

Commonwealth of Virginia Community Development Block Grant Disaster Relief (CDBG-DR)

**CDBG-DR Action Plan for Tropical Storm Helene Disaster Housing
Strategy for DR-4831-VA**



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Overview

The U.S. Department of Housing and Urban Development (HUD) announced that the Commonwealth of Virginia will receive \$46,670,000 in funding to support long-term recovery efforts following Tropical Storm Helene (FEMA-4831-DR-VA) through the Department of Housing and Community Development. Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be used to address remaining unmet need in Virginia.

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 facilitate a quicker recovery. HUD has allocated \$46,670,000 in CDBG-DR funds to the Commonwealth of Virginia in response to following, through the publication of the Federal Register Docket No. FR-6512-N-01. This allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2025 - Pub L. 118 - 158.

Disaster-Specific Overview

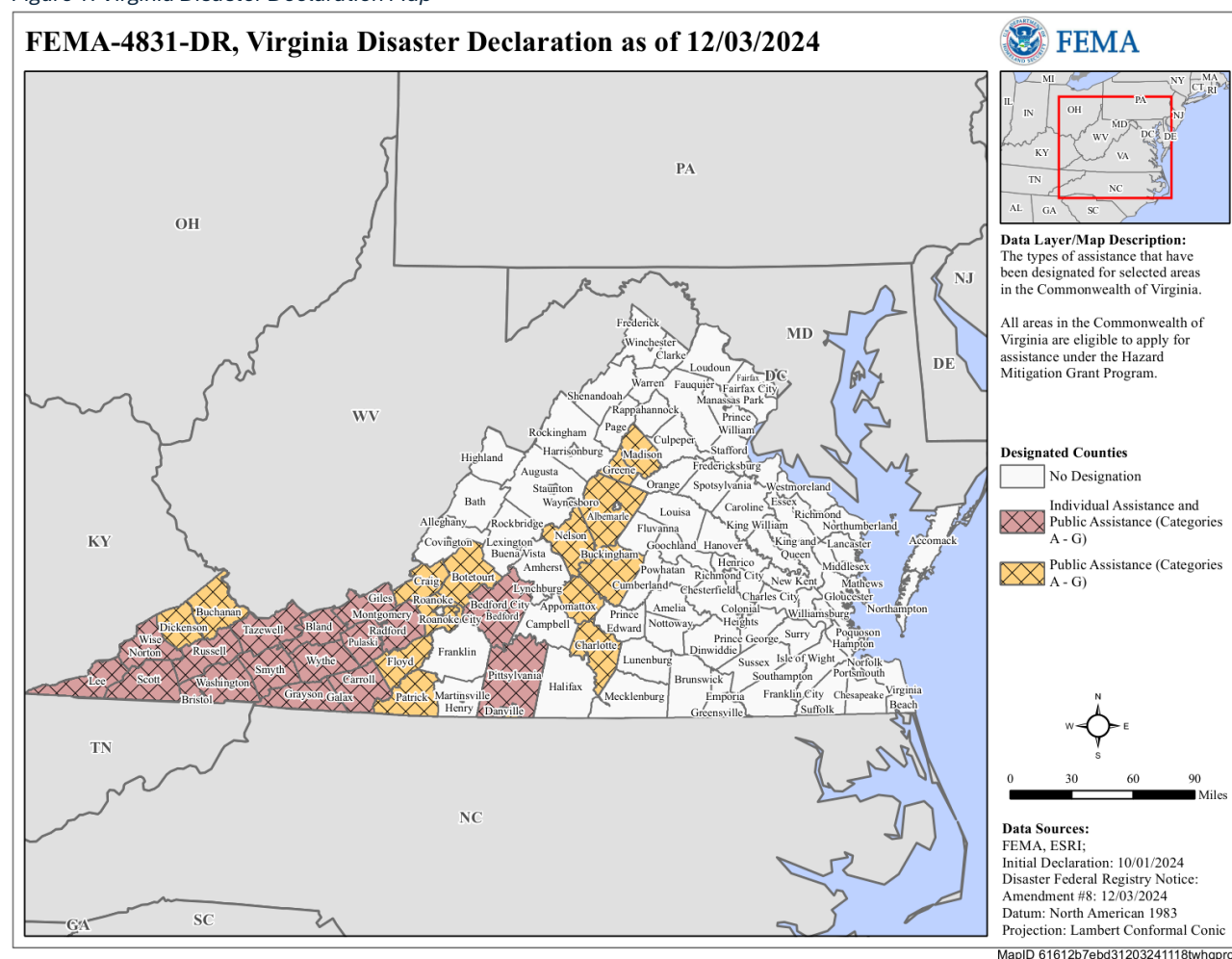
On September 27, 2024, Tropical Storm Helene hit Virginia, causing historic rainfall, floods, strong winds, and tornadoes in the Southwest region. This storm significantly damaged roads and bridges, isolating communities and hindering response and recovery efforts. With preliminary FEMA damage estimates exceeding \$340 million, the region faced severe economic impacts, including debris removal and damage to water systems, lakes, rivers, homes, and public infrastructure.

Governor Glenn Youngkin requested an expedited Major Disaster Declaration from the federal government on September 30, 2024, for southwest cities and counties to receive FEMA Public and Individual Assistance. On October 1, 2024, the President declared Virginia a major disaster area under the Stafford Act (P.L. 93-288).

This declaration made Individual Assistance requested by the Governor available to affected individuals and households in Giles, Grayson, Smyth, Tazewell, Washington, and Wythe Counties and the independent city of Galax. This declaration also made available debris removal and emergency protective measures (Categories A and B), including direct federal assistance, under the Public Assistance program for Bedford, Bland, Buchanan, Carroll, Craig, Dickenson, Giles, Grayson, Montgomery, Pittsylvania, Pulaski, Russell, Scott, Smyth, Tazewell, Washington, Wise, and Wythe Counties and the independent cities of Bristol, Covington, Danville, Galax, Norton, and Radford. Finally, this declaration made Hazard Mitigation Grant Program assistance requested by the Governor available for hazard mitigation measures for the entire Commonwealth.

The Virginia Department of Housing and Community Development (DHCD) will oversee the administration of the CDBG-DR funds. These funds will support disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas. Additionally, some mitigation activities may be funded to help communities build resilience against future storms.

Figure 1: Virginia Disaster Declaration Map



Most Impacted and Distressed Areas

HUD-identified Tropical Storm Helene MID Areas

Tropical Storm Helene caused significant damage in Giles and Washington Counties in Virginia. The hurricane brought heavy rain and strong winds, leading to widespread flood and structural damage. Many homes, businesses and farm structures were damaged or destroyed. Roads and bridges were also affected, with some collapsing or becoming impassable. According to early FEMA reports, there were also significant agricultural impacts in the region with farmers faced with substantial losses. It was estimated that over \$126 million in agricultural damages were reported across several counties including Giles and Washington. Crops, fences, and farm infrastructure were severely impacted.

According to the FEMA Individual Assistance applications there were 30 owner housing units with major damage or destroyed and less than 20 renter housing units with major damage or destroyed in Giles County. This data shows 30 owner housing units with major damage or destroyed and less than 20 renter housing units with major damage or destroyed within Washington County. There are

over 300 habitability repairs to housing units needed within the localities, which CDBG-DR funding could potentially assist.

Within Giles County, areas hardest hit by flooding from Helene were along the New River where housing was built on some of the flattest terrain in the County. This housing included single family units and manufactured housing units as well as some commercial properties associated with recreational businesses associated with the river. Debris from communities along the New River, including from North Carolina, was found in front yards and along the banks of the New River in Giles County. This debris contained hazardous liquids and materials and has been a priority to clean up for the Virginia Department of Emergency Management. The County had found rental housing for the 33 families impacted by the flooding, but housing repairs and reconstruction will be needed.

The Southeastern corner of Washington County was most drastically impacted by flooding as rain fell on this mountainous areas and flooded mountain tributaries, which impacted residential, commercial and recreation areas. Impacted housing in Washington County included single family, multi-family, and manufactured housing units as well as many businesses, some of which were located in the Town of Damascus. Flooding impacted almost every business along the small Main Street and eliminated tourism activities for the fall, which the Town's economy relied upon fully. Taylor Hollow community was completely cut off due to road obstructions and high water. Housing options within this area of Washington County are already limited and the impacts of Helene further exacerbated the housing shortage.

The communities are working hard to recover from the devastation and there has been significant outpouring of support from various organizations.

Washington County, Virginia, indicated in red in Figure 2 (right), includes the following cities and towns:

- Abingdon
- Bristol
- Damascus
- Glade Spring
- Saltville

Figure 2: Washington County



Figure 3: Giles County



Giles County, Virginia, indicated in red in Figure 3 (left), includes the following cities and towns:

- Pearisburg
- Rich Creek
- Narrows
- Glen Lyn
- Pembroke

Grantee-identified MID Areas

As outlined in the Federal Register Notice, 80% of all CDBG-DR funds will benefit HUD-identified MID areas under zip codes 24124 and 24236 which DHCD will expand to the entirety of Giles and Washington Counties. DHCD has not identified any additional MID Areas beyond those identified by HUD. The remaining 20% of CDBG-DR funds will be allocated to activities in other disaster-impacted areas. Other disaster-impacted areas will be eligible for assistance through CDBG housing and infrastructure funding as well as CDBG Urgent Need Grants. Please see the CDBG Program Design Manual for additional details.

Overview of the Impacts of the Qualifying Disaster

This event mirrored many worst-case flood scenarios, with multiple days of torrential rainfall interacting with the steep and complex terrain, resulting in widespread damage and record-high river crests along the New River. Severe-to-catastrophic flooding occurred in Southwest Virginia, particularly in Washington, Smyth, Tazewell, and Grayson counties, with up to 10-11 inches of rain over four days 500-1000-year rainfall event.

The worst flooding occurred in the Town of Damascus and Taylors Valley community (Washington County), where Laurel Creek's sudden and violent rush of high water caused extensive damage to homes, businesses, and infrastructure. The National Weather Service issued Flash Flood Emergencies with Catastrophic Tags for Smyth, Grayson, and Washington counties, indicating life-threatening flash flooding.

Critical infrastructure, such as roads, bridges, energy, communications, and water systems, was compromised, with VDOT reporting damage to 735 roadways, 89 structures, 26 bridges, and 63 culverts. The storm resulted in multiple injuries and unfortunately claimed one life.

The following photographs were obtained from the Virginia Department of Emergency Management (VDEM) and aim to provide a small glimpse of the damage done to Washington and Giles counties.

Figure 4: Overview of Flooding in the Town of Damascus



Figure 5: Destroyed Bridge in the City of Bristol



Figure 6: Flood Damage to Single Family Home and Road in Washington County



Figure 7: Creeper Trail Destruction in the Town of Damascus



Table 1: Disaster Overview

Disaster Summary	
Qualifying Disaster:	Tropical Storm Helene (FEMA-4831-DR-VA)
HUD-identified MID Areas:	Giles County (ZIP code 24124) & Washington County (ZIP code 24236)
Grantee-Identified MID Areas	n/a

Table 2: CDBG-DR Allocation Overview

CDBG-DR Allocation Overview:	
CDBG-DR Allocation:	\$ 40,583,000
CDBG-DR Mitigation Set Aside:	\$ 6,087,000
Total Allocation:	\$ 46,670,000

Unmet Needs, Mitigation Needs, and Fair Housing and Civil Rights Assessments Summary

Table 3: Unmet Needs and Proposed Allocations

Eligible Cost Category	Allocation Amount	% of CDBG-DR Allocation	% to LMI	% to HUD identified MID Areas
Administration	\$2,029,150	5%		
Planning	\$6,087,450	15%		
Housing	\$15,015,710	37%	100%	80%
Infrastructure	\$12,174,900	30%	70%	80%
Economic Revitalization	\$4,058,300	10%	70%	80%
Public Services	\$1,217,490	3%	100%	80%
Total CDBG-DR	\$40,583,000	100%	85%	80%
CDBG-DR Mitigation Set-Aside	\$6,087,000	15%	85%	80%
Total CDBG-DR funding	\$46,670,000	N/A	85%	80%

Unmet Needs Assessment

Housing

Rental and Owner-Occupied Single Family and Multifamily Housing

Housing in Giles and Washington counties had a number of deficiencies prior to the disaster occurrence which may have contributed to the extent of damage to rental and homeownership units.

The housing supply is generally older in the MID areas than in the rest of the Commonwealth. In Giles and Washington counties, the median build year for owner-occupied units is 1965 and 1978, respectively, while the statewide figure is 1978. Similarly, the median build year for rental units is 1955 in Giles County and 1971 in Washington County, compared to 1971 statewide. Given that the age of housing units is correlated with a variety of hazards and risks, these data suggest the presence of a pre-existing need for housing quality improvements in the MID areas.

This conclusion is further supported by the prevalence of housing units with a “poor” quality assessment in these counties. Statewide, 1.11 percent of owner-occupied units are deemed poor quality, while 3.19 percent of Giles County homeowners and 7.66 percent of Washington County homeowners reside in poor quality units. Among rental housing, 3.64 percent of units in Virginia have received a “poor” quality assessment; in Giles and Washington counties, this estimate is 8.43 percent and 17.27 percent, respectively.

Deficiencies in the housing stock within the MID area likely contribute to the above-average vacancy rates in these localities. While the overall vacancy rate in the Commonwealth is approximately 10 percent, 17.5 percent of all units in Giles County and 13.7 percent of Washington County units are vacant.

Lastly, a large share of the population within the MID areas resides in mobile or manufactured housing. In Giles and Washington counties, mobile homes comprise 13.6 percent and 10.6 percent of all housing units, respectively. These data indicate a higher concentration of mobile homes in the affected counties than in the Commonwealth as a whole, where just 5.8 percent of all housing units are mobile homes.

Considering that the pre-Helene housing supply in Giles and Washington counties was older, poorer quality, more vacant, and disproportionately manufactured, there is substantial opportunity for housing rehabilitation activities to improve the quality of units in addition to repairing the acute damage from the disaster event.

Table 4: Damaged Units by County by Housing Tenure

	Habitability Repairs Required		Major Damage		Destroyed	
	Owner	Renter	Owner	Renter	Owner	Renter
Giles County	73	19	19	≤10	11	≤10
Washington County	182	39	18	≤10	12	≤10

Public Housing (Including HUD-assisted Housing) and Other Affordable Housing

DHCD has identified three public housing and other affordable housing communities within the disaster declaration area, none of which lie within Washington or Giles counties. DHCD will continue to work with local Public Housing Authorities (PHAs) to assess the damages to subsidized housing units within the impacted localities.

Infrastructure

As previously noted, infrastructure such as roads, bridges, energy, communications, and water systems were compromised in the larger area but concentrated in Washington and Giles counties. For example, numerous private bridges were destroyed by the flooding, rendering homes landlocked and making health and safety inaccessible for households in the area. A primary broadband line was damaged; for many individuals, this loss of connectivity limits the availability of healthcare and educational resources, threatens economic viability, and precludes access to emergency services. Virginia continues to gather assessment data on the conditions of the impacted infrastructure.

Economic Revitalization

Businesses in Washington and Giles counties have sustained both direct and indirect impacts due to Tropical Storm Helene. The disaster caused extensive damage to the Creeper Trail in the Town of Damascus, a primary tourism attraction in the locality. Considering the trail is one of the top economic drivers in the region, the resulting loss of revenue has adversely affected the livelihood of many small businesses and employees. Virginia continues to work with FEMA and SBA to obtain a more complete picture of the disaster's economic impacts.

Table 5: Unmet Need: Quantified Disaster Impacts

Cost Categories	A Direct and Indirect Need	B Financial Assistance Budgeted and Obligated	A-B Unmet Need
Rental Housing	\$4,500,000	\$5,000,000	\$0
Owner-Occupied Housing	\$9,500,000	\$10,015,710	\$0
Infrastructure	\$25,000,000	\$12,174,900	\$12,825,100
Economic Development	\$8,000,000	\$4,058,300	\$3,941,700
Total	\$47,000,000	\$31,248,910	\$16,766,800

Mitigation Needs Assessment

To ensure the resilience of Virginia’s homes and communities, it is crucial to rebuild stronger and more resilient structures. In developing a recovery strategy for this specific flood event and the use of CDBG-DR mitigation funding, Virginia will refer to Virginia Department of Emergency Management’s (VDEM’s) Hazard Mitigation Plan (HMP). This plan outlines goals, objectives, and prioritized actions aimed at reducing damage and injuries caused by natural hazards and details long-term strategies for addressing the aftermath and ensuring the viability of housing and infrastructure. The plan emphasizes the importance of collaboration with state and local governments, as well as other stakeholders, to develop and implement effective mitigation solutions. Identification of mitigation needs are still ongoing with local, regional, state, and federal agencies to determine the full amount of mitigation needs.

Table 6: CDBG-DR Mitigation Set-Aside Needs Assessment

CDBG-DR Mitigation Set-Aside Needs Assessment:			
Categories Affected	A Total Need	B Financial Assistance Budgeted and Obligated	A-B Unmet Need
Housing	TBD	\$3,043,725	TBD
Infrastructure	TBD	\$3,043,725	TBD
Economic Development	0	0	0
Total	TBD	\$6,087,450	TBD

Fair Housing and Civil Rights Data Collection

Populations with Limited English Proficient (LEP)

Table 7: Language Proficiency by County

Locality	Language	Estimated Percent of Population Speak English “Very Well”	Estimated Percent of Population Speak English Less Than “Very Well”
Giles County	Spanish	30.7%	69.3%
Giles County	Other Indo-European languages	53.6%	46.4%
Giles County	Asian and Pacific Island languages	80.5%	19.5%
Giles County	Other languages	66.7%	33.3%
Washington County	Spanish	77.2%	22.8%
Washington County	Other Indo-European languages	97.5%	2.5%
Washington County	Asian and Pacific Island languages	42.8%	57.2%
Washington County	Other languages	87.7%	12.3%

Source: U.S. Census Bureau American Community Survey (ACS) 5-year dataset 2019-2023

Persons belonging to protected classes

The table below provides demographic data for the disaster declaration area, the HUD-declared MID area, and statewide including the population of all individuals, those under 5, over 65, living with a disability, and of different racial groups. Given that age, race, ethnicity, sexual orientation, and disability may be considered protected classes, it is useful to examine the concentration of these groups within the MID population so that DHCD can better support these individuals.

Both the disaster declaration and MID areas have a significantly greater proportion of individuals over age 65 (23.3 percent and 23.8 percent, respectively) compared to the Commonwealth as a whole (16.3 percent). Similarly, the disaster declaration and MID areas have a slightly smaller proportion of residents under age 5 (4.6 and 4.3 percent, respectively) than the statewide average of 5.7 percent. This suggests that the population of the localities impacted by Tropical Storm Helene is older than the Commonwealth average.

Moreover, there is a larger share of individuals living with disabilities in the disaster declaration area (24.9 percent) and in the MID area (24.5 percent) than the statewide average of 14 percent. This is notable as individuals with a disability are more likely to experience higher poverty rates than those without a disability according to Virginia’s Housing Needs Assessment. Additionally, the Commonwealth’s Analysis of the Impediments to Fair Housing reported that disability makes up 35% percent of the discrimination complaints received by the Virginia Office of Fair Housing.

Table 8: Persons belonging to Protected Classes

Demographics	Areawide Estimate	Areawide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID	MID Percentage
Total Population	8,657,499	100%	190,281	100%	70,523	100%
Under 5 years	495,281	5.72%	8,799	4.62%	3,012	4.27%
65 years and over	1,410,160	16.29%	44,248	23.25%	16,766	23.77%
White or Caucasian	5,344,175	61.73%	177,723	93.40%	66,797	94.72%
Black or African American	1,623,031	18.75%	5,138	2.70%	1,283	1.82%
American Indian and Alaska Native	27,216	0.31%	117	0.06%	47	0.07%
Asian	593,606	6.86%	1,090	0.57%	342	0.48%
Native Hawaiian and Other Pacific Islander	5,679	0.07%	95	0.05%	25	0.04%
Other race	1,063,792	12.29%	6,118	3.22%	2,029	2.88%
Foreign-born	1,120,207	12.94%	2,942	1.55%	1,051	1.49%
Same-Sex Couple Householders	26,536	0.51%	180	0.40%	456	0.38%
Population with a Disability	1,032,353	13.96%	37,048	24.86%	13,720	24.50%

Source: U.S. Census Bureau American Community Survey (ACS)
5-year dataset 2019-2023

Population by housing tenure

Individuals residing in the disaster declaration and MID areas are more likely to be homeowners than Virginians as a whole, given that 74.8 percent of residents in the disaster declaration area and 76.5 percent of residents in the MID area own their homes while this figure is just 67.2 percent statewide. This suggests that CDBG-DR resources can greatly benefit individuals whose homes were damaged by the disaster event.

Table 9: Population by Housing Tenure

Housing Tenure	Areawide Estimate	Areawide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID	MID Percentage
Homeowners	2,234,492	67.18%	58,896	74.84%	22,109	76.54%
Renters	1,091,768	32.82%	19,799	25.16%	6,778	23.46%

Source: U.S. Census Bureau American Community Survey (ACS)
5-year dataset 2019-2023

Persons belonging to vulnerable populations

DHCD is working to obtain demographic data for vulnerable populations within the HUD-declared MID areas of Washington and Giles counties. Upon obtaining this data, the Commonwealth may amend this Action Plan to better reflect the needs of these persons.

Table 10: Persons belonging to Vulnerable Populations

Vulnerable Populations	Areawide Estimate	Areawide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID	MID Percentage
persons at risk of or experiencing homelessness	N/D	N/D	N/D	N/D	N/D	N/D
older adults	N/D	N/D	N/D	N/D	N/D	N/D
persons with disabilities (mental, physical, developmental)	N/D	N/D	N/D	N/D	N/D	N/D
survivors of domestic violence, dating violence, sexual assault, or stalking	N/D	N/D	N/D	N/D	N/D	N/D
persons with alcohol or other substance-use disorder	N/D	N/D	N/D	N/D	N/D	N/D
persons with HIV/AIDS and their families	N/D	N/D	N/D	N/D	N/D	N/D
public housing residents	N/D	N/D	N/D	N/D	N/D	N/D

N/D: Data not available at the time of publication.

Persons belonging to historically distressed and underserved communities

DHCD is working to obtain demographic data for persons belonging to historically distressed and underserved communities within the HUD-declared MID areas of Washington and Giles counties. Upon obtaining this data, the Commonwealth may amend this Action Plan to better reflect the needs of these populations.

Table 11: Persons belonging to historically distressed and underserved communities

Vulnerable Populations	Areawide Estimate	Areawide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID	MID Percentage
	N/D	N/D	N/D	N/D	N/D	N/D

	N/D	N/D	N/D	N/D	N/D	N/D
	N/D	N/D	N/D	N/D	N/D	N/D
	N/D	N/D	N/D	N/D	N/D	N/D
	N/D	N/D	N/D	N/D	N/D	N/D
	N/D	N/D	N/D	N/D	N/D	N/D

N/D: Data not available at the time of publication.

Indigenous populations and tribal communities

DHCD is working to obtain demographic data for indigenous populations and tribal communities within the HUD-declared MID areas of Washington and Giles counties. Upon obtaining this data, the Commonwealth may amend this Action Plan to better reflect the needs of these persons.

Table 12: Indigenous Populations and Tribal Communities

Indigenous populations and tribal communities	Areawide Estimate	Areawide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID	MID Percentage
	N/D	N/D	N/D	N/D	N/D	N/D

N/D: Data not available at the time of publication.

Racially or ethnically concentrated areas of poverty (R/ECAPs)

DHCD is working to obtain data for to identify racially or ethnically concentrated areas of poverty (R/ECAPs) within the HUD-declared MID areas of Washington and Giles counties. Upon obtaining this data, the Commonwealth may amend this Action Plan to better reflect the needs of these persons.

Table 13: Racially or ethnically concentrated areas of poverty (R/ECAPs)

(R/ECAPs)	Areawide Estimate	Areawide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID	MID Percentage
	N/D	N/D	N/D	N/D	N/D	N/D

N/D: Data not available at the time of publication.

Connection between proposed programs and projects and unmet needs, mitigation needs, and fair housing and civil rights assessments.

No less than 70% of CDBG-DR funds will be allocated to projects which meet the LMI National Objective. The Housing Recovery program will exclusively benefit LMI populations, prioritizing very low-income households. DHCD aims to conduct an outreach campaign to ensure awareness of and access to resources under this program. Where possible, DHCD will provide accommodations to ensure that all eligible households have an opportunity to receive CDBG-DR assistance.

Additionally, the Commonwealth may develop a system of prioritization for households with one or more of the following characteristics: households with members 62 and older, households with children under the age of 18, and households with special needs or special accommodation requirements (disabled). In doing so, the Commonwealth aims to fairly prioritize service to populations in greatest need of assistance and adhere to all applicable laws and regulations.

Allocation and Award Caps

DHCD is the lead agency and responsible entity for administering \$46,670,000 in CDBG-DR funds allocated for Helene recovery efforts. The CDBG-DR funding available to address unmet needs of will be allocated to program categories outlined in the table below:

Table 14: CDBG-DR Program Allocation and Funding Thresholds

Eligible Cost Category	Unmet Need	% of Unmet Need	% of Funding to be Expended in HUD-Identified MID	CDBG-DR Allocation Amount	% of CDBG-DR Allocation (Excluding the 15% Mitigation Set-Aside)
Administration (5% cap)				\$2,029,150	5%
Planning (15% cap)			80%	\$6,087,450	15%
Rental Housing	\$4,500,000	100%	80%	\$4,500,000	11.1%
Owner-Occupied Housing	\$10,515,710	100%	80%	\$10,515,710	25.9%
Infrastructure	\$12,174,900	100%	80%	\$12,174,900	30%
Economic Revitalization	\$4,058,300	100%	80%	\$4,058,300	10%
Public Services (15% cap)	\$1,217,490	100%	80%	\$1,217,490	3%
Exempt Public Services (no cap)	\$ -	0%	0%	\$ -	0%
Total	\$40,583,000	100%	80%	\$40,583,000	100%

Funding Criteria

General Exception Criteria

DHCD will make exceptions to the maximum award amounts for CDBG-DR programs when necessary in order to comply with federal accessibility standards or to reasonably accommodate persons with disabilities. DHCD reserves the right to make exceptions to the maximum award amounts for CDBG-DR programs in other cases, including but not limited to projects with a well-documented critical need and lack additional funding sources.

Administration

Table 15: Grantee Administration Activity(ies) Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration Total:	\$2,029,150	5%

Planning

Table 16: Grantee Planning Activity(ies) Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Planning Activity Number One		Enter value in terms of % here.
Planning Activity Number Two	Enter value in terms of \$ here.	Enter value in terms of % here.
Planning Total:	\$6,087,450	15%

Housing

Housing Programs Overview

Table 17: Grantee Housing Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Rental & Owner-Occupied Housing Recovery Program	\$15,015,710	100% Enter value in terms of % here.
Housing Program Total:	\$15,015,710	100%

Grantee Housing Program Number One Template

Program Title Rental & Owner-Occupied Housing Recovery Program

Amount of CDBG-DR Funds Allocated to this Program: \$15,015,710

Eligible Activity(ies): The DHCD CDBG-DR Housing Recovery Program aims to restore and improve housing stock in areas affected by the disaster event. Eligible Activities include but are not limited to:

- Construction of new houses;
- Rehabilitation and reconstruction of homes
- Creation or rehabilitation of single family or multi-family units
- Housing activities that benefit either owner-owned homes or rental homes

National Objective(s):

- Benefit to low- and moderate-income persons
- Urgent Need (UN)

Lead Agency and Distribution Model:

DHCD is the Lead Agency for this grant, and the Responsible Entities will be Washington County and Giles County. DHCD may employ contractors and if so, procure and enter into contractual agreements with those parties. DHCD anticipates utilizing the CDBG-DR funds within Washington County and Giles County, the two MID communities. DHCD will enter into agreements with Washington and Giles County governments for projects identified as eligible for CDBG-DR funding and priority recovery projects. The method of distribution for these identified projects will be a rolling application approach allowing the eligible localities to prioritize recovery projects and to directly contract for each project with DHCD. DHCD will utilize and modify existing CDBG administration practices to determine appropriate internal controls to fund the infrastructure

program considering additional qualifications, monitoring, and administration requirements set forth in the program guidelines. Eligible recipients include Washington County and Giles County.

Program Description:

The program is designed to meet the housing needs identified in the unmet needs assessment. CDBG-DR will fund activities designed to improve the living conditions for those affected by Tropical Storm Helene by providing safe, disaster resistant housing to the most vulnerable residents in their recovery efforts. This program is critical to the long-term recovery strategies of the eligible areas. The program consists of rehabilitation, reconstruction, or replacement of existing or destroyed housing units. CDBG-DR funding, available in the form of grants, may be used to rehabilitate LMI housing units or as part of comprehensive neighborhood improvement projects including housing improvements, reconstruction, and demolition. In order to promote long-term recovery and limit damage from future disasters, this program may include mitigation measures, including elevation and home hardening.

Eligible Geographic Areas: This program will be administered in HUD-identified disaster areas Washington County and Giles County.

Other Eligibility Criteria: Up to 20% of funds under this program may be allocated to communities outside of the HUD-declared MID areas and included in a locality within the disaster declaration area for Tropical Storm Helene. Projects must not duplicate federal benefits.

Maximum Amount of Assistance Per Beneficiary: \$125,000 per unit

Maximum Income of Beneficiary: For a housing recovery project to be eligible to receive CDBG-DR funds, 100 percent of the beneficiaries of proposed activities must be from LMI households. Please see Appendix A for 2024 Income Limits.

Mitigation Measures: DHCD's housing rehabilitation and reconstruction standards include provisions that will incorporate resilience and hazard mitigation measures, such as building outside of existing floodplains and at higher elevations. DHCD and local partners will ensure mitigation efforts provided will lessen the impact of future disasters through the use of existing best practices.

Reducing Barriers for Assistance: DHCD anticipates coordinating with local and regional governments to identify and mitigate barriers to providing assistance. When applicable, DHCD may exercise the use of waivers for requirements which may limit access to CDBG-DR resources. Please see the Commonwealth's Analysis of the Impediments to Fair Housing for additional information.

Infrastructure

Infrastructure Programs Overview

Table 18: Grantee Infrastructure Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Infrastructure Recovery Program	\$12,174,900	70%
Infrastructure Program Total:	\$ 12,174,900	70%

Grantee Infrastructure Program Number One Template

Program Title: CDBG-DR Infrastructure Recovery Program

Amount of CDBG-DR Funds Allocated to this Program: \$12,174,900

Eligible Activity(ies): Where possible, DHCD intends to address most of its unmet infrastructure needs by utilizing multiple sources of funding. DHCD proposes utilizing local and regional partners to focus infrastructure activities that rebuild or replace infrastructure impacted by Tropical Storm Helene. Eligible activities for infrastructure projects generally include:

- projects involving water, wastewater improvements, and drainage improvements;
- certain community service facilities serving primarily LMI persons, such as health clinics or skill-building facilities for jobs related to disaster recovery;
- street improvements;
- other infrastructure activities as needed and identified in related recovery plans

The eligible DHCD recognizes the importance of prioritizing resilient infrastructure and using reliable technology to mitigate the effects of disaster-related events.

National Objective(s):

- Benefit to low- and moderate-income persons
- Aid in the prevention or elimination of slums or blight (ESB)

Lead Agency and Distribution Model: DHCD is the Lead Agency for this grant, and the Responsible Entities will be Washington County and Giles County. DHCD may employ contractors and if so, procure and enter into contractual agreements with those parties. DHCD anticipates utilizing the CDBG-DR funds within Washington County and Giles County, the two MID communities. DHCD will enter into agreements with Washington and Giles County governments for projects identified as eligible for CDBG-DR funding and priority recovery projects. The method of distribution for these identified projects will be a rolling application approach allowing the eligible

localities to prioritize recovery projects and to directly contract for each project with DHCD. DHCD will utilize and modify existing CDBG administration practices to determine appropriate internal controls to fund the infrastructure program considering additional qualifications, monitoring, and administration requirements set forth in the program guidelines. Eligible recipients include Washington County and Giles County.

Program Description: Funding in this program can be used to address a wide range of community recovery and infrastructure needs including engaging in projects that restore, repair, rebuild, or make more resilient public assets that were impacted by Helene. Infrastructure-related funding will be available in the form of loans and will be prioritized as outlined in the unmet needs assessment to provide safe infrastructure to residents in the affected areas. The goal of the program is to rebuild the necessary infrastructure to assist in community recovery, such as roads, bridges, and water management infrastructure. Infrastructure projects must demonstrate a “tie-back” to Tropical Storm Helene.

Eligible Geographic Areas: This program will be administered in HUD-identified disaster areas Washington County and Giles County.

Other Eligibility Criteria: Up to 20% of funds under this program may be allocated to communities outside of the HUD-declared MID areas and included in a locality within the disaster declaration area for Tropical Storm Helene. Projects must not duplicate federal benefits.

Maximum Amount of Assistance Per Beneficiary: Per beneficiary cost limits will be determined based on project size.

Maximum Income of Beneficiary: For a project to be eligible to receive CDBG-DR funds, at least 70 percent of the beneficiaries of proposed activities must be from LMI households. Please see Appendix A for 2024 Income Limits.

Mitigation Measures: DHCD recognizes the need to build resilient and durable infrastructure. Mitigation measures will be implemented after being determined the most cost-effective option to mitigate against future disasters. Building resilient infrastructure provides communities security and reduces the financial impact of future disasters.

Reducing Barriers for Assistance: DHCD anticipates coordinating with local and regional governments to identify and mitigate barriers to providing assistance. When applicable, DHCD may exercise the use of waivers for requirements which may limit access to CDBG-DR resources. Please see the Commonwealth’s Analysis of the Impediments to Fair Housing for additional information.

Economic Revitalization

Economic Revitalization Programs Overview

Table 19: Grantee Economic Revitalization Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Economic Revitalization Recovery Program	\$4,058,300	70%
Economic Revitalization Program Total:	\$4,058,300	70%

Grantee Economic Revitalization Program Number One Template

Program Title: CDBG-DR Economic Revitalization Recovery Program

Amount of CDBG-DR Funds Allocated to this Program: \$4,058,300

Eligible Activity(ies): The Economic Revitalization Recovery Program will focus on creating economic opportunities for those impacted by Tropical Storm Helene. Eligible activities under the Economic Revitalization Program include but are not limited to:

- Development Readiness – Activities that will result in the creation of business and job opportunities primarily benefiting low- and moderate-income persons
- Façade Improvements – Activities that will remove physical and economic blight to improve downtown facades and restore business districts.
- Site Redevelopment – Activities will target and develop sites which have been rendered unmarketable or unusable due to Tropical Storm Helene with the goal of improving economic value and increased investment in the area.
- Small Business Recovery Assistance – Activities aimed at providing financial assistance, such as loans or grants, to small businesses that were negatively impacted by the disaster event.
- Job Creation, Retention, and Training – Create programs aimed at creating and retaining jobs for community members affected by the disaster event.

National Objective(s):

- Benefit to low- and moderate-income persons
- Aid in the prevention or elimination of slums or blight (ESB)
- Urgent Need (UN)

Lead Agency and Distribution Model:

DHCD is the Lead Agency for this grant, and the Responsible Entities will be Washington County and Giles County. DHCD may employ contractors and if so, procure and enter into contractual agreements with those parties. DHCD anticipates utilizing the CDBG-DR funds within Washington County and Giles County, the two MID communities. DHCD will enter into agreements with Washington and Giles County governments for projects identified as eligible for CDBG-DR funding and priority recovery projects. The method of distribution for these identified projects will be a rolling application approach allowing the eligible localities to prioritize recovery projects and to directly contract for each project with DHCD. DHCD will utilize and modify existing CDBG administration practices to determine appropriate internal controls to fund the infrastructure program considering additional qualifications, monitoring, and administration requirements set forth in the program guidelines. Eligible recipients include Washington County and Giles County.

Program Description: Small businesses are the lifeblood of local economies throughout the state. This can include typical small shops and restaurants in communities' commercial districts, often the central hub of small and rural communities. Wind and flood events can damage structures, destroying physical locations and causing significant financial loss. Impacts on specific businesses may filter throughout the commercial area, as a few businesses unable to reopen after the disaster may reduce visitors to the commercial district, which then impacts the viability of the remaining businesses. Supporting the recovery of commercial areas is essential to ensuring that commercial tenants, customers, and jobs are restored. Recognizing this impact, DHCD will create a program for eligible subrecipients to revitalize designated commercial districts damaged by Tropical Storm Helene. 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

Eligible Geographic Areas: This program will be administered in HUD-identified disaster areas Washington County and Giles County.

Other Eligibility Criteria: Up to 20% of funds under this program may be allocated to communities outside of the HUD-declared MID areas and included in a locality within the disaster declaration area for Tropical Storm Helene. Projects must not duplicate federal benefits.

Maximum Amount of Assistance Per Beneficiary: Per beneficiary cost limits will be determined based on project and project size.

Maximum Income of Beneficiary: For a project to be eligible to receive CDBG-DR funds, at least 70 percent of the beneficiaries of proposed activities must be from LMI households. Please see Appendix A for 2024 Income Limits.

Mitigation Measures: This activity will not incorporate any mitigation measures.

Reducing Barriers for Assistance: DHCD anticipates coordinating with local and regional governments to identify and mitigate barriers to providing assistance. When applicable, DHCD may exercise the use of waivers for requirements which may limit access to CDBG-DR resources. Please see the Commonwealth's Analysis of the Impediments to Fair Housing for additional information.

Public Services

Public Service Program Overview

Table 20: Grantee Public Services Program Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit	Is this Program Exempt from the 15% Public Service Cap?
Public Services Recovery Program	\$1,217,490	100%	No
Public Services Program Total:	\$1,217,490	100%	No

Grantee Public Service Programs Number One

Program Title: CDBG DR Public Services

Eligible Activity(ies): CDBG-DR Public Services cover a range of projects designed to respond to pertinent needs of the impacts of Tropical Storm Helene. Eligible activities under the Public Services program include:

- Childcare programs – Activities designed to assist
- Health services programs
- Food security programs
- Legal Assistance to localities

National Objective(s):

- Benefit to low- and moderate-income persons
- Aid in the prevention or elimination of slums or blight (ESB)
- Urgent Need (UN)

Lead Agency and Distribution Model: DHCD is the Lead Agency for this grant, and the Responsible Entities will be Washington County and Giles County. DHCD will enter into agreements with qualified and eligible Washington and Giles County governments and use internal methods of distribution to fund the infrastructure program considering additional qualifications, monitoring, and administration requirements set forth in the program guidelines. Eligible recipients include Washington County and Giles County. Funds will be distributed in the form of either grants or loans.

Program Description: DHCD hopes to leverage the broad network of community service and nonprofit organizations with well-established ties to the communities to help remove barriers to

providing services. DHCD and relevant stakeholders will enter into subrecipient agreements with a qualified non-profit agency to provide legal services to individual applicants.

Eligible Geographic Areas: This program will be administered in HUD-identified disaster areas Washington County and Giles County.

Other Eligibility Criteria: Up to 20% of funds under this program may be allocated to communities outside of the HUD-declared MID areas and included in a locality within the disaster declaration area for Tropical Storm Helene. Projects must not duplicate federal benefits.

Maximum Amount of Assistance Per Beneficiary: Per beneficiary cost limits will be determined based on project and project size.

Maximum Income of Beneficiary: For a project to be eligible to receive CDBG-DR funds, at least 70 percent of the beneficiaries of proposed activities must be from LMI households. Please see Appendix A for 2024 Income Limits.

Mitigation Measures: This activity will not incorporate any mitigation measures.

Reducing Barriers for Assistance: DHCD anticipates coordinating with local and regional governments to identify and mitigate barriers to providing assistance. When applicable, DHCD may exercise the use of waivers for requirements which may limit access to CDBG-DR resources. Please see the Commonwealth's Analysis of the Impediments to Fair Housing for additional information.

CDBG-DR Mitigation Set-Aside

CDBG-DR Mitigation Set-Aside Programs Overview

Table 21: CDBG-DR Mitigation Set-Aside Allocation Summary

Eligible Cost Category	% of Funding to be Expended in HUD and Grantee Identified MID	CDBG-DR Mitigation Set-Aside Allocation Amount	% of CDBG-DR Allocation Mitigation Set-Aside ¹
Planning (15% cap)	0%	\$ -	0%
Housing	80%	\$3,043,725	50%
Infrastructure	80%	\$3,043,725	50%
Economic Revitalization	80%	\$0	0%
Total	80%	\$6,087,450	100%
Funds that have not been allocated:		N/A	N/A
Grant Total (Recovery funds + Mitigation + Unallocated):		\$46,670,000	115%

Table 22: Grantee CDBG-DR Mitigation Set-Aside Programs Overview

Eligible Cost Category	CDBG-DR Mitigation Set Aside Allocation Amount	% of CDBG-DR Allocation for LMI Benefit	Does this Program have tie back to the disaster?
CDBG-DR Housing Mitigation Program	\$3,043,725	100%	No
CDBG-DR Infrastructure Mitigation Program	\$3,043,725	70%	No
Total:	\$6,087,450	85%	No

¹ At a minimum, grantees are required to spend 15% of their unmet needs on CDBG-DR Mitigation Set-Aside activities. HUD assumes that grantees will spend well over this amount as they integrate mitigation measures into their recovery activities. Grantees should only look at the 15% CDBG-DR Mitigation Set-Aside as a cap for the activities a grantee does not have the ability to demonstrate a tieback to the disaster.

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Grantee CDBG-DR Mitigation Set-Aside Program Number One Template

Program Title: CDBG-DR Housing Mitigation Program

Amount of CDBG-DR Funds Allocated to this Program: \$3,043,725

Eligible Activity(ies): The DHCD CDBG-DR Housing Mitigation Program aims to improve the quality and resilience of housing units in the MID areas. Eligible Activities include but are not limited to:

- Weatherization of rental and owner-occupied units
- Housing rehabilitation, construction, and reconstruction
- Resiliency measures ex. elevation, generators, sump pumps

National Objective:

- Benefit to low- and moderate-income persons

Lead Agency and Distribution Model: DHCD is the Lead Agency for this grant, and the Responsible Entities will be Washington County and Giles County. DHCD may employ contractors and if so, procure and enter into contractual agreements with those parties. DHCD anticipates utilizing the CDBG-DR funds within Washington County and Giles County, the two MID communities. DHCD will enter into agreements with Washington and Giles County governments for projects identified as eligible for CDBG-DR funding and priority recovery projects. The method of distribution for these identified projects will be a rolling application approach allowing the eligible localities to prioritize recovery projects and to directly contract for each project with DHCD. DHCD will utilize and modify existing CDBG administration practices to determine appropriate internal controls to fund the infrastructure program considering additional qualifications, monitoring, and administration requirements set forth in the program guidelines. Eligible recipients include Washington County and Giles County.

Program Description: The program is designed to meet the housing needs identified in the unmet needs assessment. CDBG-DR Mitigation resources will fund activities designed to improve the ability of housing units to withstand future weather-related disaster events. This program is critical to the long-term recovery strategies of the eligible areas. Housing mitigation activities may include rehabilitation, construction, and reconstruction, as well as weatherization and resiliency measures to address pre-existing deficiencies and preclude future damage in the housing stock.

Eligible Geographic Areas: This program will be administered in HUD-identified disaster areas Washington County and Giles County.

Other Eligibility Criteria: Up to 20% of funds under this program may be allocated to communities outside of the HUD-declared MID areas and included in a locality within the disaster declaration area for Tropical Storm Helene. Projects must not duplicate federal benefits.

Maximum Amount of Assistance Per Beneficiary: DHCD is working with stakeholders to ascertain the nature and extent of housing mitigation efforts needed in the MID areas and other disaster-impacted areas. Maximum amount of assistance will be determined based on feedback received from public participation, as well as the type and size of the proposed project.

Maximum Income of Beneficiary: For a housing mitigation project to be eligible to receive CDBG-DR funds, 100 percent of the beneficiaries of proposed activities must be from LMI households. Please see Appendix A for 2024 Income Limits.

Mitigation Measures: DHCD's housing rehabilitation and reconstruction standards include provisions that will incorporate resilience and hazard mitigation measures, such as building outside of existing floodplains and at higher elevations. DHCD and local partners will ensure mitigation efforts provided will lessen the impact of future disasters through the use of existing best practices.

Reducing Barriers for Assistance: DHCD anticipates coordinating with local and regional governments to identify and mitigate barriers to providing assistance. When applicable, DHCD may exercise the use of waivers for requirements which may limit access to CDBG-DR resources. Please see the Commonwealth's Analysis of the Impediments to Fair Housing for additional information.

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Grantee CDBG-DR Mitigation Set-Aside Program Number Two Template

Program Title: CDBG-DR Infrastructure Mitigation Program

Amount of CDBG-DR Funds Allocated to this Program: \$3,043,725

Eligible Activity(ies): Where possible, DHCD intends to address most of its unmet infrastructure needs by utilizing multiple sources of funding. DHCD proposes utilizing local and regional partners to focus infrastructure activities to improve systems' abilities to withstand future weather-related disaster events in the eligible geographic areas. Eligible activities for infrastructure projects generally include:

- projects involving water, wastewater improvements, and drainage improvements;
- certain community service facilities serving primarily LMI persons;
- street improvements;
- other infrastructure activities as needed and identified in related recovery plans

The eligible DHCD recognizes the importance of prioritizing resilient infrastructure and using reliable technology to mitigate the effects of disaster-related events.

National Objective:

- Benefit to low- and moderate-income persons

Lead Agency and Distribution Model: DHCD is the Lead Agency for this grant, and the Responsible Entities will be Washington County and Giles County. DHCD may employ contractors and if so, procure and enter into contractual agreements with those parties. DHCD anticipates utilizing the CDBG-DR funds within Washington County and Giles County, the two MID communities. DHCD will enter into agreements with Washington and Giles County governments for projects identified as eligible for CDBG-DR funding and priority recovery projects. The method of distribution for these identified projects will be a rolling application approach allowing the eligible localities to prioritize recovery projects and to directly contract for each project with DHCD. DHCD will utilize and modify existing CDBG administration practices to determine appropriate internal controls to fund the infrastructure program considering additional qualifications, monitoring, and administration requirements set forth in the program guidelines. Eligible recipients include Washington County and Giles County.

Program Description: Funding in this program can be used to address a wide range of community recovery and infrastructure needs including engaging in projects that restore, repair, rebuild, or make more resilient public assets. Infrastructure-related funding will be prioritized as outlined in the unmet needs assessment to provide safe infrastructure to residents in the affected areas. The goal of the program is to develop the necessary infrastructure to assist in community recovery, such as roads, bridges, and water management infrastructure. Infrastructure projects are not required to demonstrate a "tie-back" to Tropical Storm Helene.

Eligible Geographic Areas: This program will be administered in HUD-identified disaster areas Washington County and Giles County.

Other Eligibility Criteria: Up to 20% of funds under this program may be allocated to communities outside of the HUD-declared MID areas and included in a locality within the disaster declaration area for Tropical Storm Helene. Projects must not duplicate federal benefits.

Maximum Amount of Assistance Per Beneficiary: DHCD is working with stakeholders to ascertain the nature and extent of infrastructure mitigation efforts needed in the MID areas and other disaster-impacted areas. Maximum amount of assistance will be determined based on feedback received from public participation, as well as the type and size of the proposed project.

Maximum Income of Beneficiary: For an infrastructure mitigation project to be eligible to receive CDBG-DR funds, 70 percent of the beneficiaries of proposed activities must be from LMI households. Please see Appendix A for 2024 Income Limits.

Mitigation Measures: DHCD recognizes the need to build resilient and durable infrastructure. Mitigation measures will be implemented after being determined the most cost-effective option to mitigate against future disasters. Building resilient infrastructure provides communities security and reduces the financial impact of future disasters.

Reducing Barriers for Assistance: DHCD anticipates coordinating with local and regional governments to identify and mitigate barriers to providing assistance. When applicable, DHCD may exercise the use of waivers for requirements which may limit access to CDBG-DR resources. Please see the Commonwealth's Analysis of the Impediments to Fair Housing for additional information.

General Information

Citizen Participation

In developing the CDBG-DR Action Plan, DHCD will comply with all HUD requirements for citizen participation and aims to follow the processes set forth in the Public Participation Plan (PPP) for the Commonwealth's Consolidated Planning process. The PPP establishes a framework to gather input from specific groups of individuals and stakeholders as well as other agencies involved with or affected by the programs or activities covered in DHCD's plans for federal resources. In particular, the PPP is designed to encourage participation by low- and moderate-income persons, particularly those living in slum and blighted areas and in areas where CDBG funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods. This document also outlines measures to engage with underserved communities and individuals, including protected classes such as persons with disabilities and persons with LEP.

Consultation of Developing the Action Plan

Table 23: Citizen Participation Consultations

Partners Consulted	Describe Consultation
Federal Partners (FEMA, SBA)	To date, DHCD has Co-Led the Post Disaster Housing Task Force bringing over 20+ state agencies and many federal agencies including FEMA, HUD, USDA, SBA, and EDA. This task force has served in conjunction with the Office of Recovery and Rebuilding to establish routine conversations with federal partners on disaster recovery efforts in the impacted areas including coordination through FEMA's Interagency Recovery Coordination Branch Chief. SBA, EDA, and USDA are all in conversations with the Office of Recovery and Rebuilding and DHCD to coordinate recovery efforts and eliminate duplication of benefits.
Local/State Government	DHCD has contacted and communicated continually with the effected local governments as well as the regional planning commission partners supporting those local governments. Washington County and Giles County have been contacted and DHCD is working closely with the Mount Rogers Planning District Commission and the New River Valley Regional Commission for coordination of relief efforts from state and federal funded sources.
Indian Tribes	There are no state or federally recognized tribes in the impacted area however, communications through tribal channels have been established in an effort to maximize the outreach of relief efforts.
Nongovernmental organizations	Many Non-profits are actively working on homes or bridges and coordinating relief efforts daily in the impacted area. These organizations are in communications with the Office of Recovery and Rebuilding and with the units of local government as to maximize

	potential federal funding that can further assist or match their ongoing efforts.
Private sector	The private sector has played a major role in offering supplies and volunteer efforts in the early stages of the relief effort. They remain active partners in the communication channels but have a minimal role at this time other than donated supplies or efforts for specific activities.
State and local emergency management agencies that have primary responsibility for the administration of FEMA funds	DHCD has been working in close coordination with the Virginia Department of Emergency Management and all of their local emergency manager contacts to create an communication channel for unmet needs. All of the FEMA IA funding has been applied for and that program has closed, while PA applications are still being accepted. DHCD is working closely with the impacted areas to think through the PA applications and their potential impacts on CDBG-DR funding.
Agencies that manage local Continuum of Care	DHCD manages the COCs and the balance of state and has been in communication with the organizations that manage shelters and operations in the impacted areas.
Public Housing Agencies	The PHAs have been notified and included in conversations as a part of the post disaster housing task force through the state financing agency – Virginia Housing. Their part or role in the relief efforts has been localized as of current, but they stand ready to assist as an opportunity arises.
HUD-approved housing counseling agencies	The housing counseling agencies have been notified and included in conversations as a part of the post disaster housing task force through the state financing agency – Virginia Housing. Their part or role in the relief efforts has been localized as of current, but they stand ready to assist as an opportunity arises.
State Housing Finance Agencies	

Public Comments

The Commonwealth will consider any comments or views of constituents received in writing, or orally at public hearings in preparing the Consolidated Plan. DHCD will afford a period of at least 30 days to collect public comments on drafts of the Consolidated Plan and any substantial amendments to the Plan as adopted. Written comments must be submitted online at www.dhcd.virginia.gov/consolidated-plan, via email at feedback.ppc@dhcd.virginia.gov or mailed to:

Virginia Department of Housing and Community Development
Office of Program Policy and Compliance
Main Street Centre 600 East Main Street, Suite 300
Richmond, Virginia 23219

A summary of these comments will be posted on DHCD’s website along with DHCD’s response, where applicable. This document will be included as an attachment when submitting the final Action Plan to HUD.

Public Hearings

Accessibility of Public Hearings

During the public comment period, DHCD will hold a public hearing to solicit feedback from individuals residing in MID areas on the contents of the CDBG-DR Action Plan or Substantial Amendment prior to submission to HUD. Constituents will be informed of this event via a public notice on the DHCD website. The notice will: summarize the scope and content of the public hearing; specify its time, date, and location; give instructions for submitting written comments; and highlight resources for attendees in need of disability accommodations or translation services. DHCD will provide this information directly to its grantees and partner organizations via e-blast. To promote maximum participation, DHCD reserves the right to host this event virtually.

DHCD complies with the Americans with Disabilities Act and will make accommodations to documents and public hearings for persons with special needs when requested. Persons requiring such accommodations should call (804) 624-9215.

Meaningful Access

DHCD encourages the participation of all its constituents, including minorities and non-English speaking persons, as well as persons with disabilities. DHCD will make reasonable efforts to provide language assistance to ensure meaningful access to participation by non-English speaking persons. Given that Spanish is the primary language spoken by constituents with Limited English Proficiency (LEP), DHCD will provide a Spanish translation of the CDBG-DR Action Plan upon request and enlist translation services to document any comments received from Spanish speaking constituents.

Consideration of Public Comments

Table 24: Consideration of Public Comments

Comment Received	Grantee’s Response

Citizen Complaints

Complaints pertaining to the CDBG-DR program can be submitted to feedback.ppc@dhcd.virginia.gov. Should the Commonwealth receive complaints from constituents related to this funding, DHCD will aim to provide a substantive written response within 15 working days of receipt. Any complaints requiring further remediation will be handled by DHCD on a case-by-case basis.

Modifications to the Action Plan

Substantial Amendment

The Commonwealth will issue a Substantial Amendment to the CDBG-DR Action Plan under the following conditions:

- A change in program benefit or eligibility criteria (including the expansion of eligible beneficiaries (e.g., establishing a new grantee-identified MID area)); or
- The addition or deletion of an activity; or
- A proposed reduction in the overall benefit requirement; or
- The allocation or reallocation of a reasonable monetary threshold specified by the grantee in its Action Plan; or
- An update to the submitted initial Action Plan if the original submission was incomplete

In the event of a Substantial Amendment to the Consolidated Plan as adopted, DHCD will make available the amended plan via the agency website at www.dhcd.virginia.gov/consolidated-plan. When requested, copies of these materials will be provided to the public at no cost. Documents will be made available in a format accessible to persons with disabilities upon request.

A period no shorter than 30 days will be afforded for constituents to comment on Substantial Amendments to the Consolidated Plan. Comments on the amended plan by individuals or groups received in writing or at public meetings will be considered by DHCD. A summary of the public comments received will be included in the final amended plans, as applicable

Nonsubstantial Amendment

The following conditions constitute a Non-Substantial Amendment to the CDBG-DR Action Plan:

- A change in the purpose, scope, location, or beneficiaries of an individual sub-recipient activity funded by any federal program covered in the plan; and
- Any re-use of funds available from cancellation of projects; from projects completed under budget; from funds designated but not expended. Funds will be reused for eligible activities as established in the CDBG-DR Action Plan.

DHCD reserves the right to make non-substantive changes to the Action Plan and its components without opening a public comment period.

Performance Reports

In order to complete performance reports, DHCD will aggregate CDBG-DR expenditures across all subgrantees and activity types and calculate current expenditure rates to project future expenditures. DHCD will ensure the accuracy of this information through cross-referencing between federal and state financial management systems.

Performance reports will be submitted on a quarterly basis until all funds have been expended and DHCD has reported on accomplishments and submitted all required materials for closeout. Once the Quarterly Performance Report (QPR) is approved by HUD, DHCD will publish a version of that QPR omitting PII to the Commonwealth's disaster recovery website.

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Appendix A: Income Demographics

Table 25: 2024 HUD Income Limits

Locality	Median Family Income	Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Washington County	\$70,300	Low-Income (80% AMI)	39,400	45,000	50,650	56,250	60,750	65,250	69,750	74,250
		Very Low-Income (50% AMI)	24,650	28,150	31,650	35,150	38,000	40,800	43,600	46,400
		Extremely Low-Income*	15,060	20,440	25,820	31,200	36,580	40,800	43,600*	46,400*
NOTE: Washington County is part of the Kingsport-Bristol-Bristol, TN-VA MSA , so all information presented above applies to all of the Kingsport-Bristol-Bristol, TN-VA MSA.										
Giles County	\$75,400	Low-Income (80% AMI)	42,250	48,250	54,300	60,300	65,150	69,950	74,800	79,600
		Very Low-Income (50% AMI)	26,400	30,200	33,950	37,700	40,750	43,750	46,750	49,800
		Extremely Low-Income*	15,850	20,440	25,820	31,200	36,580	41,960	46,750*	49,800*
*The FY 2014 Consolidated Appropriations Act changed the definition of extremely low-income to be the greater of 30/50ths (60 percent) of the Section 8 very low-income limit or the poverty guideline as established by the Department of Health and Human Services (HHS) , provided that this amount is not greater than the Section 8 50% very low-income limit. Consequently, the extremely low income limits may equal the very low (50%) income limits.										

Source: HUD FY 2024 Income Limits

Table 26: 2023 Income Demographics

	Areawide	Giles County	Washington County
Median Family Income	112,146	80,086	81,978
Per Capita Income	49,217	33,792	38,582

Note: these estimates of Median Family Income differ from Table 25 in that they are from a previous year and are only for the counties in the MID, rather than for the entire MSA