie back be documented in one or more of the following ways
 - Provide maps, photos, and written justifications
 - Include official declarations and funding gap summaries
 - GIS map showing affected area overlayed with proposed project location
 - Storm path maps
 - LMI maps (to show disproportionately impacted LMI areas)
 - Unmet need analysis

Mitigation Set-Aside

Mitigation activities do not require a disaster tie-back, but when using CDBG-DR Mitigation set-aside funds, they must still meet key requirements. These activities focus on building resilience and reducing long-term risks.

- Proactively reduces or eliminates long-term risk to people and property from hazards.
- Often exceeds pre-disaster conditions, informed by lessons learned from the disaster.
- Can include elevating critical infrastructure, replacing undersized culverts, or other flood/storm risk reduction measures.
- Must meet CDBG eligibility requirements or be covered by a HUD waiver/alternative requirement.
- Must address risks identified in the Mitigation Needs Assessment (aligned with FEMA-approved Hazard Mitigation Plans).
- Must meet a national objective of the CDBG program.
- Counted toward the CDBG-DR Mitigation Set-Aside percentage.
- State has set aside approximately 13% of CDBG-DR funds for mitigation.

Mitigation: Examples of Activities

Project Type	Description	Examples	Documentation Needed
Housing	Projects that make housing more resilient to future disasters.	<ul style="list-style-type: none"> • Elevating new or substantially rehabbed homes above base flood elevation • Installing resilient roofing, flood vents, or storm-resistant windows in affordable housing 	<ul style="list-style-type: none"> • Engineering/design specs • Hazard/floodplain maps • Cost estimates showing resilience features
Infrastructure	Critical systems hardened to reduce risk of future disasters.	<ul style="list-style-type: none"> • Elevating/electrifying pump stations • Undergrounding utilities • Expanding stormwater systems to manage future flooding 	<ul style="list-style-type: none"> • Engineering studies • Local/state hazard mitigation plans • Modeling of risk reduction
Public Facilities / Community Resilience	Facilities adapted to serve as safe havens or disaster response centers.	<ul style="list-style-type: none"> • Designing facilities with backup power for shelters • Hardening schools/fire stations • Building resilient health clinics 	<ul style="list-style-type: none"> • Local emergency operations plan • Architectural plans showing resilient features
Economic Revitalization / Lifeline Facilities	Investments to keep businesses and lifeline services functioning after disasters.	<ul style="list-style-type: none"> • Elevating small business incubator buildings • Resilient retrofits of commercial spaces critical for community supply chains 	<ul style="list-style-type: none"> • Economic impact study • Local recovery/resilience strategy • Business continuity analysis

Exercise 1 – Multipurpose Center with Occasional Shelter Use

Cedar Ridge County proposes to purchase and renovate an old commercial building in the downtown area. The building will primarily serve as a multipurpose community center with meeting rooms, a computer lab, and event space. County officials note that during disasters, it could be converted into an emergency shelter.

The county's justification for CDBG-DR funding is that the county has no other large indoor shelter space and the building could house evacuees if needed in future storms. The facility itself was not damaged in Tropical Storm Helene, and the county did not open any shelters during Helene because the flooding did not require mass evacuations in that area.

Does this project meet CDBG-DR tie-back requirements?

- A.** Yes: Direct tie-back because the county lacked shelter space during Helene
- B.** Yes: Indirect tie-back if the county documents an unmet disaster-related need
- C.** No: Tie-back cannot be established unless actual disaster-related shelter need is proven
- D.** Yes: Indirect tie-back because the building could be used for future disasters

Exercise 1 Answer

Correct Answer: C. No: Tie-back cannot be established unless actual disaster-related shelter need is proven.

Why:

- Occasional shelter use in theory is not enough because the county must prove that the lack of shelter space caused an unmet need during Helene (e.g., residents displaced with nowhere to go).
- Without documented disaster impact or unmet need, the purchase fails both direct and indirect tie-back tests.
- If the county had data showing residents were displaced but could not be accommodated during Helene, this could qualify as indirect tie-back under resilience or unmet need.

Documentation Examples (if it were to qualify):

- Emergency management reports from Helene showing displaced residents with no shelter space
- Disaster after-action reports documenting shelter capacity gaps
- Hazard mitigation plan identifying shelter space as a critical need revealed by the disaster
- Maps or data showing location of impacted populations and lack of shelter resources

Exercise 2 - Mitigation (True/False)

True or false, mitigation activities under the CDBG-DR set-aside must always have a “tie-back” to Tropical Storm Helene.

Exercise 2 Answer - Mitigation (True/False)

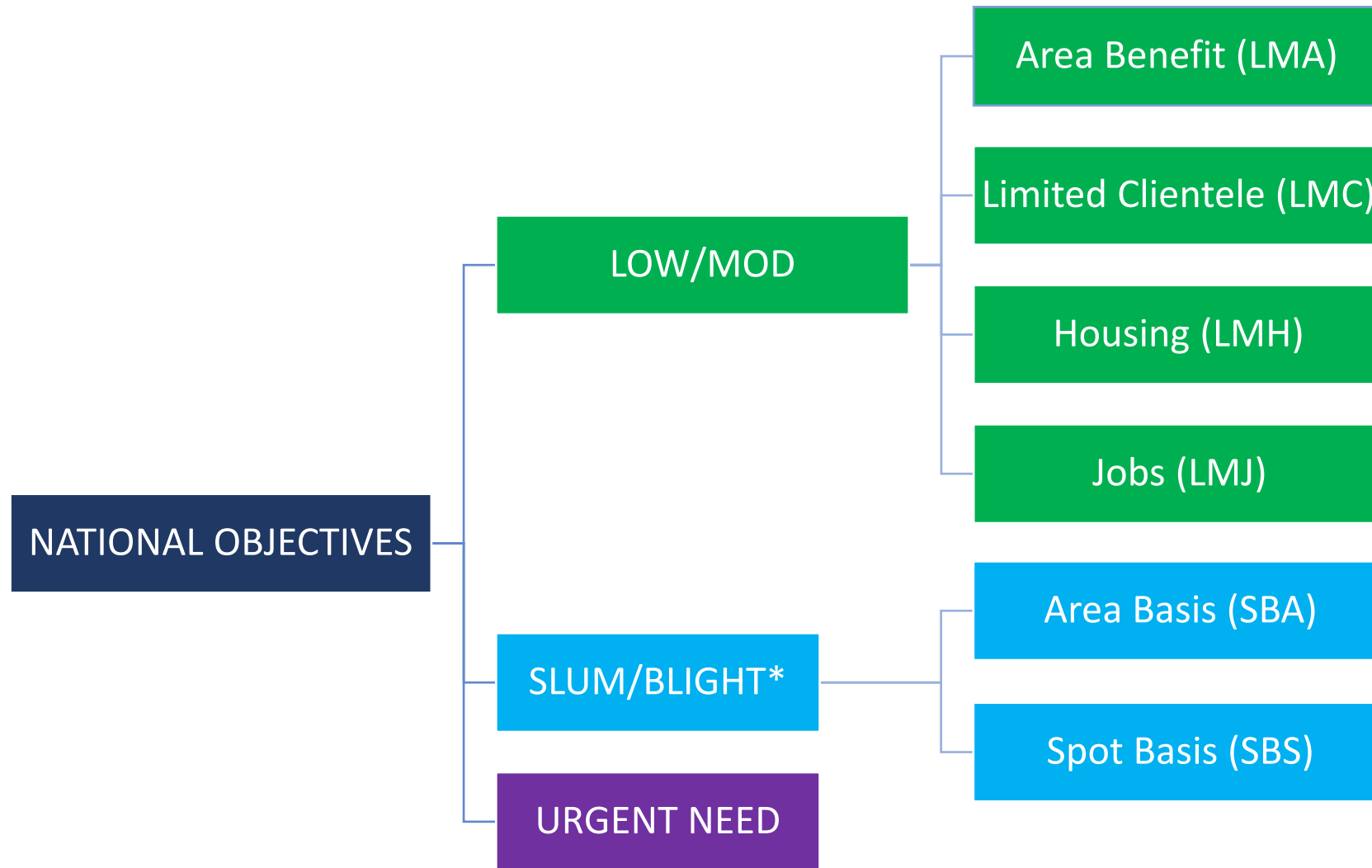
Answer: False: Mitigation set-aside allows projects that address *current or future risks*, even without tie-back.

- CDBG-DR recovery activities (the main pot of funding) require *tie-back* to the specific qualified disaster (here, Tropical Storm Helene). That means each activity must address a direct or indirect impact of Helene.
- Mitigation set-aside activities, however, have different rules. Congress requires that at least 15% of CDBG-DR allocations be spent on mitigation, and HUD allows these activities to address current or future risks, even if they do not tie back directly to Helene.
- This means that while a project must show storm damage (tie-back), a mitigation project like upgrading a dam or improving a hospital's power systems can meet the mitigation criteria if it reduces long-term risk, even if Helene didn't damage that facility.



Documenting National Objectives

CDBG National Objectives



*Aside from SBA and SBS, Slum/Blight has another category which is Urban Renewal. This category is rarely used and is meant for completing redevelopment in areas where an Urban Renewal Plan or Neighborhood Development Program was officially Approved, funded, and still legally in effect.

LMI Expenditure Requirement and Exceptions

Requirement

- HUD requires that at least 70% of a grantee's total CDBG expenditures benefit Low- and Moderate-Income (LMI) persons.
- This ensures that the program primarily supports the communities with the greatest need.
- Applies to overall program expenditures, not each individual activity.

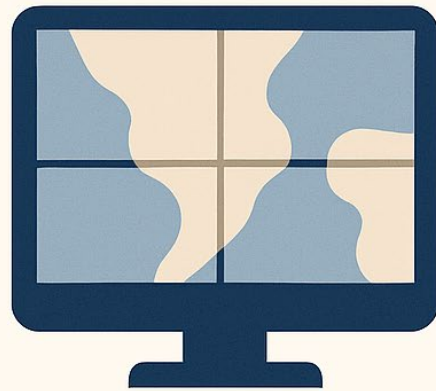
Exceptions

- HUD may allow a grantee to spend less than 70% on LMI activities if:
The grantee formally requests an exception and HUD approves it.
- The Action Plan or grant agreement specifically allows the lower threshold.
- The nature of the disaster or local need justifies a broader mix of activities (e.g., post-disaster urgent infrastructure or economic stabilization projects).

Low/Mod Area Benefit (LMA) – Determining Eligibility within a Service Area

Method 1

Using HUD Data



Method 2

Conducting an
Income Survey



LMA – Determining Eligibility within a Service Area (Cont'd)

Using HUD Data

1

Define Service Area

- Nature and scale of activity
- Location and accessibility
- Public service boundaries
- Nearby comparable services;
- Must be mainly residential and benefit the whole area
- Support with maps, service zones, or planning studies.

2

Obtain HUD-Approved LMI Data

- Use HUD Low/Mod Income Summary Data (LMISD) too or tables
- Check census block groups covering the service area to determine if more than 50% of residents are LMI

3

Calculate Weighted Average (If multiple block groups)

- Multiply block group's LMI % X its total population
- Add totals for all block groups
- Divide by total population show weighted average

LMA – Determining Eligibility within a Service Area (Cont'd)

Using HUD Data (Cont'd)

HUD LMISD (Census/ACS-based data):

- Available via HUD's LMI Mapping Tool
- Use when service area aligns with Census tract/block group
[Link: https://hud.maps.arcgis.com](https://hud.maps.arcgis.com)
- Data set can be exported

Ref: CPD Notice 24-04

LMA – Determining Eligibility within a Service Area (Cont'd)

Key Tips for using HUD Data

- Match the service area to the population that will actually benefit from the project
- Use the smallest HUD-approved geographic unit (often a **Census Block Group**) that aligns with the project's service boundaries.
- Use the **entire county** (all relevant census tracts/block groups) if the facility truly serves everyone in the county equally.
- HUD wants the service area to match the *benefit area*, not the political boundaries or project footprint



LMA – Determining Eligibility within a Service Area (Cont'd)

What if HUD's published LMI data for my project's service area is borderline (near 51%), or a possible mismatch with current local conditions, can we challenge it?

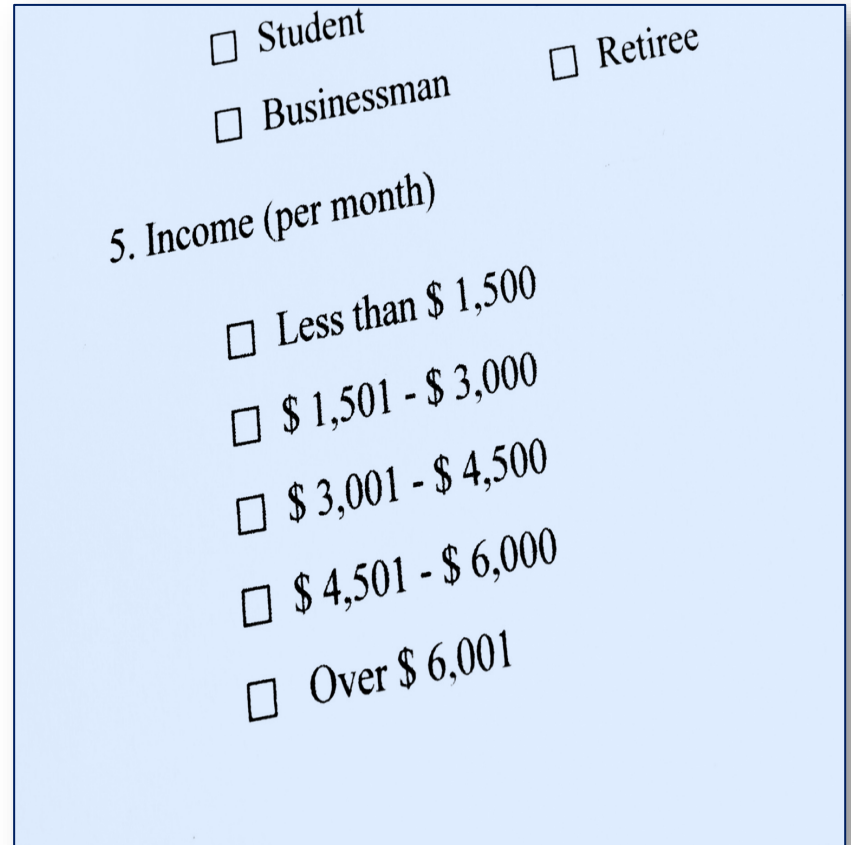
Here are some other options:

- HUD's standard for LMA is a hard threshold.
- Only flexibility comes from:
 - Conducting a HUD-compliant income survey.
 - Redefine the service area if appropriate and justified.
 - Use other qualifying national objectives if LMA can't be met.

LMA – Sources for Determining Eligibility (Cont'd)

Using Income Surveys

- Used when Census data does not cover or reflect the service area accurately
- Must follow HUD-approved methodology (e.g., CPD Notice)
- Typically used for rural or custom-defined areas



☐ Student

☐ Businessman ☐ Retiree

5. Income (per month)

☐ Less than \$ 1,500

☐ \$ 1,501 - \$ 3,000

☐ \$ 3,001 - \$ 4,500

☐ \$ 4,501 - \$ 6,000

☐ Over \$ 6,001

LMA – When Should Income Surveys Be Used

Income surveys should be used to document LMI status when HUD's LMISD data does not accurately represent the service area or when the area does not conform to census boundaries. Below is a summary table of common situations and whether income surveys are appropriate.

Situation	Should You Use an Income Survey?	Why
Service area aligns with a block group that is $\geq 51\%$ LMI	No	Use HUD LMISD
Service area overlaps multiple block groups	Yes	LMISD may not represent whole area
HUD LMISD shows $< 51\%$ LMI but local knowledge suggests otherwise	Yes	Survey can demonstrate updated conditions
Service area is custom-defined (e.g., around a new facility)	Yes	HUD data may not match geography
Project is in a newly developed or recently impacted area	Yes	Census data may be outdated

LMA – Examples of Activities

- Neighborhood park development
- Public infrastructure (sidewalks, gutters, road repaving)
- Construction of health clinics, community centers, or shelters
- Improvements to public schools or fire stations
- 911 system infrastructure (with HUD approval)
- Special assessments for LMI homeowners on shared infrastructure



Exercise 3 – Determining LMA Eligibility

The Town of Riverbend plans to use CDBG-DR funds to replace a deteriorating water line that serves the Oak Hollow neighborhood. The engineer confirms that the line only serves 142 households in Oak Hollow. You check HUD's LMI data and find:

- Block Group 1, Census Tract 2003 (Oak Hollow) has 48% LMI
- Entire Town of Riverbend has 53% LMI

What is the correct service area to use for determining LMA eligibility?

- A. The entire Town of Riverbend (because it's over 51% LMI)
- B. The Oak Hollow neighborhood (because that's the actual service area)
- C. The county where Riverbend is located
- D. Any area that gets us over 51% LMI

Exercise 3 Answer - Determining LMA Eligibility

Correct Answer: B. The Oak Hollow neighborhood (because that's the actual service area)

Why:

Even though the town's percentage is higher, HUD requires the service area to reflect the actual beneficiaries. Since the water line only serves Oak Hollow, you must use Block Group 1, even though it is below 51%. In this case, the project would not qualify under LMA using HUD data. You could try conducting an income survey, especially since the percentage of LMI households within the service area is very close to meeting the 51% LMI criteria.

LMI – Limited Clientele (LMC)

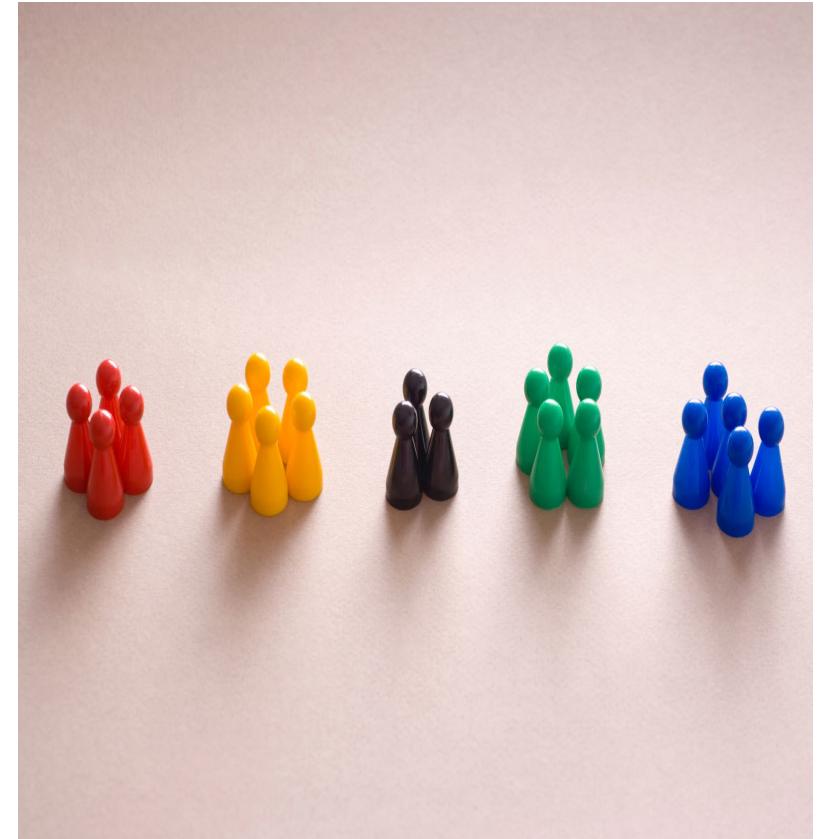


- LMC is another way to meet the Low- and Moderate-Income (LMI) National Objective under CDBG-DR.
- Focuses on activities that benefit a specific group of individuals, not an entire area.
- At least 51% of the activity's beneficiaries must be LMI individuals.
- Determination is based on the actual number of LMI persons served, not on geographic data.

LMC – Presumed Benefit Groups

Activities that exclusively serve these groups are presumed to benefit LMI persons:

- Abused children
- Battered spouses
- Elderly persons
- Severely disabled adults
- Homeless persons
- Illiterate adults
- Persons living with AIDS
- Migrant farm workers



LMC – Qualifying Tests

To meet the LMC national objective, one of these tests must apply

- Activity serves a presumed LMI group
- Documented family size and income shows at least 51% LMI beneficiaries
- Activity is limited by eligibility to LMI persons
- Nature and location make it clear that clientele are primarily LMI (e.g., service in a public housing complex)

LMC – Determining Eligibility (Cont'd)

Defining Beneficiaries for the Project

1

Identify Activity

- Describe what the project will do and who it will serve.
- Confirm it benefits a specific group of people (not the general public).

2

Check for HUD “Presumed Benefit Groups”

If 100% of your activity serves any one of these groups, then your activity qualifies as LMC. Do not have to complete Step 3 or 4.

3

Define the Service Population

- Identify exactly who is receiving the service, not just a general public area.
- Service population should be limited and specific (e.g. registered members, eligible residents, or participants)

4

Review and Verify Income Limits

- Use HUD’s published income limits for your county: <https://www.hudexchange.info/resource/5334/cdbg-income-limits/> (Effective: June 1, 2025)
- Determine if at least 51% of beneficiaries are at or below HUD’s LMI threshold:

LMC – Determining Eligibility

- Unlike Area Benefit (LMA), LMC qualification is based on direct beneficiaries, not census data.
- LMC applies to services or facilities limited to specific persons/groups.
- Cannot be used for housing (must qualify under LMI Housing) or job activities (typically LMJ).

LMC – Examples of Activities Using This Criteria

- Rehabilitation of single family housing for LMI residents
- Rehabilitation of a training center for the severely disabled
- Public facilities used predominantly by LMI clientele (e.g., homeless shelters, senior centers, childcare facilities for LMI families)
- Converting a commercial building to residential to be occupied by LMI households



LMC – Two Approaches to Documenting Eligibility

Approach 1: Presumed Benefit Groups

HUD identifies certain groups as presumed to be LMI. If your project exclusively serves one of these groups, no income forms are needed. Examples: abused children, homeless persons, severely disabled adults, battered spouses, elderly, illiterate adults, migrant farmworkers.

Documentation: Description of the service and confirmation that 100% of beneficiaries are from a presumed benefit group.

Approach 2: Direct Income Verification

Used when your activity serves a broader clientele. Must document that at least 51% of participants are at or below HUD's LMI limits.

Documentation: Intake forms (income + family size). Supporting documents (pay stubs, tax returns, or self-certifications). Aggregated data showing the 51% threshold is met.

LMI – Housing Benefit (LMH)

- LMH applies to activities that improve permanent housing for low- and moderate-income (LMI) households.
- Must ensure that housing is occupied by LMI households upon completion.
- Covers both owner-occupied and rental housing units.



LMH – Determining Project Eligibility

- For ****owner-occupied units****: The occupant's household income must be $\leq 80\%$ of Area Median Income (AMI).
- For ****rental housing****: At least 51% of the units must be occupied by LMI households or designated for such occupancy.
- Applies to activities such as acquisition, construction, or rehabilitation of housing units.
- Must be permanent residential structures (not temporary shelters or dormitories).

LMH – Determining Project Eligibility (Cont'd)

Defining Beneficiaries for the Project

1

Identify Activity

- Confirm the activity **involves permanent housing units** (construction, rehabilitation, acquisition, or conversion).
- Examples: Single-family rehab, rental housing development, replacement housing after a disaster.

2

Confirm Housing Occupancy

Determine who will occupy the assisted housing units when the project is complete:

- Owner-occupied: Homeowner must meet HUD LMI income limits.
- Rental housing: At least 51% of the units must be occupied by LMI households.

3

Review and Verify Income Data

- Use HUD's published income limits for your county: <https://www.hudexchange.info/resource/5334/cdbg-income-limits/> (Effective: June 1, 2025)

LMH – Examples of Activities that Use This Documentation Method

- Demolition and rebuilding of homes substantially damaged by the disaster
- Acquisition and new construction of affordable rental housing for LMI tenants.
- Accessibility modifications for disabled residents
- Repairing storm-damaged roofs, siding, HVAC, electrical, and plumbing for housing units occupied by LMI households



Exercise 4 – Determining LMH Eligibility

When applying for CDBG-DR funding for a 30-unit multifamily rental project, the applicant must demonstrate in the application that at least 51% of the units will be occupied by LMI households at project completion.

They can satisfy this requirement by providing:

- A proposed marketing and tenant selection plan targeting LMI households
- A written commitment to monitor and report LMI occupancy for the affordability period

Is this True or False?

Exercise 4 Answer

Correct Answer: True

Why:

The application must show a clear plan for meeting the 51% requirement, even though the actual LMI occupancy will be confirmed at project completion and monitored thereafter.

LMI – Job Creation/Retention (LMJ)

- Purpose: Benefits are provided through the creation or retention of permanent jobs.
- Requirement: At least 51% of the jobs created or retained must be held by low- or moderate-income (LMI) persons.
- Focus: Direct, measurable job impact.
- Reference: 24 CFR 570.208(a)(4)



LMJ – Key Eligibility Questions

- Job Creation or Retention?
 - Creation: New positions added as a result of the project.
 - Retention: Existing positions saved that would otherwise be lost.
- Permanent Jobs?
 - Positions must be full-time equivalent (FTE), year-round, not seasonal or temporary.
- LMI Status of Jobholders?
 - 51% of jobs must be held by LMI individuals or made available to them.

LMJ – Determining Eligibility

Defining Beneficiaries for the Project

1

Define the job impact

- Identify the number of jobs to be created or retained.
- Document how the project leads directly to these jobs.

2

Assess LMI Percentage

- Collect income data from current employees (for retention) or anticipated hires (for creation).
- Compare against HUD income limits for the service area.

3

Identify Made Available to LMI Jobs

A job can count without being filled by an LMI person if it requires no special skills beyond reasonable training **and** is advertised in ways accessible to LMI individuals. The position can still count as LMJ if it was open, reachable, and realistically attainable by LMI persons from the beginning.

LMJ – Common Pitfalls

- Counting part-time/seasonal jobs without converting to FTE.
- Using outdated HUD income limits.
- Weak or missing documentation connecting project funds to jobs.
- Not keeping required records for HUD monitoring.



LMJ – Examples of Activities

Activity Type	Description	LMJ Tie-In
Site preparation for industrial parks	Grading, utilities, road access to support a manufacturing or logistics tenant	Jobs created must be tracked; developer/business must commit to hiring ≥51% LMI
Redevelopment of vacant downtown buildings	Structural rehabilitation or façade improvements for small business tenants	Track jobs created by incoming businesses; aggregate across multiple units if needed
Reconstruction of flood-impacted commercial corridors	Rebuilding storm-damaged water/sewer lines, sidewalks, or public lots	Businesses reopening or expanding must document LMI hires or retention
Expansion of water/sewer to a business park	Infrastructure improvements to attract/retain employers in LMI-eligible zones	Must show that CDBG-funded improvements lead to job creation/retention
Road improvements to access employer sites	Upgrades to roads and intersections serving industrial or commercial users	Qualifies if jobs can be tied to businesses served by the improvements

LMJ – Recordkeeping Requirements

- Written agreement with the business stating number and type of jobs.
- Documentation for each job: FTE status, income, hiring process.
- For “available to” claims: applicant list, interview records, training commitments.
- Use HUD-compliant income verification methods (e.g., certifications, referrals).
- List of hired/retained employees

Exercise 5 – Determining LMJ Eligibility

A local government is applying for CDBG-DR funds to help a manufacturer expand operations, creating 12 new full-time jobs.

To meet LMJ requirements, the application must show that (select from below):

- A. All 12 jobs will be filled before construction begins.
- B. At least 51% of the jobs will be held by or made available to LMI persons.
- C. All jobs must be filled by residents of the county where the business is located.
- D. Job postings will only be shared with existing employees.

Exercise 5 Answer

Correct Answer: B

Why:

The applicant must demonstrate in the application that at least 51% of the created (or retained) jobs will benefit LMI persons, either by direct hire or by making the positions available to them.

Slum/Blight National Objective

Two Qualifying Approaches

Addresses deteriorated areas or structures that meet local/state definitions of slum/blight.



Area Basis

Project must link to Tropical Storm Helene



Spot Basis

Project must be located within a HUD or State-identified Most Impacted and Distressed Area (MID)

*Aside from SBA and SBS, Slum/Blight has another category which is Urban Renewal. This category is rarely used and is meant for completing redevelopment in areas where an Urban Renewal Plan or Neighborhood Development Program was officially Approved, funded, and still legally in effect.



Determining if Area or Spot

Area must be officially designated and meet state/local definition of slum/blight

- Use Area Basis when:
 - The locality has (or will make) an official local designation of a slum/blight area.
 - The project addresses one or more conditions that caused area deterioration (e.g., substandard buildings, failing public improvements).
- Use Spot Basis when:
 - A single property/site has documented health/safety blight (e.g., collapsing structure, severe code violations, hazardous conditions).
 - The activity will eliminate that condition (clearance, hazard removal, limited rehab to remove the threat, historic preservation).

Slum/Blight Area Basis Eligibility Determination

- Draw the boundaries of the proposed slum/blight area (map).
- Confirm local legal authority for designation (state/local definition of slum/blight).
- Document qualifying conditions (meet at least one “safe harbor” test):
 - A substantial number of buildings are deteriorated/deteriorating (\geq the % in state law, or if none, $\geq 25\%$), OR
 - Public improvements throughout the area are in general deterioration (multiple systems, not just one).
- Tie the project to correcting a cause of decline (not just cosmetic).
- If residential rehab is funded, each building must meet local “substandard” definition, and all deficiencies making it substandard must be corrected.

Slum/Blight for Area Basis Documentation

Documentation:

- Local slum/blight designation (resolution or ordinance) + citation to local/state definition.
- Boundary map with streets/blocks labeled; date of designation.
- Condition inventory at designation (e.g., % substandard, code findings, photos; or system-wide deterioration for public improvements).
- Project tie-back to the deterioration cause (how this activity addresses a qualifying condition).
- If residential rehab:
 - Local “substandard” definition; pre-rehab inspection; scope showing all substandard deficiencies corrected first.

Slum/Blight Spot Basis Eligibility Determination

- Define the site (parcel/address) and the specific hazardous/blighting condition.
- Select an eligible action limited to acquisition, clearance, relocation, historic preservation, or rehab only to remove the hazard.
- Show the threat is to public health/safety (not just inconvenient or cosmetic).
- Scope the work narrowly to eliminate the specific condition (no broader upgrades under spot basis).
- Note: Public improvements generally don't qualify under spot basis (except rehab of public buildings/historic preservation).

Slum/Blight for Spot Basis Documentation

Documentation:

- Address/parcel and photos/inspection reports showing the specific hazardous/blighting condition.
- Code citations or health/safety documentation (e.g., unsafe structure, failing roof causing collapse risk, faulty wiring hazards).
- Proposed scope limited to eliminating the hazard (demo, clearance, hazard abatement, or historic preservation scope).
- Post-clearance use statement (note §570.505 change-of-use rules if site will be reused later).

Slum/Blight Area or Spot Basis Examples



- Area Basis (SBA):
 - Acquisition & clearance of clusters of unsafe structures in a designated corridor.
 - Façade + life-safety system upgrades in a designated downtown blight area.
 - Park/playground or alley/street infrastructure improvements where public improvements are broadly deteriorated.
- Spot Basis (SBS):
 - Demolition of a vacant, structurally unsound house threatening collapse.
 - Removal of hazardous materials (e.g., friable asbestos) in one building to make it safe.
 - Historic preservation of a blighted public building.

Slum/Blight – Tips and References

- Consider using LMI objectives when appropriate (e.g., LMH).
- Housing rehab for LMI households often better qualified under LMH.
- Slum/blight documentation must be activity-specific and timely.
- Public improvements generally not eligible under spot basis unless part of historic preservation.

References:

- 24 CFR § 570.208(b)
- National Objectives Guide: <https://www.hudexchange.info/resource/19/basicly-cdbg-chapter-3-national-objectives/>

Urgent Need

- Purpose: Address an existing condition that poses a serious and immediate threat to the health or welfare of the community.
- When Used: Only when the need is recent and other funding sources are unavailable.
- Reg citation: 24 CFR 570.208(c).



Urgent Need – Key Criteria (All Must Be Met)

To qualify, the activity must meet all of the following:

- **Serious and Immediate Threat:** Hazard directly impacts health or welfare (e.g., public safety, sanitation, structural collapse risk, disease spread).
- **Recent Origin:** Developed or became critical within the last 18 months prior to the grantee's certification.
- **No Local Funding Available:** Local government cannot finance the activity on its own.
- **No Other Resources Available:** No state, federal, insurance, or private funding sources to fully address the need.

Urgent Need – Determining Eligibility

1

Define the Threat

- Identify the specific condition (e.g., contaminated drinking water, landslide risk, unsafe building).
- Gather evidence: inspection reports, photos, etc.

2

Establish Timing

- Document the date the condition developed or became critical.
- Show this is within 18 months of your certification.

3

Prove Seriousness

- Provide expert statements (engineers, public health, fire marshal) confirming the threat to health/welfare.

4

Confirm Funding Gap

- Show that local funds are insufficient.
- Document denials or ineligibility from other funding sources (FEMA, USDA, state programs, insurance).

Urgent Need – Examples of Activities

Example Activities:

- Emergency repair of a drinking water line serving a rural community after landslide damage, with no FEMA coverage.
- Stabilization of a hillside threatening to collapse onto homes after heavy rains, where insurance does not apply.
- Replacement of a failing sewer lift station that poses an imminent health hazard due to raw sewage discharge, with no local funds to act.
- Emergency removal of a structurally unsound public building at risk of collapse onto a roadway.

Urgent Need – Common Pitfalls to Avoid

- Trying to use Urgent Need for long-standing issues (origin > 18 months ago).
- Failing to document that other funding sources were explored and unavailable.
- Not providing clear evidence of the immediate threat.
- Using Urgent Need when LMA or LMH would be easier to prove and help meet the 70% LMI requirement.

Recap – Project Types Aligned with National Objectives

Project Type	LMI – Area Benefit (LMA)	LMI – Limited Clientele (LMC)	LMI – Housing (LMH)	LMI – Jobs (LMJ) / Slum & Blight / Urgent Need
Multifamily Rental Housing	-	-	LMH: ≥51% of units must be LMI-occupied	Urgent Need if disaster-driven threat to safety
Workforce Housing for Owners	-	-	LMH: owner must meet income limits	
Community Infrastructure (e.g., water, sewer, roads)	LMA: serves primarily residential area ≥51% LMI	-	LMH: if the infrastructure is directly tied to serving a specific housing development (not the general public)	-Slum/Blight: if area designated -Urgent Need: if critical infrastructure failure; or -LMJ: job creation/retention
Economic Revitalization (site prep, commercial rehab)	LMA: if the benefit is clearly tied to serving residents in an area where ≥51% are LMI and the project is not solely for private business benefit.	-	-	-LMJ: Job creation/retention -Slum/Blight: Area or Spot -Urgent Need: Post-disaster economic recovery

Part 1
Evaluation/
Break

Part I: Tie-Back and National
Objectives Evaluation





Introduction to the Environmental Review Process for CDBG-DR Projects

100-Year
Floodplain

Floodway

Purpose of Environmental Review

Why It Matters

- Ensure projects comply with federal, state, and local environmental laws.
- Identify and avoid or minimize harm to people, property, and the environment.
- Promote informed decision-making before funds are committed.
- Required by law under 24 CFR Part 58 for all projects considered for CDBG-DR funds.

Levels of Environmental Review

Level	Description	Typical CDBG-DR Examples
Exempt	No significant impact; still document	Planning, admin, predevelopment studies
Categorically Excluded – Not Subject to (CENST)	No laws triggered; minimal impact	General inspections, training, temporary shelters (no rehab)
Categorically Excluded – Subject To (CEST)	May trigger laws requiring consultation	Rehabilitation of facilities, small infrastructure
Environmental Assessment (EA)	Moderate complexity; Finding of No Significant Impact (FONSI) needed	New construction, major rehab, infrastructure in sensitive areas
Environmental Impact Statement (EIS)	Major impact; rarely used in CDBG-DR	Large-scale developments affecting environment significantly

When an Environmental Review is Triggered

- The Environmental Review (ER) is triggered once a project has a federal nexus.
- For the State of North Carolina (NC Department of Commerce / Division of Community Revitalization) CDBG-DR application, the environmental review requirements are triggered at the time of application submission.
- As soon as a local government submits an application to the State for CDBG-DR funding, the project becomes subject to HUD's Environmental Review requirements under **24 CFR Part 58**.
- No “choice-limiting” activities can start until ER clearance is completed.

Choice-Limiting Actions

- **Definition of a Choice-Limiting Action:** Any action that commits HUD funds or changes the physical or landscape of a project.
- **Examples:**
 - Signing construction contracts.
 - Beginning demolition or site grading.
 - Acquiring property.
 - Rehabilitation or construction.
 - Infrastructure development.
 - Encumbering land in a way that assumes project approval.

Main Point: If any choice-limiting action takes place prior to receiving environmental review clearance, the entire project may become ineligible for CDBG-DR funding.

Examples of Fund Commitments Allowed or Not Allowed Before ER Clearance

Allowed Before ER Clearance	NOT Allowed Before ER Clearance
Option agreement (nominal value, contingent)	Purchase of property (closing)
Feasibility study	Demolition or site prep
Preliminary design	Signing construction contract
Phase I environmental site assessment	Ordering materials or equipment

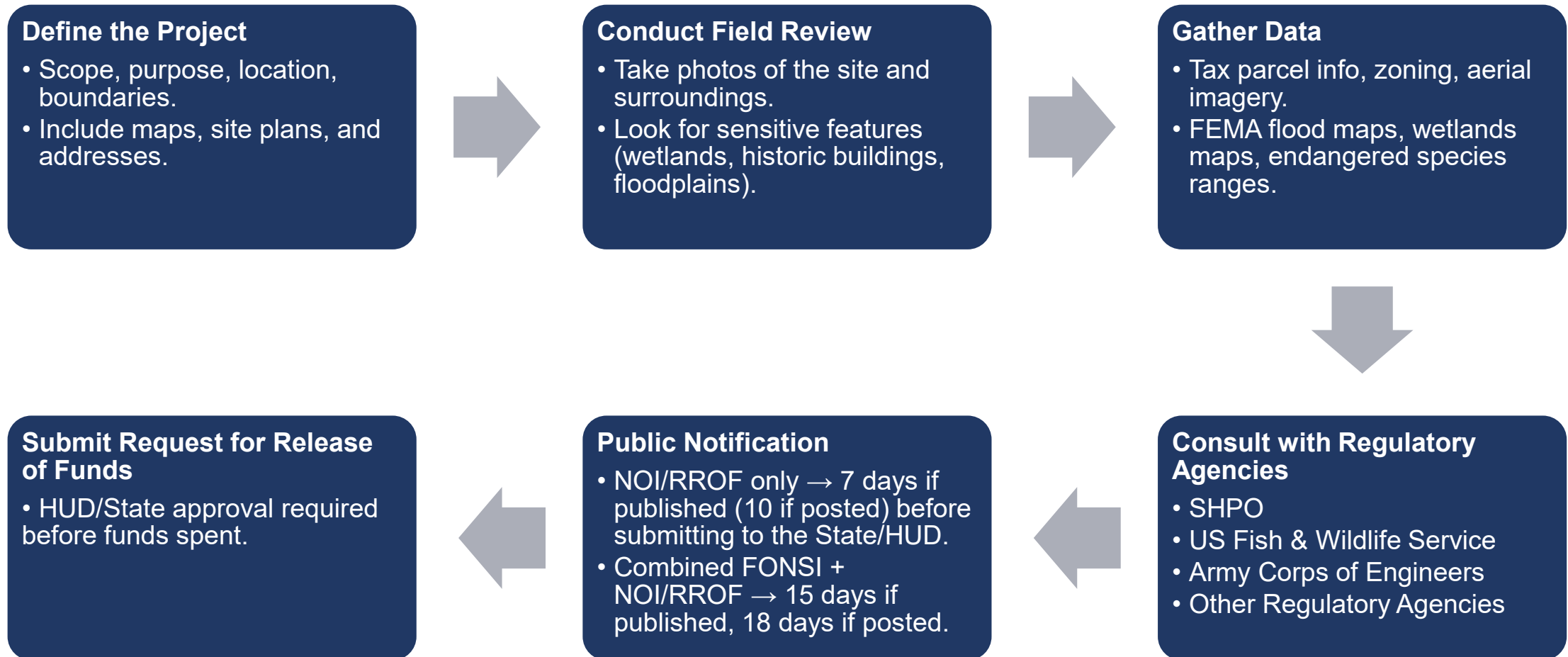
Responsible Entity's Role

Responsible Entity (RE): Agency responsible for ensuring compliance with HUD's environmental review regulations.

- Conduct environmental reviews
- Make findings and determinations
- Request release of funds from HUD
- Ensure no choice-limiting actions occur prior to clearance.

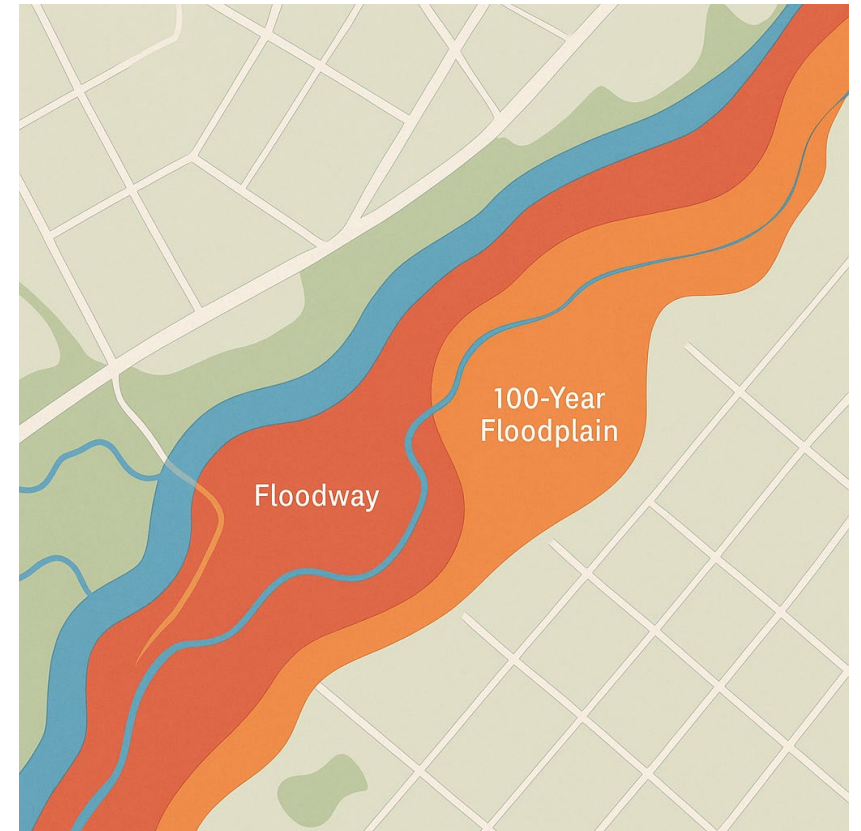
Preparing the Environmental Review Record (ERR)

Typical Steps (RE or in coordination with RE)



Common Triggers in Projects

- Floodplains & wetlands.
- Historic buildings.
- Endangered species habitats.
- Hazardous materials on site.
- Noise from major roads or rail.



Formal Adoption of FEMA Environmental Reviews

HUD's Universal Notice (section III.B.10.c.) allows adoption of a FEMA environmental review when:

- The scope is substantially the same.
- A copy of FEMA's review is obtained.
- A memo confirms scope alignment. HUD or State is notified on the RROF form with FEMA details.
- Adoption satisfies HUD environmental review obligations without additional review, unless the CDBG-DR scope changes.

If Work Started Before the Federal Nexus

Reference

HUD CLA Fact Sheet (24 CFR 58.22)

Federal Nexus & CLA Guidance

FEMA Review Adoption Guidance

Snapshot

Defines prohibited pre-clearance actions (e.g., building, land purchase, demolition) and outlines consequences of violations. ([HUD](#))

Work after the Nexus must stop; no new physical commitments are allowed until environmental clearance is obtained. ([HUD](#), [HUD Exchange](#))

Any post-nexus work must be reviewed; Post-nexus work prior to environmental review can make an entire project ineligible. ([HUD](#))

FEMA reviews may be adopted when scope aligns, but adoption does not retroactively legalize work started before clearance. ([FEMA](#))

When In Doubt

Include environmental review discussions early in project planning, especially when using multiple funding sources.

Engage the State (NCDOC/DCR) or TA partners (e.g. NCACC, COGs, NCLM, UNC-SOG) before committing to contracts or construction.

Exercise 6 - Obtaining Site Control

The Town of Riverbend submitted its CDBG-DR application two months ago. The plan is to use CDBG-DR funds to purchase privately owned land and develop a multifamily housing complex on the site. Currently, the Town is waiting for the State to approve the application. The environmental review (ER) has not yet been cleared. However, the Town council wants to move forward with obtaining site control.

Can the Town move forward with site control now?

- A. Yes, by purchasing the land immediately
- B. Yes, if the purchase contract is signed with a contingency clause for ER and funding approval
- C. Yes, but only through an option-to-purchase agreement clearly contingent on ER clearance and State approval
- D. No, the Town must wait until the ER is fully complete before any action

Exercise 6 Answer – Obtaining Site Control

Correct Answer: C – An option-to-purchase agreement is allowable under 24 CFR 58.22 if properly conditioned.

Why:

HUD Regulations (24 CFR 58.22) Federal rules say that local governments cannot take any choice-limiting action (like acquiring, rehabilitating, demolishing, or constructing property) before the environmental review (ER) is complete and the Authority to Use Grant Funds (AUGF) is issued. However, HUD allows an option-to-purchase agreement if it is expressly contingent on receiving environmental clearance and funding approval. This means the Town can secure a form of site control without committing federal funds or predetermining the outcome of the ER.

Why Purchasing Now is a Problem: If the Town outright purchases the land before ER clearance, that counts as a choice-limiting action. HUD's rule is strict: even if local funds are used, the act of purchase could make the entire project ineligible for CDBG-DR because it prejudices the outcome of the environmental review.

Exercise 7 – Using FEMA Review for CDBG-DR

The City of Riverbend began repairing its damaged water treatment plant using FEMA Public Assistance (PA) funds immediately after the disaster. A FEMA environmental review and FONSI (Finding of No Significant Impact) were completed as part of that process. The City now needs additional CDBG-DR funds to finish the project. However, they also started site clearing before submitting their CDBG-DR application. They ask, "Can we use the FEMA environmental review so we don't have to start over? And what about the clearing, can we keep going?"

Which of the following is correct, given HUD's guidance?

- A. Yes: If the FEMA review covers the same scope, the State RE can adopt it for CDBG-DR, even if site clearing has already begun.
- B. Yes: The City can continue site clearing, since environmental review is already done by FEMA.
- C. No: To use the FEMA review, the Scope must match, and the State RE must formally adopt it; clearing before CDBG-DR clearance is a choice-limiting action and makes the project ineligible.
- D. No: FEMA environmental reviews are never accepted for CDBG-DR projects under any circumstance

Exercise 7 Answer – Using FEMA Review

Correct Answer: C: No - To use the FEMA review, the Scope must match, and the State RE must adopt it; clearing before CDBG-DR clearance is a choice-limiting action and makes the project ineligible.

Why:

HUD allows adopting FEMA environmental reviews in many situations, provided:

- The scope of CDBG-DR work is identical to or fully covered by the FEMA review.
- The Responsible Entity (RE), here, the State or an authorized local government, formally reviews and adopts the FEMA review.

However, starting physical work before completing the CDBG-DR Environmental Review Record, even if a FEMA review exists, is a choice-limiting action, which violates 24 CFR 58.22 and may render the project ineligible.

NOTE: Do not begin work (like clearing or purchase) until the State RE completes its environmental review and issues RROF. If FEMA conducted the initial review:

- Let the State examine the documents and adopt FEMA's review.
- Confirm that the scope matches (same location, same improvements, same footprint).
- Any additional CDBG-DR-related activity not covered by FEMA's scope will require its own supplementation or entirely new review.

The background features a light gray illustration. At the top, two hands are shown counting a stack of banknotes. Below this, there is a large, rounded rectangular container or jar. Inside the jar, there are more stacks of banknotes. A white label with the word "FUNDS" in bold, capital letters is attached to the front of the jar. The entire scene is set against a light gray background with subtle curved lines.

Understanding Duplication of Benefits

Duplication of Benefits Overview

- Definition: Receiving financial assistance from multiple sources for the same purpose and same cost of a project.
- Authority: Stafford Act, Section 312; HUD Guidance (e.g., Federal Register Notices for CDBG-DR allocations).
- Key Principle: Federal disaster recovery funds (like CDBG-DR) cannot pay for costs already covered by another source.
- Why It Matters: Avoids overcompensation and ensures funding is used to address unmet needs.

Common Sources Checked for DOB

The State will verify funding from:

- FEMA Public Assistance (PA) or Individual Assistance (IA)
- SBA Disaster Loans
- NFIP or Private Insurance Proceeds
- Other Federal/State disaster grants
- Charitable/Nonprofit assistance
- Other local or private sources related to the same damage



How Duplication of Benefits is Reviewed by the State

The State will:

- Identify total project cost.
- Collect documentation from applicant (local government) showing:
 - FEMA/SBA award letters
 - Insurance claim statements
 - Receipts from other recovery funds
- Determine total assistance received for the same scope of work.
- Subtract eligible non-duplicative costs (e.g., funds used for different purposes).
- Identify any unmet need – CDBG-DR funds can cover this gap.

Example of DOB Calculation

Description	Amount
Total Project Cost	- \$500,000
FEMA PA Award	\$200,000
Insurance Payout	\$100,000
Total Other Assistance	\$300,000
Unmet Need (Eligible for CDBG-DR)	- \$200,000

What Applicants Need to Do

Even though the State will do the formal DOB analysis, you should:

- Keep copies of all funding award letters and insurance claim documentation.
- Track how funds from other sources are spent.
- Clearly document project scope to avoid confusion with other funding.
- Be prepared to explain why other assistance did not cover full costs.

Common Pitfalls

- Not reporting insurance proceeds because the payout was small.
- Using FEMA funds for a purpose outside original scope, then requesting CDBG-DR for the same expense.
- Misunderstanding that **in-kind donations** can be considered assistance in some cases.

Key Takeaways

- DOB is about avoiding overpayment for the same damage or need.
- The State will look for all other sources of disaster assistance.
- Applicants should maintain thorough records from day one.
- CDBG-DR funds fill gaps after all other sources are accounted for.

Exercise 8 – Understanding DOB

A town applies for CDBG-DR funds to repair a sewer pump station damaged by Hurricane Helene.

- FEMA Public Assistance has already approved \$400,000 for the same repairs.
- The total repair cost is estimated at \$650,000.
- The town has not yet spent the FEMA funds.

Based on the DOB rules, what is the **maximum** CDBG-DR amount the State could approve for this project?

- A. \$650,000 – because CDBG-DR can fund the full project
- B. \$400,000 – same amount FEMA approved
- C. \$250,000 – the unmet need after subtracting FEMA funds
- D. \$0 – CDBG-DR can't be used for infrastructure repairs if FEMA funds are available

Exercise 8 Answer – Understanding DOB

Correct Answer: C: \$250,000 – the unmet need after subtracting FEMA funds

Why:

The State will subtract other sources (FEMA funds) from the total cost to identify unmet need, ensuring no duplication of benefits.

Understanding Administrative, Planning, and Project / Activity Delivery Costs

Why These Costs Matters

- Each funding category has different rules on eligibility and caps.
- Misclassification can lead to ineligible costs or funding claw backs.
- Understanding these differences will help local governments budget correctly and stay compliant.



Planning Costs

Definition: Costs for activities that help a community make informed decisions, set priorities, and develop strategies before a project begins.

- HUD Reference: 24 CFR 570.205
- Examples for CDBG-DR Programs:
 - Workforce Housing for Owners: Housing market study, housing needs assessment.
 - Multifamily Housing (Rental): Feasibility study, site selection analysis.
 - Community Infrastructure: Preliminary engineering reports, infrastructure master plan updates.
 - Economic Revitalization: Business district market analysis, economic development strategic plan.
- Important: Must lead to activities that meet a national objective.

Administrative Costs

Definition: Costs to manage and oversee the grant itself and not tied directly to delivering a specific project.

- HUD Reference: 24 CFR 570.206
- Examples:
 - Staff salaries for program administration
 - General grant reporting
 - Financial management
 - Compliance monitoring
 - Office supplies, indirect costs
- Note:
 - States often cap admin at up to 5% of the grant award.
 - Local governments may or may not be allocated admin funds so check State guidance.

Project Delivery Costs

Definition: Costs directly tied to implementing a specific CDBG-DR funded project or activity.

HUD Reference: 24 CFR 570.206 & HUD guidance on activity delivery.

Examples for CDBG-DR Programs:

Program	Examples of Project/Activity Delivery Costs
Workforce Housing for Owners	Housing inspections, environmental review costs, title searches.
Multifamily Housing (Rental)	Developer procurement, construction inspections, relocation assistance.
Community Infrastructure	Engineering design, bid package preparation, construction oversight.
Economic Revitalization	Marketing for job recruitment, site remediation tied to funded project.

Key Differences

Category	Purpose	Tied to Specific Project?	Example
Planning	Prepare for future projects & strategies	No, but must lead to eligible activities	Housing needs assessment
Administrative	Manage the grant program	No	Staff time for grant reporting
Activity Delivery	Directly deliver a funded project	Yes	Construction inspections

Common Mistakes

- Charging admin staff time as project delivery.
- Treating preliminary planning for a specific project as admin instead of planning or delivery.
- Failing to link planning studies to an eventual eligible CDBG-DR activity.

Key Takeaways

- Know which bucket your costs fall into.
- Expect limited or no admin funding from the State.
- Keep clear timesheets and cost documentation to show eligibility.
- Planning and delivery costs are often more directly reimbursable than admin costs.

Exercise 9 – Understanding Project/Activity Delivery Costs

A local government is applying for CDBG-DR funds under the Community Infrastructure program to replace a damaged water main. As part of the project budget, they include:

1. Engineering design fees for the water main replacement
2. Time spent by the town's project manager overseeing contractor work
3. Travel expenses for the town manager to attend a disaster recovery conference in another state
4. Environmental review field inspection and mapping costs

Which of the above costs can be classified as **eligible activity/project delivery costs** for the water main project?

- A. Items 1, 2, and 4
- B. Items 1 and 4 only
- C. Items 1, 2, 3, and 4
- D. Item 1 only

Exercise 9 Answer - Understanding Project/Activity Delivery Costs

Correct Answer: A. Items 1, 2, and 4

Why:

Engineering design fees, local staff time directly tied to the project, and environmental review work are allowable activity delivery costs. Travel for unrelated conferences (Item 3) is not.



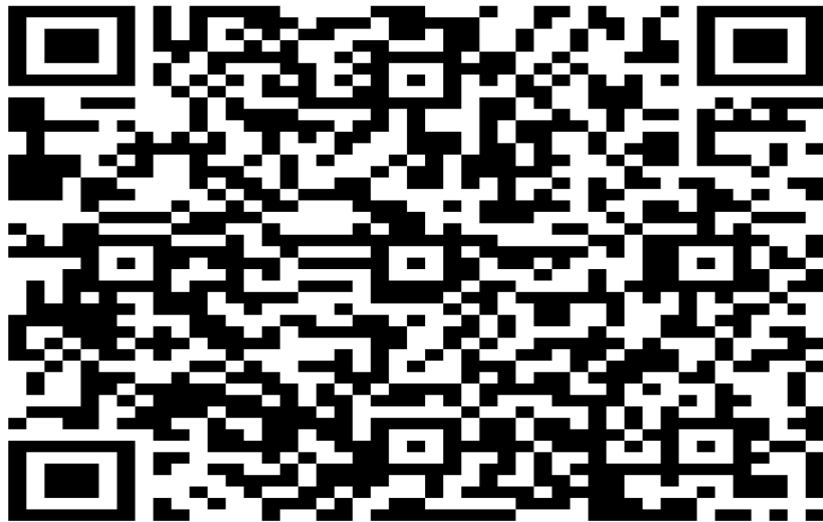
Meet the Supporting Teams

Agencies Providing Technical Assistance or Support

Agency	POC for CDBG-DR TA	Email/Telephone	Agency Website
NCDOC / DCR	Samantha Graham	samantha.graham@commerce.nc.gov 919-814-4600	https://www.commerce.nc.gov/
UNC-SOG	Rebecca Badgett	rbadgett@sog.unc.edu 919-966-8757	
Land of Sky Regional Council	Erica Anderson	erica@landofsky.org 828-251-7442	https://www.landofsky.org/
Western Piedmont Council of Governments	Ben Willis	ben.willis@wpcog.org	https://www.wpcog.org/
Foothills Regional Commission	Amanda Scott	Ascott@frcnc.gov 828-506-2526	https://www.foothillsregion.org/
High Country Council of Governments	Chris Grubb	cgrubb@hccog.org	https://www.regiond.org/
Southwestern COMmission	Becca Scott	Becca@reguiba.org	Regiona.org
North Carolina Association of County Commissioners (NCACC)	Dee Taylor	dee.taylor@ncacc.org 910-797-5564	https://www.ncacc.org/
North Carolina League of Municipalities (NCLM)	Regina Mathis	Rmathis@nclm.org 828-508-8756	https://www.nclm.org/

Part 2 Evaluation

Part II: Environmental Review,
Duplication of Benefits, and
Administrative/ADC





References to Rules, Guides, and Tools

Resources

- HUD Universal Notice 6489-N-01 (2025 update): <https://www.hud.gov/stat/cpd/universal-notice-grantees>
- HUD CDBG-DR Designations & Allocations
<https://www.hudexchange.info/programs/cdbg-dr/cdbg-dr-grantee-contact-information/>
- State of North Carolina's Action Plan (April 2025): <https://www.commercerecovery.nc.gov/2025-04-17hud-action-plan-cdbg-dr-approved/download?attachment=>
- CDBG National Objective Regulatory Source: 24 CFR 570.208
- HUD Guidance: <https://www.hudexchange.info/resource/19/basically-cdbg-chapter-3-national-objectives/>
- Income limits: <https://www.huduser.gov/portal/datasets/il.html>
- Rent limits: <https://www.huduser.gov/portal/datasets/HOME-Rent-limits.html>

Resources

- <https://www.hudexchange.info/resource/19/basicly-cdbg-chapter-3-national-objectives/>
HUD LMI Mapping Tool: <https://hud.maps.arcgis.com>
- Income Survey Toolkit: <https://www.hudexchange.info/programs/cdbg/cdbg-income-survey-toolkit/>
- FEMA disaster declaration: <https://www.fema.gov/disaster/4709>
- FEMA Disaster Details
- <https://www.fema.gov/disaster/4709/designated-areas>
- State executive orders
- <https://governor.nc.gov/news/executive-orders>
- North Carolina Emergency Management Press Releases
<https://www.ncdps.gov/news/press-releases>