



Richland County Blue Ribbon Committee

Date: May 28, 2020

Time: 1:00 PM

Location: Zoom Meeting (Call-in details to be provided)

Agenda

- 1. Welcome**
- 2. Overall Progress Update**
- 3. HMGP 4241 (2015 Flood) Property Buyout Program Update [Action]**
 - a. Residential Property Acquisitions Update**
 - b. Non-Residential Property Acquisitions Update**
 - i. Disqualification of Two (2) Properties**
- 4. CDBG-DR Update [Action]**
 - a. Single Family Homeowner Rehab (SFR) Program Update**
 - b. Small Rental Rehab (SRR) Program Update**
 - c. Reallocation of Funding for Business Assistance Program (BAP)**
 - d. Change Order #8 for Task Order #7**
- 5. CDBG-MIT Update [Action]**
 - a. Action Plan**
 - b. Public Comments and Responses**
- 6. Next Steps**
- 7. Questions/Adjournment**

Richland County Blue Ribbon Committee

May 28, 2020

CDBG-DR and CDBG-MIT Updates



Agenda Overview



- Welcome
- Overall Recovery Program Update
- HMGP 4241 (2015 Flood) Property Buyout Program Update [Action]
 - Residential Property Acquisitions Update
 - Non-Residential Property Acquisitions Update
 - Disqualifications of Two (2) Properties
- CDBG-DR Update [Action]
 - Single Family Homeowner Rehab Program Update
 - Small Rental Rehab (SRR) Program Update
 - Options for Business Assistance Program (BAP)
 - Change Order #8 for Task Order #7
- CDBG-MIT Update [Action]
 - Action Plan
 - Public Comments and Responses
- Next Steps
- Adjourn

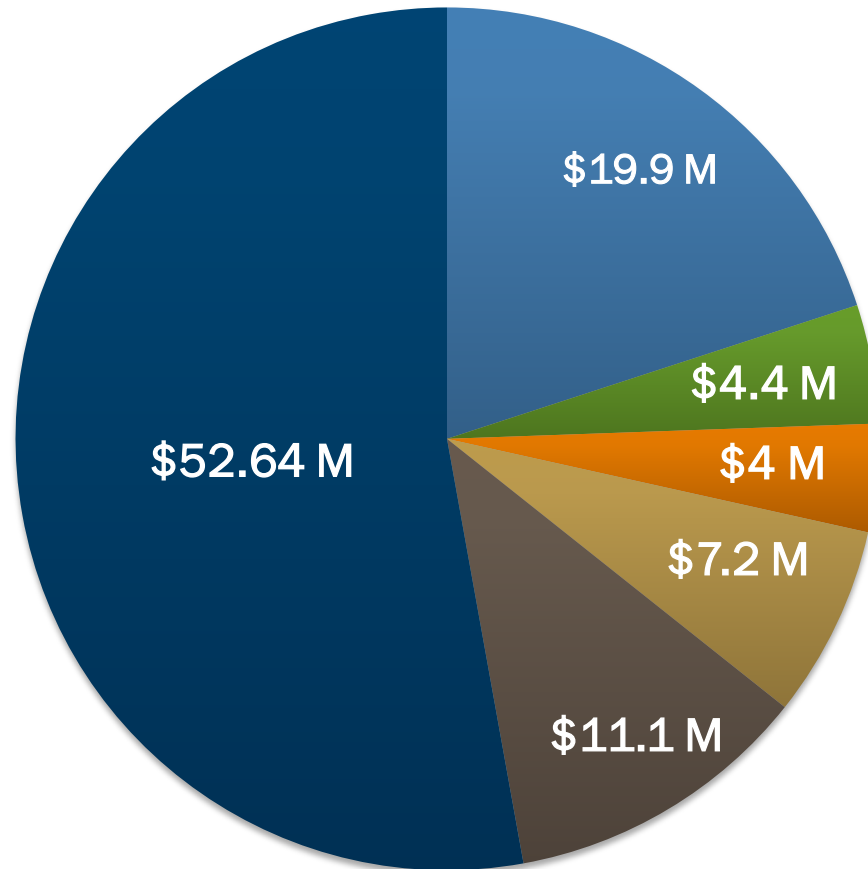
Overall Recovery Program Update



Resources to Rebuild Richland County

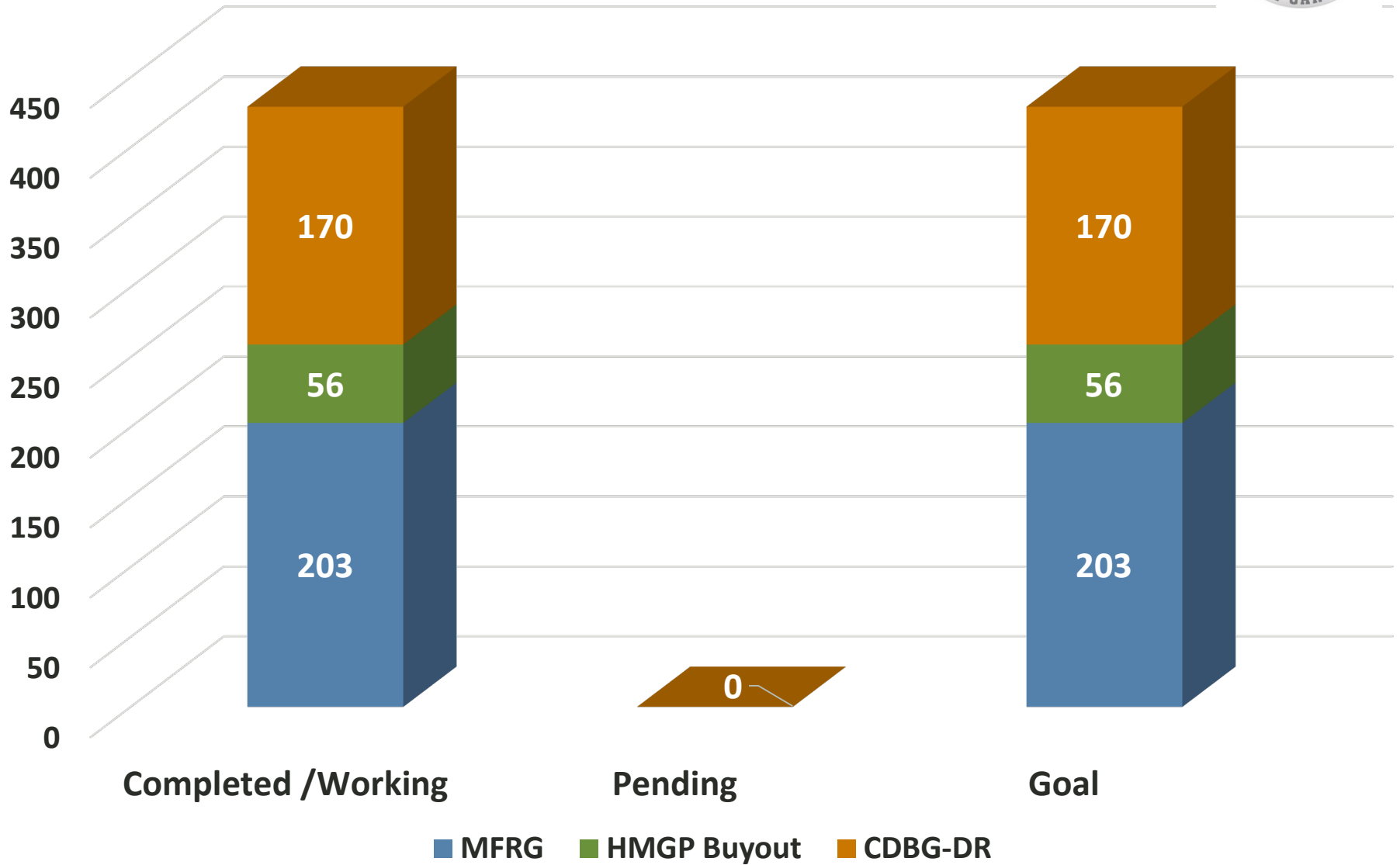


\$99,236,208



■ IA ■ PA ■ VOADS - City ■ VOADs - County ■ HMGP ■ CDBG-DR

Rebuilding Richland County



HGMP 4241 (2015 Flood) Update



HMGP 4241-DR (2015 Flood) Update



Property Acquisitions

- We were approved for the acquisition of seventy-four (74) properties.
 - Sixty-Four (64) Residential Properties
 - Ten (10) Non- Residential properties
- Subsequently, 18 properties either withdrew from the program or were disqualified
 - Ten (10) Residential Properties
 - Eight (8) Non-Residential Properties
 - Please see Slide #9 for action required on two of the non-residential properties
 - Fifty-Six (56) eligible properties remained eligible.
- We have concluded all fifty-six (56) property acquisitions at this time.



Demolition/Land Restoration Phase

- We are now progressing with the Demolition /Land Restoration Phase of the Project:
 - Of the fifty-six (56) properties,
 - 47 have completed demolition/land restoration
 - 3 have pending demolition change orders
 - 3 are problematic properties
 - We are working with RC Building Codes and Inspections
 - Will require engineering study
 - 3 are vacant lots
 - No demolition needed.
- Note: We are working with Community Planning & Development (Conservation Division) on reforestation of applicable properties.
 - Trillion Trees Project

HMGP 4241-DR (2015 Flood) Update



- During the acquisition process of two (2) non-residential properties (same corporate ownership) we were notified the property owner would not accept the purchase contract without significant revisions.
 - One the revisions sought full indemnification for the property owner of any hazardous material findings on the properties
 - The properties were subsequently viewed and it was determined there is a significant potential of hazardous material contamination (Brown Fields)
 - Due to the hazardous material indemnification requisite, it was recommended to the County Administrator we withdraw from further acquisition consideration.
 - The Administrator concurred, and directed the withdrawal be presented to the BRC for action.
- **Action:** Recommend County Council formally approve withdrawal of these two (2) non-residential properties from program acquisition.

CDBG-DR Update



CDBG-DR Rehab Status



Completed

- 56 MHUs have completed construction.
- 81 stick built home repairs have begun
 - 76 completed repairs.
- 33 rebuilds have begun construction.
 - 14 completed rebuilds.

Expectations

- All stick built repairs and rebuilds expected to be completed by October.

COVID-19 Response

- Staff modified program policies and procedures for completing punch list items and closings and approval of invoices and change orders.

CDBG-DR Rehab Status



Previously, we closed the Small Rental Rehab (SRR) program due to inactivity and moved the monies into the SFR program.

We have found at least one SRR that applied on time and is qualified for repair.

Action: Recommend County Council reopen the SRR program by transferring \$400,000 from the SFR program to the SRR program to conduct repairs to any qualified SRR that are eligible for repairs under the program guidelines.

- All funds will come from the CDBG-DR grant money.
- No cost to the County.

CDBG-DR Rehab Status



The County has received no activity in the Business Assistance Program while we have significant needs in the SFR program.

- County staff canvassed 25 businesses in 2016-2017 and determined as of last year that only 5 businesses could still be assisted

Option #1: Conduct another RFP to procure an implementing contractor for the BAP

- All CDBG-DR funds must be expended by November 2022
- The first unsuccessful contractor was provided a two-year contract period to conduct and complete outreach, application intake, verification of eligibility, and loan funding for a minimum of 14 businesses

CDBG-DR Rehab Status



Option #2: Close the BAP and transfer \$1,050,000 from the BAP into the SFR Program

- Anticipate completing an additional 10-15 homes on the frozen list based on average construction and relocation costs and depending on the mix of repairs vs. rebuilds

Action: Recommend County Council close the BAP program and transfer \$1,050,000 from the BAP program into the SFR program.

- All funds will come from the CDBG-DR grant money.
- No cost to the County.

Currently, the CDBG-DR program has 110 homes frozen and another 118 individuals on the waiting list.

CDBG-DR Rehab Status



COVID-19 has impacted the ability for contractors to conduct work due to homeowners inability to hire movers, homeowners fear of the virus, or contractor's workforce affected by the outbreak.

Action: Recommend County Council approve Tetra Tech Change Order #8 for Task Order #7 to extend the period of performance to October 2, 2020 and increase the task order to \$214,176.00 due to delays from COVID-19.

CDBG-MIT Update





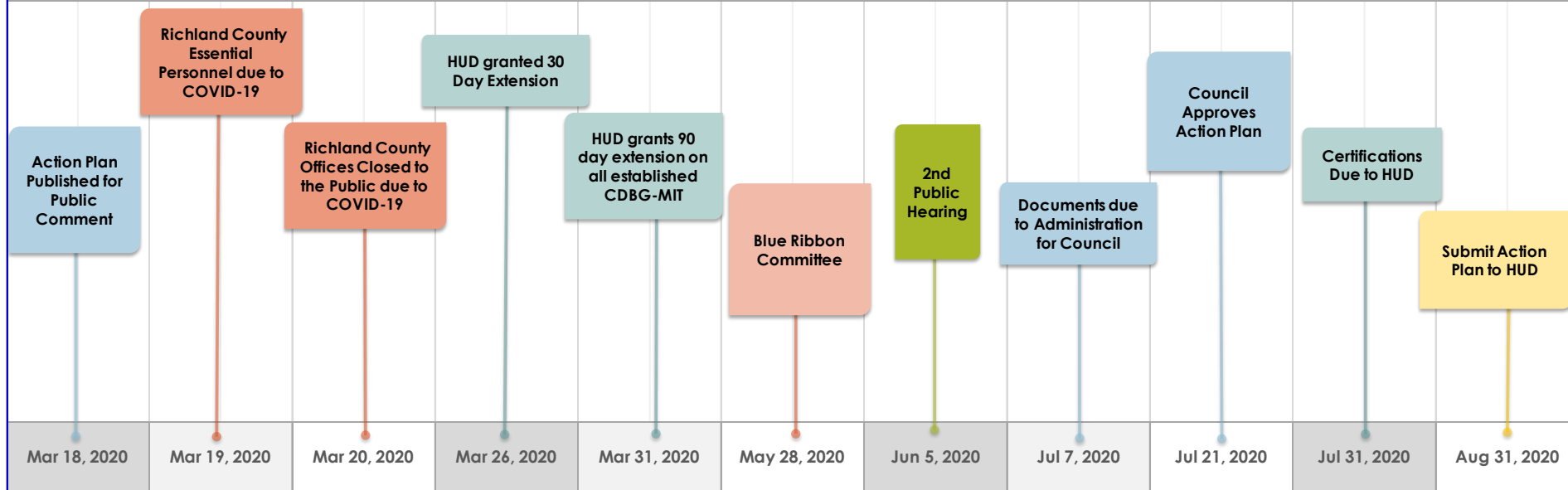
\$6.875 billion in Community Development Block Grant Mitigation (CDBG-MIT) funds to grantees recovering from qualifying 2015, 2016, and 2017 disasters

- **\$21,864,000 allocated to Richland County**
- **Increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters**
- **50% of funds must benefit low-and-moderate income (LMI) individuals**

Action Plan Approval Timeline



Updated CDBG-MIT Action Plan Timeline



Action Plan Overview



HUD granted extension to submit action plan by August 31, 2020 through COVID-19 Response Waivers

- Action Plan Elements
 - Mitigation Needs Assessment of MID areas
 - Planned Programs and Budgets
 - Infrastructure
 - Housing
 - Planning
 - Administration
 - Citizen Participation Plan
 - Mitigation Pre-Award Implementation Plan

Mitigation Needs Assessment



USC's Hazards and Vulnerability Research Institute conducted an empirical geospatial approach modeled to define the most vulnerable areas within Richland County

- Used similar approach as State of South Carolina
- Hazard Risk (flooding) – hazard risk profile compared to social vulnerability of census tracts
- Potential Community Lifeline Impact Index (PCLII) – potential lifeline impacts compared to social vulnerability of census tracts
- Household Mitigation Deficits – examination of recovery profiles and waiting list for support for rehabilitation of homes compared to social vulnerability of census tracts



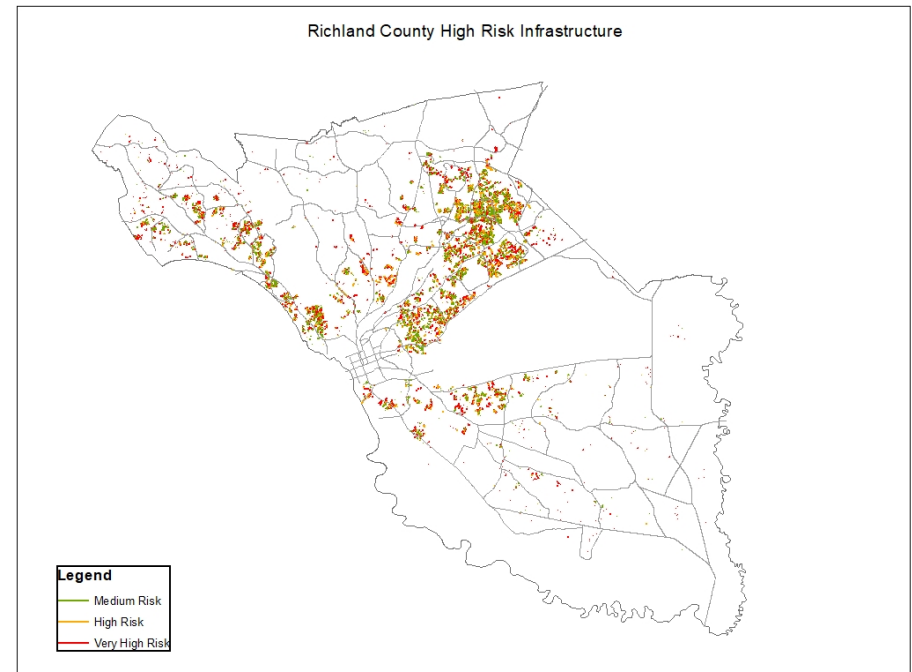
Water Supply Infrastructure Resilience Program

- Program Budget - \$832,500
- Richland County will use a portion of CDBG-MIT funds to build a resilient fire suppression water supply system
 - Replace water points decimated by 2015 Flood Event
 - Drilling of 3 wells located on County owned properties
 - If funding permits – up to 3 additional wells
 - Wells will be self-sufficient
 - High Capacity Pumps
 - Independent Power Generation Systems
 - Storage Tanks (as needed)



Stormwater and Drainage Infrastructure Resilience Program

- Program Budget - \$7,050,000
- Richland County selected projects using input from Roads and Drainage, Engineering, and Stormwater Management.
- Focused on High Risk Infrastructure, LMI areas, and critical needs.
- Utilized the Project Ranking Database created in the 25 Year Stormwater Strategic Plan to avoid bias during project ranking.
 - Infrastructure
 - Pipes
 - Culverts
 - Catch Basins





Single Family Housing Rehabilitation Program

- Program Budget - \$6,158,700
- Richland County will provide resilient housing in the Richland County or HUD MID areas through use of mitigation measures designed to mitigate against the impact of future disasters
 - Elevation
 - Dry flood proofing
 - Home hardening
 - Disaster-, flood-, and mold-resistant construction materials
- Prioritize the housing needs of low-and-moderate income households



Voluntary Buyout Program

- Program Budget - \$3,000,000
- Richland County will use a portion of the CDBG-MIT funds to acquire, demolish, and return to a naturalized state
 - 11 Residential Properties
 - 3 Non-Residential Properties
- These properties have been identified as being located in the Special Flood Hazard Area and have a history of repetitive loss

Planned Programs and Budgets: Planning



CDBG-MIT Planning

- Budget – 15% of the total grant award (\$3,729,600)
- Funds will support the following:
 - Development of and amendments to the action plan
 - Development of a property acquisition and land management policy for the County



CDBG-MIT Program Administration

- Budget – 5% of the total grant award (\$1,093,200)
- Funds will support the administration of the programs and the Implementation Plan

Citizen Participation Plan



Citizen Participation Plan is designed to encourage participation by the public and allow equal access to information about the CDBG-MIT program by all citizens

- Public hearings to collect input from citizens and stakeholders in writing or orally
 - March 12 and June 5
- Public notice and comment period via Richland County Mitigation website at <http://rcgov.us/mitigation>.
- Blue Ribbon Advisory Committee
- Performance reporting on a quarterly basis via website
- Accommodations for persons with limited English proficiency (LEP)

Implementation Plan



Grantee's capacity to carry out mitigation activities defined by:

- Financial Controls
- Procurement
- Duplication of Benefits
- Timely Expenditure of Funds
- Management of Funds
 - Hire an additional internal auditor
- Comprehensive Mitigation Website
- Capacity Assessment and Staffing
- Internal and Interagency Coordination
 - City of Columbia and Lexington County

Public Comments and Responses



- Extended public comment period 30 days to June 5 due to COVID-19 impacts
- Received public comments from Gills Creek Watershed Association and Richland County Conservation Commission
- HUD requires grantee to provide and respond to summary of comments and submit to HUD with action plan

Action: Recommend County Council approve the CDBG-MIT Action Plan

Next Steps



Questions?



Company Name	Address	Phone number
JD's Community Store	7730 Bluff Road, Columbia	803-467-3010
Tony's Lounge	2414 Congaree Road Columbia	803-776-4433
Smooth Quick Shop	6045 Bluff Rd Columbia	803-309-1946
Jewel Beautiful	110 Moore Gadsden SC	803-353-8413
Scotts Resturant	440 Main Street Eastover, SC	803-353-0111
Barber Shop Precision Cuts	221 Clark Street Eastover	803-394-2854
Kids World	716 Main St Eastover	803-351-0799
Fresh Food Market	712 Main St Eastover	803-960-5690
Longs & Sons	Eastover, SC	803-353-0860
Tombe Grille	4517 Forest Dr, Columbia, SC 29206	803 782-9665
The Picture Place	4711 Forest Dr #9, Columbia, SC 29206	803 782-6138
Casual Living	6006 Two Notch Rd, Columbia, SC 29223	803 754-5022
Ed Robinson laundry and Cleaners	2009, 2551 Forest Dr, Columbia, SC 29204	803 254-8187
Forest Acers Florist	2305 N Beltline Blvd, Columbia, SC 29204	803 220-8856
Coplon's	4825 Forest Dr, Columbia, SC 29206	803 790-0015
Forest Lake Fabrics	4865 Forest Dr, Columbia, SC 29206	803 782-5916
Women Against Teen Abuse (WATA)	2801 Congaree Rd Gadsden, SC	803-497-6537
Adams Grocery Store	400 Main St Eastover	803-518-5768
China Taste Resturant	2516 Cliffside Drive	803-353-8818
Eastover Oil Company	401 Main Street Eastover	803-353-2345
The Fish Hole	104 Chalk Street Eastover	803-353-2211
Rare Properties	505 Henry St Eastover	803-353-0167
Rhudy's Soul Food	101 Solomon St Eastover, SC	803-353-2971
Scotts ABC Store	442 Main St Eastover, SC	803-603-1824
Phillips P-Fashion	714 B Mian St Eastover	803-800-0998

**RICHLAND COUNTY, SOUTH CAROLINA
TASK ORDER No. 7-2016-RichlandCo**

**CHANGE ORDER
AUTHORIZATION No. 8**

In accordance with **TASK ORDER No. 7-2016-RichlandCo** dated June 27, 2016 between **Richland County, South Carolina** (County) and **Tetra Tech, Inc.** (Tetra Tech), County hereby authorizes the following **Scope of Services** to be performed for the **Period of Performance** and **Estimated Project Cost** as set forth herein:

PROJECT: Community Development Block Grant Disaster Recovery (CDBG-DR) Planning and Implementation Services -- October/2015 Severe Storm and Flooding

The Task Order is amended as follows:

SCOPE OF SERVICES:

Delete: The County and Tetra Tech agree that Tetra Tech will provide services described in the scope of work attached hereto as **Exhibit A7**.

Add: The County and Tetra Tech agree that Tetra Tech will provide services described in the scope of work attached hereto as **Exhibit A8**.

PROJECT SCHEDULE/TIMELINE:

The new Period of Performance will end on October 2, 2020. The project work schedule will be reviewed during the last 90 days of the Period of Performance to determine if a work extension is required for one or more of the positions budgeted for in this task order.

ESTIMATED COST (not to exceed):

The project not-to-exceed amount will increase by \$213,776.00 from \$4,615,924.00 to \$4,829,700.00.


This change order reflects the revised project scope, project cost increase, and extended period of performance to October 2, 2020.

All other terms of **TASK ORDER No. 7-2016-RichlandCo** shall continue in full force and effect unless further amended by the Parties.

APPROVED BY:

Tetra Tech, Inc.

Richland County, South Carolina

Signature: 
Name: Jonathan Burgiel
Title: Business Unit President
Date: April 6, 2020

Signature: _____
Name: _____
Title: _____
Date: _____

EXHIBIT A8

Richland County, South Carolina CDBG-DR Planning and Implementation Services EIGHTH Change Order Request

April 6, 2020

BACKGROUND AND PURPOSE

The flooding event that impacted the State of South Carolina from Oct 1 thru 5, 2015 was unprecedented in nature, destroying significant infrastructure throughout the State. Richland County was one of the most impacted areas, with many residents' homes flooded and hundreds of roads made impassable. As a result of the storm, many homeowners, many with low to moderate income, experienced significant losses not fully covered by insurance or FEMA Individual Assistance.

As a result of the disaster, Richland County was provided a direct allocation of \$23.5 million in U.S. Department of Housing and Urban Development (HUD) CDBG-DR funds to assist the County with the unmet needs of its citizens from the storm. The County has developed and had HUD approve an Action Plan and must implement the plan to manage these funds meticulously and comply with all HUD regulations.

Richland County (the "County") approved **Task Order No. 7-2016-RichlandCo** for Tetra Tech, Inc. (Tetra Tech) to provide experienced staff to help develop the processes for administering the CDBG-DR funds and implement the resulting housing programs thru June 26, 2017. This Task Order No. 7 was subsequently modified without an increase in budget (**Task Order No. 7-2016-RichlandCo Change Order #1**) to include certain Tetra Tech staff to the task order to handle tasks associated with applicant intake, processing, funding approval, and field work management.

The County approved a second change order (**Task Order No. 7-2016-RichlandCo Change Order #2**) to authorize Tetra Tech to provide a full complement of staff to plan and implement the County's CDBG-DR program thru June 15, 2017 without changing the original task order budget (attached hereto as Attachment B).

The County subsequently approved a third change order to the scope and budget (**Task Order No. 7-2016-RichlandCo – Change Order #3**) to authorize Tetra Tech to provide CDBG-DR staffing thru February 28, 2019 during which time it was anticipated the majority of the CDBG-DR funds would have been expended. This third change order covered work beginning June 27, 2016 and continuing through February 28, 2019. The third change order increased the amount of the not to exceed cost for Tetra Tech's services from \$996,843 to \$2,968,564.

In February, 2017, Richland County formally sought additional CDBG-DR funding from HUD. As a result, HUD awarded Richland County an additional \$7.25 million in HUD CDBG-DR funds to further assist the County with unmet needs of its citizens from the storm. As a result of this additional funding, the County has requested Tetra Tech to submit a fourth change order to extend the period of performance through December 31, 2019 in order to administer the additional HUD funding. (**Task Order No. 7-2016-RichlandCo – Change Order #4**). This additional change order covers the increased project costs with repairing an increased number of single-family homes and/or replacing mobile home units from an originally estimated 178 units to up to 200 units. This fourth change order covers work beginning June 27, 2016 and continuing through December 31, 2019. It is anticipated that any remaining work beyond December 31, 2019 would be transitioned to County staff for project wrap-up and closeout. This fourth change order will also increase the amount of the not to exceed cost for Tetra Tech's services from \$2,968,564 to \$4,268,564.

On June 31, 2018, the task order that was paying for the Project Manager's travel expenses ends. Prior to June 13, 2018, the Project Manager's time was split amongst several other Richland County task orders. Starting July 1, 2018, the Project Manager will focus his time on **Task Order No. 7-2016-RichlandCo. Change Order #5** increased the amount of the not to exceed cost for Tetra Tech's services from \$4,268,564 to \$4,365,059 to cover the Project Manager's travel expenses under **Task Order No. 7-2016-RichlandCo**.

In March, 2019, Richland County made a decision to implement control and oversight changes to the CDBG-DR program. At the time, the cost to this change had not been determined. This change order reflects the cost of the changes found in **Change Order #6** and the increased period of performance in Change Order #7.

In March, 2020, Richland County as well as the entire country was impacted by COVID19. The impact to the project was primarily a delay in construction. Therefore, Richland County requests that Tetra Tech extend its project management services until October 2, 2020. This change order reflects the cost of the changes found in **Change Order #7** and the increased period of performance in Change Order #8.

SCOPE OF WORK

The County has requested that the following technical staff/services be provided by Tetra Tech:

- CDBG-DR Project Manager
- Housing Construction Manager
- Compliance Manager
- Case Workers Outreach/Intake and Application Review Specialists
- Environmental Review of Record and Historical Reviewers (ERR)
- Lead-Based Paint Inspectors
- 2 Inspectors/Cost Estimators
- Electronic/IT Specialist
- Uniform Relocation Act (URA) Services
- Additional support as required

The staff shown for the positions listed will be phased in when required by the project and phased out when no longer required. Project responsibilities for each position to be performed by Tetra Tech (Attachment A) along with the level of effort in hours during this task order are provided in the exhibits below.

PROJECT SCHEDULE/TIMELINE

Tetra Tech will work with the County to determine if the delivery schedule below is appropriate given the County's priorities and operational considerations. The Change Order #8 scope of work is based on a 51-month timeframe beginning June 27, 2016 and extending to October 2, 2020 (the "Period of Performance"). The project work schedule will be reviewed during the last 90 days of the Period of Performance to determine if a work extension is required for one or more of the positions budgeted for in this task order.

PROJECT COST PROPOSAL

The proposed Change Order #8 budget of \$4,829,700.00 is based on Tetra Tech's current understanding of the project requirements and best estimate of the level of effort required for each position to perform the basic services over the 51-month Period of Performance and may be subject to change upon mutual agreement between Richland County and Tetra Tech.

The fee for the services will be based on a combination of Tetra Tech staff time and materials. The time and materials costs will be charged based on the actual hours of services furnished multiplied by Tetra Tech's hourly rate along with direct project related expenses reimbursed to Tetra Tech in accordance with the Professional Services Agreement procured under the Richland County RFP No. RC-651-P-2016. Exhibit 1 shows the estimated cost breakdown for the time and materials costs and is exclusive of the \$4,615,924 budget previously approved by Richland County Council plus the additional budget under this Change Order #8.

Exhibit 1: Cost Breakdown by Staff Position
For Period of Performance of
July 18, 2020 through October 2, 2020
(Includes labor, materials, and travel expenses)

Position	Estimated # of Staff	Estimated Hours	Estimated Cost
CDBG-DR Program Manager	1	80	\$10,800
Construction Project Manager ¹	1	460	\$57,500
CDBG-DR Compliance Manager/ Case Workers Outreach/Intake	1	440	\$37,400
Inspectors/Cost Estimators ³	2	900	\$103,500
Principal in Charge	0	0	\$0
Electronic Records/IT Specialist	0	0	\$0
Other Support ⁴	2	24	\$2,676
Other Project Related Expenses Support ⁵			\$1,900
Net Increase for Change Order 8			\$213,776.00

This estimate is valid for 60 days from the date of the proposal. To the extent the proposed scope and budget do not meet the County's needs; Tetra Tech would be willing to negotiate a revised scope and budget.

PROJECT ASSUMPTIONS AND CONSTRAINTS

This project is based on the following key assumptions and constraints. Deviations that arise during the proposed project will be managed through a standard change control process.

- **Budget and Staffing Level Assumptions.** The proposed staffing levels and hours for each position are based on our best estimates assuming a mix of programs utilizing the \$30.77 million in CDBG-DR monies allocated by HUD to Richland County. For the purposes of this scope and budget it is assumed that Tetra Tech will assist with the implementation of approximately \$17 million of housing rehabilitation projects. To the extent the mix of programs funded deviates from the estimates provided above, the anticipated level of effort outlined herein is subject to change.
- **Project Sponsor.** County will assign a primary point of contact to serve as project sponsor to address administrative and functional issues.
- **County Oversight:** Tetra Tech is not responsible for selecting the general contractors doing the MHU replacements, SFR repairs, or rebuilds and therefore, cannot be liable for the performance of these contractors selected by and reporting to the County. Furthermore, since prior to this change order, Tetra Tech was not responsible for implementing the SFHRP program except for the scope of work outlined in the Task Order #7 as modified by the previous five change orders, Tetra Tech shall not be held responsible for any issues the program or County has as a result of decisions or actions by the County or other general contractors

¹ Assumes 40-50 hours/week over the project timeline. Assumes the Construction Manager will become the Project Manager effective October 9, 2019. Assumes the previous Project Manager will maintain oversight of the project until the end of the project.

² Assumes one compliance manager/case manager 40 hours/week.

³ Assumes 2 inspectors/cost estimators working 40-50 hours/week.

⁴ Includes back office support, and SMEs.

⁵ Includes travel and other direct costs.

employed by the County in overseeing and running the overall SFHRP. From the time this change order goes into effect, Tetra Tech will become the implementing contractor responsible for implementing County policies and procedures as included in the County's Action Plan and the County's SFHRP Guidebook. Tetra Tech will not be responsible for developing policies and procedures, nor held liable for the County's policies and procedures contained in the County's Action Plan or the SFHRP Guidebook. Tetra Tech will be responsible to take the County's policy, guidance and direction from the County's SFHRP Oversight Committee as articulated in the County's Action Plan and SFHRP Guidebook. Tetra Tech will advise the Oversight Committee as to changes in policies and procedures to be included or changed in the County's Action Plan and/or SFHRP Guidebook. Tetra Tech will keep the Oversight Committee informed of the performance of the program and any issues that may arise from the performance of the County's other contractors.

- **Access to Materials.** Documentation pertinent to the execution of this project should be made available to Tetra Tech for review in electronic format within five business days of the request from Tetra Tech.
- **Payment for Incomplete Projects:** Tetra Tech will be compensated for work completed on a property even if the property owner decides to withdraw their application or the property is deemed ineligible to include, but not limited to, time spent on such properties for URA assistance, case management by Tetra Tech staff, inspections and cost estimation.
- **Lead-based Paint Clearance Tests:** Currently, the properties identified for repair have been tested for lead-based paint. Only twenty of these units tested positive for lead-based paint. This budget assumes that Tetra Tech will conduct twenty clearance tests. Tetra Tech reserves the right to request an adjustment to the budget for costs associated with any additional lead-based paint tests or clearance tests.
- **Inspection Cost Estimate:** Currently, we are estimating 107 rehabs remaining to be completed in the period of performance. If additional properties above the 107 rehabs require repair cost estimates, Tetra Tech reserves the right to request an adjustment to the budget for costs associated with developing cost estimates for such additional properties. Tetra Tech will use Xactimate for developing estimate scopes of work and cost estimates.
- **Access to Key Personnel.** Availability of County key personnel is critical to obtaining the information required for the overall success of this project. Information presented by key personnel will be accepted as factual and no confirmation will be made.
- **Work Location/Meeting Space.** Tetra Tech will perform work on-site at Richland County offices or participate via conference call during the performance period. The work location of each individual assigned to the project by Tetra Tech will be mutually agreed to by the County and Tetra Tech. It is envisioned that case management staff; cost estimators and inspectors will be located on site in Richland County. It is anticipated that the Project Manager will work on site.
- **Period of Performance.** To the extent the Period of Performance is required to be extended due to reasons beyond the Tetra Tech Team's control; such unforeseen circumstances may result in an increase in the project timeline and budget.
- **Payment Plan.** The County will be invoiced monthly for labor expended and expenses incurred. Invoice payment terms are net 30 days.

Attachment A
Position: CDBG-DR Project Manager
Position Description

This Tetra Tech position will report directly to the County's Oversight Committee or their designated representative and will manage the day to day activities and the staff of the County's CDBG-DR SFHRP Programs.

Description of role and responsibilities – More specifically, the position will provide technical guidance, strategic direction and management assistance to the County's Oversight Committee for the development and implementation of the County's SFHRP by providing the following specific services in accordance with The County's Action Plan and SFHRP Guidebook:

- Develop all forms for tracking each step of the process for the implementation program;
- Manage the development of the data and information management procedures;
- Manage the development of the administrative procedures;
- Manage the development of internal compliance reports and monitoring process for quality control;
- Manage the process to design and ensure accurate project work records are maintained and accessible to meet Grantee/Sub-Grantee needs and auditory requirements;
- Manage the required Environmental Reviews of Record and Historic Preservation reviews for projects;
- Develop processes and implementation plans that meet HUD requirements for the Uniform Relocation Act requirements;
- Manage the development of the Duplication of Benefits review.
- Manage the process for damage assessments and development of project cost estimates and the scopes of work for the projects;
- Manage the construction process to ensure that work is being completed which would include the inspectors;
- Assist with the coordination between the County's Oversight Committee and the County's Legal Department to develop the project agreements between the County and the contractors;
- Develop and deliver, along with the County Oversight Committee, training of internal County staff on the implementation of the SFHRP.
- Develop and deliver training programs on the County's SFHRP for the construction contractors;
- Communication with senior leadership and elected officials with the coordination and direction of the County's Oversight Committee and/or the County Administrator;
- Attend client's internal staff meetings at the request of the Oversight Committee designee;
- Attend meetings and conference calls with US HUD with the Oversight Committee designee;
- Travel throughout the County and visit sites of proposed projects and projects;
- Assist with the preparation of materials for and attend public meetings, meetings with key stakeholder groups and residents, and meetings with property owners and businesses along with the Oversight Committee and other representatives of the County;
- Attend the County's Blue-Ribbon Advisory Committee along with the Oversight Committee designee and representatives from the County;
- Attend the County's Work Group meetings along with the Oversight Committee designee and representatives from the County;
- Attend other meetings as assigned with the Oversight Committee and representatives from the County;
- Interface with County Departments along with the Oversight Committee or their designee;
- Work with the County staff and other Tetra Tech staff to identify opportunities to use and leverage the CDBG-DR funding with other Federal and State awarded funding for disaster recovery including HMGP, Flood Mitigation Assistance, FEMA 404 and 406 funding;
- Coordinate with the internal staff to conduct required inspections of projects for compliance with CDBG-DR program requirements;
- Coordinate with the County's staff to conduct required inspections of projects for compliance with the applicable County's codes, rules and regulations;
- Coordinate with the internal staff to assign the required Environmental Reviews of Record and Historic Preservation reviews for projects;

- Coordinate with the internal staff to assign and review the damage assessments, project cost estimates and the scopes of work for the projects;
- Coordinate with the internal SFHRP Inspectors/Cost Estimators to assign inspectors to inspect the construction work that is being completed, (including the County's Building Department and Floodplain Manager for relevant inspections);
- Manage the interface with the selected contractor for the work to monitor the completion of the work in compliance with the County's policies and procedures contained in the SFHRP Guidebook;
- Review and provide recommendation for invoices submitted to the County;
- Attend meetings with the State of South Carolina along with the Oversight Committee and/or appropriate representatives from the County; and
- Interface with the general public.

The position will report to the County Administrative Building and Oversight Committee designee each week for the entire period of performance.

Assumption: It is assumed that the County's Oversight Committee or the County's responsible representative will be responsible for making all binding and legal decisions related to the CDBG-DR program. This includes signing and approving decisions of award, contracts, invoices and requisitions for payment of CDBG-DR funding. It also includes the hiring, termination and discipline of County employees and contractors other than the Tetra Tech staff assigned to this project. This position will not provide legal services to the County.

Position: CDBG-DR Construction Project Manager
Position Description

This Tetra Tech position will report directly to the CDBG-DR Project Manager and will assist the Project Manager with management of the day to day construction and financial management activities and the staff of the County's CDBG-DR SFHRP Programs.

Description of role and responsibilities – More specifically, the position will provide construction management, financial management, technical guidance, strategic direction and management assistance to the CDBG-DR Project Manager for the development and implementation of the County's SFHRP by providing the following specific services in accordance with The County's Action Plan and SFHRP Guidebook:

- Manage the development of the implementation plan/evidence of financial control⁶ to be submitted 30 days after the public notice is published by US HUD and the Action Plan which is due 90 days after the public notice if published in the Federal Register by US HUD;
- Manage the development of the policy and program guidelines for the SFHRP which are in compliance with US HUD guidelines and the County's Action Plan and SFHRP Guidebook;
- Develop all forms for tracking each step of the process for the implementation program;
- Manage the development of the data and information management procedures;
- Manage the development the administrative procedures;
- Manage the development of internal compliance reports and monitoring process for quality control;
- Manage the process to design and ensure accurate project work records are maintained and accessible to meet Grantee/Sub-Grantee needs and auditory requirements;
- Manage the required Environmental Reviews of Record and Historic Preservation reviews for projects; Develop processes and implementation plans that meet HUD requirements for Davis Bacon, The Uniform Relocation Act requirements;
- Manage the process for damage assessments and development of project cost estimates and the scopes of work for the projects;
- Manage the solicitation process of the contractors for the work associated with the SFHRP programs and projects;
- Manage the construction process to ensure that work is being completed which would include the inspectors;
- Coordinate between the SFHRP Project Manager and the County's Legal Department to develop the project agreements between the County and the contractors;
- Develop and deliver, along with the SFHRP Project Manager training of internal County staff on the implementation of the CDBG-DR program.
- Develop and deliver training programs on the County's CDBG-DR program for the construction contractors;
- Assist with the preparation of materials for public meetings, meetings with key stakeholder groups and residents, and meetings with property owners and businesses;
- Interface with County Departments along with the SFHRP Project Manager;
- Work with the County staff and other Tetra Tech staff to identify opportunities to utilize and leverage the CDBG-DR funding with other Federal and State awarded funding for disaster recovery including HMGP, Flood Mitigation Assistance, FEMA 404 and 406 funding.

Assumption: It is assumed that the County's Oversight Committee or the County's responsible representative will be responsible for making all binding and legal decisions related to the CDBG-DR program. This includes signing and approving decisions of award, contracts, invoices and requisitions for payment of CDBG-DR funding. It also

⁶ This is a new HUD requirement and the official definition of this document will be included in the Public Notice published in the Federal Register

includes the hiring, termination and discipline of county employees and contractors other than the Tetra Tech staff assigned to this project. This position will not provide legal services to the County.

Position: CDBG-DR Case Manager
Position Description

These Tetra Tech management positions will report directly to Tetra Tech's SFHRP Project Manager. This position will provide case management services related to the County's SFHRP programs.

Description of role and responsibilities – More specifically, this position will provide technical guidance, strategic direction and management services during the implementation of the County's SFHRP. The roles and responsibilities are as follows:

- Manage the implementation of the SFHRP developed in the Action Plan and in accordance with the SFHRP Guidebook;
- Provide expert technical assistance to the County and the applicants on SFHRP applicant requirements and regulations;
- Meet with the residents, citizens and property owners interested in SFHRP assistance;
- Meet with prospective applicants to describe the SFHRP, review applicable required materials and provide technical assistance on the application;
- Review submitted applications for compliance with the program guidelines and policies;
- Review and evaluate applications for compliance with all the County's SFHRP policies, procedures and guidelines in accordance with the County's Action Plan and SFHRP Guidebook and provide recommendations for decisions;
- Coordinate with the internal staff to conduct site inspections of proposed projects and the development of the damage assessment, cost estimate and definition of the scope of work for the application;
- Conduct eligibility calculations;
- Coordinate with the internal staff to conduct required inspections of projects for compliance with SFHRP program requirements in accordance with the County's Action Plan and SFHRP Guidebook;
- Coordinate with the County's staff to conduct required inspections of projects for compliance with the applicable County's codes, rules and regulations;
- Meet with applicants to advise them regarding the award and the time schedule for the completion of the project;
- Prepare documents for the Pre-Construction and Closing meetings;
- Coordinate and schedule Pre-Construction and Closing Meetings as required;
- Manage the data and information for the assigned applications and cases per the required policies and procedures to ensure accurate project work records are maintained and accessible to meet Grantee/Sub-Grantee needs and auditory requirements;
- Coordinate with the internal staff to assign the required Environmental Reviews of Record and Historic Preservation reviews for projects;
- Coordinate with the internal staff to assign and review the damage assessments, project cost estimates and the scopes of work for the projects;
- If required; coordinate with the internal staff to conduct required title searches and appraisals;
- Evaluate issues and work with the Assistant SFHRP Project Manager to developed proposed solutions;
- Prepare a written recommendation on the received applications;
- Review and provide recommendation for invoices submitted to the County;
- Attend required training programs on the County's SFHRP program offered by the County;
- Communication with senior leadership staff from clients;
- Attend client's internal staff meetings at the request of Tetra Tech's SFHRP Project Manager;
- Travel throughout the County and visit sites of proposed projects;

- Assist with the preparation of materials for public meetings, meetings with key stakeholder groups and residents, and meetings with property owners and businesses;
- Assist with the preparation of the internal compliance reports and monitoring process for quality control;
- Attend other meetings as assigned;
- Interface with County Departments;
- Work with the County staff and other Tetra Tech staff to identify opportunities to utilize and leverage the CDBG-DR funding with other Federal and State awarded funding for disaster recovery including HMGP, Flood Mitigation Assistance, FEMA 404 and 406 funding; and
- Prepare applicable written correspondence to applicants for the County's Oversight Committee approval and signature.

This position will report to the County Administrative Building daily. They will be managed by the Tetra Tech's SFHRP Project Manager an average of 40 hours per week.

Assumption: It is assumed that the County's Oversight Committee or the County's responsible representative will be responsible for making all binding and legal decisions related to the CDBG-DR program. This includes signing and approving decisions of award, contracts, invoices and requisitions for payment of CDBG-DR funding. It also includes the hiring, termination and discipline of county employees and contractors other than the Tetra Tech staff assigned to this project. This position will not provide legal services to the County.



2020 Hampton Street ▪ Room 3063A
Columbia, SC 29204
(803) 576-2083

April 23, 2020

Mr. Clayton Voignier, Director
Richland County Community Planning and Development Department
2020 Hampton Street
Columbia, SC 29204

Transmitted via email

Dear Clayton:

As Chair of the Richland County Conservation Commission (RCCC) and member of the Blue-Ribbon Committee (BRC), I am providing comments on behalf of the RCCC on the draft Richland County Community Development Block Grant Mitigation 2020 Action Plan (Plan). These comments were unanimously approved by the RCCC at our meeting on April 20, 2020.

Collaboration and Public Input

The RCCC is concerned over the lack of input in the development of the Plan from the BRC and other interested parties. The BRC was established by Richland County Council to serve as a stakeholder group to make recommendations to Council about flood recovery efforts and how best to use flood relief funds. Prior to the BRC meeting on February 20, 2020, the BRC had not met since June 5, 2018.¹ At the February 20 meeting, numerous BRC members expressed serious concerns over staffing shortages and the lack of information and collaboration in the development of the Plan. The April 2, 2020 meeting of the BRC was cancelled due to the COVID-19 virus and no further updates have been provided.

Further, on p. 100, the Plan states the internal Richland County Mitigation Working Group “has provided oversight and strategic direction” regarding the Plan. The RCCC is staffed by the Conservation Division within the Community Development and Planning Department. Contrary to the statement regarding internal coordination, the RCCC through the Conservation Division staff has had little if any participation and input in the development of the Plan.

Plan Purpose and SoVI Data Analysis

The purpose of this report and the mitigation plan concerns flooding and should not address an all hazards approach modeled after the SC Hazards Mitigation Plan of 2018. While it is appropriate to consider Richland County’s rank within the referenced 2018 Plan (p. 7), **the analysis and the final action plan should be flooding centric.**

¹ <http://www.richlandcountysc.gov/Flood-Recovery/Blue-Ribbon-Committee>

Based on the above, much of Section 2 (Mitigation Needs Assessment) is unnecessary and should be excluded from the report. This includes a majority of the SoVI figures (pp. 17-38) with the exception of the SoVI figures for riverine and flash flood risks (pp. 13-16). Hazards such as tornados, wildfires and liquefaction, etc. are beyond the scope of the current allocation of CDBG-MIT funds (funds). For the purposes here, Figure 3 provides important guidance on the areas of the County to focus funds to address flood recovery and mitigation in LMI communities. While numerous pages are devoted to the SoVI analysis, the report contains limited narrative on how the analysis will be used to target funds either within this section or Section 3. The conclusion is left to the reader based on the common knowledge of Low to Moderate Income (LMI) community locations in Figure 3.

Another technical issue concerns the bi-variate analysis. Per the provided references, this approach has been widely used by the State of South Carolina and other state and federal entities to provide a broad analysis of the intersection of a given hazard risk and social vulnerability. As stated previously, Figure 3 provides important guidance on the areas of the County to focus funds; however, from our perspective, many more engineering and scientific variables should be considered to optimize the expenditure of funds. I will mention this later in my comments on Section 3 of the report.

- If the numerous SoVI figures are included, each should be labeled with a “figure number”. In addition, the SoVI figures are mislabeled. Each is labeled with “average # of ...” which is incorrect. The labels should read “Standard deviation of ...per year” to be consist with the analysis.

Assessment of Critical Community Lifelines

As with the SoVI analysis, the use of the potential community lifeline impact index (PCLII) provides little value to the report to target and optimize the expenditure of funds. As the report clearly states on p. 39,

“Given the Community Lifelines Implementation Toolkit is oriented towards response, not mitigation and enhancing long-term resilience, not all the sub-components were applicable and thus are not included in the PCLII.”

Since the use of PCLII is for response and not mitigation, this section (pp. 38-49) is inappropriate and should be excluded from the report.

The PCLII methodology was used by the State of South Carolina most recently in response to Hurricane Matthew (see footnote 19 on p. 40). However, in our technical opinion, the scoring procedure outlined on p. 38 is not robust and provides limited information on response or mitigation **concerning flooding**. Empirical data (actual data on miles of electric transmission, number of bridges, etc.) is gathered but then averaged which significantly reduces its usefulness, Further, no consideration of infrastructure interdependencies and the relative importance of each is included in the scoring analysis **to mitigate future flooding impacts**. For example, including the gross miles and location of electric transmission lines within a census tract is meaningless. Of importance is how these lines relate to bulk electric reliability and customer reliability statistics regulated by the SC Public Service Commission. Specific to the targeting and expenditure of CDBG-MIT funds to mitigate future flood impacts, which transmission lines are **vulnerable to flooding?**

Mitigation Projects and Needs

This section should be the real focus of this report and should address prior CDBG-DR implementation and expenditures as well as unmet needs. Little of the SoVI and Lifeline Impact Analysis data appear to

be used to target funds as referenced on pp. 58-62. This section needs to be improved and strengthened and include only limited SoVI riverine and flash-flooding analysis.

Budget and Funding Priorities

The Plan provides insufficient details on the methodology, analytic techniques, budget and project formulation, and a detailed listing of proposed projects and efforts to be funded using the approximate \$21.9 M in CDGB-MIT funds. We suggest the following be added to the Plan:

- a listing of all projects and components contained within the proposed budget (pp. 64 - 65) for each category (infrastructure, housing, planning and administration) be included in an appendix;
- a description of how the budgeted activities and amounts were selected and derived (p. 64)
- a description of the funds already spent from FEMA, CDBG, and the County on mitigation efforts and their relationship to the Plan

In particular, infrastructure and housing projects should be shown in rank order to include the “score” for each utilizing the Richland County Department of Public Works’ Project Database Tool (p. 67) or whatever methodology was used.

Infrastructure Projects

On p. 65, three different infrastructure “project descriptions” are listed in an unnumbered table. As mentioned above:

- A list of specific projects (by ranking, score and location) should be included for the first category totaling \$1.45M for completing drainage studies and infrastructure improvements;
- In the second category totaling \$1.2M, how and by what criteria was the Spears Creek watershed selected? What does it mean to “increase flows in the watershed”? Since significant damage was observed in the October 2015 flood within the Gills Creek watershed, explain why no projects within the Gills Creek watershed are included?
- In the third category totaling \$4.4M, what are the criteria to be used to assess “high risk infrastructure” and is this category to be exclusive to “drainage”?

On p. 66, under the header “Connection to Mitigation, Lifelines, and Long-Term Resiliency” the Plan states the County maintains nearly 20,000 stormwater assets. As commented previously, the Plan makes a weak connection between mitigation and lifelines and an inadequate linkage is made in this section. While constrained culvert capacity under roads (for example) often results in localized flooding, many stormwater assets such as detention basins provide limited flood benefits due the limited recurrence interval design of detention basins. The Plan needs to clarify and include in an appendix the broad categories and numbers of what comprises the 20,000 stormwater assets referenced.

On p. 66, the Plan states “This program will support public stormwater and drainage infrastructure located within Richland County, outside the boundaries of the City of Columbia”. Does this restriction also exclude other incorporated municipalities located within Richland County? A reference should be provided to any federal CDBG-MIT funding guidelines which constrain funding to unincorporated areas of Richland County. Certain watersheds located in the County, such as Gills Creek, cross multiple jurisdictional boundaries and has not been referenced in the Plan. We think the Plan should address how to provide a unified watershed approach (refer to p.67 and the Richland County Department of Public

Works' Project Database Tool) within Gills Creek or other watersheds located within multiple jurisdictions.

On p. 67, the Richland County Department of Public Works' Project Database Tool and the Richland County Public Works Department's 25 Year Roadmap and Stormwater Management Plan are referenced.

While the Project Database Tool may be useful to the Public Works Department in the development of capital improvement projects, we are concerned three aspects of the methodology are as a means to allocate CDBG-MIT funds. These are:

- First, the criteria including fiscal responsibility, customer service and workforce improvements are inappropriate criteria to determine the allocation of CDBG-MIT funds. It should be given Richland County will act in a responsible manner to improve customer service and workforce. However, we think these criteria are not useful or appropriate to target CDBG-MIT funds. Use of these two criteria biases the actual project prioritization away from the "actual" need for a project. While consideration of O&M costs under fiscal responsibility is important, justification is needed on how "leverages additional funding" is a consideration regarding CDBG-MIT fund prioritization.
- Second, we have concerns regarding the "goodness" of the scoring methodology. The scoring metrics using values of 0, 2, 6 or 10 appear arbitrary and "mask" the actual importance ranking for a project. For each of the project types (stormwater drainage, floodplain management and water quality improvements) no methodology is provided on how a scoring metric value is selected. For example, under improves stormwater drainage; no documentation is provided on the units of measurement for "size of area improved, part of a larger plan and public safety" and a resultant score of 2, 6 or 10? For example, is actual watershed area measured and how is this translated into a score of 2, 6 or 10? What metric is used to measure public safety? For example, is vehicle count on a road with a deficient culvert used to measure public safety? These same "units of measurement" questions also apply to categories for floodplain management and water quality.
- Third, the weights applied to each of the categories also appears arbitrary. For example, stormwater drainage has a weight of "60" while improves floodplain management and water quality improvements have weights of "40." Please provide the rationale used to determine that stormwater drainage is 50% more important than improving floodplain management or water quality. Further, documentation or an explanation is needed to address "multi-objective benefits" between stormwater drainage, floodplain management and water quality since all three categories could benefit from a single project in any of the categories. Should "multi-objective benefits" receive priority and a greater weight (importance)?

Water Supply Infrastructure Resilience Program

On p. 69, the plan states "RCESD will use CDBG-MIT funds to build a resilient fire suppression water supply system". It is our understanding, prior recovery funds were not used for fire suppression. Please provide a more detailed description of the components and proposed locations of the water supply system and how these mitigate future impacts from flooding. Are these systems proposed to have raw water from existing or proposed ponds or creeks in Lower Richland? If so, please state how raw water sources will be protected under this Plan.

Summary

Thank you for the opportunity to comment on the Plan. In summary, collaboration among stakeholders in the development of the Plan has been very limited, should be improved going forward, and an updated timeline for BRC meetings or other collaborative efforts should be provided. We think the Plan needs to be more succinct by removing unnecessary SoVI and Lifeline analysis and figures. Select SoVI and Lifeline analysis should be more narrowly focused on flooding and how the funds will be used to further community resilience to flooding, as opposed to an all hazards approach, and incorporated into the Mitigation Project Needs and Assessment section. Additional detail is needed to justify the budget expenditures, including a ranked listing of the actual projects identified for funding, the scoring criteria used to rank projects, and an explanation as to how each project builds resilience for future flood events. Such information should be included as appendices in the Plan to memorialize the analysis and ultimate CDBG-MIT funding priorities. Lastly, more information should be included regarding fire suppression and how it mitigates future flooding impacts.

Yours truly,



Carol Kososki, RCCC Chair

CC: Richland County Administrator Leonardo Brown
Mr. Charles Weber, District 1 RCCC Commissioner
Mr. Tim McSwain, District 2 RCCC Commissioner
Mr. Sam Holland, District 3 RCCC Commissioner
Dr. Buddy Atkins, District 5 RCCC Commissioner
Dr. John Grego, District 6 RCCC Commissioner
Mr. Robert Squirewell, District 7 RCCC Commissioner
Mr. Jim Thomas, District 9 RCCC Commissioner
Ms. Gail Rodriguez, District 11 RCCC Commissioner



GILLS CREEK WATERSHED ASSOCIATION

712 Main St., EWS 603 Columbia, SC 29208 • (803) 727-8326 • coordinator@gillscreekwatershed.org •
www.gillscreekwatershed.org

1 May 2020

Sent via email to: hunter.lauren@richlandcountysc.gov

Richland County Government
Community Planning & Development Division
Attention: Lauren Hunter
P.O. Box 192
2020 Hampton St.
Columbia, SC 29204

Re: Request for Public Comment on Richland County Proposed CDBG-MIT 2020 Action Plan

Dear Ms. Hunter:

Thank you for the opportunity to comment on the proposed Richland County Community Development Block Grant Mitigation 2020 Action Plan (Plan). Gills Creek Watershed Association (GCWA) is a local nonprofit, working to restore Gills Creek, educate the communities within its watershed, and advocate for the protection and preservation of the Creek's resources, beauty, and environmental sustainability. We have drawn upon our expertise in environmental sciences, ecology, and community planning for our review and are pleased to provide comments. As Coordinator of Gills Creek Watershed Association (GCWA), which is also a member organization of the Blue Ribbon Advisory Committee, I am providing comments on behalf of GCWA on the draft Richland County Community Development Block Grant Mitigation 2020 Action Plan (Plan).

GCWA greatly appreciates Richland County's time and effort in putting this Plan together, as well as its goals in making the County more resilient to extreme weather conditions. However, GCWA agrees on all points made by Richland County Conservation Commission (RCCC) in their public comments submitted via email on 23 April 2020. We would like to particularly emphasize deeply troubling omissions that undermine the future of the Gills Creek Watershed and Richland County as a whole.

Gills Creek Watershed is specifically mentioned as a high-risk area multiple times throughout the Plan and identified as a tract "with the highest total hazard score":

- p. 15: "The flash flood risk is greatest in the most urbanized areas of the county (including the cities of Columbia, Irmo, and Forest Acres) as well the urbanized Gills Creek Watershed."
- p. 38: "[...] those tracts with the highest total hazard score that include all of Lower Richland County and the Gills Creek Watershed to the west of Fort Jackson."
- p. 38: "Richland County was at the center of the federally declared disaster area (PDD 4241) and experienced significant freshwater riverine flooding throughout the county. The transportation system (roads and bridges), water supply, and community safety all were affected. Sixteen earthen dams breached or failed in the county, including five high-hazard dams in the Gills Creek watershed and one on Fort Jackson."



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- p. 56: “Those census tracts with the largest household mitigation deficit appear in those inland riverine areas that had significant flood damage during the 2015 Floods (Figure 32 bottom). These include Gills Creek [...]”

However, despite these acknowledgements, specific projects within the Gills Creek Watershed are not mentioned or described in the Plan. The only reference to a specific project area is the Spears Creek Watershed (p. 65), which is not mentioned anywhere else in the Plan. The Plan states that the specific infrastructure projects identified were “ranked high by the PDT.” As RCCC also asked, what were the specific criteria used to determine each of these? GCWA would like to see a full list of the proposed projects to be funded, along with a breakdown of their rankings. Further, how was the budget for each specific infrastructure project determined (p. 65), and how was the overall CDBG-MIT Program Budget (p. 64) determined? With such a large amount of public money involved, how funding is allocated and how projects are ranked should be clearly explained in the Plan. Consequently, for enhanced public transparency, GCWA would like to reiterate both the comments and the suggested items that RCCC made under “Budget and Funding Priorities” in their public comment, specifically:

“The Plan provides insufficient details on the methodology, analytic techniques, budget and project formulation, and a detailed listing of proposed projects and efforts to be funded using the approximate \$21.9 M in CDGB-MIT funds. We suggest the following be added to the Plan:

- a listing of all projects and components contained within the proposed budget (pp. 64-65) for each category (infrastructure, housing, planning and administration) be included in an appendix;
- a description of how the budgeted activities and amounts were selected and derived (p. 64)
- a description of the funds already spent from FEMA, CDBG, and the County on mitigation efforts and their relationship to the Plan

In particular, infrastructure and housing projects should be shown in rank order to include the “score” for each utilizing the Richland County Department of Public Works’ Project Database Tool (p. 67) or whatever methodology was used.”

GCWA was pleased to see projects for acquiring floodplain property as a means of mitigating flood hazards in the Plan. However, GCWA is very concerned about the larger budget allocation for rebuilding houses on floodplain property than for buyouts. While initially beneficial, rehabilitation/reconstruction does not address the underlying impact of continued building/rebuilding in floodplains, which means they will inevitably continue to create issues.

Floods inundate floodplains, a natural process. Properly functioning floodplains provide protection for the entire County by providing floodwater storage and safe passage, reducing flood velocities, and restricting erosion and sedimentation, which in turn helps to maintain water quality. Thus, when floodplains are kept in or restored to their natural state, they can actually reduce the number and severity of floods. This natural process is much more cost-effective than rebuilding or enhancing a structure.



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Therefore, moving homes out of floodplains through buyouts is the most cost-effective solution—reconstruction leaves the homes in flood-prone areas where they will likely be flooded again, particularly as we expect to see frequency and damage increase. This only leads to additional funds being spent in subsequent years on the same properties. **The “Natural Hazard Mitigation Saves 2019 Report” by the National Institute of Building Sciences states that “Buyouts represent permanent flood mitigation.”** Richland County has already had success with buyouts, as the Plan states the County “has successfully purchased 56 properties.” If a total rehabilitation program budget of \$6,158,000.00 is going to be spent, that money should be spent on permanent flood mitigation (buyouts), not rebuilding in an area that will inevitably flood again and require millions of dollars of additional funding down the line.

GCWA also echoes the comments of RCCC concerning the Blue Ribbon Advisory Committee. There was limited collaboration among stakeholders in the development of this Plan. The Blue Ribbon Advisory Committee should have a larger role in developing this Plan and associated budget, prioritizing projects, and in seeing the Plan through.

GCWA would like to work more closely with the County and other involved entities on preventative measures related to flooding. This is an ideal time to work together since there is currently a bill (S 0259/H 3083) which creates the "South Carolina Resilience Revolving Fund" to provide low interest loans to perform flooded-home buyouts and floodplain restoration. The bill has passed the Senate and is currently before the House Ways and Means Committee.

Gills Creek Watershed Association joins RCCC in encouraging Richland County to improve collaboration among stakeholders and provide an updated timeline for Blue Ribbon Advisory Committee meetings. Additional Plan details are needed to justify project rankings and budget expenditures, and should be included as appendices to the Plan for enhanced public transparency. GCWA encourages the County to direct CDBG-MIT funds to buyout floodplain properties as an immediate and effective means of mitigating demonstrated flood hazards rather than merely rebuilding in harm’s way. In this spirit of encouragement and increased transparency, we will look for appropriate provisions to be added to the Plan and for a more active Blue Ribbon Advisory Committee.

GCWA appreciates the opportunity to comment on this Plan and looks forward to joining with Richland County as we continue to respond to threats posed by flooding.

Sincerely,

Carmony Adler
Coordinator

Responses to Public Comments received from Gills Creek Watershed Association (GWCA) and Richland County Conservation Commission (RCCC)

The Gills Creek Watershed Association provided public comments to the CDBG-MIT Action Plan related to collaboration and public input, specific projects within the Gills Creek Watershed not mentioned or described, specific criteria used to determine and rank infrastructure projects, determination of the CDBG-MIT Program Budget, and spending of additional funds on permanent flood mitigation through buyouts.

The Richland County Conservation Commission also provided public comments to the CDBG-MIT Action Plan related to collaboration and public input, the Mitigation Needs Assessment, and budget and funding priorities. County staff have provided responses below that address the comments.

Collaboration and Public Input

Shortly after the Federal Register Notice for CDBG-MIT funds was released on August 30, 2019, representatives from the Working Group met initially on October 7, 2019 with several subsequent follow-up meetings and calls with individual members from the Working Group through the end of October 2019 to discuss the funding allocation and development of the action plan. During this time, the Conservation Division Manager was consulted concerning possible infrastructure projects related to Gills Creek. In early November 2019, staff began consulting with Administration and the Chair and Vice-Chair of County Council about the format and membership of the Blue Ribbon Committee (BRC) given that significant time had elapsed since the last meeting of the BRC. A considerable amount of time was devoted to re-establishing the membership of the BRC and confirming availability of Councilmembers to convene the BRC. The BRC meeting was held on February 20, 2020, at which time staff presented information for input from the BRC on the overview and purpose of CDBG-MIT funds and the timeline for and progress on development of the action plan. As stated in the action plan, the BRC is charged with viewing and providing input on the development of the action plan as an advisory committee.

Mitigation Needs Assessment

RCCC expressed several concerns regarding the Mitigation Needs Assessment primarily focused on 1) the Mitigation Needs Assessment should be flooding centric and should not address all hazards, 2) the limited narrative on how the assessment is used to target funds, 3) the bi-variate analysis approach used, 4) the labeling of SoVI figures, 5) the PCLII methodology used, and 6) other sources of mitigation funds and their relationship to the plan. Per the Federal Register Notice vol. 84, no. 169, the guidance from HUD expressly requires the needs assessment to include other risks beyond the qualifying one, in this case flooding:

Each grantee must assess the characteristics and impacts of current and future hazards identified through its recovery from the qualified disaster and any other Presidentially-declared disaster. Mitigation solutions designed to be resilient only for threats and hazards related to a prior disaster can leave a community vulnerable to negative effects from future extreme events related to other threats or hazards. When risks are identified among other vulnerabilities during the framing and design of mitigation projects, implementation of those projects can enhance protection and save lives, maximize the utility of scarce resources, and benefit the community long after the projects are complete. Accordingly, each grantee receiving a CDBG-MIT allocation must conduct a risk-based assessment to inform the use of CDBG-MIT funds to meet its mitigation needs, considering identified current and future hazards.

In addition, the purpose of the Mitigation Needs Assessment and the bi-variate analysis is to highlight risks and vulnerabilities that will provide the evidentiary basis for informed decisions on the selection of mitigation actions

and expenditures made by County staff, not make the decision for County staff. The underlying data are as stated in the SoVI figures. The classification or binning of the “average # of ...” for the choropleth mapping is indeed done by standard deviation. According to cartographic practices, the figure labels represent the phenomena being mapped not how they were classified into map categories for which there are many different ways, which is addressed in footnote 13. As with the Mitigation Needs Assessment, HUD’s guidance also specifically requires a quantitative assessment of lifeline impacts, but does not provide any specific method or approach for doing so:

The Mitigation Needs Assessment must quantitatively assess the significant potential impacts and risks of hazards affecting the following seven critical service areas, or community lifelines:

- Safety and Security
- Communications
- Food, Water, Sheltering
- Transportation
- Health and Medical
- Hazardous Material (Management)
- Energy (Power & Fuel)

The County followed the State of South Carolina’s lead in this regard providing a generalized picture of critical service and infrastructure impacts. While it is suggested that the PCLII is not robust and overly generalized, it does adhere to HUD guidance. Further, it provides an evidence-based comparison of where critical infrastructure and services co-locate with socially-vulnerable populations and hazards. Finally, CDBG-MIT funding has different requirements than other mitigation funds (e.g. FEMA HMP, or FEMA PDM), with an explicit statutory focus on “benefitting vulnerable lower-income people and communities and targeting the most impacted and distressed areas.” The place-based analysis expanded beyond the flood hazards in keeping with the longer term goal of the HUD CDBG-MIT program to reducing disaster risk and enhancing community resilience especially benefitting the most impacted and distressed areas.

Infrastructure

The infrastructure projects for the Stormwater and Drainage Infrastructure Resilience Program were selected based on the Mitigation Needs Assessment, the goals of the CDBG-MIT, and the framework for ranking projects outlined in the 25-Year Stormwater Strategic Plan. The 25-Year Stormwater Strategic Plan provides a guideline to proactively address flood control, water quality and drainage infrastructure needs in Richland County. The plan was developed with the help of an internal, multi-department Steering Committee responsible for plan implementation and a Watershed Advisory Committee made up of community members who provided input on various citizen needs and concerns. The plan created a better understanding of the existing state of the County’s drainage network and established a justifiable decision making process for the prioritization and implementation of projects based on critical assets. Using an already established framework to identify and rank infrastructure projects allowed the County to select CDBG-MIT infrastructure projects efficiently and without bias.

The 25-Year Stormwater Strategic Plan is a 300-page document, therefore key items from the plan were paraphrased in the CDBG-MIT Action Plan. A copy of the full 25 Year Stormwater Strategic Plan can be made available to the GCWA for further details about the criticality analysis, project ranking database tool, and creation of project scoring and weighting.

The 20,000 stormwater assets referred to in the plan include storm drainage infrastructure such as pipes, catch basins, culverts, etc. Many of these assets are older and reaching the end of their useful life. As part of the 25-

year Strategic Plan, a criticality analysis was completed to identify the most critical assets. This allows the selection of projects in areas that are the most critical to protect the life and safety of the residents of Richland County. Criticality is based on the likelihood of failure (material, age, and condition) and consequences of failure (proximity to certain buildings and road types). Each linear asset (pipes and culverts) was given a score. Assets with a higher risk were given priority in the selection of projects. Failure of high risk assets will have a greater impact on the community.

As part of this project, high risk infrastructure identified in the criticality analysis will undergo visual inspection using CCTV to detect any immediate threats to public safety. \$4,400,000 in funding is allocated to quickly initiate drainage studies, project design, or project construction to upgrade or repair failing infrastructure.

The Spears Creek Watershed project description should read: *“A drainage study of the Spears Creek Watershed which is currently experiencing localized flooding and increased flows. The goal of the study is to protect the safety and security of residents in the area and protect transportation networks.”* There are no previous watershed studies in the Spears Creek Watershed, whereas other watershed in the County, have had previous watershed studies. The Gills Creek Watershed has a watershed plan which is currently being updated.

Although significant damage occurred in the Gills Creek Watershed during the October 2015 flooding event, there were also numerous other locations damaged throughout Richland County. A holistic approach was taken to select infrastructure projects based on known flooding locations, high risk infrastructure and the goal of the CDBG-MIT program to protect the most vulnerable communities. In addition, the Blue Ribbon Committee was previously presented with information pertaining to responsibility for maintenance of the waterways and ditches in the state of South Carolina. According to the information presented, the owner of the property along the waterways and ditches owns the maintenance responsibility, which includes cleaning out trees, trash and debris, sediment removal, bank stabilization and realignment. It was determined at that time that a significant portion or supermajority of the property along Gills Creek is owned by the City of Columbia or residents of the City of Columbia, and thus, maintenance is the responsibility of those owners.

The October 2015 flooding event affected hundreds of residents and infrastructure throughout the County. During the incident, the County experienced severe storms and heavy rainfall, which resulted in failure of several privately owned dams. The Southeast quadrant of the County, which is a mostly rural, LMI area, was significantly impacted by the storm and subsequent damages.

Several of these dams support privately owned ponds. These ponds serve as a crucial water resupply source for rural fire suppression activities, as there are no pressurized water hydrant systems in the area. Three (3) of these natural water point sites (commonly referred to as Dry Hydrants) were decimated due to dam failure. The loss of these natural water points has negatively affected the fire department’s ability to efficiently resupply their fire suppression water supply during emergency operations. The owners of the dams have been unable to repair the damage and restore the natural water supply for fire suppression needs.

Through the Water Supply Infrastructure Resilience Program, the County will use CDBG-MIT funds to build a resilient fire suppression water supply system to mitigate future impacts from flooding by replacing the three (3) decimated natural water points, and adding up to three (3) additional water resupply points in the area, with the focus on improving the Insurance Services Office (ISO) Public Protection Classification (PPC) for area residents.

The County will contract the installation of up to six (6) strategically located private wells on county owned properties, having high capacity pumps, an independent power generation system, and storage tank (as needed)

to supply a continuous pressured source of water for fire suppression needs. These water points will comply with DHEC Well Standards: 61-71, and DHEC 61-44 Well Permitting requisites.

Housing

As stated in the Mitigation Needs Assessment, Richland County successfully bought out 56 properties using HMGP funding in addition to CDBG-DR resources. The majority of these residences were in the Special Flood Hazard Area (SFHA), which are flood-prone areas aligned with the 100-year floodplain. Richland County recognizes that buyouts represent permanent flood mitigation. As such, to increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, Richland County will use a portion of the CDBG-MIT funds to acquire, demolish, and return to a naturalized state eleven (11) residential properties and three (3) non-residential properties through its Voluntary Buyout Program. These properties have been identified as being located in the SFHA and have a history of repetitive loss. The budget for the Voluntary Buyout Program used the pre-disaster appraisal price for each property with estimated average costs for closings, appraisal fees, demolitions, incentives, Uniform Relocation Assistance costs, and contingency costs.

The Mitigation Needs Assessment also identified many homes outside of, but in close proximity to, the SFHA that experienced significant damage due to the October 2015 flooding event. Thus, the unmet household mitigation deficit comprises homes near flood-prone areas and the 100-year floodplain where permanent flood mitigation may not be necessary as many of these homes do not have a history of repetitive loss. Since part of the household mitigation deficit is a result of ineligibility for other federal programs, the County's Single Family Homeowner Rehabilitation Program (SFHRP) made progress in reducing the mitigation deficit despite limited funding as it relates to these types of homes. As such, the Single Family Housing Rehabilitation Program under CDBG-MIT will provide resilient housing primarily outside, but near to, the SFHA to help mitigate future damage to homes from flooding and severe storms. For any of these homes that qualify for the program, rehabilitation would include certain mitigation measures, such as dry flood-proofing, home hardening, and disaster-, flood- and mold-resistant construction. For any homes inside the SFHA that would qualify for this program, rehabilitation would include more intensive mitigation measures, primarily elevation above the base flood level.

The initial budget for the Single Family Housing Rehabilitation Program was based on the estimated average construction and relocation costs under the current SFHRP that would meet the portion of the household mitigation deficit identified through the applicant waitlist, which represents 111 homes. However, due to competing funding priorities identified by the infrastructure programs and the Voluntary Buyout Program, the budget was reduced to rehabilitate an estimated 80 homes.

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