

**Metropolitan Government
of
Nashville and Davidson County**

**ACTION PLAN
for
2020 CDBG DISASTER-RECOVERY GRANT**

Prepared by



December 2024

Local Action Plan for Community Development Block Grant - Disaster Recovery (CDBG-DR) 2020 Funding Metropolitan Government of Nashville and Davidson County

The Tennessee Department of Economic and Community Development (TNECD) has received funding from HUD related to major presidentially declared disasters occurring in 2020 (& 2021). Additional information about this funding, including the State of Tennessee Action Plan, may be found at:

<https://www.tn.gov/e cd /community-development-block-grant/cdbg/cdbg-disaster-program.html>

Eligible local jurisdictions that have been allocated funding through the State of Tennessee Action Plan must complete a Local Action Plan that addresses unmet disaster recovery needs within the county, proposed project types for use of funding, public engagement and civic participation, and general requirements of the grant program.

Contents

1. Overview/Executive Summary:	3
2. Unmet Needs Assessment:	5
Housing Unmet Needs:	5
Housing Disaster Damage and Impacts:.....	5
Single-Family v. Multifamily Housing Needs:	5
Homeowner vs Renter/Tenant Needs:.....	5
Public Housing and Affordable Housing Needs:.....	6
Infrastructure Unmet Need:.....	7
Infrastructure Disaster Damage and Impacts:	7
Infrastructure Unmet Needs:	8
Mitigation Only Activities	8
3. General Requirements	9
Low-and-Moderate Income (LMI) Analysis	9
Citizen Participation	9
Outreach and Engagement:	10
Public Hearing Comments and Feedback:	11
Complaints:	11
Fair Housing, Civil Rights Data and Advancing Equity:	12
Displacement of Persons and Other Entities	12
Building Standards	13
Elevation Standards:.....	13
Flood Insurance Requirements:	13
Green Building Standards:.....	14
Cost-Effectiveness:	14

Preparedness, Mitigation & Resiliency: 15

Duplication of Benefits:..... 16

4. Program Budget 16

 Budget 16

 Program Budget Narrative 17

 Leveraged Funds 19

 Program Partners 20

 Program Administration..... 20

1. Overview/Executive Summary:

Include information about the disaster, the area(s) of the county that were impacted, short-term impacts, and long-term impacts.

Enter response here.

Overview

In the early morning hours of March 3, 2020, an EF-2 and high-end EF-3 tornado struck portions of Nashville-Davidson County as part of a violent system that wreaked destruction in Middle and West Tennessee. In Nashville, the tornado substantially impacted the John C. Tune Airport and produced widespread damage in the communities of North Nashville, Germantown, East Nashville, Donelson, and Hermitage. Unfortunately, the two people in East Nashville lost their lives. On March 5, 2020, President Trump issued a disaster declaration (DR-4476-TN) enabling impacted areas to receive Federal disaster assistance.

On February 3, 2022, the U.S. Department of Housing and Urban Development (HUD) announced that the State of Tennessee would receive \$42,740,000 in Community Development Block Grant – Disaster Recovery (CDBG-DR) funds to support long-term recovery efforts in response to disasters occurring in 2020 (FR-6303-N-01). On May 24, 2022, HUD issued another notice (FR-6326-N-01) allocating funds to the State of Tennessee and other jurisdictions for disasters occurring in 2021 (not applicable to this Action Plan) and making modifications to the February 3, 2022 Notice (applicable to this Action Plan) indicating the 2020 CDBG-DR funds would flow from HUD to the Tennessee Department of Economic and Community Development (TNECD).

Because TNECD is the lead agency and responsible entity for administering \$42,740,000 in 2020 CDBG-DR funds (as well as for 2021 CDBG-DR funds), it prepared a [CDBG-DR Action Plan](#) (November 2023) describing the proposed use of funds and methods of distribution. CDBG-DR funds are designated for necessary expenses for activities authorized under Title I of the Housing and Community Development Act of 1974 (42 United States Code [U.S.C.] 5301 et seq.) (HCDA) related to disaster relief, long-term recovery, restoration of housing and infrastructure, economic revitalization, and mitigation in the “most impacted and distressed” (MID) areas resulting from a qualifying major disaster in 2020 (or 2021).

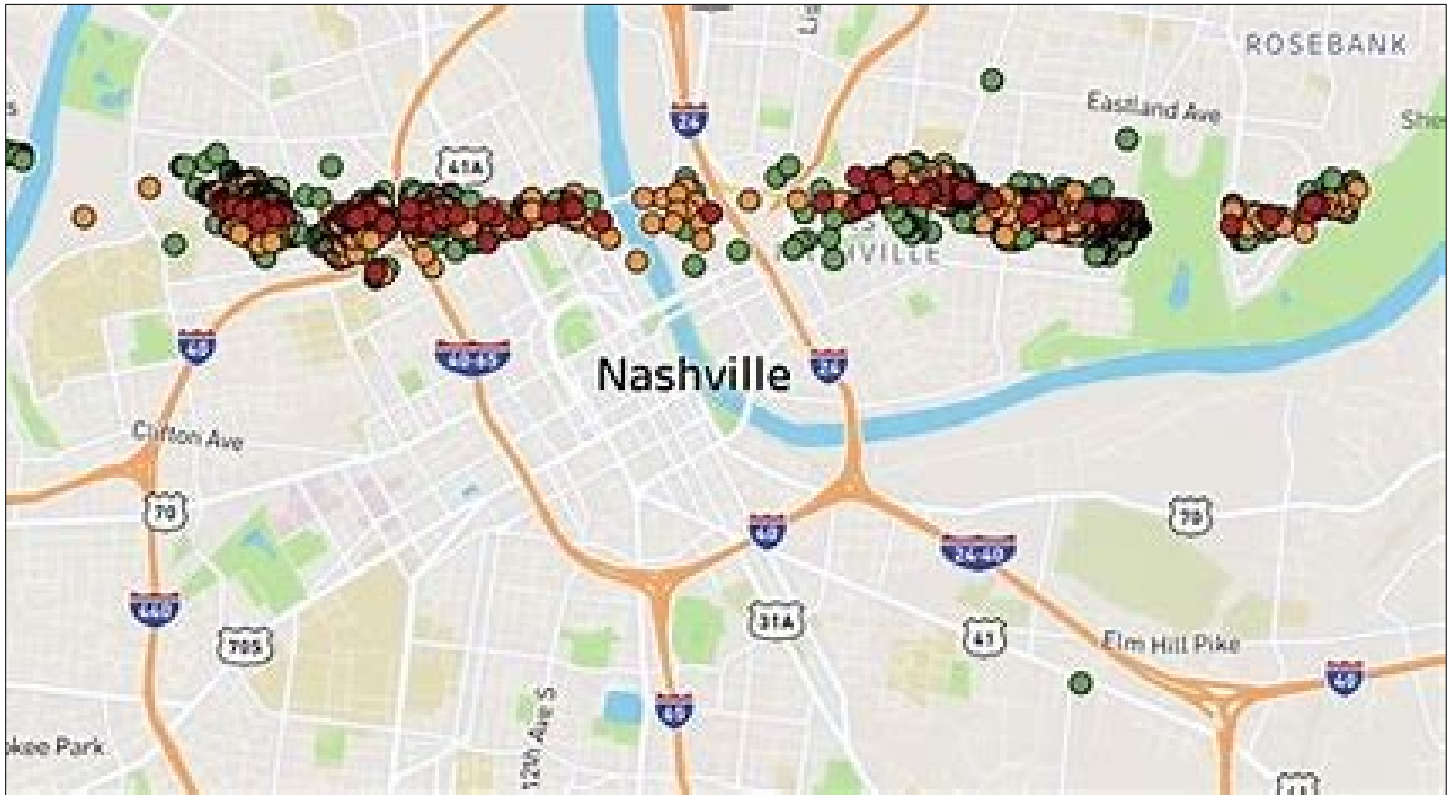
On July 11, 2024, TNECD notified Metro Nashville that it will receive \$10,827,467 for long-term recovery and mitigation activities in response to the March 2020 tornado. These funds cannot be used in response to other disasters. To receive these funds, the Housing Division of the Metropolitan Nashville Planning Department (Metro Housing Division) has prepared this Action Plan, utilizing the template provided by TNECD, to describe how Metro Nashville will utilize these funds to address unmet housing needs, particularly in zip codes impacted by the March 2020 tornado. Consistent with the Federal authorities for the use of these funds and the State of Tennessee Action Plan, proposed activities support the rehabilitation of owner-occupied homes, as well as construction of new homes and voluntary acquisition and rehabilitation of vacant homes to sell to qualified households. Preserving and facilitating homeownership in areas impacted by the tornado and in areas at risk of housing loss due to market pressures promote long-term recovery, mitigate disaster-related effects, stabilize neighborhoods, and further housing security. Proposed activity budgets are listed below. CDBG-DR funds must predominately serve households with incomes at or below 80% of the area median income.

Rehab/Reconstruction	\$ 1,624,120.05
New Construction	\$ 7,037,853.55
Mitigation	\$ 1,624,120.05
Administration	\$ 541,373.35
TOTAL	\$10,827,467.00

For long-term recovery efforts, Metro has identified the following zip codes as “most impacted and distressed” due to the damage confirmed in these areas.

- 37013 37210
- 37076 37214
- 37115 37216
- 37203 37217
- 37206 37218
- 37207 37243
- 37208 37138
- 37209

March 2020 Tornado Path



Because mitigation activities do not have a tie back to the actual disaster and are intended to reduce vulnerabilities and risks arising from future disasters, Metro will focus mitigation activities to make substandard homes more resilient. Mitigation activities may occur countywide, but Metro will prioritize projects in areas at risk of affordable housing loss due to market pressures to minimize potential displacement.

2. Unmet Needs Assessment:

Provide a brief introduction to the variety of needs identified in the Unmet Needs Assessment, any long-and short-term impacts identified. This section should include:

- specific factors to cause damage (wind, rain, flood, fire, etc.), and
- any impacts from prior disasters/events or subsequent disasters/events that are creating barriers to the recovery efforts.

Upload maps and pictures, as needed.

Housing Unmet Needs:

Housing Disaster Damage and Impacts:

Include data in the table below to the best of your knowledge. Include additional data and information from the State of Tennessee Action Plan as needed. Discuss how the disaster impacted housing in your county.

Housing Type	# of Units Impacted	# of Units Assisted (Non-FEMA/SBA)	Total Amount of Assistance (\$) (Non-FEMA/SBA)	Average Amount of Assistance (Non-FEMA/SBA)	# of Units Still Needing Assistance	Total Amount of Unmet Need (\$)
Single Family	1,464	Unknown*	Unknown*	Unknown*	0**	\$0**
Multifamily	496	Unknown*	Unknown*	Unknown*	0**	\$0**
Public Housing	0	0	0	0	0	\$0

Sources: Metro Nashville damage assessment records

[Enter response here.](#)

Although all cases from the 2020 tornado are closed with the Long-Term Recovery Group, there remains a need to assist homeowners who utilized personal resources to make repairs, to enhance housing security, and stabilize neighborhoods experiencing gentrification post-tornado through affordable homeownership opportunities.

Single-Family v. Multifamily Housing Needs:

How do the unmet recovery needs of single-family housing units compare to that of multifamily housing units. If proposing housing programs address how funding will be directed toward single-family units, multifamily units, or both.

[Enter response here.](#)

FEMA's Open-Source data does not include information on Individual Housing Assistance for 4476-DR, and Metro Nashville currently lacks a data sharing agreement with FEMA and SBA. Therefore, Metro Nashville cannot determine unmet need by type (Single-Family or Multifamily). However, according to a member of Nashville's Long Term Recovery Group, all homes that were impacted by the 2020 tornado have been fully recovered. Therefore, Metro Nashville is not proposing activities based on a particular housing type.

Homeowner vs Renter/Tenant Needs:

How do the unmet recovery needs of homeowners compare to that of renters. If proposing housing programs address how funding will be directed toward homeowners, renters, or both.

[Enter response here.](#)

According to FEMA’s Open-Source data, 1,263 homeowners registered for assistance. Of those, FEMA inspected 341 homes and estimated total damage of \$1,704,114.69. Ultimately, 84 applicants were approved for repair/replacement assistance totaling \$416,230.35. By this analysis, the gap between total damage and FEMA repair assistance is approximately \$1.2 million. However, some costs may have been covered by insurance or SBA. Metro Nashville will use a portion of its grant funds to reimburse homeowners for qualifying costs not covered by FEMA, SBA, insurance, or other local, state, or federal programs.

FEMA’s Open-Source data shows that 2,690 renters applied for assistance. Of those, FEMA determined after inspection that 2,283 renters did not sustain damage from the tornado. FEMA approved assistance for 523 renters for a total amount of \$1.5 million.

Because homeownership provides greater housing security and stabilizes neighborhoods, all proposed housing and mitigation activities will further the creation and preservation of homeownership with opportunities for persons displaced from their communities to return.

Public Housing and Affordable Housing Needs:

The CDBG-DR program is following the rent limits and affordability periods established in the State of Tennessee HOME program administered by the Tennessee Housing Development Agency. Thresholds that are proposed to differ must be detailed in this section.

[Enter response here.](#)

No public housing units operated by the Metropolitan Development and Housing Agency have outstanding needs.

Metro’s affordable housing needs are well-documented, with 49% of renters and 22% of homeowners cost-burdened. Metro’s 2021 Affordable Housing Task Force Report projected that Nashville needs approximately 50,000 homes affordable to households with incomes at or below 80% AMI to meet current demand and future growth by 2030. (The soon-to-be released Unified Housing Strategy will update this projection.) While Nashville has made strides in adding and preserving housing stock, the need is still great, especially for deeply affordable (0-30% AMI) housing and affordable homeownership (up to 80% AMI).

Many of the most impacted and distressed areas have seen affordable housing loss post-tornado as investors purchased damaged homes and buildings then flipped for sale to higher income buyers. According to Metro records, over 200 homes damaged by the tornado have been sold at least once since the tornado, with the mean sales price increasing from \$356,299 in 2020 to \$634,274 in 2022. As discussed later, the impact on affordability is particularly acute in North Nashville. Households earning more than \$75,000 per year rose from 15.5% (pre-tornado) to 30.9% (post-tornado) signaling gentrification and displacement.

Metro will utilize most of its funds to assist households with incomes at or below 80% AMI. Only new construction projects will be allowed to assisted households with incomes up to 120% AMI to facilitate mixed-income communities, but at least 75% of homes in a project must serve households with incomes at or below 80% AMI.

All new construction projects and voluntary acquisition/rehab/sale projects must be affordable to homeowners at the designated AMI for a period of 30 years, formalized by a deed of restrictive covenant running with the land. Metro will implement the “resale” approach, ensuring any home sold within the 30-year period remains affordable and sold to an income-eligible buyer. These provisions are consistent with other Metro programs like the Barnes Housing Trust Fund. Metro reserves the right to include additional requirements, particularly for any Metro land that may be made available.

Infrastructure Unmet Need:

Infrastructure Disaster Damage and Impacts:

Include data in the table below to the best of your knowledge. Include additional data and information from the State of Tennessee Action Plan as needed. Discuss how the disaster impacted infrastructure in your county.

FEMA Public Assistance Category	Total Amount of Damage (\$)	Total Amount of FEMA Assistance (\$)	Total Amount of Assistance (\$) (Non-FEMA/SBA)	Total Amount of Unmet Need (\$)
A - Debris Removal	\$7,734,696.48	\$6,961,226.84	\$733,469.64	\$0
C - Roads and Bridges	\$174,548.21	\$157,093.39	\$17,454.82	\$0
D - Water Control Facilities	\$0	\$0	\$0	\$0
E - Public Buildings	\$6,020,525.12	\$5,418,472.60	\$602,052.52	\$0
F - Public Utilities	\$21,043,159.85	\$18,938,843.87	\$2,104,315.98	\$0
G - Recreational or Other	\$2,700,531.17	\$2,535,745.16	\$164,786.01	\$0

Source: FEMA Open Data – Public Assistance Funded Projects

[Enter response here.](#)

The tornado downed power lines, trees, and scattered debris throughout affected areas. The most significant infrastructure damage was at the John C. Tune Airport, where the tornado caused an estimated \$93 million in damage to 17 hangars, airfield, pavement, navigational aids, signage, lighting, fencing, utilities, and more. In July 2021, Nashville's airport authority began redevelopment of the airport by replacing storm-damaged buildings and adding new aviation facilities. The new facilities opened in May 2022.



Infrastructure Unmet Needs:

The local jurisdiction should summarize the overall impact to infrastructure by the disaster. This could include graphics, tables, and pictures.

- *The local jurisdiction should briefly describe the conditions pre-disaster.*
- *The local jurisdiction must describe how preparedness and mitigation measures will be integrated into rebuilding activities and how the grantee will promote community and/or regional (e.g., multiple local jurisdictions) post-disaster recovery and mitigation planning.*
- *The local jurisdiction must describe how they intend to align these investments with other planned State, local, or regional capital improvements*
- *If the local jurisdiction is using funds for infrastructure, it must also describe how it will address the construction or rehabilitation of disaster-related systems (e.g., storm water management systems) or other disaster-related community-based mitigation systems (i.e., using FEMA's community lifelines).*

Enter response here.

Metro Nashville is not proposing to fund infrastructure projects.

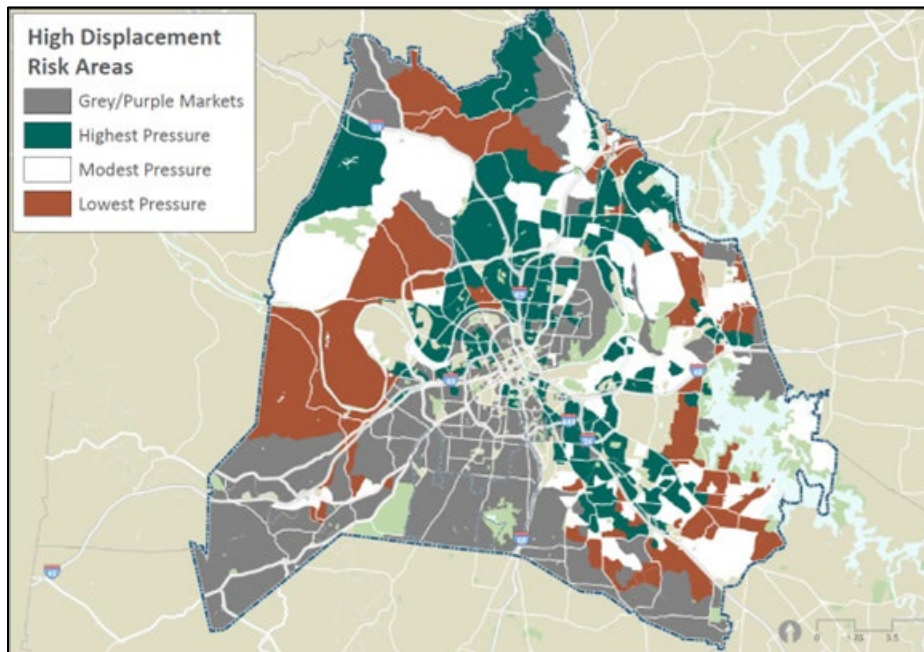
Mitigation Only Activities

Describe how the proposed activity will address the impacts of future natural disasters in the most impacted and distressed area. Mitigation only activities must be able to meet a National Objective.

Enter response here.

Metro Nashville will utilize 15% (per the Federal Register Notice) of the 2020 CDBG-DR Grant to make substandard homes more resilient to windstorms and tornados. Metro will prioritize homes in areas at risk of affordable housing loss

due to gentrification using a Displacement Risk Ratio Analysis. By targeting homes in areas already at risk of housing loss due to market pressures (green areas on the map below), homeowners are better able to withstand and recover from a windstorm or tornado without fear of displacement. All funds for mitigation activities will serve households with incomes at or below 80% AMI.



Source: Reinvestment Fund Market Value Analysis

NOTE: Grey and purple markets are considered strong markets with minimal signs of distress. Grey markets have large, well-maintained properties with highest home values, and purple markets are a mix of owner and renter neighborhoods with above average prices.

3. General Requirements

Low-and-Moderate Income (LMI) Analysis

Like all CDBG programs, activities must be able to meet a National Objective, predominately benefitting low-and-moderate (LMI) individuals. While more detailed information will be provided for each activity proposal, provide general LMI information below. Does the area where activities are anticipated qualify as at least 51% LMI using the [HUD Low-and Moderate-Income Summary Data \(LMISD\)](#)? If not, explain how the local jurisdiction intends to meet the LMI requirement.

Enter response here.

Because all proposed activities are housing-related, Metro Nashville will meet the LMI National Objective by ensuring that 75% of households assisted have incomes at or below 80% AMI.

Citizen Participation

Outreach and Engagement:

NOTE: all publication efforts must meet the effective communication requirements of 24 CFR 8.6 and other fair housing and civil requirements (i.e. Americans with Disabilities Act).

The local jurisdiction should include all applicable public engagement activities, include important dates, locations, the different modes of outreach, how and when the citizens were notified.

- Publications and posting
- Webinars/trainings
- Public hearings
- Key stakeholder interviews/meetings
- Surveys conducted

As applicable, grantee should identify LEP populations and translated versions that will be available to the public and upon request.

NOTE: Local jurisdictions should list the methods of how to submit public comment (i.e. mail, email, website).

Enter response here.

The Metro Housing Division makes every effort to broadly communicate information about the 2020 CDBG-DR Action Plan and opportunities to provide comments, especially to LEP persons and persons most likely to benefit from the proposed activities but less likely to hear about opportunities.

The Public Notice in Appendix A was made available in the following ways:

- Post on the Metro Housing Division webpage. The Metro website offers direct translation.
- Publication in The Tennessean, the local paper of general circulation.
- Publication in The Tennessee Tribune, a weekly publication focused on issues facing Black families.
- Publication in Azul615, a free, biweekly magazine in Spanish.
- Email to Metro Housing Division listserv.
- Email to community partners and advocates with request to share with networks.
- Email to elected officials.
- Post at Metro office buildings and public libraries in disaster impacted areas.
- Post reminders of upcoming public hearings on Metro Planning's social media outlets.

Metro will hold two public meetings, with one meeting held in person at an ADA accessible venue in a most impacted and distressed zip code (37208).

Virtual
January 14, 2024
5:00 p.m.

[01.14.25|Davidson County 2020 Tornado Recovery Grant Meeting Link](#)

Meeting Password: 011425

In-Person
January 16, 2024
5:00 p.m.

Metro Police Department North Nashville Precinct
Community Room
2231 26th Avenue N.
Nashville, TN 37208

In addition to receiving comments at the public hearing, members of the public may submit written comments **through 11:59 p.m., central time, on Thursday, January 16, 2025**. Comments may be submitted in any of the following ways:

- Completing a [Comment Form](#);
- Emailing Metrohousing@nashville.org, Subject: 2020 CDBG-DR Grant Comments;

- Mailing to Metro Nashville Planning Department, Attention: 2020 CDBG-DR Grant Comments, Metro Housing Division, 800 President Ronald Reagan Way, Nashville, TN 37210 (post-marked no later than January 16, 2025); or
- Hand-delivered during business hours (Monday-Friday, 9:00 am to 4:30 pm) to Metro Nashville Housing Division, Attention: 2020 CDBG-DR Grant Comments, 800 President Ronald Reagan Way, Nashville, TN 37210 (date-stamped no later than January 16, 2025).

The public notice includes contact information for persons needing assistance in Spanish, Arabic, Chinese, Vietnamese, and Somali. Metro will provide translation and ASL services at the public hearings upon request and will make translated versions of the Action Plan available in Spanish, Arabic, and Swahili.

Statement of non-discrimination and request for accommodations: The Planning Department does not discriminate on the basis of race, color, national origin, gender, gender identity, sexual orientation, age, religion, creed, or disability in admission to, access to, or operations of its programs, services, or activities. For ADA inquiries and accommodations, contact Randi Semrick, ADA Compliance Coordinator, at (615) 862-7230 or e-mail her at randi.semrick@nashville.gov. For Title VI inquiries, contact Human Relations at (615) 880-3370. If any accommodations are needed for individuals who wish to attend a public hearing, please request the accommodation as soon as possible, but 72 hours prior to the scheduled meeting is recommended.

Public Hearing Comments and Feedback:

Enter response here.

Comments received at the public hearing and in writing, along with Metro’s responses, are available in Appendix B.

Complaints:

The local jurisdiction will follow the policies and procedures for Fraud, Waste, and Abuse on the Tennessee Comptroller's website: <https://comptroller.tn.gov/officefunctions/investigations/fraud-waste-and-abuse.html>. The website provides instructions and guidance for citizens, auditors, and public officials. Anyone can submit a report of Fraud, Waste, and Abuse using this online form: <https://apps.cot.tn.gov/ANTS/Submission/Submit>. Any reports of Fraud, Waste, and Abuse to the state related to these grants or activities funded in part or whole under this grant will be made available to HUD.

Complaints alleging violation of fair housing laws will be directed to FHEO for immediate review.

Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov) and/or the FHEO Region 4 Office (phone: 1-800-440-8091 or email: complaintsoffice04@hud.gov).

Any additional actions to address complaints should be detailed below.

Enter response here.

Members of the public may use hubNashville to report an issue or complaint. The hubNashville platform is Metro’s one-stop shop, accessible by phone (311 or 615.862.5000) and [online](#), for the public to report non-emergency issues to Metro without needing to know which department to contact.

The Metro Housing Division will maintain a file that documents all citizen complaints and the Housing Division’s response to any complaints related to the 2020 CDBG-DR Action Plan, amendments, and performance reports. In addition, the Metro Housing Division will provide a substantive written response to every written citizen complaint

within 15 working days of the receipt of the complaint. As well as taking these complaints into consideration when evaluating program performance as part of its reports to HUD.

Fair Housing, Civil Rights Data and Advancing Equity:

Provide an assessment of how the use of CDBG-DR funds and its planning decisions will impact vulnerable populations, members of protected classes under fair housing and civil rights laws, racially and ethnically concentrated areas, concentrated areas of poverty, and historically underserved communities. Describe the benefit of the project to minority populations within the service area. Are there any areas of minority concentration that will benefit more or less than the surrounding areas? Describe the specific needs of low and moderate income persons, minorities, persons with disabilities, the elderly, and other underrepresented or underserved populations. How are these needs being met?

Enter response here.

As discussed in Metro's [Climate Adaptation and Resilience Plan](#) (CARP) residents with low incomes, often in communities of color, are disproportionately threatened by tornadoes because low-income households are more likely to reside in substandard housing that is more susceptible to being damaged. Additionally, the recovery and rebuilding process for low-income residents is challenging due to a lack of financial resources and/or insurance resulting in the inability to recover or relocate after disasters. Research indicates that during the tornado in March 2020, damage in North Nashville (which included the HBCUs Tennessee State University, Fisk University, and Meharry Medical College) did not receive as much public attention, investment, and/or resources. (GCC 2017, Deas et al. 2017).

To compound the destruction, as households in frontline communities struggle to rebuild their homes after they have been damaged by tornadoes (or any destructive event), developers have been known to buy up damaged homes and flip properties, causing displacement of low-income families and persons of color and increasing gentrification. Metro recognizes that climate change extreme weather hazards threaten to exacerbate these social inequalities, which are rooted in income inequality, redlining, racism, neighborhood disinvestment, and political disenfranchisement (GCC 2017)

Unfortunately, this scenario is especially present in North Nashville, a historically Black community, following the 2020 tornado. Prior to the tornado, the Black-African American population in North Nashville was 77.8%. A year after the tornado, the Black-African American population was 60.4%. Moreover, households earning more than \$75,000 per year rose from 15.5% (before) to 30.9% (after the tornado) signaling gentrification and displacement.

Metro Nashville will utilize grant funds to create homeownership opportunities in North Nashville and other most impacted and distressed areas, particularly targeted to residents who were displaced because of the tornado or subsequent market pressures. In addition, Metro Nashville will support residents in these areas who relied on their own resources to rebuild and recover.

Displacement of Persons and Other Entities

The State of Tennessee does not intend to fund activities that require displacement of individuals. If the subrecipient grant proposes activities that may result in the displacement of individuals, the follow criteria must be met.

The action plan must include a description of how the grantee will plan programs or projects in such a manner that recognizes the problems associated with the displacement of individuals, families, businesses, farms, and nonprofit organizations and develop solutions to minimize the adverse impacts of displacement as described in 49 CFR 24.205 et seq. Specifically, grantees must describe how they will plan and budget for relocation activities. This policy should address both homeowners and tenants.

Local jurisdictions may establish optional relocation policies or permit their subrecipients to establish separate optional relocation policies.

Local jurisdictions should reference eminent domain and how they will meet the waivers and alternative requirements as specified in the applicable Federal Register notice(s).

CDBG-DR funds may not be used to support any Federal, state, or local projects that seek to use the power of eminent domain, unless eminent domain is employed only for a public use. For purposes of this paragraph, public use shall not be construed to include economic development that primarily benefits private entities. Any use of funds for mass transit, railroad, airport, seaport or highway projects, as well as utility projects which benefit or serve the general public including energy related, communication-related, water related, and wastewater-related infrastructure), other structures designated for use by the general public or which have other common-carrier or public-utility functions that serve the general public and are subject to regulation and oversight by the government, and projects for the removal of an immediate threat to public health and safety or brownfields as defined in the Small Business Liability Relief and Brownfields Revitalization Act (Pub. L. 107–118) shall be considered a public use for purposes of eminent domain.

Enter response here.

Metro Nashville will not utilize eminent domain to undertake any action with CDBG-DR funds nor undertake any activity that will result in the displacement of individuals. New construction and acquisition/rehab/sale activities will utilize vacant and abandoned properties. Owner/occupied rehab projects will be undertaken in a manner to allow the homeowner to remain housed during repairs to the greatest extent possible. However, for health and safety reasons, a homeowner may not be able to remain in the home until repairs are completed. A homeowner will be considered “displaced” if removed from the home for 12 months or more. In this instance, Metro Nashville will follow the displacement and relocation protocols outlined in [Metro Nashville’s 2023-2028 Consolidated Plan](#).

Building Standards

Elevation Standards:

How will the local jurisdiction adhere to elevation standards, particularly elevating standards are cost reasonable compared to other alternative strategies (demolition of substantially damaged structures, property buyouts or infrastructure improvements)?

NOTE:

- *Include an estimate of the average cost associated with elevating structures*
- *Non-flood related disasters must provide a description to mitigate against similar future disasters (FORTIFIED Home for wind and storm damage)/ Some disasters cannot be mitigated, other than buyouts resulting in relocation to less hazardous locations.*

Enter response here.

Metro will prioritize projects proposing to incorporate [building envelope and load path construction techniques](#) to reduce potential damage from windstorms and tornados. Further, Metro will not use any grant funds for projects located in a floodplain or floodway.

Flood Insurance Requirements:

How will the local jurisdictions ensure properties are adequately insured for potential flooding? Does the local jurisdiction participate in the National Flood Insurance Program (NFIP) or the Community Rating System (CRS)?

Enter response here.

Metro Nashville participates in the National Flood Insurance Program (NFIP) Community Rating System (CRS). As part of this participation, Metro mails flood risk information to property owners within a floodway or floodplain annually. Additional flood risk information is available on Metro's [website](#).

Green Building Standards:

All rehabilitation, reconstruction, or new construction must meet an industry-recognized standard that has achieved certification under at least one of the following programs:

- *Energy STAR (Certified Homes or Multifamily High Risk)*
- *Enterprise Green Communities*
- *LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance or Neighborhood Development)*
- *ICC- 700 National Green Building Standards*
- *EPA Indoor AirPlus*
- *Any other equivalent comprehensive green building standard program acceptable to HUD*

Detail any building standards the local jurisdiction intends to follow. This may differ depending on building type (ie. single-family housing, multifamily housing, commercial buildings, etc.)

Enter response here.

Metro Nashville has adopted the 2018 International Building Codes.

Activities undertaken with 2020 CDBG-DR grant funds, Metro will require Energy Star certification or other acceptable third-party rating.

Cost-Effectiveness:

Policies and procedures have been established to assess the cost-effectiveness of each proposed activity to assist a household under any residential rehabilitation or reconstruction program or activity funded with CDBG-DR funds. The criteria for determining when the cost of the rehabilitation or reconstruction of the unit will not be cost-effective relative to other means of assisting the property-owner, such as buyout or acquisition of the property.

TNECD defines a residential property as “not suitable for rehabilitation” if any of these conditions apply:

- *The property is declared a total loss.*
- *Repairs would exceed 50% of the cost of reconstruction.*
- *Repairs would exceed 50% of the pre-disaster fair market value*
- *Homes cannot be rehabilitated or reconstructed in place under existing agency policies and award caps due to legal, engineering, or environmental constraints, such as permitting, extraordinary site conditions, or historic preservation.*

The local jurisdiction may provide additional detail for how it intends to assess the cost-effectiveness of rehabilitation and reconstruction of residential properties.

Enter response here.

Metro Nashville will adopt TNECD’s cost-effectiveness approach as described above.

Preparedness, Mitigation & Resiliency:

Resilience is defined as a community’s ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks.

How will the local jurisdiction design and implement programs or activities with the goal of protecting people and property from harm, support adoption and enforcement of modern and/or resilient building codes and mitigation of natural hazard risk, make land-use decisions that reflect responsible and safe standards to reduce future natural hazard risks, and increase awareness of the hazards in their communities (including underserved communities).

How will the local FEMA-approved Hazard Mitigation Plan (HMP) to inform the selection and development of proposed activities?

Enter response here.

To inform the selection and development of proposed activities, the Housing Division reviewed Metro’s Hazard Mitigation Plan, Climate Adaptation and Resilience Plan, and Technical Assistance Panel Report – Sustaining Nashville: Building Sustainability and Resiliency into Affordable Housing.

Metro Nashville adopted its most recent [Hazard Mitigation Plan](#) (HMP) on May 8, 2020 – two months after the F-3 tornado touched down on March 3rd. In this plan, respondents ranked tornado as the highest threat to them. As discussed in the HMP, NOAA Storm Prediction Center Statistics place Nashville in an area of High Risk for tornadoes. Thunderstorms that produce tornadoes are very rare with an estimate of 1 tornado touching down in Davidson County about every 3 years. However, as the population grows and development increases, the likelihood of a tornado touching down in Davidson County also increases. Since 1950, Davidson County has averaged about 1 event every 2 years, with an EF2 tornado touching down about every 6 years. When the statistics for the counties surrounding Davidson County are included, there are approximately 2.5 tornado events each year, and an EF2 event occurs every 1.5 years. In fact, a deadly tornado ripped through parts of Nashville on December 9, 2023. The heaviest damage occurring where mobile homes were destroyed.

According to the HMP, there are approximately 4,000 manufactured homes in Metro Nashville. Campers, manufactured homes, other light weight structures and their occupants are particularly vulnerable in windstorms. While manufactured homes are an affordable homeownership option, these structures are at-risk in severe windstorms situations.

Published in September 2024, Metro’s [Climate Adaptation and Resilience Plan](#) (CARP) substantiates the HMP that Nashville is now part of the new “tornado alley.” The plan notes people living in dwellings such as mobile homes or substandard housing are at higher risk for damage or impact and are less likely to withstand severe storms like tornados than standard houses or those meeting safety codes. As mentioned previously, the CARP also notes the detrimental impacts residents with low incomes, often in communities of color, disproportionately experience after tornadoes due to the likelihood of low-income households residing in substandard housing that is more susceptible to being damaged. Oftentimes resulting in communities of color becoming vulnerable to displacement and lost to gentrification. In 2024, the Metro Housing Division partnered with ULI Nashville, and ULI’s Terwilliger Center to convene a technical assistance panel (TAP) of local and national experts to research and discuss what is reasonable to require of affordable housing developers in building housing that is sustainable, resilient, and affordable? Released December 3, 2024, [Sustaining Nashville: Building Sustainability and Resiliency into Affordable Housing](#) (i.e., TAP Report) presents a number of recommendations related to city operations, land use policy, building codes, and incentives/tools to create a more resilient and sustainable housing stock that is also affordable.

Duplication of Benefits:

Explanation of the duplication of benefit requirement may be found at (84 FR 28836 and 84 FR 28848, published June 20, 2019 or other applicable notices).

Section 312 of the Stafford Act, as amended, generally prohibits any person, business concern, or other entity from receiving financial assistance with respect to any part of a loss resulting from a major disaster for which such person, business concern, or other entity has received financial assistance under any other program or from insurance or any other source.

To comply with Section 312, each local jurisdiction must ensure that each activity provides assistance to a person or entity only to the extent that the person or entity has a disaster recovery need that has not been fully met.

TNECD will provide a Duplication of Benefits policy for the CDBG-DR program. The local jurisdiction may provide additional detail for how it will prevent a duplication of benefits of grant funds.

Enter response here.

Metro Nashville will implement policies and procedures to comply with the duplication of benefits requirement. In addition, Metro Nashville Housing Division staff will be properly trained on duplication of benefits analysis, and Metro will endeavor to enter into data-sharing agreements with FEMA and SBA.

4. Program Budget

Budget

Complete program budget broken down by the program. Detailed activity budget will be developed at a later stage.

Total Allocation of CDBG-DR Funds: Enter response here.

Program Category	Program	CDBG-DR Funds Distribution (\$)	Estimated Number of Grant-Funded Activities (#)
Housing	Rehabilitation/ Reconstruction	\$1,642,120.05	32
	New Construction	\$7,037,853.55	40
Infrastructure	Water/Sewer Improvements	\$0	0
	Health Facilities	\$0	0
	Other	\$0	0
Mitigation	Mitigation Only (No Disaster Tie-back)	\$1,624,120.05	54
Administration	Administration	\$541,373.35	N/A

Program Budget Narrative

Provide a general narrative for considered activities that may be proposed based on the unmet needs analysis and the program budget above.

Enter response here.

Housing - Rehabilitation/Reconstruction

Metro is budgeting \$1,624,120.05 to support the following rehabilitation/reconstruction activities in the most impacted and distressed zip codes listed below.

1. *Reimbursement of costs to homeowners*

Metro will prioritize Rehab/Reconstruction funding to reimburse homeowners who used their own funds to make repairs to homes impacted by the 2020 tornado upon the following conditions:

- a. Person applying for reimbursement resided in the home as the principal place of residence on March 3, 2020, and still resides in the home as the principal place of residence.
- b. Home sustained damage from the March 3, 2020, tornado as verified by local and federal (FEMA) records.
- c. Costs are for rehabilitation/reconstruction of the primary dwelling unit (not ADUs, detached garages, sheds, etc.) within the original footprint.
- d. Costs must be reasonable (i.e., based upon estimates or invoiced worked) and documented by receipts.
- e. Costs were not covered by FEMA, insurance, or other local, state, or federally funded program as determined by a duplication of benefits analysis performed by Metro.
- f. Rehabilitation/reconstruction work meets all HUD environmental review requirements prior to reimbursement.
- g. Homeowners apply for reimbursement from Metro within 12 months from the date the program is opened.
- h. Household income at the time of application for reimbursement does not exceed 80% of the area median income (AMI).

Homeowners who are interested in receiving reimbursement may contact MetroHousing@nashville.gov to be notified when the program opens.

2. *Rehabilitation/reconstruction of acquired properties*

Metro will utilize a portion of the Rehab/Reconstruction funding to support nonprofit organizations procured through a competitive process to acquire and rehab/reconstruct vacant properties under the following parameters:

- a. Homes are vacant and acquired through voluntary acquisition.
- b. Rehab/reconstruction work meets all HUD environmental review requirements.
- c. Homes are not located in a floodplain or floodway.
- d. Rehab/reconstruction will meet energy star or other third-party green building standards and incorporate measures to make homes more resilient to windstorms and tornadoes.
- e. Homes are sold and affordable to households with incomes at or below 80% AMI.
 - i. First priority will be given to income-eligible buyers who resided in one of the most impacted and distressed zip codes (either as an owner or renter) as of March 3, 2020, but were subsequently displaced.

- ii. Second priority will be given to income-eligible buyers who currently reside in one of the most impacted and distressed zip codes as a renter or owner but are cost-burdened.
- iii. Third priority will be given to income-eligible first-generation homebuyers.
- iv. All buyers must qualify for a mortgage.
- f. Homes will have a 30-year deed of restrictive covenant that runs with the land. Metro will utilize the resale approach which requires any homes sold during the 30-year period must remain affordable and be sold to households with incomes at or below 80% AMI.

Housing - New Construction

Metro is budgeting \$7,037,853.55 for the construction of new homes by nonprofit organizations procured through a competitive process in the most impacted and distressed zip codes with the following parameters.

- a. Project meets all HUD environmental review requirements.
- b. Homes are not located in a floodplain or floodway.
- c. Homes will meet energy star or other third-party green building standards and incorporate measures to make homes more resilient to windstorms and tornadoes.
- d. Homes may be attached or detached. At least 75% of homes in a project must be sold as affordable to households with incomes at or below 80% AMI. Remaining homes in a project may be sold as affordable to households with incomes not exceeding 120% AMI. However, all homes in a project must be comparable in size and finishes.
 - i. First priority will be given to income-eligible buyers who resided in one of the most impacted and distressed zip codes (either as an owner or renter) as of March 3, 2020, but were subsequently displaced.
 - ii. Second priority will be given to income-eligible buyers who currently reside in one of the most impacted and distressed zip codes as a renter or owner but are cost-burdened.
 - iii. Third priority will be given to income-eligible first-generation homebuyers.
 - iv. All buyers must qualify for a mortgage.
- e. Homes will have a 30-year deed of restrictive covenant that runs with the land. Metro will utilize the resale approach which requires any homes sold during the 30-year period must remain affordable and be sold to households at the designated AMI.
- f. Metro reserves the right to include additional requirements, particularly for any Metro land that may be made available.

Most Impacted and Distressed Zip Codes

The housing activities described above are designed to promote long-term recovery and stabilize neighborhoods most affected by the March 3, 2020, tornado. Therefore, projects may only be undertaken in the zip codes list below:

37013 37210
 37076 37214
 37115 37216
 37203 37217
 37206 37218
 37207 37243
 37208 37138
 37209

Mitigation Only

Metro is allocating \$1,624,120.05 or 15% of its allocation as per the Federal Register Notice for mitigation activities. Proposed mitigation activities were informed by Metro’s Hazard Mitigation Plan, Climate Adaptation and Resilience Plan, and Technical Assistance Panel Report – Sustaining Nashville: Building Sustainability and Resiliency into Affordable Housing. These reports identified substandard housing owned by low- and moderate-income households as most vulnerable to threats and hazards. To mitigate these risks, Metro will make funding available to nonprofit organizations for the rehab of owner/occupied homes under the parameters listed below. Because any area of the county may be at risk of a threat or hazard, mitigation activities may be undertaken county-wide but priority will be given to homes in areas at risk of housing loss due to market pressures and gentrification using a Displacement Risk Ratio Analysis.

- a. Rehab work meets all HUD environmental review requirements.
- b. Homes are not located in a floodplain or floodway.
- c. Rehab will correct all code deficiencies and will incorporate energy star or other third-party green building standards as well as measures to make homes more resilient to windstorms and tornadoes. Rehab may include accessibility improvements.
- d. Home is the primary residence for the owner.
- e. Household income is at or below 80% AMI.
- f. Home may not have received other disaster recovery assistance.
- g. Metro may require a lien be placed upon the property for a period of time to preserve and protect the public investment.

Administration

Metro is budgeting \$541,373.35 or 5% as per the Federal Register Notice to administer the grant. A portion of funds may be used to support MDHA assistance with procurement and environmental reviews.

Leveraged Funds

Does the local jurisdiction anticipate any additional public or private funding will be used in conjunction with these CDBG-DR funds? If yes, provide a narrative explaining the source(s) of the leveraged funds, the estimated leveraged funding amount(s), and the program(s) the leveraged funding will go toward.

Enter response here.

Metro Nashville anticipates nonprofit partners leveraging additional public funds for new construction and rehab projects through the Barnes Fund, Metro’s local housing trust fund. In recent years, the Barnes Fund has been appropriated \$30 million annually by Metro Council. Funds are awarded via a competitive application to nonprofit organizations. As a requirement to maintain affordability, all Barnes Fund projects, except owner-occupied rehabs, must be affordable for 30 years.

In addition to the Barnes Fund, partners may leverage funding for predevelopment and other costs through the newly launched Catalyst Fund. The Catalyst Fund leveraged \$20 million in American Rescue Plan Act (ARPA) funds to attract an additional \$55.5 million in private investments, creating a flexible funding source for mission-driven developers.

Also, Metro will make property located at 2119 24th Avenue North (37208) available for a new construction project and may make additional property available in the targeted zip codes.

Given the focus of the 2020 CDBG-DR grant on homeownership, partners are encouraged to utilize downpayment assistance and mortgage products offered by the Tennessee Housing Development Agency (THDA).

Program Partners

Does the local jurisdiction anticipate utilizing any formal partnerships during the execution of projects and activities? If yes, list the partners, their expertise, and their roles.

Enter response here.

Metro anticipates partnering with the Metropolitan Development and Housing Agency (MDHA) to assist with procurement activities and environmental reviews. MDHA serves as the administrator of the Consolidated Plan and its related programs, including other CDBG-DR activities, on behalf of Metro Nashville. MDHA's procurement process incorporates HUD requirements, and MDHA performs Part 50 and 58 environmental reviews for all HUD-funded projects.

Metro will award funds for all activities, except Administration, via requests for proposals/applications from nonprofits and/or nonprofit-led partnerships. Awards will be made based on the most responsive and responsible proposals/applications according to the evaluation criteria.

Program Administration

Describe how the program will be administered to complete the grant-funded activities by 2030 and maintain compliance with CDBG-DR rules and requirements. Will any third-party organizations be used to assist with the program administration? If yes, list the organizations, their experience with CDBG programs, and their roles in the administration.

Enter response here.

The Metro Housing Division will administer the 2020 CDBG-DR grant and maintain compliance with CDBG-DR rules and requirements. The Metro Housing Division Director oversaw the administration of Metro's CDBG-DR grant following the 2010 flood, as well as the administration of Metro's Consolidated Plan and related programs in her role as Community Development Director at MDHA from 2012-2018. From her role at a development district (2018-2021), the Housing Director is experienced with State CDBG grants in addition to entitlement funds. Having worked a considerable amount of time with the State Comptroller's Office, the Housing Director has a deep compliance background. The Metro Housing Division is supported by a Compliance Monitor also with experience in State CDBG grants. The Compliance Monitor will create an internal control checklist and standard operating procedures for all grant-related activities modeled after HUD's. Also, the Housing Division has implemented new databases for project management to track milestones and performance metrics.

As mentioned in the previous section, Metro will partner with MDHA, who will assist with procurement and environmental reviews.

NOTICE OF PUBLIC HEARINGS AND REQUEST FOR PUBLIC COMMENT

2020 CDBG DISASTER RECOVERY ACTION PLAN

Purpose and Summary: The Metropolitan Government of Nashville and Davidson County (Metro Nashville) has been allocated \$10,827,467 in Community Development Block Grant Disaster Recovery (CDBG-DR) funds from the U.S. Department of Housing and Urban Development (HUD) through the Tennessee Department of Economic and Community Development (TNECD) for long-term recovery and disaster mitigation activities in response to the March 2020 tornado.

To receive these funds, the Housing Division of the Metropolitan Nashville Planning Department (Metro Housing Division) is preparing an Action Plan which describes how Metro Nashville will utilize these funds to address unmet housing needs, particularly in zip codes impacted by the March 2020 tornado. Proposed activities support the rehabilitation of owner-occupied homes, as well as construction of new homes and voluntary acquisition and rehabilitation of vacant homes to sell to qualified households. Preserving and facilitating homeownership in areas impacted by the tornado and in areas at risk of housing loss due to market pressures promote long-term recovery, mitigate disaster-related effects, stabilize neighborhoods, and further housing security. Proposed activity budgets are listed below. CDBG-DR funds must predominately serve households with incomes at or below 80% of the area median income.

Rehab/Reconstruction	\$ 1,624,120.05
New Construction	\$ 7,037,853.55
Mitigation	\$ 1,624,120.05
Administration	\$ 541,373.35
TOTAL	\$10,827,467.00

Beginning Monday, December 30, 2024, the 2020 CDBG-DR Action Plan will be available to view and download at [Metro Nashville Housing Division | Nashville.gov](https://www.metrohousing.com/nashville) or by requesting a copy via email to MetroHousing@nashville.gov (Subject: Request for 2020 CDBG-DR Action Plan) or contacting the Housing Division at 615-862-6283.

Public Hearings: The Metro Housing Division will host two public hearings on the 2020 CDBG-DR Action Plan to allow members of the public to learn more about the proposed activities and provide comments.

Virtual

January 14, 2024

5:00 p.m.

[01.14.25 | Davidson County 2020 Tornado Recovery Grant Meeting Link](#)

Meeting Password: 011425

If you have difficulties accessing the meeting, please email MetroHousing@Nashville.gov.

In-Person

January 16, 2024

5:00 p.m.

Metro Police Department North Nashville Precinct
Community Room
2231 26th Avenue N.
Nashville, TN 37208

Public Comments: In addition to the public hearing, members of the public may submit written comments **through 11:59 p.m., central time, on Thursday, January 16, 2025**. Comments may be submitted in any of the following ways:

- Completing a [Comment Form](#);
- Emailing Metrohousing@nashville.org, Subject: 2020 CDBG-DR Grant Comments;
- Mailing to Metro Nashville Planning Department, Attention: 2020 CDBG-DR Grant Comments, Metro Housing Division, 800 President Ronald Reagan Way, Nashville, TN 37210 (post-marked no later than January 16, 2025); or
- Hand-delivered during business hours (Monday-Friday, 9:00 am to 4:30 pm) to Metro Nashville Housing Division, Attention: 2020 CDBG-DR Grant Comments, 800 President Ronald Reagan Way, Nashville, TN 37210 (date-stamped no later than January 16, 2025).

Request for accommodations: The Planning Department does not discriminate on the basis of race, color, national origin, gender, gender identity, sexual orientation, age, religion, creed, or disability in admission to, access to, or operations of its programs, services, or activities. For ADA inquiries and accommodations, contact Randi Semrick, ADA Compliance Coordinator, at (615) 862-7230 or e-mail her at randi.semrick@nashville.gov. For Title VI inquiries, contact Human Relations at (615) 880-3370. If any accommodations are needed for individuals who wish to attend a public hearing, please request the accommodation as soon as possible, but 72 hours prior to the scheduled meeting is recommended.

Para asistencia en Español llame al 615-862-7230

如果需要本通知的中文翻译 · 请打电话 615-862-7230

Để nhận một bản dịch Tiếng Việt của thông báo này, vui lòng gọi: 615-862-7230

615-862-7230: ب الإلتصال يرجى، نايبلا لهذا عربية ترجمة على للحصول

Haddii aad rabto qoraalkan oo af-Soomaali lagu tarjumay haddii aad doonayso fadlan naga soo wac: 615-862-7230.

Summary of Public Comments and Metro's Responses