

Substantial Amendment 4

| Substantial Amendment 4 | | | |
|-------------------------|------------|------------------------------|---|
| Previous Page # | New Page # | Section | Change/Addition/Deletion |
| 6 | N/A | Executive Summary | <p>Updated Table 1: 2016 - 2017 CDBG-MIT Program Allocation to reallocate \$41,993,205.84 from the GIP, CFHP, and Planning budgets to create a new Housing Oversubscription Program for Hurricane Irma (2017) damaged homes.</p> <p>Updated Infrastructure, Housing, and Planning budget and percentage accordingly.</p> |
| 73 | N/A | III. Projects and Activities | <p>Updated Table 20: 2016 - 2017 CDBG-MIT Program Allocation to reallocate \$41,993,205.84 from the GIP, CFHP, and Planning budgets to create a new Housing Oversubscription Program for Hurricane Irma (2017) damaged homes.</p> <p>Updated Infrastructure, Housing, and Planning budget and percentage accordingly.</p> |
| N/A | 74 | III. Projects and Activities | <p>Added Table 22: Budget Adjustment of 2016-2017 CDBG-MIT Funds, as well as a brief justification for the reallocation of funds.</p> <p>Changed Planning budget from 5 percent to 2.5 percent to reflect new Planning Budget.</p> |
| N/A | 75 | III. Projects and Activities | <p>Changed Planning budget from 5 percent to 2.5 percent to reflect new Planning Budget.</p> <p>Added brief description of the Housing Oversubscription Program.</p> |
| N/A | 76 | III. Projects and Activities | <p>Added "Housing" and the "Hurricane Irma Housing Oversubscription" Program to the existing list of categories and program areas in the CDBG-MIT grant.</p> <p>Changed Infrastructure program percentage from 87 percent to 82.5 percent.</p> <p>Changed GIP percentage from 75 percent to 71 percent.</p> |
| 76 | 77 | III. Projects and Activities | <p>In Table 23: 2016-2017 General Infrastructure Program (GIP) Adjusted "Funding Dollars" to \$450,536,057.16 "Funding Percentage" to 71 percent "HUD-MID Area Allocation Minimum" to \$225,268,029 and "LMI Designation Allocation Minimum" to \$225,268,029 and Applicant Maximum to \$450,536,057.16.</p> |

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|-----|-------|------------------------------|---|
| 81 | 82 | III. Projects and Activities | In Table 26: 2016-2017 Critical Facility Hardening Program (CFHP) Adjusted “Funding Dollars” to \$73,474,529, “Funding Percentage” to 11.5 percent, “HUD-MID Area Allocation Minimum” to \$36,737,265 and “LMI Designation Allocation Minimum” to \$36,737,265. |
| | 88 | III. Projects and Activities | Changed Planning budget from 5 percent to 2.5 percent to reflect new Planning Budget. |
| N/A | 88-89 | III. Projects and Activities | Added “c. 2016 and 2017 Housing Programs” which includes subsection “i. Housing Oversubscription Program” describing the new Housing Oversubscription Program that will serve Hurricane Irma Housing Repair and Replacement Program applicants that were not able to be served with Hurricane Irma CDBG-DR funding. |
| N/A | 148 | Appendices | Added Appendix H—Summary of Public Comments for Substantial Amendment. |
| N/A | N/A | | Made minor typographical, grammatical, and formatting corrections throughout the document. |

from Florida communities on their mitigation priorities. The State Action Plan used this input in determining how to distribute the federal funds to help better protect Florida's communities from future disasters.

In response to the goals of risk mitigation and increased resilience and in consideration of stakeholder and community input, the state of Florida has proposed CDBG-MIT programs that will focus on both infrastructure and planning as follows:

1. Infrastructure

- General Infrastructure
- Critical Facility Hardening

2. Planning and Administrative Costs

- General Planning Support
- DEO Administration
- DEO Planning

3. Housing

- Hurricane Irma Housing Oversubscription

The new CDBG-MIT funds will be added to the General Infrastructure activities proposed in the initial Action Plan.

The proposed allocations for both CDBG-MIT programs and their share of the total funding are presented below.

Table 1: 2016-2017 CDBG-MIT Program Allocation

| Allocation of 2016-2017 CDBG-MIT Funds | | | | |
|--|-------------------------|----------------------------|---------------------------------|------------------------------------|
| Program | Allocation | Percent of Overall Funding | HUD-MID Area Allocation Minimum | LMI Designation Allocation Minimum |
| Infrastructure | \$524,010,586.16 | 82.5% | \$262,005,293 | \$262,005,293 |
| General Infrastructure | \$450,536,057.16 | 71% | \$225,268,029 | \$225,268,029 |
| Critical Facility Hardening Program | \$73,474,529 | 11.5% | \$36,737,265 | \$36,737,265 |
| Housing | \$41,993,205.84 | 7% | \$20,996,603 | \$20,996,603 |
| Housing Oversubscription | \$41,993,205.84 | 7% | \$20,996,603 | \$20,996,603 |
| Planning and Administrative Costs | \$67,481,208 | 10.5% | | |
| General Planning Support | \$20,000,000 | 3% | \$10,000,000 | \$10,000,000 |
| DEO Administration | \$31,674,250 | 5% | | |
| DEO Planning | \$15,806,958 | 2.5% | | |
| Total Allocation | \$633,485,000 | 100% | \$293,001,896 | \$293,001,896 |

Table 20: Allocation of 2016 and 2017 CDBG-MIT Funds

| Allocation of 2016 and 2017 CDBG-MIT Funds | | | | |
|--|-------------------------|----------------------------|---------------------------------|------------------------------------|
| Program | Allocation | Percent of Overall Funding | HUD-MID Area Allocation Minimum | LMI Designation Allocation Minimum |
| Infrastructure | \$524,010,586.16 | 82.5% | \$262,005,293 | \$262,005,293 |
| General Infrastructure | \$450,536,057.16 | 71% | \$225,268,029 | \$225,268,029 |
| Critical Facility Hardening Program | \$73,474,529 | 11.5% | \$36,737,265 | \$36,737,265 |
| Housing | \$41,993,205.84 | 7% | \$20,996,603 | \$20,996,603 |
| Housing Oversubscription | \$41,993,205.84 | 7% | \$20,996,603 | \$20,996,603 |
| Planning and Administrative Costs | \$67,481,208 | 10.5% | | |
| General Planning Support | \$20,000,000 | 3% | \$10,000,000 | \$10,000,000 |
| DEO Administration | \$31,674,250 | 5% | | |
| DEO Planning | \$15,806,958 | 2.5% | | |
| Total Allocation | \$633,485,000 | 100% | \$293,001,896 | \$293,001,896 |

Table 21: Allocation of 2018 CDBG-MIT Funds

| Allocation of 2018 CDBG-MIT Funds | | | | |
|--|---------------------|----------------------------|---------------------------------|------------------------------------|
| Program | Allocation | Percent of Overall Funding | HUD-MID Area Allocation Minimum | LMI Designation Allocation Minimum |
| General Infrastructure Program | \$42,233,400 | 90% | \$21,116,700 | \$21,116,700 |
| Planning and Administrative Costs | \$4,692,600 | 10% | \$ | \$ |
| DEO Administration | \$2,346,300 | 5% | \$ | \$ |
| DEO Planning | \$2,346,300 | 5% | \$ | \$ |
| Total Allocation | \$46,926,000 | 100% | \$21,116,700 | \$21,116,700 |

Table 22: Budget Adjustment of 2016-2017 CDBG-MIT Funds

| Budget Adjustment of 2016 and 2017 CDBG-MIT Funds | | | |
|---|-------------------------|--------------------------------------|-------------------------|
| Program | Original Program Budget | June 13, 2022 Amended Program Budget | Amount Adjusted |
| Infrastructure | \$550,000,000 | \$524,010,586.16 | -\$25,989,413.84 |
| General Infrastructure | \$475,000,000 | \$450,536,057.16 | -\$24,463,942.84 |
| Critical Facility Hardening Program | \$75,000,000 | \$73,474,529 | -\$1,525,471 |
| Housing | \$0 | \$41,993,205.84 | +\$41,993,205.84 |
| Housing Oversubscription | \$0 | \$41,993,205.84 | +\$41,993,205.84 |
| Planning and Administrative Costs | \$83,485,000 | \$67,481,208 | -\$16,003,792 |
| General Planning Support | \$20,000,000 | \$20,000,000 | |
| DEO Administration | \$31,674,250 | \$31,674,250 | |
| DEO Planning | \$31,810,750 | \$15,806,958 | -\$16,003,792 |
| Total Allocation | \$633,485,000 | \$633,485,000 | |

Substantial amendment number 4 to the State of Florida Mitigation Action Plan submitted to HUD on 9/2/2022 re-allocated \$41,993,205.84 from 2016-2017 MIT Funds for Infrastructure and Planning to create the Housing Oversubscription Program (HOP) to help address additional unmet needs in the Hurricane Irma Housing Repair and Replacement Program (HRRP) administered under the State of Florida Action Plan for Disaster Recovery. The HOP will follow the mission of the HRRP—to repair, replace, or reconstruct eligible homes—with an additional focus on mitigation measures, which 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 for homeowners located in HUD and State MID areas affected by the 2017 disaster, Hurricane Irma.

C. 2016 and 2017 CDBG-MIT Program

1. 2016 and 2017 CDBG-MIT Program Overview

In accordance with Federal Register Vol. 84 No. 169, DEO’s aggregate total for indirect costs and administrative and technical assistance expenditures will not exceed 5 percent of its total grant (\$31,674,250) plus program income. Planning costs are subject to the 15 percent cap (\$95,022,750) defined in 42 U.S.C. 5305(a) (12). The state is

proposing a **planning** budget of **2.5 percent (\$15,806,958)**. Per the Federal Register, CDBG-MIT funds can be used to meet a matching requirement, share or contribution for other federal grant programs if they are used to carry out an eligible mitigation activity. This includes mitigation grants administered by FEMA and the United States Army Corps of Engineers. (The maximum amount for the US Army Corps of Engineers is \$250,000.) Activities that are funded with match dollars must meet the definition of a mitigation activity and must meet the eligibility requirements for the CDBG-MIT program and the federal program that is being aided with CDBG-MIT funds.

Eligible project delivery costs are presumed included as a portion of the overall CDBG-MIT grant funding allocation provided to each subrecipient. DEO will limit spending to a maximum of 11 percent of the total grant amount on a combination of planning and indirect and direct program administration costs. Subrecipients will be responsible for properly tracking and monitoring the expenses that may not be included as part of the overall grant award to each individual project or individual applicant as applicable.

DEO proposes two primary mitigation categories; Infrastructure and Planning. Within these two categories are programs that focus on risk reduction for the hazards identified in the state Action Plan's risk-based mitigation needs assessment. These hazards include flooding, severe storms, tropical cyclones, coastal erosion and wildfires.

DEO is also proposing a HOP to help address additional unmet needs in the Hurricane Irma HRRP administered under the State of Florida Action Plan for Disaster Recovery. The HOP will follow the mission of the HRRP—to repair, replace, or reconstruct eligible homes—with an additional focus on providing mitigation measures, which 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 for homeowners located in HUD and State MID areas affected by the 2017 disaster, Hurricane Irma.

Eligible CDBG-MIT activities are set forth in the Housing and Community Development Act of 1974 (HCDA). HCDA activities that meet the criteria for both Infrastructure and Planning include: the payment of the non-Federal share required in connection with a Federal grant-in-aid program undertaken as part of activities assisted under this title and the provision of assistance including loans (both interim and long-term) and grants for activities which are carried out by public or private nonprofit entities, including: acquisition of real property; acquisition, construction, reconstruction, rehabilitation or installation of public facilities (except for buildings for the general conduct of government), site improvements, and utilities, and commercial or industrial buildings or structures and other commercial or industrial real property improvements; and planning.¹

The categories and program areas in this CDBG-MIT grant are:

- Infrastructure Programs
 - General Infrastructure; and

¹ U.S. Department of Housing and Urban Development (n.d.). State CDBG Program Guide to National Objectives and Eligible Activities for State CDBG Programs - Appendix A. Retrieved from The Housing and Community Development Act of 1974 (HCDA) Eligible Activities for States Section 105(a)(14).

- Critical Facility Hardening
- Planning, Administration and Public Services
 - General Planning Support;
 - DEO Administration; and
 - DEO Planning.
- Housing
 - Hurricane Irma Housing Oversubscription

These programs are summarized below.

2. 2016 and 2017 CDBG-MIT Program Details
 - a. 2016 and 2017 Infrastructure Programs

Infrastructure is the largest program area and is comprised of two programs: General Infrastructure and Critical Facility Hardening. These infrastructure programs will account for 82.5 percent of the total CDBG-MIT allocation.

Both programs are detailed below.

- i. 2016 and 2017 General Infrastructure Program (GIP) Overview

The GIP will account for 71 percent of the total CDBG-MIT grant funding. It is the broadest, most flexible, and most impactful of proposed programs. The GIP will fund large scale and high impact local, multi-jurisdictional and regional investments that include: upgrading of water, sewer, solid waste, communications, energy, transportation, health and medical and other public infrastructure projects that will reduce the hazard risks identified in the Mitigation Needs Assessment portion of this Action Plan.

The state currently has no plans to fund housing programs with the CDBG-MIT funds, but recognizes that vulnerable populations include children, senior citizens, persons with disabilities, persons from diverse cultures, immigrants, transportation disadvantaged, homeless persons, persons with chronic medical disorders and persons with limited English or who are altogether non-English speaking. The state certifies that it will conduct and carry out grant expenditures in conformity with Title VI of the Civil Rights Act of 1964 (42 USC 2000d) and the Fair Housing Act (42 USC 3601-3619) and implementing regulations, and that it will affirmatively further fair housing as applicable to its projects.

General Infrastructure dollars will allow local and regional units of government to address their most pressing hazard mitigation needs and will require subgrantee applicants to document how their proposed projects will meet or exceed hazard reduction needs of their most vulnerable citizens and identify which critical lifelines are protected by each proposed project. Other considerations such as multi-use facilities and natural infrastructure developments will be encouraged through the subgrantee application process described herein.

In accordance with the HCDA, eligible activities for Infrastructure projects include the acquisition, construction, reconstruction, or installation (including design features and improvements with respect to such construction, reconstruction or installation that

promote energy efficiency) of public works, facilities (except for buildings for the general conduct of government), and site or other improvements.²

Table 23: 2016-2017 General Infrastructure Program (GIP)

DEO will provide an initial allocation of resources to Units of General Local Government (UGLG) and entities that apply in partnership with their UGLG with an emphasis on innovative, collaborative and/or large-scale mitigation activities that reduce risks. DEO will solicit applications for projects from the pool of eligible applicants. Each project will be prioritized based on the overall score from each category of scoring criteria.

| General Infrastructure Program (GIP) | |
|--------------------------------------|--|
| Funding Dollars | \$450,536,057.16 |
| Funding Percentage | 71% |
| HUD-MID Area Allocation Minimum | \$225,268,029 |
| LMI Designation Allocation Minimum | \$225,268,029 |
| Applicant Minimum & Maximum | \$500,000 - \$450,536,057.16 |
| Application Type | Subrecipient |
| Applicant Eligibility | UGLG, state agencies, and other applicants including, but not limited to, non-profits and non-governmental agencies that apply in partnership with their local UGLG or state agencies. |
| Geographic Eligibility | HUD and State designated MIDS |
| National Objectives Fulfilled | LMI and Urgent Need |
| Hazard Risks Addressed | Flooding, Severe Storms, Tropical Cyclones, Coastal Erosion, Wildfires |
| Lifelines Protected | Safety and Security, Food, Water and Shelter, Health and Medical, Energy, Communications, Transportation, Hazardous Materials |

² U.S. Department of Housing and Urban Development (n.d.). State CDBG Program Guide to National Objectives and Eligible Activities for State CDBG Programs - Appendix A. Retrieved from The Housing and Community Development Act of 1974 (HCDA) Eligible Activities for States Section 105(a)(2): https://www.hud.gov/sites/documents/DOC_16364.PDF

Table 26: 2016-2017 Critical Facility Hardening Program (CFHP)

| 2016-2017 Critical Facility Hardening Program | |
|---|---|
| Funding Dollars | \$73,474,529 |
| Funding Percentage | 11.5% |
| Project Minimum & Maximum | \$50,000 - \$15,000,000 |
| HUD-MID Area Allocation Minimum | \$36,737,265 |
| LMI Designation Allocation Minimum | \$36,737,265 |
| Application Type | Subrecipient |
| Applicant Eligibility | UGLG, state agencies and other applicants including, but not limited to, non-profits and non-governmental agencies that apply in partnership with their local UGLG or state agencies. |
| Geographic Eligibility | HUD and State-Designated MIDS |
| National Objectives Fulfilled | LMI and Urgent Need |
| Hazard Risks Addressed | Flooding, Severe Storms, Tropical Cyclones, Coastal Erosion, Wildfires |
| Lifelines Protected | Safety and Security, Health and Medical, Energy, Communications |

- **2016-2017 CFHP Eligibility Criteria**

To be eligible for funding, an application must:

- Be in conformance with the State Mitigation Plan and Local or Tribal Mitigation Plan approved under 44 CFR part 201.4; or for Indian Tribal governments acting as grantees, be in conformance with the Tribal Mitigation Plan approved under 44 CFR 201.7;
- Have a beneficial impact upon the designated disaster area;
- Solve a problem independently or constitute a functional portion of a solution in which there is assurance that the project will be completed. Projects that merely identify or analyze hazards or problems are not eligible;
- Consider the following for any flood mitigation project: high wind, continued sea level rise and ensure responsible floodplain and wetland management based on the history of flood mitigation efforts and the frequency and intensity of precipitation events;
- As a condition of consideration for project CDBG-MIT funding, applicants will be required to identify their plans for funding operations and maintenance costs (when

ii. 2016 and 2017 DEO Administration & Planning

In accordance with the Federal Register, DEO's aggregate total for indirect costs and administrative and technical assistance expenditures will not exceed 5 percent of its total grant (\$31,674,250) plus program income. Planning costs are subject to the 15 percent cap (\$95,022,750) defined in 42 U.S.C. 5305(a) (12). The state is proposing a **planning budget of 2.5 percent (\$15,806,958).**

Per the Federal Register, CDBG-MIT funds can be used to meet a matching requirement, share or contribution for other federal grant programs if they are used to carry out an eligible mitigation activity. This includes mitigation grants administered by FEMA and the United States Army Corps of Engineers. (The maximum amount for the US Army Corps of Engineers is \$250,000.) Activities that are funded with match dollars must meet the definition of a mitigation activity and must meet the eligibility requirements for the CDBG-MIT program and the federal program that is being aided with CDBG-MIT funds.

Eligible project delivery costs are presumed included as a portion of the overall CDBG-MIT grant funding allocation provided to each subrecipient. DEO will limit spending to a maximum of 10.5 percent of the total grant amount on a combination of planning and indirect and direct program administration costs.

c. **2016 and 2017 Housing Programs**

iii. **Housing Oversubscription Program (HOP)**

Hurricane Irma (2017) had a devastating impact on the Florida housing market, destroying thousands of homes. The Hurricane Irma HRRP is a state-run housing program administered under the State of Florida Action Plan for Disaster Recovery.

However, a portion of applicants to the Hurricane Irma HRRP remain unserved. This housing unmet need has only been exacerbated by rising construction costs following Hurricane Michael and the 2019 Novel Coronavirus (COVID-19) pandemic. In order to accomplish more of the remaining unmet housing need in the Hurricane Irma impacted counties, DEO is creating the HOP. The HOP will follow the mission of the HRRP—to repair, replace, or reconstruct eligible homes—with an additional focus on providing mitigation measures that 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 for homeowners located in HUD and State MID areas affected by 2017 disaster, Hurricane Irma.

At present, the HRRP program is oversubscribed, with the number of HRRP applications for assistance exceeding the available program funds needed to move forward with the repair or replacement of damaged homes. Consequently, HRRP applicants potentially eligible for assistance are unable to be served until further funding becomes available. Additional CDBG-MIT funding is being allocated to help address HRRP funding limitations so that additional homeowners may be served in the state's recovery process. The HRRP awarded applicants based on specific prioritization of vulnerable populations. For additional details of this housing recovery program, please refer to the state action plan on DEO's CDBG-DR website at <https://www.floridajobs.org/rebuildflorida/mitigation>

Table 30: 2016-2017 Housing Oversubscription Program (HOP)

| Housing Oversubscriptions Program (HOP) | |
|---|---|
| Funding Dollars | \$41,993,205.84 |
| Funding Percentage | 7% |
| HUD-MID Area Allocation Minimum | \$20,996,603 |
| LMI Designation Allocation Minimum | \$20,996,603 |
| Applicant Minimum & Maximum | \$350,000, except in Monroe County which has a maximum assistance of \$650,000 |
| Application Type | Citizen |
| Applicant Eligibility | Eligible Applicants who have been awarded through the CDBG-DR Hurricane Irma HRRP |
| Geographic Eligibility | HUD and State designated MIDs |
| National Objectives Fulfilled | LMI |
| Hazard Risks Addressed | Flooding, Severe Storms, Tropical Cyclones, Coastal Erosion, Wildfires |
| Lifelines Protected | Safety and Security, Food, Water and Shelter |

D. 2018 CDBG-MIT Program

To streamline program delivery, DEO will offer one consolidated program for 2018 Mitigation: General Infrastructure Program (2018 GIP). The program focuses on risk reduction for the hazards identified in the state Action Plan’s risk-based mitigation needs assessment. These hazards include flooding, severe storms, tropical cyclones, coastal erosion, and wildfires. At this time, the CDBG-MIT program will not pursue housing as a program activity. The state is addressing the housing need through the CDBG-DR grant funds administered by DEO.

1. 2018 CDBG-MIT Program Details**a. 2018 General Infrastructure Program (2018 GIP) Overview**

The 2018 GIP will account for 90 percent of the total CDBG-MIT grant funding. It is a broad and flexible program that will fund local, multi-jurisdictional and regional investments that include:

- Upgrading of water, sewer, solid waste, communications, energy, transportation, health and medical, and other public infrastructure projects that will reduce the hazard risks identified in the Mitigation Needs Assessment portion of this Action Plan.

Appendix H - Summary of Public Comments for Substantial Amendment 4

1. Responses to Public Comment

This document describes the comments received from the public following the release of Substantial Amendment 4 to the Community Development Block Grant – Mitigation (CDBG-MIT) draft State Action Plan.

Release Date: July 19, 2022

Comment Period: July 19, 2022 – August 18, 2022

Approved by HUD: October 21, 2022

Number of Comments received: Four

Comments were received via email. The duration of the public comment period and as instructions for how to submit public comments were posted to the webpage. More information can be found on the CDBG-MIT official webpage at www.floridajobs.org/CDBG-MIT.

(1) DEO received three comments expressing frustration with the timeliness of assistance provided to individuals impacted by Hurricane Irma, specifically through the HRRP.

Staff Response: DEO acknowledges receipt of these comments and encourages Rebuild Florida Housing Repair and Replacement Program applicants to reach out to their Rebuild Florida Intake Specialist or OLTR Constituent Management Services staff via email at CDBG-DR@deo.myflorida.com for specific application status information.

At a minimum, 70 percent of program funds must meet the Low- and Moderate-Income (LMI) national objective as directed in Federal Register, Vol. 83, No. 28, February 9, 2018. At-risk and vulnerable populations with the greatest needs will be prioritized. LMI households with one or more of the following vulnerability factors will be prioritized and processed in the order that they complete an application:

- Households with seniors age 62 and older.
- Households with children under the age of 18.
- Households with special needs or special accommodation requirements (disabled).
- Persons who have been displaced from Puerto Rico and the U. S. Virgin Islands and are permanently resettling in Florida.

In addition, the purpose of the Housing Oversubscription Program (HOP) is to utilize CDBG-MIT funding to serve individuals who have applied to the Hurricane Irma HRRP to receive assistance for home damage caused by Hurricane Irma. DEO's intention in implementing the HOP is to better serve more eligible individuals in a timely manner.

(2) DEO received one comment from a coalition in South Florida requesting that grant funding be reopened to assist individuals in two South Florida counties (Hendry and Glades) to assist “residents impacted by (Hurricane) Irma” with unmet housing needs. This commenter also expressed that DEO should increase outreach efforts to Limited English Proficiency (LEP) individuals in these areas to include “door to door” outreach and mailers.

Staff Response: DEO acknowledges receipt of this comment and has reached out to the commenter directly to provide further information and response.

Due to catastrophic damage caused by Hurricane Irma and because the CDBG-DR funding allocated to Florida does not meet the estimated amount of damage caused, DEO will not be able to meet all needs. Recognizing that the HRRP allocation for owner-occupied housing and rental properties will likely not address all needs, at-risk and vulnerable populations with the greatest needs will be prioritized. In addition, the purpose of the HOP is to utilize CDBG-MIT funding to serve individuals who have applied to the Hurricane Irma HRRP to receive assistance for home damage caused by Hurricane Irma. DEO’s intention in implementing the HOP is to serve individuals whose housing situation was impacted by Hurricane Irma, especially those in historically underserved communities and populations with LEP.

In future outreach, DEO will ensure that outreach materials continue to be provided in languages and formats accessible to the communities impacted by the applicable disaster. In the future, DEO may utilize mailers as outreach to impacted communities, especially those that have been historically underserved.