

STATE OF FLORIDA 2020

MITIGATION ACTION PLAN

Submitted to the U.S.
Department of Housing and
Urban Development Block
Grant-Mitigation (CDBG-MIT)
program in response to
Hurricanes Hermine (2016),
Matthew (2016), and Irma (2017).



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I. DEFINITIONS, ACRONYMS & ABBREVIATIONS

- **100-year flood plain**—The geographical area defined by FEMA as having a 1% chance of being inundated by a flooding event in any given year.
- **500-year flood plain**—The geographical area defined by FEMA as having a .2% chance of being inundated by a flooding event in any given year.
- **Accessibility**—means that the public or common use areas of the building can be approached, entered, and used by individuals with physical disabilities.
- **Accessibility Standards**—regulations that require housing to be accessible to individuals with physical disabilities, such as the 1968 Fair Housing Act, Section 504 of the 1973 Rehabilitation Act, the Americans with Disabilities Act, and the Architectural Barriers Act.
- **Affirmatively Furthering Fair Housing**—refers to the 1968 Fair Housing Act's obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability, or familial status.
- **BRACE**—Building Resilience Against Climate Effects
- **CDBG**—Community Development Block Grant
- **CDBG-DR**—Community Development Block Grant - Disaster Recovery
- **CDBG-MIT**—Community Development Block Grant - Mitigation
- **CFHP**—Critical Facility Hardening Program (one of three CDBG-MIT subrecipient funding application options)
- **Community participation engagement**—The process of soliciting feedback from and implementing suggestions by the residents who will be affected by a proposed project.
- **DEO**—Department of Economic Opportunity
- **DEP**—Department of Environmental Protection
- **Designated area**—The land determined by the subrecipient that is eligible for mitigation assistance.
- **DOB**—Duplication of Benefits. Any assistance provided to subrecipients for the same purpose (i.e., for repair, replacement or reconstruction) as any previous financial or in-kind assistance already provided for the same. Rebuild Florida is prohibited from creating a DOB. This prohibition comes from the Robert T. Stafford Disaster Assistance and Emergency Relief Act (Stafford Act) and therefore, these other sources of funds must be deducted from any potential award.
- **DOH**—Department of Health
- **DEM**—Florida Division of Emergency Management

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- **Effective communications**—Provision of auxiliary aids and services necessary to communicate with persons with disabilities.
- **Environmental justice**—the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.
- **ESHMP**—Enhanced State Hazard Mitigation Plan
- **Fair housing and equal opportunity**—refers to the 1968 Fair Housing Act (amended in 1974 and 1988) providing the HUD Secretary with fair housing enforcement and investigation responsibilities. A law that prohibits discrimination in all facets of the homebuying process on the basis of race, color, national origin, religion, sex, familial status or disability.
- **FEMA**—Federal Emergency Management Agency
- **GIP**—General Infrastructure Program (one of three CDBG-MIT subrecipient funding application options)
- **GPS**—General Planning Support (one of three CDBG-MIT subrecipient funding application options)
- **HAZUS-MH**—Hazards U.S. Multi-Hazard
- **HCDA** - Housing and Community Development Act of 1974
- **HelpFL**—Hazard Events and Location Prognosticator – Florida. A tool developed by the University of South Carolina used to update and advance the science of spatially enabled hazard models and to develop and deploy a hazards analysis web mapping application. Project was funded by an HMGP planning grant.
- **HMGP**—Hazard Mitigation Grant Program
- **HUD**—U.S. Department of Housing & Urban Development
- **IBC**—International Business Code
- **ICE**—Independent Cost Estimates
- **Limited English proficiency**—Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.
- **LMA**—Land Management Agencies
- **LMI**—Low to Moderate Income. An income of less than 50% to 80% of the local area median income.
- **LMH**—Low to Moderate Income Household. A household with an income of less than 50% to 80% of the local area median income (AMI).
- **LMS**—Local Mitigation Strategy
- **Low-income Population** - a group of individuals living in geographic proximity to one another, or a geographically dispersed or transient (migrant) group of individuals that have household incomes at or below poverty level.

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- **MIDs**—Most Impacted and Distressed areas
- **Minority**—a racial, ethnic, religious, or social subdivision of a society that is subordinate to the dominant group in political, financial, or social power without regard to the size of these groups.
- **Low income areas and populations**—populations protected by Executive Order 12898. Federal agencies are required to consider how federally assisted projects may have disproportionately high and adverse human health or environmental effects on minority and low-income populations.
- **Minority concentration**—a location is considered to be in an area of minority concentration when either: A) the percentage of persons of a particular racial or ethnic minority within the area of the site is at least 20 percentage points higher than the percentage of that minority group in the housing market area as a whole or B) the total percentage of minority persons within the area of the site is at least 20 points higher than the total percentage of minorities in the housing market area as a whole.
- **NCEI**—National Centers of Environmental Information
- **NFIP**—National Flood Insurance Program.
- **Prohibited bases**—Civil rights statutes establish the demographic categories by which discrimination is prohibited. Under the Fair Housing Act, the prohibited bases are race, color, religion, sex, national origin, familial status, and disability.
- **Reasonable accommodations**—under the Fair Housing Act, a reasonable accommodation is a change, exception, or adjustment to a rule, policy, practice, or service.
- **Subrecipient**— A city or a county that has applied for and been awarded a grant by the Florida Department of Economic Opportunity (DEO).
- **TBD**—To Be Determined
- **UGLG**—Units of General Local Government. Cities, counties, towns, villages and other general-purpose political subdivisions of a state.
- **WMD**—Water Management District

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III. EXECUTIVE SUMMARY

Community Development Block Grant Mitigation (CDBG-MIT) funds represent a unique and significant opportunity for the state of Florida, in the areas most impacted by recent disasters, to carry out strategic and high-impact activities to minimize or eliminate risks and reduce losses from future disasters. In addition to mitigating disaster risks, the funds provide an opportunity to improve state and local planning protocols and procedures.

The Florida Department of Economic Opportunity (DEO) has led the state's efforts in creating this State Action Plan that provides a high-level strategy for how the funding will be used to address eligible communities' disaster mitigation needs. The State Action Plan has been developed in partnership with state agencies working on resiliency efforts, as well as with input from local communities and stakeholders to determine Florida's most critical disaster mitigation needs.

Florida's focus is to support data-informed investments through high-impact projects that will reduce risks attributable to natural disasters, with particular attention to repetitive losses of property and critical infrastructure. The state also supports the adoption of policies that reflect local and regional priorities that will have long-lasting effects on community risk reduction, to include the reduction of risk to community lifelines such as Safety and Security and Communications.

Due to its unique geography, the state of Florida is at risk of experiencing a variety of hazards including tropical winds, storm surge, flash flooding, sea level rise, coastal erosion, extreme heat, drought and wildfires. Florida has experienced more landfalling hurricanes than any other state in the nation. Winds can potentially affect any county in Florida and storm surge can impact all of Florida's coastal counties. In addition, according to the 2018 Florida Division of Emergency Management's Enhanced State Hazard Mitigation Plan (ESHMP), sea levels have been rising at a rate of about one foot per century in much of the United States. In combination with land subsidence, rising sea levels can affect drinking water supplies and infrastructure and can also amplify storm surge risk and coastal erosion.

Florida has more than 11,000 miles of rivers, streams and waterways with 1,197 miles of coastline and 663 miles of beaches. Florida is also home to the 700-square mile Lake Okeechobee, the second largest freshwater lake in the United States. Of the state's 67 counties, 35 have coastlines bordering either the Atlantic Ocean or the Gulf of Mexico. These counties comprise approximately 1,350 miles of general coastline. When considering the intricacies of the Florida coastline, with its bays, inlets and waterways, there are more than 8,000 miles of coastline. All of these factors combined create complex and interconnected disaster risks that require innovative approaches to mitigate.

This State Action Plan reflects local and regional priorities that will have long-lasting effects on community risk reduction, including risk reduction to Safety and Security and Communications lifelines. The goal is to maximize the impact of available funds by encouraging and leveraging public-private partnerships and coordinating with other Federal and state programs. States are expected to take steps to set in place policies

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that will enhance the impact of the U.S. Department of Housing and Urban Development's (HUD's) investments.

HUD is providing the state of Florida with \$633,485,000 for mitigation activities in communities that experienced major declared disaster events during 2016 and 2017. DEO is the governor-designated state authority responsible for administering all long-term hazard mitigation and disaster recovery funds awarded to the state from HUD. This action plan details how this funding will be allocated to reduce the effects of natural disasters and eliminate long-term risks to Floridians.

The purpose of this mitigation action plan is to detail a strategy that:

- Reduces risks and vulnerabilities of people in hazard-prone areas through current technology, better planning and mitigation activities;
- Reduces the potential impact of natural disasters on new and existing properties, infrastructures and local economies;
- Promotes education, outreach and research and development programs to improve the knowledge and awareness among the citizens and industry about hazards they may face and mitigation alternatives that can reduce vulnerabilities;
- Strengthens communication and coordination between public agencies, citizens, non-profit organizations and businesses; and
- Emphasizes long-term, maximum benefits to the public.

Florida's Mitigation Program planning goal is to work with federal, regional and local partners to safeguard against loss of life and injury, disruptions to essential public services and infrastructure, economic impacts to residents and businesses, and losses to civic, cultural, and environmental resources. Florida's Mitigation Strategy is built on a comprehensive Risk Based Mitigation Needs Assessment, presented in this Action Plan, that has identified flooding, severe storms, tropical cyclones, coastal erosion and wildfires as the most significant risks to Floridians. Further, Florida's mitigation planning strategy seeks to protect seven critical community lifelines:

1. Safety and Security
2. Food, Water and Shelter
3. Health and Medical
4. Energy
5. Communications
6. Transportation
7. Hazardous Material

DEO, alongside other state agencies and local communities, has sought to engage with and seek input from local, state and federal partners on their disaster mitigation needs and priorities. DEO held statewide webinars, multiple regional workshops and sought input from community partners statewide through a survey to gather feedback from Florida communities on their mitigation priorities. This input was used to determine how to distribute the federal funds to help better protect Florida's communities from future disasters for this State Action Plan.

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In response to the goals of risk reduction and increased resilience and in consideration of stakeholder and community input, the state of Florida is proposing 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
 - DEP Planning

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

Allocation of CDBG-MIT Funds				
Program	Allocation	Percent of Overall Funding	HUD-MID Area Allocation Minimum	LMI Designation Allocation Minimum
Infrastructure	\$550,000,000	87%	\$275,000,000	\$275,000,000
• General Infrastructure	\$475,000,000	75%	\$237,500,000	\$237,500,000
• Critical Facility Hardening Program	\$75,000,000	12%	\$37,500,000	\$37,500,000
Planning and Administrative Costs	\$83,485,000	13%		
• General Planning Support	\$20,000,000	3%	\$10,000,000	\$10,000,000
• DEO Administration	\$31,674,250	5%		
• DEO Planning	\$31,810,750	5%		
Total Allocation	\$633,485,000	100%	\$285,000,000	\$285,000,000

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Each program is further described in Section VI of this Action Plan. These proposed programs will aid the state of Florida in protecting all of its citizens, including those most vulnerable to hazards.

IV. INTRODUCTION & BACKGROUND

A. What is Hazard Mitigation?

Hazard mitigation is defined as any action taken to reduce or eliminate the long-term risk to human life and property from man-made or natural hazards. A hazard is any event or condition with the potential to cause fatalities, injuries, property damage, infrastructure damage, agricultural loss, environmental damage, business interruption or other structural or financial losses.

Hazard mitigation seeks to make human development and the natural environment safer and more resilient. The mitigation process generally involves enhancing the built environment to significantly reduce risks and vulnerability to hazards. Mitigation can also include removing the built environment from disaster prone areas and maintaining natural mitigating features, such as wetlands or floodplains. Hazard mitigation makes it easier and less expensive to respond to, and recover from, disasters by breaking the damage and repair cycle.

Examples of hazard mitigation measures include, but are not limited to, the following:

- Development of mitigation standards, regulations, policies and programs;
- Land use/zoning policies;
- Strong statewide building code and floodplain management regulations;
- Dam safety programs, seawalls and levee systems;
- Acquisition of flood prone and environmentally-sensitive lands;
- Retrofitting/hardening/elevating structures and critical facilities;
- Relocation of structures, infrastructure and facilities out of vulnerable areas;
- Permanent relocation of residential housing and businesses located in in high-risk areas through voluntary buyback programs, appropriate relocation assistance and rebuilding in low-risk areas within the neighborhood or areas of opportunity;
- Public awareness/education campaigns; and
- Improvement of warning and evacuation systems.

Benefits of hazard mitigation include, but are not limited to, the following:

- Saving lives and protecting public health;
- Preventing or minimizing property damage;
- Minimizing social dislocation and stress;
- Reducing economic losses;
- Protecting and preserving infrastructure;
- Reducing legal liability of government and public officials; and






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- Spending less on response and recovery efforts.

According to a 2017 FEMA study¹ that reviewed the impacts of 23 years of federal mitigation grants provided by FEMA, the Economic Development Administration (EDA) and HUD, there is a national benefit of \$6 for every \$1 invested.

The study also found that the costs and benefits of designing all new construction that exceeded select International Building Code, International Residential Code and International Wildland Urban Interface provisions resulted in a national benefit of \$4 for every \$1 invested.

Figure 1: Benefit-Cost Ratio by Hazard and Mitigation Measure

National Benefit-Cost Ratio (BCR) Per Peril <i>*BCR numbers in this study have been rounded</i>		Beyond Code Requirements	Federally Funded
Overall Hazard Benefit-Cost Ratio		\$4:1	\$6:1
 Riverine Flood		\$5:1	\$7:1
 Hurricane Surge		\$7:1	Too few grants
 Wind		\$5:1	\$5:1
 Earthquake		\$4:1	\$3:1
 Wildland-Urban Interface Fire		\$4:1	\$3:1

Source: FEMA, “Natural Mitigation Saves Lives”, Retrieved from https://www.fema.gov/media-library-data/1528727738945-e9805d8703ed4a1b02c5e2861b7ac65a/MitigationSaves_FEMA_180611_508.pdf

B. Recent Disasters

Hurricane Hermine

In late August 2016, Hurricane Hermine made landfall at its peak intensity, just east of St. Marks, Florida. Hermine brought moderate storm surge to coastal areas with the highest measured storm surge of 7.5 feet above normal tide levels, which occurred at a National Ocean Service gauge on Cedar Key. The combined effect of surge and tide produced maximum inundation levels of four to seven feet above ground level to the east

¹ FEMA, “Natural Mitigation Saves Lives”, Retrieved from https://www.fema.gov/media-library-data/1528727738945-e9805d8703ed4a1b02c5e2861b7ac65a/MitigationSaves_FEMA_180611_508.pdf

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of Hermine's landfall location along the coastlines in Dixie, Jefferson, Levy and Taylor Counties.

Hermine produced heavy rainfall across much of western and northern Florida. The maximum reported storm-total rainfall was near Tarpon Springs, in Pinellas County, where 22.36 inches was measured between August 30 and September 2, 2016. More than 10 inches of rain were reported at other sites along the west coast of Florida, including Charlotte, Manatee and Pasco counties. The heavy rainfall caused flooding of streets and low-lying areas near the west coast of Florida and on several rivers in northern Florida.

Within four hours of landfall, Hermine's winds dropped below hurricane force as the storm crossed into Georgia. Then Florida Governor, Rick Scott, declared a state of emergency for 51 counties. A major disaster was declared on September 28, 2016. According to a 2017 report from the Florida Office of Insurance Regulation, insured losses to property in Florida reached \$139 million with 19,699 claims.

Hurricane Matthew

In October 2016, after causing catastrophic category five-level damage in Haiti and severe damage in the Bahamas, Hurricane Matthew tracked northwest and paralleled the coast of the southeastern United States for 36 hours. It gradually weakened and remained just offshore before making its final landfall over near McClellanville, South Carolina as a Category 1 hurricane on the morning of October 8. Although many lives were spared because of proper planning and execution of hurricane plans, Florida nevertheless saw significant storm surge and high winds, which caused damage to infrastructure, homes and businesses.

As Matthew approached, states of emergencies were declared along Florida's eastern coast and widespread evacuations were ordered for extensive areas. High wind speeds and flooding, especially in the Jacksonville metropolitan area were anticipated. In Florida, over one million people lost power as the storm passed to the east.

In total, Matthew killed 47 people in the US, including 12 in Florida. As the storm traveled northeast, it hit close to the eastern coasts of Florida, Georgia, North Carolina and South Carolina. On October 7 in Fernandina Beach, Florida, there was a peak surge of 9.88 feet above normal. Additionally, in the St. Augustine area, water was reported to be 2.5 feet above ground.

In Jacksonville there was major sand dune damage on the coast and flooding of the St. Johns River. In the Flagler Beach area, a portion of Florida State Road A1A was washed away. At the Kennedy Space Center, winds reached 80 mph at ground level while a gust of 136 mph was observed atop a 500-foot tower. The facility sustained millions of dollars' worth of damage.

In addition to flooding, many homes were damaged by the combination of wind and rainfall. This complicated the recovery process because wind and rain damages can only be assessed on a case-by-case basis with areal flooding impacts more easily ascertained for larger areas at once. Portions of the state saw high amounts of rainfall with several regions receiving more than 10 inches of rain in a 24-hour period. Orlando received nearly

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nine inches of rain, Jacksonville nearly seven inches and Daytona Beach almost six inches.

Storm surge flooding affected the St. Augustine area, including major flooding on Anastasia Island where water was reported to be 2.5 feet above ground level. To the south, in nearby Flagler Beach, parts of Highway A1A were washed out by the storm surge. Some of the highest inundation occurred farther inland, away from the immediate coast, on smaller back bays and inland waterways. The St. John's River in northeast Florida was flooded by storm surge of up to 4.3 feet. A major disaster was declared on October 11, 2016.

Hurricane Irma

Approximately one year after Hurricanes Hermine and Matthew left their trails of destruction, Hurricane Irma, a Category 4 storm, made landfall on September 10, 2017 in the midst of the Florida Keys. Irma devastated coast lines, infrastructure and homes. Irma then turned northward, making a second landfall near Marco Island in southwest Florida and then progressed in a northeasterly direction through the center of the state. Hurricane force winds pummeled southeast Florida and portions of the center of the state. The northern portions of Florida were affected by tropical storm force winds.

Storm surges impacted the state's coastal areas from the Florida Keys all the way to the northern border of Florida. South Florida counties saw surges of more than eight feet, with Monroe and Miami-Dade recording observed surges of more than 15 feet. Surges along the St. Johns River and its tributaries were also extreme. Fresh water outflows from rivers slowed retreat of the storm surges in Jacksonville, lengthening the flooding period over the days following Irma's passage.

Irma produced moderate rainfall across much of western and central portions of Florida. The maximum reported storm-total rainfall was nearly 16 inches in Fort Pierce. In Oviedo (north of Orlando), a measurement of 14.6 inches was recorded. The entire southwestern seaboard of Florida received between six and 14 inches of rain and there was localized heavy rainfall in Pasco and Polk counties as Irma moved northward.

The most significant concentration of Irma-related damage however, occurred in the Florida Keys, where Irma made landfall. The storm left this chain of islands, which was connected by a span of 40 bridges, with 1,200 destroyed homes and an additional 3,000 significantly-damaged homes.² Many bridges, roadways and state beaches were severely damaged.

A major disaster declaration was issued by the President for Hurricane Irma on September 10, 2017. The declaration encompassed all 67 of Florida's counties; 51 with Individual and Public Assistance designations and 18 with Public Assistance only designations. (Individual designations allow assistance to individuals and families that have sustained disaster-related losses. Public assistance can fund the repair, restoration, reconstruction or replacement of a public facility or infrastructure that was

² Monroe County, "Approximate Damage Assessment results", Retrieved from <https://www.monroecounty-fl.gov/DocumentCenter/View/12459/Approximate-Damage-Assessment-Results?bidId=>

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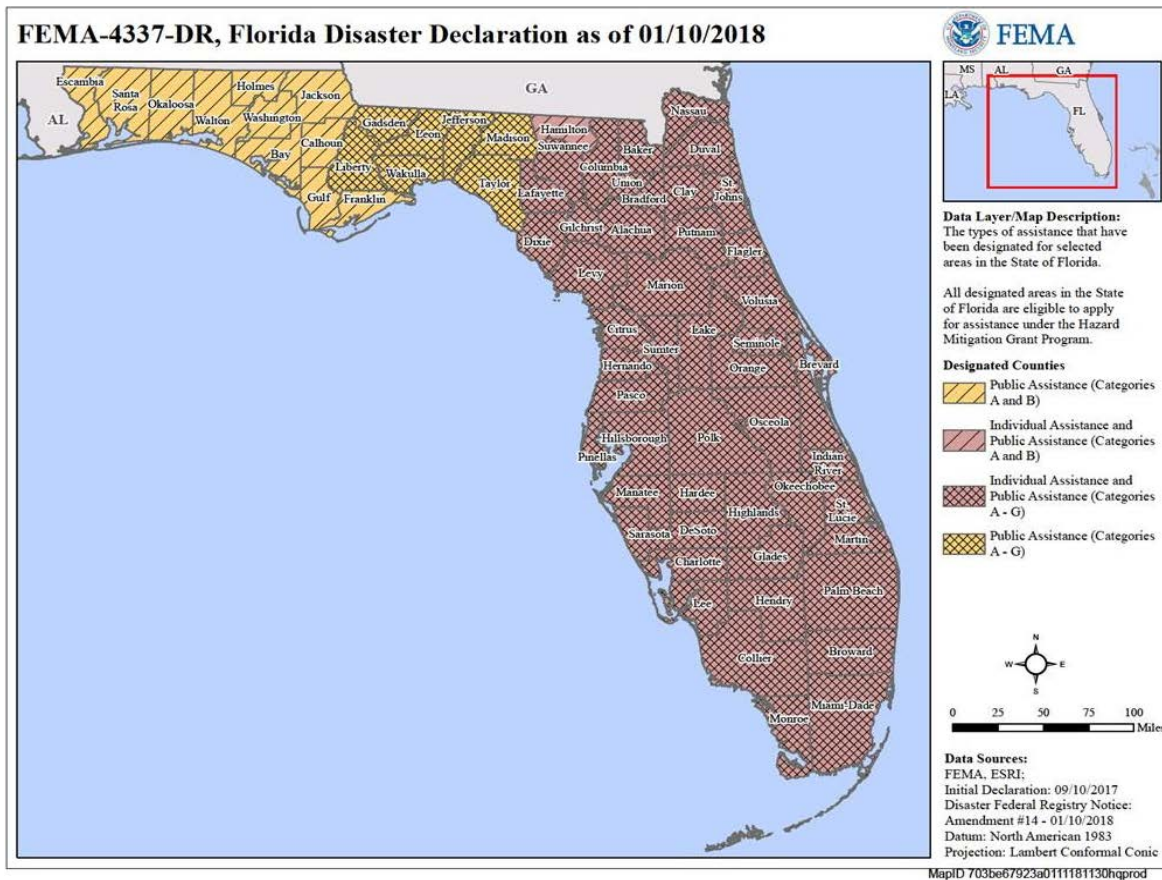
damaged or destroyed by a disaster.) The Florida designation breakdown is outlined in **Table 1** and **Figure 2**.

Table 1: List of Presidential Disaster Declarations

FEMA Declaration Type	Counties
Individual Assistance (IA) and Public Assistance (PA)	Alachua, Baker, Bradford, Brevard, Broward, Charlotte, Citrus, Clay, Collier, Columbia, DeSoto, Dixie, Duval, Flagler, Gilchrist, Glades, Hardee, Hamilton, Hendry, Hernando, Highlands, Hillsborough, Indian River, Lafayette, Lake, Lee, Levy, Manatee, Marion, Martin, Miami-Dade, Monroe, Nassau, Okeechobee, Orange, Osceola, Palm Beach, Pasco, Pinellas, Polk, Putnam, Sarasota, Seminole, St. Johns, St. Lucie, Sumter, Suwannee, Taylor, Union, Volusia, Wakulla
Public Assistance Only (PA)	Bay, Calhoun, Escambia, Franklin, Gadsden, Gulf, Holmes, Jackson, Jefferson, Leon, Liberty, Madison, Okaloosa, Santa Rosa, Walton, Washington

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Figure 2: Presidential Disaster Declarations by County for Hurricane Irma



Source: FEMA, retrieved from <https://www.fema.gov/disaster/4337>

and Matthew skirted the state’s eastern coast. These three storms accounted for more than 90 fatalities, massive infrastructure damage, demolished homes and personal property and widespread and prolonged power outages. The flooding and high winds left more than \$63 billion in damages in their wake.³

C. Mitigation Allocation

In April 2018, the U.S. Department of Housing and Urban Development (HUD) announced that the state of Florida’s Department of Economic Opportunity (DEO) would receive \$633,485,000 in funding to support long-term mitigation efforts following Hurricane Irma through HUD’s Community Development Block Grant Mitigation (CDBG-MIT) Program.

The national objectives of this HUD program include providing benefits to low-to-moderate (LMI) persons by addressing severe and recently-arising urgent community welfare or health needs. CDBG-DR and CDBG-MIT grants have a statutory focus on

³ The NOAA National Centers for Environmental Information, “National Hurricane Center Tropical Cyclone Reports”, Retrieved from <https://www.nhc.noaa.gov/data/>

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targeting the most impacted and distressed (MID) areas. A *minimum** of 50% (\$316,742,500) is to be spent to benefit LMI persons in the MID areas. (*Florida’s CDGB-MIT program is likely to exceed this minimum requirement.)

This funding is designed to address needs that remain after other assistance has been exhausted, including federal assistance and private insurance. DEO is the lead agency and responsible entity for administering the CDBG-MIT funds allocated to the state. The state of Florida’s Action Plan details how this funding, along with subsequent allocations, will be apportioned to address remaining unmet needs in Florida that represent targeted strategic investments for grantees based on current or foreseeable risks.

As required by the Federal Register, Vol. 84, No. 169, the state will designate at least 50% of the CDBG-MIT allocation to address mitigation and resiliency needs in the HUD-identified Most Impacted and Distressed (MID) areas.

Table 2: HUD MID Counties and Zip Codes

HUD MID Counties	Brevard, Broward, Clay, Collier, Duval, Hillsborough, Lee, Miami Dade, Monroe, Orange, Osceola, Palm Beach, Polk, St. Johns, St. Lucie, and Volusia
HUD MID Zip Codes	32084, 32091, 32136, 32145, 32771, 33440, 33523, 33825, 33870, 32068, 33935, 34266

The remaining 50% can be spent on state-identified MIDs that were declared disaster areas eligible for both individual and public assistance.

Table 3: State MID Counties

State MID Counties	Alachua, Baker, Bradford, Charlotte, Citrus, Columbia, DeSoto, Dixie, Flagler, Gilchrist, Glades, Hardee, Hendry, Hernando, Highlands, Indian River, Lafayette, Lake, Leon, Levy, Manatee, Marion, Martin, Nassau, Okeechobee, Pasco, Pinellas, Putnam, Sarasota, Seminole, Sumter, Suwannee, Taylor, Union, Wakulla
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Table 4: State Non-MID Counties

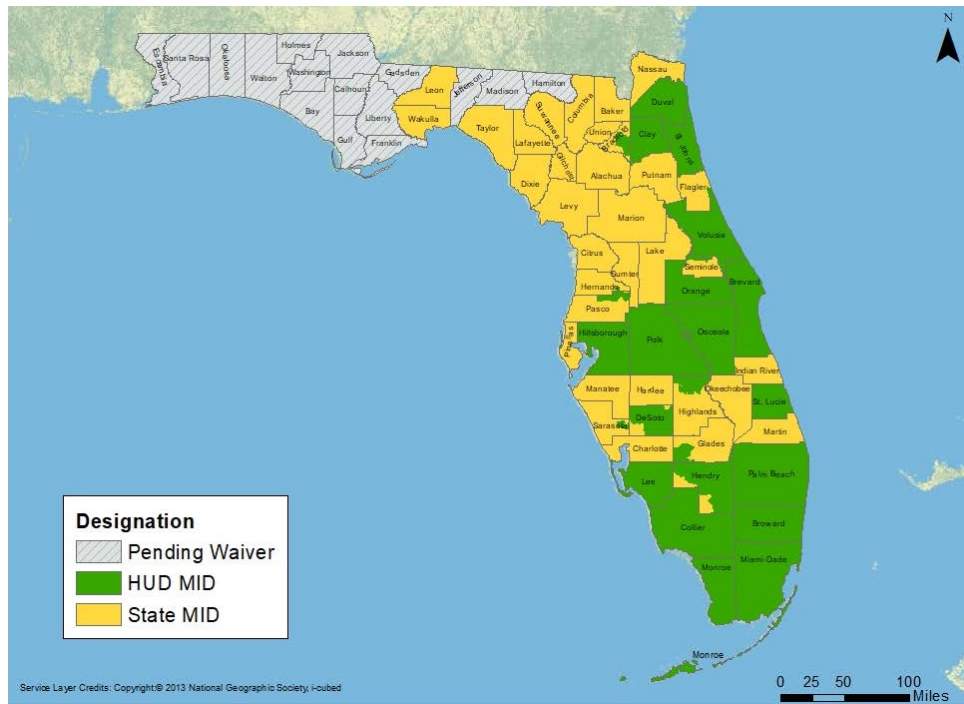
Non-MID Counties*	Bay, Calhoun, Gadsden, Gulf, Franklin, Hamilton, Holmes, Escambia, Jackson, Jefferson, Liberty, Madison, Okaloosa, Santa Rosa, Walton, Washington
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* On December 2, 2019 the State requested a waiver to include these non-MID counties.

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Figure 3 shows HUD-designated MIDs in green, Florida-designated MIDs in gold and Non-MID Counties in gray. The counties illustrated in gray were not originally designated as HUD or state MID counties. However, given the nature of the CDBG-MIT funding, the state of Florida is requesting a HUD waiver to include every Florida county. The state will ensure that at least 50% of the CDBG-MIT allocation will address only HUD MIDs. Including all Florida counties will allow the state to employ a truly statewide approach to hazard mitigation.

Figure 3: Mitigation HUD and State MID Areas



Source: Department of Economic Opportunity, Retrieved from RebuildFlorida.com

V. RISK-BASED MITIGATION NEEDS ASSESSMENT

A. Introduction

The state of Florida's Department of Economic Opportunity (DEO) has completed this risk-based mitigation needs assessment to identify and analyze all significant current and future disaster risks that provide a substantive basis for the activities proposed in Section VI, Projects & Activities. This assessment utilizes the findings of Florida's Enhanced State Hazard Mitigation Plan (ESHMP), data and research acquired from essential data resources, and consultation with public, private and non-profit stakeholders to arrive at a thorough assessment of the hazards which pose substantial risk of loss of life, injury, damage and loss of property, along with suffering and hardship.

To both ensure sufficient clarity of this Action Plan and address current risks, future risks and the mitigation needs of the state, this assessment:

1. Discusses historic damage patterns statewide;
2. Utilizes the state and local Hazard Mitigation Plans to inform risk analysis;
3. Assesses hazards in accordance with local and regional plans, research and data;
4. Assesses current and future risks to critical service areas or community lifelines; and
5. Addresses unmet mitigation needs in response to identified current and future risks.

B. Data Sources

A variety of resources were utilized to advise the findings of the risk-based mitigation needs assessment. DEO has sought to use all available mitigation plans, research and analyses to inform the development of the mitigation needs assessment.

1. Considered Resources

DEO certifies that, in responding to this Action Plan requirement and presenting the required information, the Agency has reviewed and considered sources including, but not limited to:

- The FEMA Hazard Mitigation Plan Resources website:
<https://www.fema.gov/hazard-mitigation-planning-resources;>
- The FEMA State Mitigation Planning Resources website:
<https://www.fema.gov/state-mitigation-planning-resources;>
- FEMA State Mitigation Planning Key Topics Bulletins:
https://www.fema.gov/medialibrary/assets/documents/il_5780;
- The FEMA Local Mitigation Planning Resources website:
<https://www.fema.gov/local-mitigation-planning-resources;>

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- The U.S. Forest Service’s wildland fire resources:
<https://www.fs.fed.us/managing-land/fire>
- The National Interagency Coordination Center (NICC):
<https://www.nifc.gov/nicc/> and;
- HUD’s CPD Mapping Tool:
<https://egis.hud.gov/cpdmaps/>.

2. Enhanced State Hazard Mitigation Plan

The state of Florida’s 2018 Enhanced State Hazard Mitigation Plan (ESHMP) is the most recent risk assessment completed through the FEMA hazard mitigation planning process and is the starting point for the Action Plan’s risk-based mitigation needs assessment. The ESHMP was completed by the Florida Division of Emergency Management’s (FDEM’s) Mitigation Bureau and serves as the FEMA-approved ESHMP. It provides the factual basis for developing a mitigation strategy for the state. The purpose of the ESHMP is to reduce death, injuries and property losses caused by natural hazards in Florida. The 2018 Plan identifies hazards based on the history of disasters within the state and lists goals, objectives, strategies and actions for reducing future losses.

3. Florida Resilient Coastlines Program

The Florida Resilient Coastlines Program is the Department of Environmental Protection’s (DEP’s) effort to synergize community resilience planning, natural resource protection tools and funding to prepare Florida’s coastline for the effects of climate change, especially rising sea levels⁴. DEP’s vision is that Florida’s coastal communities are resilient and prepared for the effects of rising sea levels, including coastal flooding, erosion and ecosystem changes. Through the Florida Resilient Coastlines Program, DEP continues its efforts to ensure collaboration among Florida’s coastal communities and to offer technical assistance and funding to coastal communities dealing with increasingly complex flooding, erosion and habitat shifts.

4. Adaptation Action Areas

Adopted into the Florida Statute in 2011 through the Community Planning Act, Adaptation Action Areas provide a flexible and optional framework that can be applied to the entire state through individual local action. At the request of coastal communities, DEO created this guidance to assist communities understand how they can use Adaptation Action Areas to adapt to coastal flooding. Florida (Chapter 163, Fla. Stat.) requires each local government authority to create, adopt and maintain a comprehensive land use plan. The local comprehensive plan is a key driver of development and redevelopment because it outlines legally enforceable guidelines and strategies, directly influencing the decision-making process. Comprehensive plans can be amended to create strategies for merging growth with resilience. This creates possibilities for continuously revisiting and updating best practices for sustainable development, post-

⁴ Florida Department of Environmental Protection, “Florida Resilient Coastlines Program”, Retrieved from <https://floridadep.gov/ResilientCoastlines>

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disaster redevelopment, green infrastructure, water management and protection of natural resources. In the context of sea level rise, planning today via tools such as Adaptation Action Areas improves the preparedness and resilience of communities in a way that persists over time.

5. Wildfire Hazard Mitigation Plan Annex

The Wildfire Hazard Mitigation Plan Annex to the ESHMP was a coordinated effort led by the Florida Forest Service (FFS), formerly known as the Division of Forestry, involving a wide variety of organizations throughout the state and funded by FEMA. The Annex is a comprehensive strategy for addressing Florida's wildfire hazard and it expands upon the ESHMP's discussion of pre- and post-disaster mitigation. The Annex was developed to serve as an expanded wildfire hazard mitigation plan that will enable the state and local governments to prioritize future projects to better prepare for and mitigate wildfire risk in their communities⁵. The plan identifies high-risk areas of the state, describes available capacity for minimizing risk and includes specific state, regional and local implementation strategies.

6. Southeast Florida Regional Climate Change Compact

The Southeast Florida Regional Climate Change Compact was executed by Broward, Miami-Dade, Monroe and Palm Beach Counties in January 2010 to coordinate climate mitigation and adaptation activities across county lines. The four Compact counties have advanced local and regional responses to, and preparations for, the effects of climate change, including sea level rise, flooding, and economic and social disruptions. The Regional Climate Action Plan (RCAP) is the Compact's guiding tool for coordinated climate action in Southeast Florida. The first RCAP was published in 2012 after a two-year planning process. RCAP 2.0, launched in December 2017, reflects the lessons learned and actions taken in the first five years of implementation. Since its inception, the Compact has expanded to work with a growing number of federal, state, regional, municipal, nonprofit, academic and private sector partners. The Compact represents a new form of regional climate governance designed to allow local governments to set the agenda for adaptation, while providing state and federal agencies with access to technical assistance and support.

7. Florida Vulnerability Assessment: Climate-Sensitive Hazards

The Building Resilience Against Climate Effects (BRACE) Program at the Florida Department of Health (DOH) is working to improve the ability of the public health sector to respond to health effects related to weather variability. As part of the Centers for Disease Control and Prevention's Climate-Ready states and Cities Initiative, the BRACE Program, along with internal and external partners, is implementing the five-step BRACE

⁵Florida Department of Agriculture and Consumer Affairs, Florida Division of Emergency Management; Retrieved from https://www.floridadisaster.org/contentassets/c6a7ead876b1439caad3b38f7122d334/appendix-g_wildfire-hazard-mitigation-plan-annex.pdf

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Framework. As part of BRACE step one, forecasting climate impacts and assessing vulnerabilities, DOH collaborated with the University of South Carolina Hazards and Vulnerability Research Institute to produce the Florida Vulnerability Assessment⁶ which focused on climate-sensitive hazards in Florida.

8. Community Engagement

In anticipation of the release of the Federal Register, DEO conducted a survey in which state-wide jurisdiction representatives, private businesses and citizen stakeholders participated to discuss their current mitigation barriers and needs. The mitigation needs reflected in the survey helped to inform this mitigation strategy. Questions asked in the survey are included in **Appendix A**. A survey summary is provided in **Appendix B**. In addition, DEO held seven regional workshops prior to the public comment period to answer questions and solicit input and feedback from various MID communities.

C. **Historic Damage Patterns**

Historically, Florida has been no stranger to hazards and disasters. Common hazards within the state include flooding, severe storms, tropical cyclones, coastal erosion and wildfires. In many cases, these hazards outnumber similar events across the country in frequency, magnitude and impacts. This section provides background into historic patterns of damage in Florida.

1. Major Disaster Declarations

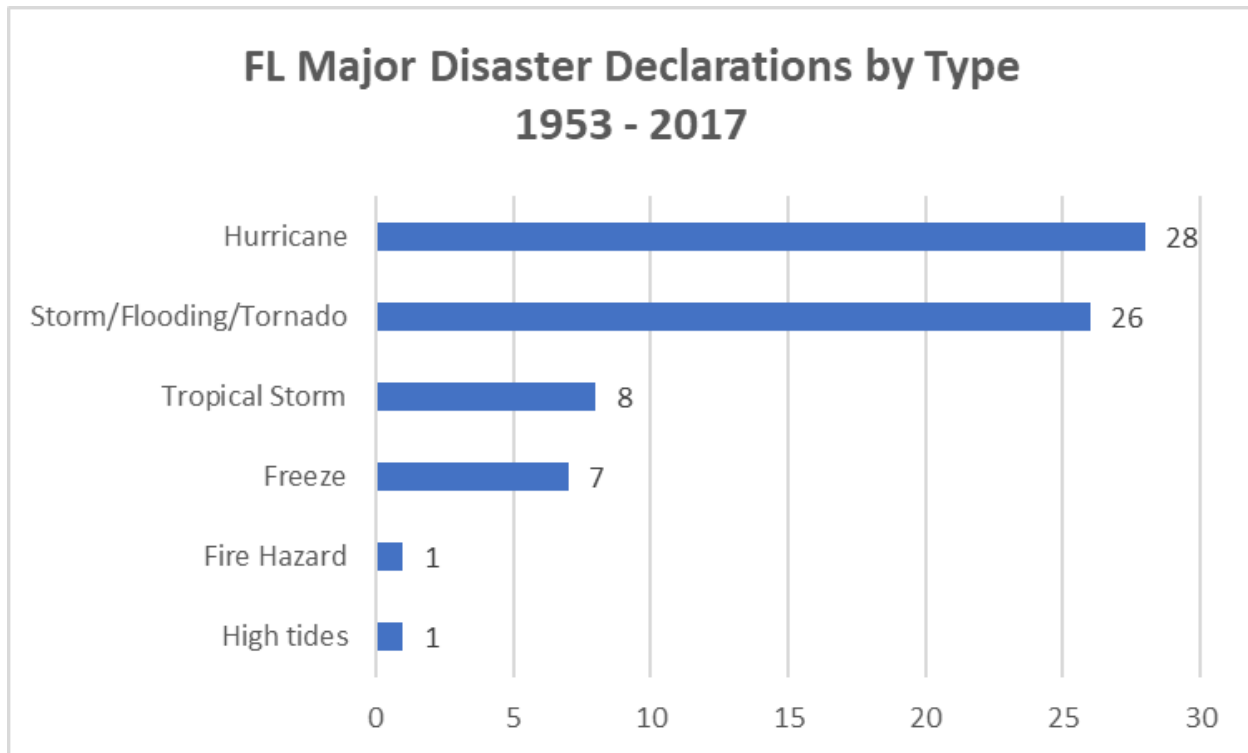
Florida has had 71 Major Disaster Declarations since 1953, when these federal declarations began, through 2017⁷. **Figure 4** demonstrates the types of disasters that have received a Major Disaster Declaration, by type, from 1953 until 2017. Wildfires and floods are among the most common hazards in Florida, but hurricanes have historically inflicted the most catastrophic destruction.

⁶ Emrich, et al. and Hazards and Vulnerability Research Institute, "Climate-Sensitive Hazards in Florida Identifying and Prioritizing Threats to Build Resilience against Climate Effects", Retrieved from <https://flbrace.org/fl-vulnerability-assessment.html>

⁷ FEMA, Retrieved from <https://www.fema.gov/disasters>

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Figure 4: Major Disaster Declarations by Type



Source: FEMA, Retrieved from <https://www.fema.gov/disasters>

Wildfires are not commonly declared as a major disaster, but rather as a Fire Management Assistance Declaration. From 1953 through 2017, there were 59 wildfires that received the Fire Management Assistance Declaration. Only one wildfire was declared a major disaster in Florida.

Agricultural disruptions are also not commonly declared as major disasters, but rather as a Secretarial Disaster Declaration by the USDA. **Table 5** illustrates the number of primary counties that were declared and the contiguous counties that were also declared from 2012 through 2018⁸.

⁸ U.S. Department of Agriculture, Retrieved from <https://www.fsa.usda.gov/programs-and-services/disaster-assistance-program/disaster-designation-information/index>

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Table 5: USDA Secretarial Disaster Declarations

USDA Secretarial Disaster Declarations		
Year	Primary Counties	Contiguous Counties
2012	63	4
2013	33	18
2014	12	22
2015	4	12
2016	18	31
2017	61	5
2018	12	16

Source: U.S. Department of Agriculture, Retrieved from <https://www.fsa.usda.gov/programs-and-services/disaster-assistance-program/disaster-designation-information/index>

2. Cost of Disasters

Hurricanes and tropical storms represent the costliest hazard in Florida’s history, accounting for 86% of the state’s total hazard losses from 1960 to 2012⁹ (inflation-adjusted for 2012). **Table 6** illustrates monetary losses and casualties by hazard type for the 53-year period. Measured by injuries, impacts from hurricanes and tropical storms are second only to tornadoes. In examining total fatalities however, lightning and combined coastal hazards (including storm surge and rip currents) represent the deadliest hazards in the state.

Table 6: Monetary Losses Due to Natural Hazards

Monetary Losses Due to Natural Hazards			
Hazard Type	(2012 adjusted)	Fatalities	Injuries
Hurricane/Tropical Storm	\$ 87,373,452,167	148	2,940
Wind	\$ 3,932,003,179	86	473
Flooding	\$ 3,436,397,989	19	5
Winter Weather	\$ 2,354,049,615	36	2
Tornado	\$ 2,044,959,759	168	3,070
Wildfire	\$ 834,628,358	0	255
Severe Storm	\$ 740,811,980	47	228
Hail	\$ 592,629,556	10	31

⁹ Hazards & Vulnerability Research Institute, 2013

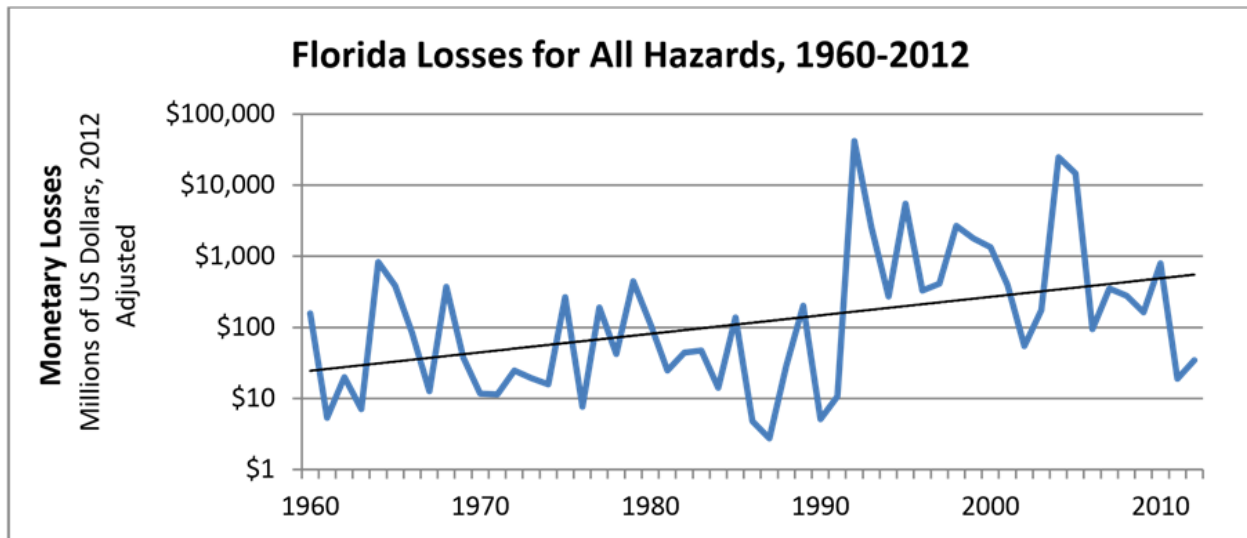
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Coastal	\$ 555,793,597	296	349
Lightning	\$ 119,672,074	458	1,564
Fog	\$ 2,350,860	6	47
Heat and Drought*	\$ 129,666,151	12	10
TOTAL	\$102,116,415,285	1,288	8,974

Source: Hazards and Vulnerability Research Institute, “Climate-Sensitive Hazards in Florida” Report, Retrieved from: <https://flbrace.org/images/docs/climate-sensitive-hazards-in-florida-final-report.pdf>

Temporal trends for all hazard losses in Florida are generally concurrent with those tabulated throughout the United States^{10,11}, representing an increasing and unsustainable pattern of damage. **Figure 5** illustrates the long-term trend of hazard losses for Florida, which suggests an overall increase in annual total costs over time. This tendency relates to both an increase in hazard frequency and an ever-inflating coastal population, leaving more people and infrastructure exposed to future disasters¹².

Figure 5: Florida Losses for All Hazards, 1960-2012



Source: Hazards and Vulnerability Research Institute, “Climate-Sensitive Hazards in Florida” Report, Retrieved from: <https://flbrace.org/images/docs/climate-sensitive-hazards-in-florida-final-report.pdf>

¹⁰ Cutter, S. L., & Emrich, C. (2005). “Are natural hazards and disaster losses in the U.S. Increasing?” *Eos, Transactions American Geophysical Union*, 86(41), 381. doi: 10.1029/2005eo410001

¹¹ Gall, M., K.A. Borden, C.T. Emrich, and S.L. Cutter. 2011. “The Unsustainable Trend of Natural Hazard Losses in the United States.” *Sustainability* no. 3:2157-2181. doi: 10.3390/su3112157.

¹² Malmstadt, J., K. Scheitlin, and J. Elsner. 2009. “Florida Hurricanes and Damage Costs.” *Southeastern Geographer* no. 49:108-131. doi: 10.1353/sgo.0.0045.

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3. National Flood Insurance Program

As of January 2020, Florida had 1,749,804 National Flood Insurance Program (NFIP) policies, equaling approximately 35% of all policies in the nation. Total premiums equal an annual amount of \$999,244,873. These policies cover more than \$441 billion in property¹³.

Over the past 40 years, Florida has contributed to the NFIP fund an average of nearly 10 times the amount of premiums paid than the state has received in closed paid NFIP claims. As with much of the nation, flooding represents the most damaging natural hazard in the state. As of January 2018, Florida had 3,925 repetitive loss properties that have been mitigated and 14,887 repetitive loss properties that have not been mitigated. Moreover, there are 657 mitigated and non-mitigated properties that are considered severe repetitive loss. Clearly a strong mitigation program is still necessary in Florida. The state currently has 467 communities (local governments) that participate in the NFIP.

E. Greatest Risk Hazards

Of the hazards that have the potential to place the lives and property of Floridians at risk, five natural hazards are identified as major priorities in this risk-based needs assessment.

Floods were found to be the highest risk to the state, followed by tropical cyclones, severe storms, wildfires and coastal erosion. These hazards have been selected based largely on the 2018 ESHMP's vulnerability assessments. The ESHMP's examination is based on past disasters, frequency of occurrence, probability of occurrence, possible impacts, analysis of individual LMS hazard rankings and jurisdiction and state vulnerability. The prioritization of these hazards in many mitigation plans and programs throughout the state are indicative of the breadth and depth of their impacts.

This section addresses quantitative and qualitative descriptions of these hazards and their projected current and future risk to the state of Florida, particularly in MID-identified areas. Each hazard profile includes a description of the hazard, discussion of hazard exposure to people and assets, and when possible, a discussion of vulnerability.

Climate change is a key overarching challenge which threatens to compound the extent and effects of hazards¹⁴. These events are likely to include increases in wind, rain and storm surges linked with rising atmospheric and sea surface temperatures, and an overall rise in sea level¹⁵. As such, throughout this section, climate change is discussed in relationship to its potentially aggravating outcomes on future vulnerabilities.

The 2018 ESHMP Mitigation Bureau reviewed all available county Local Mitigation Plans to make comparisons possible across identified hazards to jurisdictions. The method chosen to align these plans was a ranking system based on frequency of occurrence.

¹³ Florida Division of Emergency Management, Mitigation Bureau

¹⁴ Fourth National Climate Assessment (NCA4), Retrieved from <https://science2017.globalchange.gov/>

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Key for Local Mitigation Plan Identified Frequent Hazards

Key		
Ranking Level	Code	Description
High Hazard Ranking	H	One or more occurrences each year
Medium/High Hazard Ranking	MH	One occurrence every 3 years
Medium Hazard Ranking	M	One occurrence every 5 – 7 years
Low Hazard Ranking	L	One occurrence every 10 years
Not Identified	-	-

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Table 7: HUD MID Areas - Identified Frequent Hazards

Floods, tropical cyclones and severe storms present high risks throughout the entire state, inflicting deaths and causing great damage to physical assets. Impact from wildfires and coastal erosion hazards emphasizes risk concentrated in certain geographical regions. However, their consequences to life and critical assets are high and are also subject to cascading effects as a resulting risk of other hazards.

HUD MID Areas – Frequent hazards					
County	Flooding	Hurricane	Severe Storm	Wildfire	Erosion
Brevard	H	H	H	MH	MH
Broward	H	MH	H	MH	MH
Clay	H	M	H	H	-
Collier	MH	MH	H	H	H
Duval	H	H	H	H	-
Hillsborough	H	MH	H	H	L
Lee	M	M	H	H	H
Miami Dade	H	H	H	L	M
Monroe	H	MH	H	MH	H
Orange	H	H	H	H	-
Osceola	H	H	H	H	-
Palm Beach	H	H	H	L	L
Polk	H	MH	H	H	-
St. Johns	H	H	H	H	M
St. Lucie	H	H	H	M	H
Volusia	H	H	H	H	H

Table 8: State MID Areas - Identified Frequent Hazards

Table 8 is to the right.

State MID Areas- Frequent Hazards					
County	Flooding	Hurricane	Severe Storm	Wildfire	Erosion
Alachua	MH	M	M	H	-
Baker	H	H	H	H	-
Bradford	H	H	H	MH	L
Brevard	H	H	H	MH	MH
Broward	H	MH	H	MH	MH
Charlotte	H	M	H	M	M
Citrus	H	H	H	H	-
Clay	H	M	H	H	-
Collier	MH	MH	H	H	H
Columbia	M	M	H	M	M
DeSoto	H	MH	H	M	-
Dixie	H	H	M	M	L
Duval	H	H	H	H	-
Flagler	H	H	H	H	MH
Gilchrist	H	M	H	H	-
Glades	H	H	H	H	-
Hardee	H	MH	H	H	-
Hendry	M	H	H	H	-
Hernando	H	H	H	H	M
Highlands	H	H	H	H	-
Hillsborough	H	MH	H	H	L
Indian River	H	H	H	M	H
Lafayette	M	MH	H	H	M
Lake	M	M	H	M	L
Lee	M	M	H	H	H
Leon	M	L	H	M	-
Levy	H	M	-	H	M
Manatee	H	H	H	H	M
Marion	H	L	-	M	L
Martin	H	M	H	M	M
Miami-Dade	H	H	H	L	M
Monroe	H	MH	H	MH	H
Nassau	-	L	M	L	L
Okeechobee	M	H	M	H	L
Orange	H	H	H	H	-
Osceola	H	H	H	H	-
Palm Beach	H	H	H	L	L
Pasco	MH	M	H	H	M
Pinellas	M	H	H	M	H
Polk	H	MH	H	H	-
Putnam	MH	M	H	MH	-
Sarasota	H	H	H	H	H
Seminole	H	H	MH	MH	-
St. Johns	H	H	H	H	M
St. Lucie	H	H	H	M	H
Sumter	H	M	H	H	-
Suwannee	H	H	H	H	H
Taylor	M	H	H	H	M
Union	H	H	H	H	L
Volusia	H	H	H	H	H
Wakulla	H	H	H	H	M

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1. Flooding

Flooding refers to the general or temporary conditions of partial or complete inundation of normally dry land areas resulting from the overflow of inland or tidal water and surface water runoff from any source. In Florida, where severe thunderstorms, tropical cyclones, seasonal rains and other meteorological conditions produce excessive water and wind, floods are common and pose an exceptionally high risk. Florida's low-lying topography and subtropical climate, combined with its rapid urbanization, results in increased impervious surface areas such as asphalt roads and concrete areas. If local conditions cannot accommodate intense precipitation through a combination of infiltration and surface runoff, water may accumulate and cause flooding. Flooding occurs in several variations due to weather-related conditions: two main categories are inland flooding (rivers, dams/dikes and flash floods) and coastal flooding (storm surge and tidal flooding).

Heavy precipitation may result in designated and natural drainage systems exceeding carrying capacities and resulting in riverine flooding. Flash floods are most often caused by slow-moving thunderstorms or tropical cyclones and tend to be exceptionally dangerous because of their rapid onset, high velocity and debris load. These floods can develop quickly depending on the intensity and duration of the storm, the topography of the area, soil conditions and ground cover. Rapid urbanization and the increase of impervious surfaces such as roads and sidewalks, has led to increased levels of flash flooding during weather events¹⁵. The failure of a dam or dike can also produce a flood event that presents a potential hazard to downstream areas. High-risk dams and dikes are those in which failure or operational error results in loss of human life and poses significant risks to lifeline facilities.

Coastal flooding is usually the result of a weather system such as a severe thunderstorm, hurricane or tropical storm with high winds. Storm surge occurs when water is driven ashore by the wind resulting in a rise of water over and above regular tides. The damaging effects to structures in beach areas are caused by a combination of higher levels of storm surge, winds, waves, rains, erosion and battering by debris. During a hurricane, this is often the greatest threat to life and property along the coast. King tides, which are higher than normal tides and usually occur in autumn months, can be worsened in the overlapping hurricane season, compounding its effects.

Florida's geography also makes it very susceptible to the threat of severe repetitive loss. As sea levels rise, several consequences, including increasing the salt content (salination) of fresh water sources, land loss and increases in storms and flooding can occur. Water inundates and erodes coastal wetland ecosystems such as mangroves and salt marshes. Higher water levels wash away wetlands and flood previously dry land¹⁶. These coastal wetland ecosystems are crucial to absorbing the impact of tropical storms and providing a breeding ground for a significant proportion of sea life.

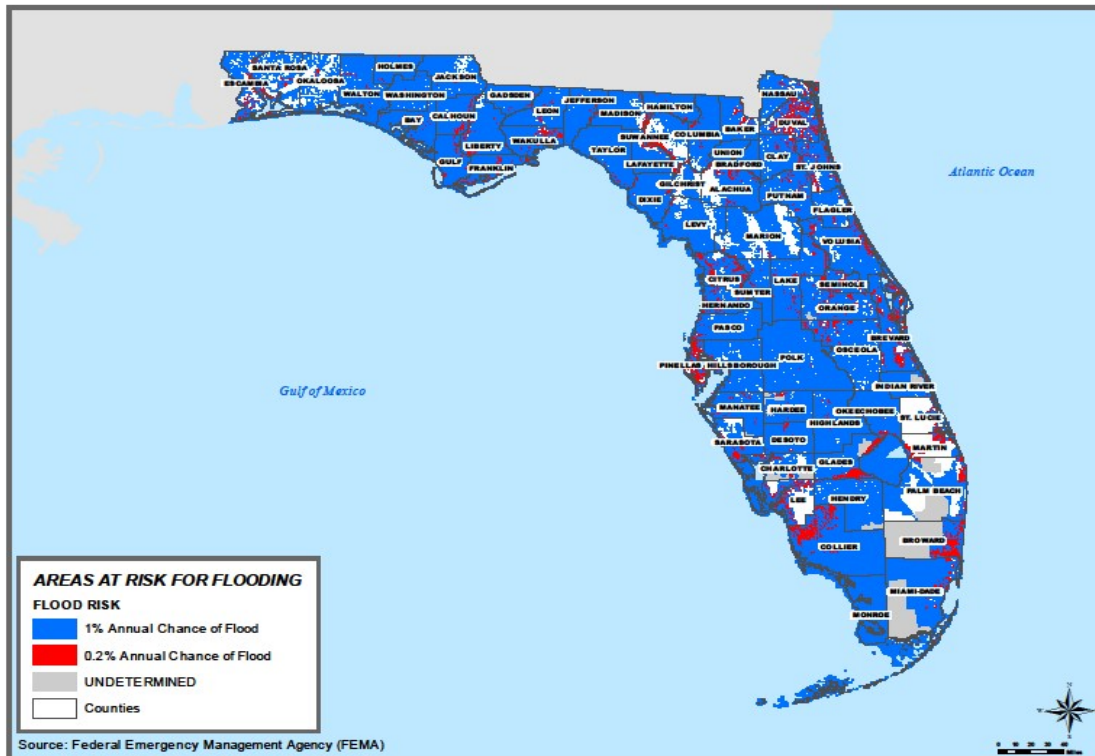
¹⁵ Enhanced State Hazard Mitigation Plan, p. 181

¹⁶ Enhanced State Hazard Mitigation Plan, p. 106

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Figure 6 depicts floodplains; geographic areas that are recognized as being susceptible to increased levels of flood risk. The area in blue represents the 1% floodplain, also known as the base flood or the 100-year flood, which is the level of a flood that has a 1% probability of occurring in any given year. In red is the .2% flood or 500-year floodplain, which has a .2% chance of annual inundation.

Figure 6: Areas at Risk for Flooding



Source: Enhanced State Hazard Mitigation Plan, p. 109

Based on historical knowledge and an understanding of floodplains, it is believed that Florida will continue to experience flooding events on an annual basis. Specific probability is difficult to determine; however, 100-year and 500-year estimates help provide a baseline understanding. It is likely that Florida will continue to be impacted by flooding due to any number of causes annually. The ESHMP's analysis of 2012 to 2016 in Florida, from the National Centers of Environmental Information (NCEI), indicates that there are about nine to 10 coastal floods, 16 flash floods and 19 to 20 inland floods each year in Florida.

Table 9: Annual Flooding Frequency

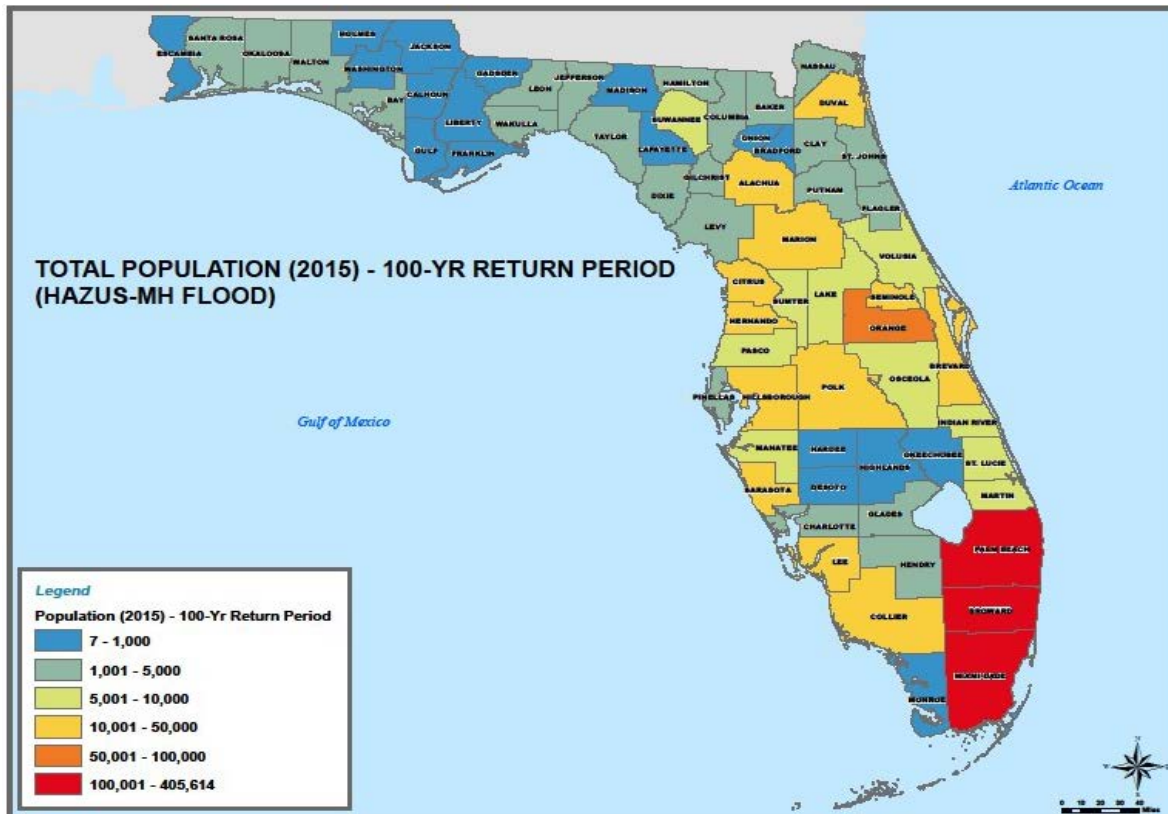
Type of Flood	NCEI Reports	Average per Year
Coastal Flood	48	9.6
Flash Flood	81	16.2
Inland Flood	98	19.6
Total	227	45.4

Source: Enhanced State Hazard Mitigation Plan, p. 117

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A large segment of the population of Florida is exposed to flooding risk. According to the ESHMP analysis based on data from the Hazards U.S. Multi-Hazard (HAZUS-MH) flood model and the 2015 American Community Survey, more than 1.3 million people live within flood zones with a 100-year return period (1% flood zone) and more than 1.5 million live in a 500-year flood return period (.2% floodplain). Of these exposed populations, HUD MID jurisdictions make up 1.1 million (83.8%) and 1.3 million (84.6%) respectively. Of the eight counties with more than 10,000 people at risk, only one county, Pinellas, is not an identified HUD MID area¹⁷ but it has been designated a state MID area in response to Hurricane Irma. The map in **Figure 7** depicts HAZUS-MH data.

Figure 7: Total Population in 100-Year Floodplain



Source: State Hazard Mitigation Plan, p. 122

Based on the state facility database and the Hazard Events and Location Prognosticator – Florida (HelpFL) inland flood data, there are nearly 4,000 state facilities in the 100-year floodplain and more than 700 additional state facilities in the 500-year floodplain. There are 11 counties with more than 100 state facilities in the 100-year floodplain. These include Broward, Collier, Franklin, Gulf, Lee, Miami-Dade, Monroe, Palm Beach, Pinellas, Polk and St. Johns. Miami-Dade County has the most, with almost

¹⁷ Enhanced State Hazard Mitigation Plan, “Appendix E - Risk Assessment Tables”, Retrieved from <https://www.floridadisaster.org/dem/mitigation/statemitigationstrategy/state-hazard-mitigation-plan/>

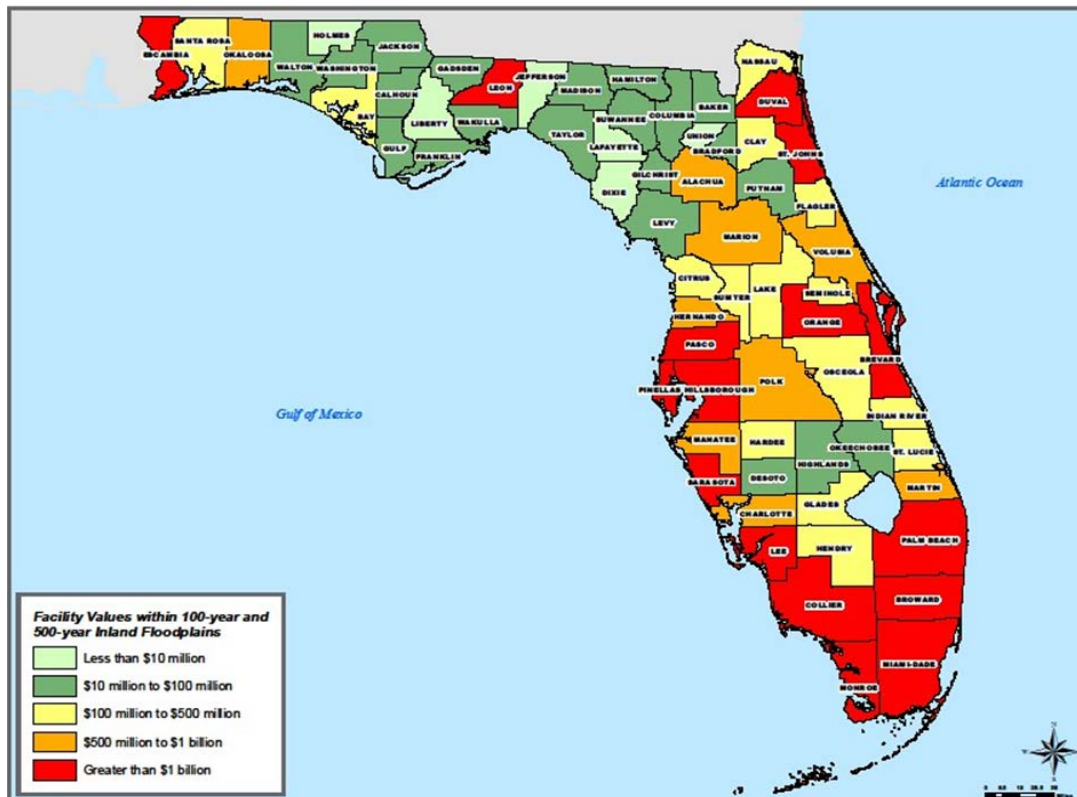
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700 state facilities in the 100-year floodplain. Broward County is the only County with an additional 100 or more state facilities in the 500-year floodplain.

An analysis of county facilities within the 100-year and 500-year return flood zones estimates 15 counties with more than \$1 billion worth of public facilities at risk, including Brevard, Collier, Duval, Escambia, Hillsborough, Lee, Leon, Orange, Pasco, Pinellas, Sarasota and St. Johns. Of these, only four counties are not in HUD MID areas. These public facilities include hospitals, fire stations, police stations and other types of county facilities.

According to data analysis conducted using the HAZUS software, the total potential direct economic loss due to a 100-year and 500-year flood is \$8,896,289,000 and \$12,597,571,000 respectively¹⁸. Three counties would have more than \$500 million in assets at risk in a 100-year flood zone. There are 11 counties; Brevard, Citrus, Collier, Hillsborough, Indian River, Lee, Marion, Orange, Pasco, Seminole and Suwannee, that have between \$100 million and \$500 million worth of assets at risk.

Figure 8: Facility Values within 100-Year and 500-Year Floodplains



Source: Enhanced State Hazard Mitigation Plan, p. 124

¹⁸ Enhanced State Hazard Mitigation Plan, “– Risk Assessment Tables”, Retrieved from <https://www.floridadisaster.org/dem/mitigation/statemitigationstrategy/state-hazard-mitigation-plan/>; Note: “Direct economic losses were calculated in HAZUS-MH by taking the general building stock (Residential, Commercial, Industrial, etc.) that intersected a given Census Block and applied damage curves within the model based on the depth of flood inundation from the model’s derived 100-year and 500-year return periods that were generated based on a Digital Elevation Model and calculated reaches within a County. The data for these figures can be found in.”

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Within the 500-year flood zone, Broward, Miami-Dade and Palm Beach counties have more than \$500 million in assets at risk. There are also 15 counties that could experience between \$100 million and \$500 million in losses due to flooding damage within the 500-year flood zone. These counties are; Brevard, Citrus, Collier, Duval, Hillsborough, Indian River, Lee, Marion, Orange, Pasco, Polk, Santa Rosa, Sarasota, Seminole, Suwannee, and St. Lucie counties.

2. Tropical Cyclone Profile

A tropical cyclone, also known as a tropical storm or hurricane, is a rotating, organized system of clouds and thunderstorms that originates over tropical or subtropical waters and has a closed low-level circulation. A hurricane is a tropical cyclone which occurs in the Atlantic Ocean and northeastern Pacific Ocean, and a typhoon occurs in the northwestern Pacific Ocean; in the south Pacific or Indian Ocean, comparable storms are referred to simply as "tropical cyclones" or "severe cyclonic storms."

The entire state of Florida is subject to the effects of tropical cyclones, but some areas are more vulnerable than others due to the state's large expanses of coastal shorelines on the Atlantic and Gulf Coasts¹⁹. The diameter of hurricane force winds averages 100 miles and tropical storm force winds extend out up to 400 miles. At the same time, there is no point within Florida that is more than 70 miles from either the Atlantic Ocean or the Gulf of Mexico.

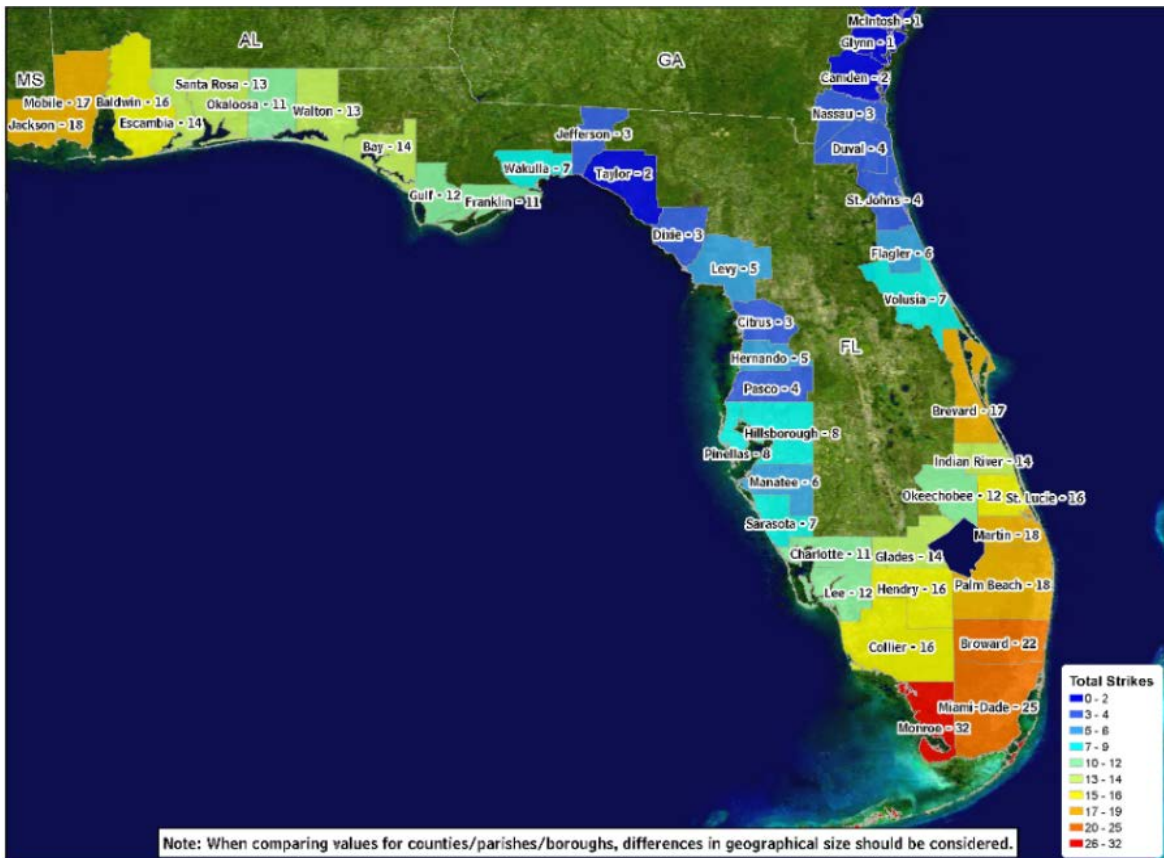
Flooding from tropical cyclones poses the greatest threat for people who live inland. Rainfall can cause flash flooding and flooding on rivers and streams that can persist for several days after the storm. Rainfall amounts are related to the speed and size of tropical cyclones rather than the intensity. A slower moving and larger tropical cyclone has a longer and larger capacity to produce rainfall.

¹⁹ Nation Oceanic and Atmospheric Administration, Retrieved from https://www.nhc.noaa.gov/climo/images/strikes_egulf.jpg

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Figure 9 illustrates the location and number of hurricane strikes in Florida between 1900 and 2010.

Figure 9: Total Number of Hurricane Strikes



Total number of hurricane strikes by counties/parishes/boroughs, 1900-2010

Source: National Oceanic and Atmospheric Agency, Retrieved from: https://www.nhc.noaa.gov/climo/images/strikes_egulf.jpg

Storm surge is perhaps the most dangerous aspect of a hurricane. It occurs when the winds and forward motion associated with a tropical cyclone accumulate water as it moves toward shore. The ESHMP presents data on land areas that would be impacted by storm surge coastal flooding due to a Category 2 Hurricane or a Category 5 Hurricane based on the Sea, Lake and Overland Surge from Hurricanes (SLOSH) maps, flood depth grids from the State Regional Evacuation Studies and census block data. In total, more than 1.8 million people are living in coastal areas are positioned to be impacted by a Category 2 Hurricane storm surge, whereas 5.8 million people could be impacted by a Category 5 Hurricane storm surge.

There are five counties with more than 100,000 people living in the storm surge zone of a Category 2 Hurricane: Collier, Hillsborough, Lee, Miami-Dade and Pinellas. There are 14 counties with more than 100,000 people living in the storm surge zone of a Category 5 hurricane: Brevard, Broward, Charlotte, Collier, Duval, Hillsborough, Lee, Manatee, Miami-Dade, Pasco, Pinellas, St. Johns, Sarasota and Volusia. With 1.5 million

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people, Miami-Dade County has the highest population in the Category 5 Hurricane storm surge zone.

In addition to people being vulnerable to the hazards associated with tropical cyclones and the storm surges they generate, thousands of structures, worth billions of dollars, are also at risk. **Table 10** illustrates modeling of the total value of county and state facilities exposed to the storm surge of Category 2 and Category 5 storms. County facilities include, but are not limited to, commission-owned buildings such as offices, parks, and libraries. State facilities include, but are not limited to, state government offices and properties, detention facilities and state parks. Tropical cyclones can produce very strong and destructive winds that can persist for great distances and durations, even after landfall. In recent years, much of the wind damage from hurricanes has been attributed to tornadoes and has been the result of down bursts, which are strong downdrafts that cause damaging winds on or near the ground.

Table 10: Economic Impact of Storm Surge on Counties

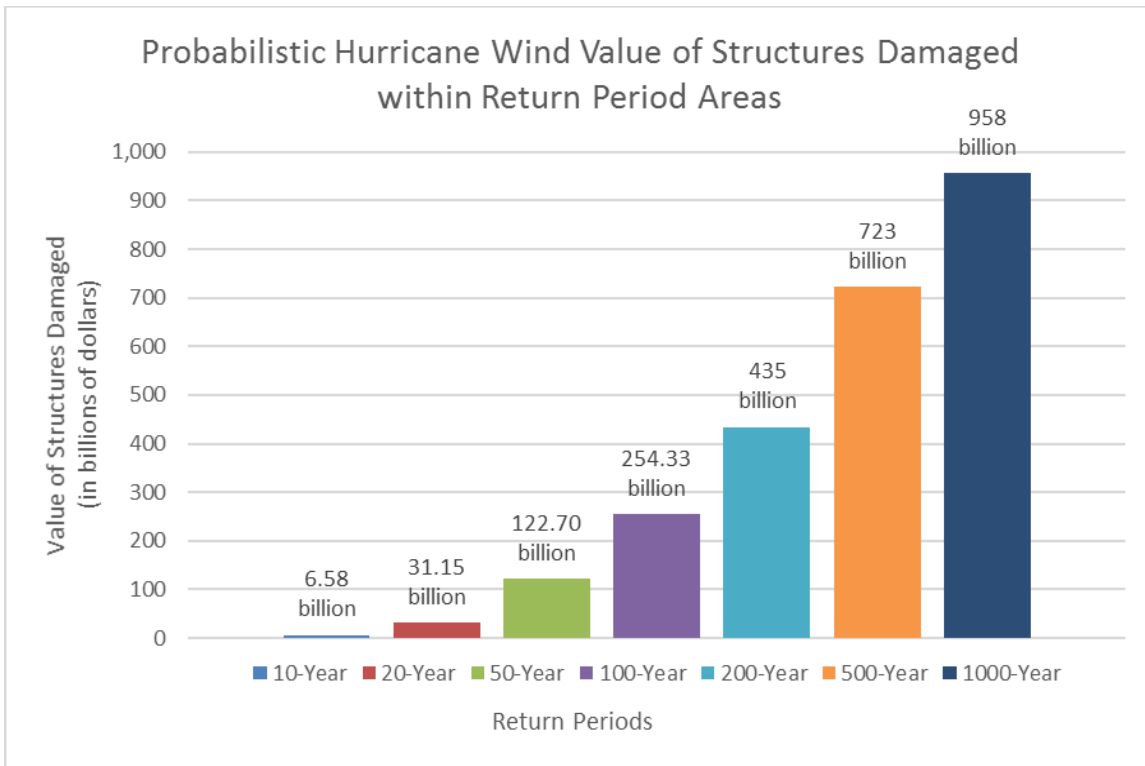
Hurricane Category and MID Designation	Storm Surge Asset Impacts by Dollar
County Facilities	
Category 2	\$4,490,862,602
HUD MIDs	\$ 3,150,980,788
State MIDs	\$ 917,124,475
Non-MIDs	\$ 422,757,339
Category 5	\$17,745,539,113
HUD MIDs	\$ 14,781,649,517
State MIDs	\$ 1,678,520,521
Non-MIDs	\$ 1,285,369,075
State Facilities	
Category 2	\$ 4,384,342,330
HUD MIDs	\$1,139,326,862
State MIDs	\$652,959,480
Non-MIDs	\$ 2,592,055,988
Category 5	\$ 9,870,824,374
HUD MIDs	\$ 2,778,683,185
State MIDs	\$ 1,115,840,487
Non-MIDs	\$ 5,976,300,702

Source: Data used for this table is from the Enhanced State Hazard Mitigation Plan

Figure 10 shows the value of damaged structures within probabilistic return period areas for hurricane winds. This shows that while the value of structures that would be damaged from hurricane winds in the 10-year return period area is \$6.58 billion, that number increases exponentially to \$958 billion in the 1,000-year return period area.

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Figure 10: Probabilistic Hurricane Wind Damage



Source: Enhanced State Hazard Mitigation Plan, p. 167

3. Severe Storms

A thunderstorm is a local storm that produces lightning and thunder and varies in type depending on its size and organization. Florida is considered the thunderstorm capital of the United States as no other part of the nation has more thunderstorm activity. The National Weather Service considers a thunderstorm “severe” if it produces hail at least one inch in diameter, winds of 58 mph or stronger or a tornado.

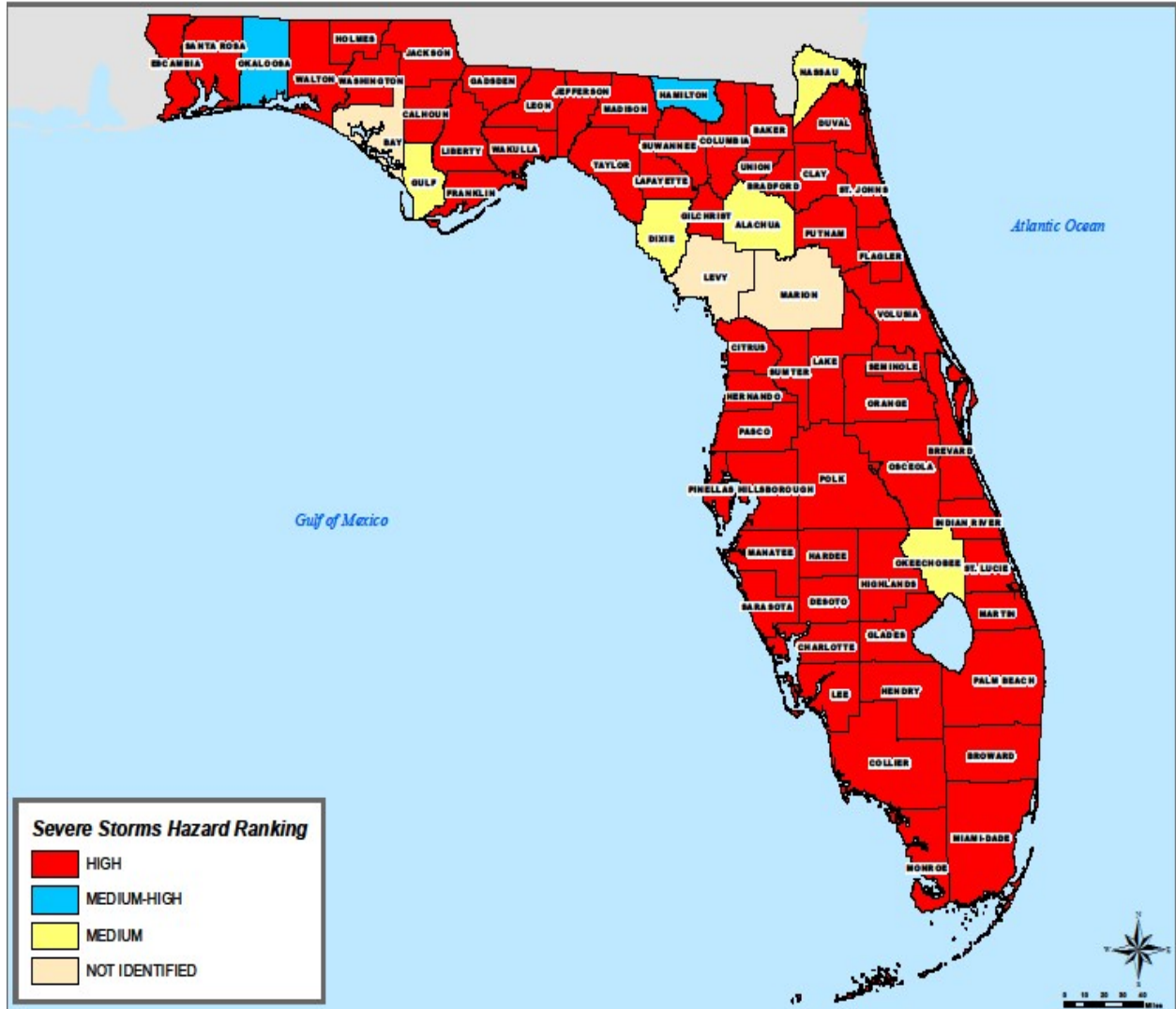
Severe storms are highly likely in Florida, particularly in the Panhandle and the northern, central and southeast regions of the state. Approximately half the state is likely to have three to 18 severe storm warnings each year²⁰. In a typical year, the western half of the Florida peninsula experiences more than 80 days with thunder and lightning. Severe thunderstorms and tornadoes can occur anywhere throughout the state. As the number of structures and population increases, the probability that a severe storm or tornado will cause property damage or human casualties likewise increases. **Figure 11** displays the jurisdictional rankings for the severe storms hazard included in the ESHMP. Fifty-seven of Florida’s 67 counties have a high-risk of severe storms hazards; two

²⁰ Enhanced State Hazard Mitigation Plan, page 395

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counties have medium-high-risk; five are medium-risk; and three do not identify severe storms as a risk.

Figure 11: Severe Storm Hazard Ranking



Source: State Hazard Mitigation Plan, p. 198

Flash flooding caused by thunderstorm rainfall causes more deaths annually than tropical cyclones, tornados or lightning. Lightning is one of the deadliest weather phenomena. Between 2009 and 2018, Florida had 49 lightning deaths, ranking it first in the U.S.²¹. Lightning is also responsible for many fires²². Strong (up to more than 120 mph) straight-line winds associated with thunderstorms knock down trees, power lines and mobile

²¹ National Weather Service, Retrieved from <https://www.weather.gov/safety/lightning-media>

²² The National Severe Storms Laboratory, Retrieved from <http://www.nssl.noaa.gov/education/svrwx101/hail/>

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homes. Tornadoes (with winds up to about 300 mph) can destroy all but the best-built man-made structures.

4. Wildfire Hazard

Wildfire, or wildland fire, are fires started by lightning or by humans in an area with vegetation. Wildfires occur in Florida every year and at all times of the year and are part of the natural cycle of Florida's fire-adapted ecosystems. Between 2006 and 2016, about 70% to 80% of Florida's wildfires were caused by humans, including arson, burning debris or accidents, 20% to 30% of were caused by lightning and about 9% were the result of prescribed fires²³.

Environmental short-term loss caused by a wildland fire can include the destruction of wildlife habitat and watersheds. Long-term effects include reduced access to affected recreational areas, destruction of cultural and economic resources and community infrastructure and vulnerability to flooding due to the destruction of watersheds. Based on the LMS plans, the majority of counties have identified wildfires as one of their hazards: 42 as high-risk; six as medium-high-risk; 15 as medium-risk; and four as low-risk. Approximately 9.8% of the population of Florida (1,848,396 people) reside in an area of high wildfire risk and 11.2% of the state's population (2,112,245 people) live in medium-risk wildfire areas²⁴.

Hurricanes increase wildfire risk when they flatten forests and leave giant swaths of dead trees in their wake. Acres of forests can be devastated leaving tons of dead wood per acre behind. Debris accumulation often becomes the "fuel" for destructive fires.²⁶

5. Coastal Erosion

Coastal erosion is the wearing away of land or the removal of beach or dune sediments by wave action, tidal currents, wave currents or drainage. Some erosion changes are slow, inexorable and gradual. However, the changes on a beach can happen overnight, especially during a storm. According to the Beach Management Funding Assistance Program (formerly the Beach Erosion Control Program) within the Florida Department of Environmental Protection, there are many stretches of shoreline that have been critically-eroded. Critically-eroded beaches are those in which there is a threat to, or loss of, upland development, recreation, wildlife habitat and/or important cultural resources. Non-critically-eroded beaches are those in which there may be significant erosion conditions, but there is no current public or private interest threatened.

Approximately half (420 of 825 miles) of the state's coastline fronting the Atlantic Ocean, the Gulf of Mexico and the Straits of Florida is critically-eroded²⁵. Both global eustatic sea level rise (the distance from the earth's center to the surface of the sea) and

²³ Enhanced State Hazard Mitigation Plan, p. 210

²⁴ Enhanced State Hazard Mitigation Plan, "Appendix G: Wildfire Hazard Mitigation Plan Annex", Retrieved from https://www.floridadisaster.org/contentassets/c6a7ead876b1439caad3b38f7122d334/appendix-g_wildfire-hazard-mitigation-plan-annex.pdf

²⁵ Division of Water Resource Management Florida Department of Environmental Protection; "Critically Eroded Beaches in Florida", Retrieved from <https://floridadep.gov/sites/default/files/FDEP-Critically-Eroded-Beaches-2019.pdf>

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the increased frequency of higher intensity hurricanes can affect coastal erosion. Continued atmospheric warming could also increase rates of global eustatic sea level rise. In the absence of offsetting changes in natural sediment supply, sand beaches will erode more rapidly as the rate of sea level rise increases.

F. Social Vulnerability

Florida prioritizes the fair and equitable treatment of vulnerable populations which are historically neglected during disaster recovery and in the consideration of long-term risk resilience and mitigation measures. The Federal Register requires Florida to assess how the use of CDBG-MIT funds may affect members of protected classes under fair housing and civil rights laws, racially and ethnically concentrated areas, as well as concentrated areas of poverty.

Throughout the lifecycle of the CDBG-Mitigation program DEO will ensure special care will be taken by DEO staff members, subrecipients and contractors regarding all protected populations. An analysis of how risks is not spread equitably throughout the state was included in the Risk Based Mitigation Needs Assessment. Analysis from the Risk Based Needs assessment ties directly to the programs presented in the Action Plan. Further, through a competitive application process, specific program projects will be selected with high consideration of special populations. Current proposed usage of the CDBG-MIT funds is focused on hardening critical facilities, updating or creating mitigation plans and general infrastructure. The scoring criteria for each of these programs is weighted heavily in favor of vulnerable and minority populations.

If a holistic understanding of disaster risk is to be achieved, it is important to incorporate aspects of multiple hazards (natural systems), social vulnerability (social systems) and built-environment vulnerability (human-constructed systems). Hazards that are uniform across considerable distances often result in widely divergent impacts and recovery rates for those who are affected. Social vulnerability describes this differential susceptibility of people based on social, economic, political and institutional factors. As these communities rebuild, the state will focus its planning and outreach efforts to ensure that rebuilding is equitable across all neighborhoods.

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Table 11: Demographic Profile of MID Counties

	Total Population	Percent Minority	Percent Hispanic	Percent LEP	Percent Persons with Disabilities	Percent LMI
HUD MID Counties						
Brevard	576,808	14.7	10.0	1.7	15.6	40.79
Broward	1,909,151	36.3	29.1	9.6	11.0	46.84
Clay	207,291	15.9	9.7	1.6	13.6	34.50
Collier	363,922	10.8	27.5	6.4	11.4	43.55
Duval	924,229	36.8	9.3	2.9	13.5	45.57
Hillsborough	1,378,883	26.6	28.0	6.7	11.5	40.78
Lee	718,679	13.6	20.7	5.0	13.6	41.77
Miami Dade	2,715,516	23.5	68.0	25.1	10.1	54.73
Monroe	76,325	10	23.9	5.0	11.1	49.52
Orange	1,321,194	33.4	30.9	8.0	10.9	42.86
Osceola	338,619	24	53.0	10.9	14.4	48.71
Palm Beach	1,446,277	24.3	21.9	7.0	12.3	45.10
Polk	668,671	19.9	21.5	3.7	15.4	39.15
St. Johns	235,503	9.5	6.7	0.8	11.3	29.29
St. Lucie	305,591	25	18.5	4.4	15.7	42.82
Volusia	527,634	15.8	13.4	2.1	17.0	41.13
State MID Counties						
Alachua	263,148	27.6	9.6	2.1	10.7	47.90
Baker	27,785	15.8	2.4	0.6	17.3	40.98
Bradford	26,979	21.2	4.0	0.6	19.9	38.12
Charlotte	176,954	8.1	7.0	1.8	21.9	39.13
Citrus	143,087	5.8	5.5	1.5	21.4	38.66
Columbia	69,105	20.6	6.0	0.9	19.5	40.08
DeSoto	36,399	15.3	31.2	11.2	14.1	50.14
Dixie	16,437	10.4	3.9	0.4	24.5	42.93
Flagler	107,139	15.7	10.1	3.7	16.0	37.36

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Gilchrist	17,615	7.1	5.7	1.5	21.0	49.29
Glades	13,363	19.2	20.9	7.3	18.6	47.92
Hardee	27,228	18	43.5	8.9	10.1	51.46
Hendry	40,127	17.4	52.9	14.7	12.7	45.40
Hernando	182,696	8.4	12.9	1.9	19.1	45.23
Highlands	102,101	18	19.6	3.3	20.4	42.09
Indian River	150,984	11.9	12.3	2.3	16.6	42.08
Lafayette	8,744	18.8	14.4	3.6	17.2	39.17
Lake	335,362	14.9	14.9	2.2	16.4	39.86
Leon	288,102	36.1	6.3	1.1	11.4	46.55
Levy	39,961	10.2	8.2	1.4	19.9	43.74
Manatee	373,853	12.8	16.2	3.2	14.1	43.64
Marion	348,371	15.9	12.7	1.6	18.1	38.74
Martin	157,581	10.7	13.4	2.7	15.2	34.05
Nassau	80,578	8.1	4.0	1.1	16.0	39.43
Okeechobee	40,572	12.4	25.2	5.8	15.2	52.01
Pasco	510,593	10.1	14.5	1.9	16.2	41.35
Pinellas	957,875	15.7	9.4	2.7	15.3	39.87
Putnam	72,766	17.9	9.9	2.6	18.0	48.58
Sarasota	412,144	7.2	9.0	3.0	15.5	38.61
Seminole	455,086	19.9	20.7	3.3	10.3	33.12
Sumter	120,999	10.1	5.7	0.5	19.6	31.68
Suwannee	43,924	14.3	9.0	2.4	19.5	44.56
Taylor	22,098	24.6	4.2	-	22.7	40.91
Union	15,239	24.6	5.5	-	15.4	41.52
Wakulla	31,8778	16.5	3.7	-	16.2	38.09

Sources: American Community Survey (2018), U.S. Census Bureau, Retrieved from <https://factfinder.census.gov/aces/nav/jsf/pages/index.xhtml>

Peterson, Robert. 2019. *Low- and Moderate-Income Summary Data, based on 2011-2015 ACS*. Housing and Urban Development.

<https://hud.maps.arcgis.com/home/item.html?id=ffd0597e8af24f88b501b7e7f326bedd>

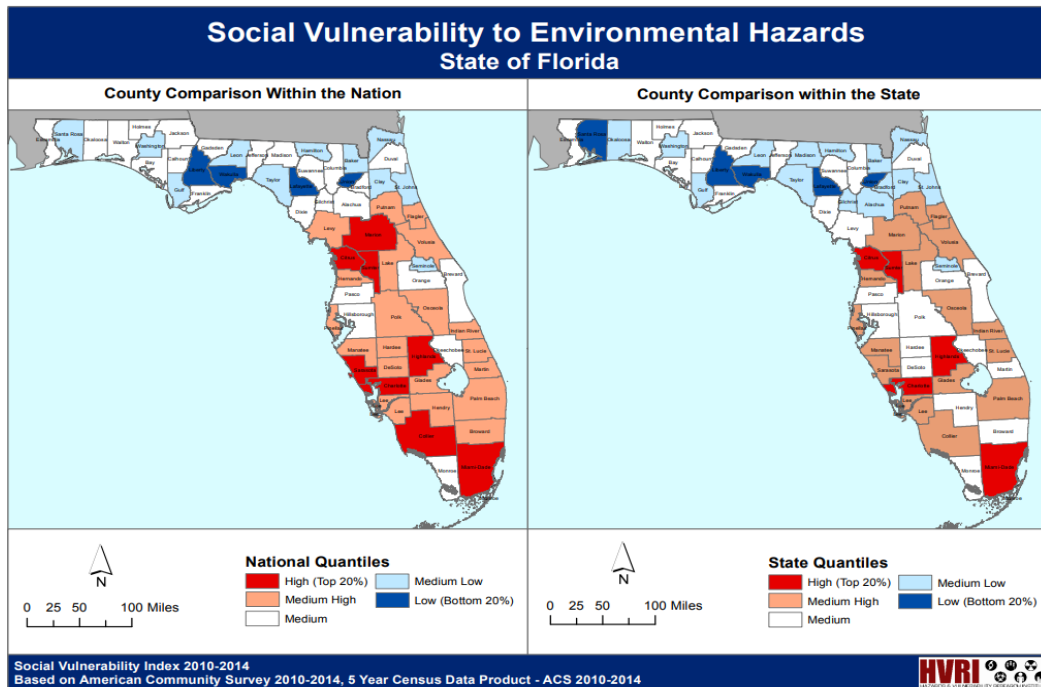
- = no available data

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1. Social Vulnerability Index

The Hazard and Vulnerability Research Institute's Social Vulnerability Index (SoVI®) measures the social vulnerability of U.S. counties to environmental hazards. This index synthesizes 29 socioeconomic variables that impact a community's ability to prepare for, and respond to, disasters²⁶. The index of variables includes, but is not limited to, age, sex, race, income and unemployment rate. A full list of variables is located in **Appendix D**.

Figure 12: Social Vulnerability Map



Source: Hazards Vulnerability Research Institute, Retrieved from:
<http://artsandsciences.sc.edu/geog/hvri/sovi%C2%AE-2010-2014-state-maps>

In addition to the information provided by SoVI®, the state is considering demographic characteristics and their connection to risk during disasters in state and HUD MID areas. Communities with higher percentages of socially-vulnerable residents are impacted adversely at a rate that is higher than state-wide averages. These demographics are presented in **Table 12**.

²⁶ Hazards & Vulnerability Research Institute, "Social Vulnerability Index for the United States - 2010-2014" Retrieved from <http://artsandsciences.sc.edu/geog/hvri/sovi%C2%AE-0>

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Table 12: Demographic Profile of MID Areas

Demographic Profile Information - American Community Survey (2018)²⁷		
Socio-Demographic Characteristics	Designated MID Area Average²⁸	Florida
Population		
Population estimates, July 1, 2018, (V2018)	20,321,514	21,299,325
Age and Sex		
Persons under 5 years, percent	5.18%	5.40%
Persons under 18 years, percent	19.81%	19.90%
Persons 65 years and over, percent	22.63%	20.50%
Race		
White alone, percent	81.50%	77.30%
Black or African American alone, percent	13.24%	16.90%
American Indian and Alaska Native alone, percent	0.69%	0.50%
Asian alone, percent	1.90%	3.00%
Native Hawaiian and Other Pacific Islander alone, percent	0.11%	0.10%
Two or More Races, percent	2.06%	2.20%
Hispanic or Latino, percent	18.55%	26.10%
White alone, not Hispanic or Latino, percent	65.08%	53.50%
Population Characteristics		
Veterans, 2013-2017	1,318,833	1,454,632
Foreign born persons, percent, 2013-2017	12.71%	20.20%
Language other than English spoken at home, percent of persons age 5 years+, 2013-2017	18.63%	28.70%
Education		
High school graduate or higher, percent of persons age 25 years+, 2013-2017	84.40%	87.60%
Bachelor's degree or higher, percent of persons age 25 years+, 2013-2017	21.75%	28.50%
Health		
With a disability, under age 65 years, percent, 2013-2017	10.22%	8.60%
Persons without health insurance, under age 65 years, percent	16.39%	16.00%
Economy		
In civilian labor force, total, percent of population age 16 years+, 2013-2017	52.40%	58.40%
Median household income (in 2017 dollars), 2013-2017	\$47,193.58	\$ 50,883.00
Per capita income in past 12 months (in 2017 dollars), 2013-2017	\$25,697.50	\$ 28,774.00
Persons in poverty, percent	17.98%	13.60%

²⁷ Margin of Error: All ACS estimates published on AFF have Margins of Error calculated at the 90% confidence level.

²⁸ This column depicts data averages across MID areas.

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As illustrated in **Table 12**, the areas at a higher risk of impacts from disasters have a higher percentage of elderly residents (22.6%) per county as compared to the state average (20.5%). On average these counties also have more people with disabilities, more uninsured residents, lower median income households, lower per capita incomes and more people living in poverty than in the state as a whole. Poverty is an indicator of places that might see greater impacts from disasters because of a general lack of ability to prepare and plan for shocks and stresses.

2. Impact on Low-and-Moderate Income Populations

All projects supported by HUD Community Development Block Grant (CDBG) assistance must meet one of the program's three National Objectives: (1) benefiting low-and-moderate income (LMI) persons, (2) meeting a particularly urgent need or (3) aiding in the prevention or elimination of slums or blight. This CDMG-MIT allocation is focused on addressing LMI and Urgent Needs.

Low-and Moderate-Income households are defined as households that do not exceed 80% of the median income for their area, as determined by HUD. These income categories are grouped into the following classifications:

- Very low income: with an annual income at 30% or below the area median income
- Low income: with an annual income at 31% of up to 50% of the area median income
- Moderate income: with an annual income at 50% to 80% of the area median income

For the purpose of the CDBG-MIT programs, a minimum of 50% of funds must benefit LMI persons. Every Florida county has areas that fall within the threshold of LMI income households. In **Table 13**, data regarding the LMI income population estimates are based upon HUD's LMI Summary Data (2011-2015 ACS). Attention will be paid to how programs and project benefits will directly meet the needs of these populations.

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Table13: LMI Population Summary of MID Counties

Table Key	
LOW	Low Income
LOWMOD	Low and Moderate Income
LOWMOD_PCT	Percentage of the eligible population ²⁹ who are LMI
State MID Areas	
HUD MID Areas	

Low and Moderate-Income Populations Summary (ACS 5-Year 2011-2015)							
NAME	LOW	LOWMOD	LOW MOD PCT	NAME	LOW	LOWMOD	LOW MOD PCT
Alachua County	79,229	114,030	47.9%	Levy County	9,845	17,175	43.74%
Baker County	6,320	10,085	40.98%	Manatee County	87,505	148,010	43.64%
Bradford County	6,125	9,090	38.12%	Marion County	71,645	127,110	38.74%
Brevard County	124,830	223,160	40.79%	Martin County	27,255	50,355	34.05%
Broward County	513,920	855,715	46.84%	Miami-Dade County	918,603	1,418,853	54.73%
Charlotte County	32,415	63,510	39.13%	Monroe County	21,600	36,455	49.52%
Citrus County	30,005	53,120	38.66%	Nassau County	15,945	29,660	39.43%
Clay County	37,380	67,660	34.5%	Okeechobee County	10,595	18,775	52.01%
Collier County	84,240	146,720	43.55%	Orange County	303,619	512,634	42.86%
Columbia County	15,330	25,270	40.08%	Osceola County	81,065	145,325	48.71%
DeSoto County	9,025	15,675	50.14%	Palm Beach County	370,370	612,920	45.1%
Dixie County	3,645	6,255	42.93%	Pasco County	107,225	195,210	41.35%
Duval County	240,430	397,200	45.57%	Pinellas County	210,105	364,484	39.87%
Flagler County	20,365	37,460	37.36%	Polk County	134,999	239,760	39.15%
Gilchrist County	5,135	7,755	49.29%	Putnam County	22,815	34,550	48.58%
Glades County	2,795	5,715	47.92%	St. Johns County	34,380	60,890	29.29%
Hardee County	7,510	13,040	51.46%	St. Lucie County	70,630	122,035	42.82%
Hendry County	10,360	16,370	45.4%	Sarasota County	80,980	149,210	38.61%
Hernando County	43,970	78,125	45.23%	Seminole County	79,220	143,535	33.12%
Highlands County	22,155	40,680	42.09%	Sumter County	16,580	31,210	31.68%
Hillsborough County	304,965	522,705	40.78%	Suwannee County	11,510	18,730	44.56%
Indian River County	33,665	59,450	42.08%	Taylor County	3,605	7,590	40.91%
Lafayette County	1,905	2,740	39.17%	Union County	2,355	4,160	41.52%
Lake County	66,025	122,220	39.86%	Volusia County	112,750	202,905	41.13%
Lee County	154,249	273,063	41.77%	Wakulla County	5,655	10,475	38.09%
Leon County	85,050	125,365	46.55%				

Source: HUD, ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data, Retrieved from: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

²⁹ Eligible population: The Community Planning and Development Office uses the Census Bureau's definition of persons eligible, which removes persons in group housing such as college students, jails and nursing homes.

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3. Impact on Special Needs Populations

Florida will consider accessibility issues and functional needs of vulnerable populations in planning for and carrying out activities using CDBG-MIT funds. DEO will satisfy effective communications, language assistance needs and reasonable accommodations procedures required of recipients of Federal financial assistance. The state will implement HUD guidance to plan for the functional needs of persons with disabilities in the implementation of its CDBG-MIT programs. Florida will utilize specialized resources to plan for and accommodate the functional needs of persons with disabilities, persons with limited English proficiency and other vulnerable populations - including, but not limited to, public or private social services, information, interpreters, translators, and other services for those persons who may be visually or speech-impaired during the application and project-scoring process.

Of significant concern is housing which typically serves vulnerable populations, including mixed-population public housing, transitional housing, permanent supportive housing, permanent housing serving individuals and families (including subpopulations) that are homeless and at-risk of homelessness, and single room occupancy (SRO) housing. An analysis of the housing needs of special and vulnerable populations was conducted during the Hurricane Irma Disaster Recovery Action Plan. The Irma Housing Repair and Reconstruction program ensures that these populations' housing needs are not ignored.

While the state currently has no plans to fund housing programs with the CDBG-MIT funds, it recognizes and will put forth every reasonable effort to accommodate the needs of vulnerable populations including 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.

Individuals with functional needs will require assistance with accessing and/or receiving mitigation benefits and resources. These individuals could be children, older adults, pregnant women, individuals from diverse cultures, people who are transportation-disadvantaged, the homeless and individuals with chronic medical disorders and/or a pharmacological dependency. These individuals could also have disabilities, live in institutions, have limited English proficiency or be non-English speaking. We will work in partnership with Florida's Agency for Persons with Disabilities to ensure accommodation of vulnerable populations throughout the life of the program.

Specialized resources may include, but are not limited to, public or private social services, accommodations, information, transportation or medications to maintain health. Regardless of the nature of the need, care must be taken to ensure that all special need individuals are beneficiaries of mitigation activities.

The LMI Summary Data may be used by CDBG grantees to determine whether a CDBG-funded activity qualifies as meeting the LMI national objective. The LMI

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percentages are calculated at various principal geographies provided by the U.S. Census Bureau.

While the program areas included in this Action Plan do not define eligibility based on protected class status, the state is prioritizing both disaster risk mitigation and benefit to LMI households. The State is not using these CDBG-MIT funds to provide housing.

G. Community Lifelines

HUD requires that grantees assess their mitigation needs in a manner that effectively addresses risks to indispensable services. To accomplish this, the community lifeline construct is used to enable decision-makers to characterize and identify the root causes of priority issue areas and to create effective solutions. Community lifelines enable the continuous operation of government functions and critical businesses that are essential to human health and safety or economic security³⁰.

Community lifelines are made up of the seven critical service areas displayed in **Figure 11**. Each of these lifelines are discussed with relevance to state capabilities and critical facilities. The guiding principles of the FEMA BRIC (Building Resilient Infrastructure and Communities) program, such as partnership promotion, large scale projects and supporting communities through capability and capacity building, help to inform the vision of the CDBG-MIT program goals.

Figure 13: Community Lifeline Components



Source: FEMA, “Community Lifelines Implementation Toolkit: Comprehensive Information and Resources for Implementing Lifelines During Incident Response”

1. Safety and Security

Government services, law enforcement and search and rescue teams are key entities in the network of operators who deliver robust safety and security capabilities. Disaster conditions can greatly impact the capabilities of response activities necessary to stabilize the conditions of safety and security. Floods and severe winds can have major impacts on emergency operation centers and the infrastructure needed to deliver necessary resources to rescue survivors of life-threatening circumstances. For instance, several

³⁰ FEMA, “Community Lifelines Implementation Toolkit: Comprehensive information and resources for implementing lifelines during incident response”, February 2019, Retrieved from https://www.fema.gov/media-library-data/1550596598262-99b1671f270c18c934294a449bcca3ce/Tab1b.CommunityLifelinesResponseToolkit_508.pdf

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days after Hurricane Michael passed through the state, multiple public safety facilities still had limited functionality which hampered their ability to service their communities³¹.

Several jurisdictions throughout the state have emergency operations centers which are outdated and vulnerable to hazards. In the aftermath of Hurricane Michael, nearly 2,000 additional law enforcement personnel and 437 additional ambulances were deployed to the Panhandle to assist with emergency lifesaving missions³². Further development of capacity and resources will minimize loss of life by mitigating threats to operations of response and recovery teams.

2. Communications

Communication is critical in times of disaster response and recovery. Failures in communications during disasters are most commonly due to physical damage to the devices or communication components of network infrastructure. Resilient telecommunications services can be the difference between life and death for both disaster victims and emergency response teams.

During Hurricane Irma, one of the costliest storms to hit Florida, the communications sector did not fare well immediately after the storm. Communications to intelligent transportation system infrastructure and devices along state highways were sporadic at best. Traffic signal system infrastructure was devastated in the urbanized areas. At one point, more than 27% of cell towers across the state were out of service, with several counties (Collier, Hendry, Highlands, Lee, Miami-Dade and Monroe), experiencing outages of 50% or more³³. While public and private response efforts proved resilient (within a week wireless service in the state was back up to 97%), more than a year later, in the aftermath of Hurricane Michael, communications continued to pose a major problem. Wireless carriers and internet service providers, including the Florida Department of Transportation's wireless/cellular and internet service providers, continued to experience widespread outages. With no critical communications available to or from the Northwest Florida Regional Transportation Management Center, emergency responders were forced for some time to rely on the personal cellphone of one consultant for much of their critical communications³⁴.

³¹ The Florida State Emergency Response Team, "Current Disaster Updates: Situation Report No. 7", Retrieved from <https://floridadisaster.biz/ManageContent?PageID=CURRENT+DISASTER+DATES>

³²The State Emergency Response Team, "Hurricane Michael: After Action Report and Improvement Plan", Retrieved from <https://portal.floridadisaster.org/SERT/AfterActionReports/Real-World%20AARs/Hurricane%20Michael%20AAR-IP%201-7-19.pdf>

³³ Federal Communications Commission, "Communications Status Report for Areas Impacted by Hurricane Irma September 11, 2017", Retrieved from <https://docs.fcc.gov/public/attachments/DOC-346655A1.pdf>

³⁴ Florida Department of Transportation, "One FDOT! Hurricane Michael Preparation, Response, and Recovery, Part I", *Transportation Systems Management & Operations Disseminator*, Retrieved from https://transops.s3.amazonaws.com/uploaded_files/TSMO%20DISSEMINATOR.pdf, p. 5

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Past events indicate that there is a rapid recovery capability within the communications sector but the high susceptibility to damage and outages poses significant risk to response and recovery efforts.

3. Food, Water, Sheltering

Coordination of food, water and shelter resources in major hazard events can be difficult, especially when the location of impact is wide-spread or uncertain. During hurricanes, stores have been severely limited in their ability to supply food along regular distribution lines. Stoppages and outages along highways and roads commonly result in the spoilage of perishable food. Analysts explain that Irma's size and path made it the perfect storm to cripple Florida's grocery supply lines impacting both suppliers and consumers³⁵.

Hurricane Irma's path crossed some of Florida's most productive agricultural landscapes and consequently caused major losses to all segments of agriculture production. Total crop losses from Hurricane Irma were estimated at \$2 billion, while total losses to agriculture production were estimated at \$2.5 billion³⁶. Half of Miami-Dade's agricultural crops were affected, resulting in damages of \$245 million.

Widespread damage to homes in Florida placed significant burdens on the emergency shelters positioned across the state. During Hurricane Irma, an estimated 6.5 million residents were ordered to evacuate; the largest evacuation in Florida history. Throughout the state, approximately 700 emergency shelters were opened, which collectively housed nearly 192,000 people³⁷. The 2018 state-wide Emergency Shelter Plan shows that, though regional deficits still exist, on a state-wide aggregate basis, Florida has eliminated the deficit in general population public hurricane evacuation shelter space. However, a deficit of special needs shelter spaces continues to exist³⁸. As the Florida population continues to increase, there will be an on-going need to maintain and continue to support hurricane evacuation shelter space.

4. Transportation

Florida has a large transportation network that consists of airports, major highways, passenger railroads, marine ports and pipelines. These systems provide lifeline services for communities and are vitally important for response and recovery operations. In Florida, heavy rainfall events can disrupt transportation services and damage infrastructure and

³⁵CNA Analysis and Solutions "Supply Chain Resilience and the 2017 Hurricane Season", Retrieved from https://www.cna.org/CNA_files/PDF/IRM-2018-U-018098-Final.pdf

³⁶ Her, Y.G. et al., "Hurricane Impacts on Florida's Agriculture and Natural Resources", Retrieved from <http://edis.ifas.ufl.edu/ae528>

³⁷ The State Emergency Response Team, "Hurricane Irma: After-Action Report/Improvement Plan", Retrieved from <https://portal.floridadisaster.org/SERT/AfterActionReports/Real-World%20AARs/Irma%20AAR-IP%20Final.pdf>

³⁸ The State Emergency Response Team, "Statewide Emergency Shelter Plan", Retrieved from https://www.floridadisaster.org/globalassets/dem/response/sesp/2018/2018-sesp-a1-main-plan-text_final_1-30-18.pdf

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facilities. During or following periods of heavy rainfall, inundation and washouts can block transportation routes, damage facilities and interrupt power supplies.

Tropical cyclones can damage critical infrastructure such as roads and bridges, causing delays in critical response services and the ability to move throughout the state. For instance, during Hurricane Matthew, areas along the Atlantic coast sustained major infrastructure damage, including the main A1A highway, as multiple feet of storm surge and waves led to substantial coastal impacts³⁹.

Of the more than 12,000 bridges that stretch across Florida, 376 of them are designated as structurally deficient (SD), a classification used to identify bridges that need repair or replacement are at risk⁴⁰.

5. Health and Medical

Health and Medical lifeline components include medical care, patient movement, public health, fatality management and the health care supply chain. These critical public health and medical services are necessary in order to reduce the potential for adverse health outcomes during an event. The capacity of facilities to cope with hazard impacts directly and to manage under the duress of providing increased service to those in need places a significant strain on the critical health and medical community lifeline. For example, according to the Florida Health Care Association⁴¹, 150 of the state's 700 nursing homes still lacked full power three days after Irma struck. Meeting the needs of persons with access needs and functional needs during or following a disaster is a key component of public health and medical preparedness planning. Direct vulnerability of health and medical centers also pose significant challenges. With more than 300 hospitals and more older adults than in any other state, emergency plans for Florida's hospitals are a critical issue facing mitigation planners.

6. Hazardous Material (Management)

A hazardous material is any substance that poses a threat to humans, animals or the environment. Hazardous materials generally refer to hazardous substances such as petroleum, natural gas, synthetic gas and acutely toxic chemicals. The threat that hazardous materials pose to the health and safety of the environment and its inhabitants can be enhanced due to the destruction rendered by serious hazards. Exposure to contaminated water commonly affects communities hit by a hurricane or tropical storm. In the area hit, water treatment plants may not be operating.

³⁹ Florida Department of Environmental Protection, "Hurricane Damage Assessment report for 2016 Florida's Beaches and Dunes", Retrieved from https://floridadep.gov/sites/default/files/HurricaneDamageAssessmentReport_2016_0.pdf

⁴⁰ Florida Department of Transportation, "Bridge Inventory 2019 Annual Report", Retrieved from https://fdotwww.blob.core.windows.net/sitefinity/docs/default-source/maintenance/str/bi/florida_bridge_inventory_2019_annual_report.pdf?sfvrsn=1d855ba0_0

⁴¹ Florida Hospital Association, Retrieved from <http://www.fha.org/facts.html>

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7. Energy

Energy and electricity facilities, as well as transmission and distribution lines, are among the most critical of the lifelines⁴². Essential elements of this lifeline include the power grid and its critical facilities, including fuel supply lines. During Hurricane Matthew, Florida Power and Light reported that nearly 1.2 million customers across Florida lost power as a result of the storm⁴³. When Hurricane Irma struck the state, it knocked out power to an estimated 6.7 million utility customers⁴⁴. At its peak, Hurricane Michael caused more than 400,000 power outages throughout the Panhandle. Impacts on the state's energy grid places heavy strain on all sectors. During disasters, the continuity of energy access for the most critical facilities and operations is a high mitigation priority.

H. Mitigation Needs Problem Statements

Throughout the planning and administration of the CDBG-MIT grant, DEO is committed to providing multiple opportunities for public participation. Local residents are best able to provide valuable information about the needs of a community. Examples of public participation include public meetings, surveys, and public comment periods. Federal guidance mandates that DEO consider and implement public comments as much as possible, seek input from minority and low-income populations, and conduct public outreach strategies during a review under the National Environmental Policy Act.

DEO is directed by the affirmatively Furthering Fair Housing (AFFH) rule to provide opportunities for community participation, consultation and coordination. The purpose of this mandate is to solicit the views and recommendations of community members that live in the area that will be affected by a federal action. DEO is committed to considering and implementing those views and recommendations into decisions and outcomes as much as possible. In addition, DEO will provide outreach to populations who have been historically excluded from decision-making processes, including racial and ethnic minorities, Limited English Proficient (LEP) persons, and persons with disabilities.

DEO is committed to ensuring environmental justice in minority populations and low-income populations. Members of these populations are encouraged to participate in outreach efforts by DEO to provide valuable input on the needs and priorities of these communities. To ensure adequate public participation and access to information as required by Executive Order 12898, DEO will:

- Solicit public recommendations in developing and implementing environmental justice strategies;
- Use public documents that are concise and understandable; and

⁴² National Association of Counties, "Improving Lifelines: Protecting Critical Infrastructure for Resilient Counties", Retrieved from https://www.naco.org/sites/default/files/documents/NACo_ResilientCounties_Lifelines_Nov2014.pdf

⁴³ Florida Power and Light, Retrieved from <https://www.fpl.com/landing/thank-you.html?cid=HB1>

⁴⁴ U.S. Energy Information Administration, "Hurricane Irma cut power to nearly two-third of Florida's electricity customers", Retrieved from <https://www.eia.gov/todayinenergy/detail.php?id=32992>

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- Translate appropriate public documents for limited-English speaking populations.

DEO will provide meaningful opportunities for public participation throughout the environmental review process as required by guidance from the Council on Environmental Quality. Key opportunities for citizens to get involved in the NEPA process include:

- Public meetings;
- Webinars;
- Surveys; and
- Written comments

To ensure that citizens remain informed, DEO will provide regular updates on the CDBG-MIT website.

1. Mitigation Need: Operational Resilience

Public safety facilities enable first responders and emergency management staff to efficiently coordinate and navigate response and recovery efforts across Florida. Billions of dollars' worth of state and county facilities are vulnerable to hazard impacts of tropical cyclones, such as strong winds and flooding. Feedback from stakeholders across the state highlight the conditions of multiple Emergency Operations Centers, many of which have been identified as being inadequate in terms of meeting public safety needs. Older buildings, which are not up to code or are otherwise unprepared for weather hazard impacts, create increased risks for the populations they serve.

2. Mitigation Need: Repetitive Flooding

One of the most significant challenges faced by Florida communities is the threat of repetitive flooding. Maintaining current levels of flood risk in Florida is unsustainable and threatens the state's ability to provide critical services, preserve critical service areas and maintain long-term community and ecosystem viability and resilience. Flooding has been identified as one of the most destructive hazards in terms of loss of human life, injury and property damage. Florida's population is largely concentrated in coastal areas, which presents a difficult logistical challenge in the years to come and a strong need for implementation of mitigation projects. Coastal erosion, sea-level rise and destructive winds and storm surge will cause increasing dangers to coastal communities. According to a 2019 article by the National Oceanic and Atmospheric Association (NOAA), the sea level will continue to rise at a rate of about one-eighth of an inch per year⁴⁵. The rising sea level is expected to increase the frequency of flooding and the strength of storm surge, especially in Florida where coastal counties contain 76% of the state's

⁴⁵ National Oceanic and Atmospheric Association. "Is sea level rising?" National Ocean Service website, <https://oceanservice.noaa.gov/facts/eutrophication.html>, 10/09/19.

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population⁴⁶. The Enhanced SHMP notes that increasing sea levels will result in more flooding and an expansion of the current floodplain area⁴⁷. Enhancing the function of natural flood mitigation features such as streams and wetlands to ensure that conveyed water makes it to rivers and other water bodies is increasingly important. Storm water management is also a major issue for inland communities. Funding for implementing flooding mitigation projects is critical to achieving the state's lifeline objectives.

3. Mitigation Need: Resilient Infrastructure

There is a great need for the implementation of infrastructure mitigation projects that will improve resiliency to hazard impacts. In many communities, essential mitigation projects have gone unimplemented due to a lack of the funding necessary to complete them. Aging infrastructure across the state is vulnerable to the effects of hazard impacts such as flooding and damaging winds. If infrastructure failure was to occur during a disaster event, a critical situation could evolve into a crisis. Resilience of the power grid, especially to critical facilities such as medical centers and other public services, is recognized as a prevalent problem during most Florida hazards. Severe storms and tropical cyclones can have a devastating effect on the power grid, disrupting residents for a couple hours or for as long as several weeks.

⁴⁶ Florida Department of Environmental Protection. "Florida Adaption Planning Guidebook". Retrieved from <https://floridadep.gov/mwg-internal/de5fs23hu73ds/progress?id=OV71ys70nscbBbnZ90gZzMvg5jH6PFOABfohkhRlfZ4>.

⁴⁷ Florida Division of Emergency Management. "Enhanced State Hazard Mitigation Plan". Retrieved from <https://www.floridadisaster.org/dem/mitigation/statemitigationstrategy/state-hazard-mitigation-plan/>.

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VI. PROJECTS & ACTIVITIES

A. Program Budget

DEO's Office of Disaster Recovery is the lead agency and responsible entity for administering more than \$633 million in funds allocated to the state for mitigation and resiliency efforts through the Community Development Block Grant Mitigation program. In accordance with the Federal Register, DEO's aggregate total for indirect costs and administrative and technical assistance expenditures will not exceed 5% of its total grant (\$31,674,250) plus program income. Planning costs are subject to the 15% cap (\$95,022,750) defined in 42 U.S.C. 5305(a) (12). The state is proposing a budget of 5% (\$31,810,750). 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 13% 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.

Table 14: Allocation of CDBG-MIT Funds

Allocation of CDBG-MIT Funds				
Program	Allocation	Percent of Overall Funding	HUD-MID Area Allocation Minimum	LMI Designation Allocation Minimum
Infrastructure	\$550,000,000	87%	\$275,000,000	\$275,000,000
<ul style="list-style-type: none"> General Infrastructure 	\$475,000,000	75%	\$237,500,000	\$237,500,000
<ul style="list-style-type: none"> Critical Facility Hardening Program 	\$75,000,000	12%	\$37,500,000	\$37,500,000
Planning and Administrative Costs	\$83,485,000	13%		

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• General Planning Support	\$20,000,000	3%	\$10,000,000	\$10,000,000
• DEO Administration	\$31,674,250	5%		
• DEO Planning	\$31,810,750	5%		
Total Allocation	\$633,485,000	100%	\$285,000,000	\$285,000,000

B. Mitigation Program Overview

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. 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.

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 title⁴⁸ 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 planning⁴⁹.

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

- Infrastructure Programs
 - General Infrastructure; and
 - Critical Facility Hardening

⁴⁸ 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)(9): https://www.hud.gov/sites/documents/DOC_16364.PDF

⁴⁹ 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): https://www.hud.gov/sites/documents/DOC_16364.PDF

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- Planning, Administration and Public Services
 - General Planning Support;
 - DEO Administration; and
 - DEO Planning.

These programs are summarized below.

C. Mitigation Program Details

1. 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 87% of the total CDBG-MIT allocation.

Both programs are detailed below.

a. General Infrastructure Program (GIP) Overview

The GIP will account for 75% 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

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promote energy efficiency) of public works, facilities (except for buildings for the general conduct of government), and site or other improvements.⁵⁰

Table 15: General Infrastructure Program (GIP)

General Infrastructure Program (GIP)	
Funding Dollars	\$475,000,000
Funding Percentage	87%
HUD-MID Area Allocation Minimum	\$237,500,000
LMI Designation Allocation Minimum	\$237,500,000
Applicant Minimum & Maximum	\$500,000 - \$475,000,000
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

The GIP will be implemented in three rounds:

Round I will provide an initial allocation of resources to units of 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

⁵⁰ 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

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applicants. Each project will be prioritized based on the overall score from each category of scoring criteria.

The CDBG-MIT Program will select projects based on the rankings from the scores with additional consideration to ensure that funding is applied in an equitable manner on a geographic basis. \$150 million will be available in Round I. The state anticipates that regional coalitions and local governments or local public entities will act as partners in the implementation of this program. Each round will have a competitive application process, with a minimum project cost of \$500,000 and no maximum limit.

Rounds II and III of the GIP are designed to be implemented with an emphasis on providing opportunities to communities that may lack the resources to put forth a quality application in Round I. The GPS Program will assist future applicants with prioritizing their mitigation needs to submit projects for upcoming GIP funding. Round II will make strategic investments on a competitive basis to implement programs and projects that align with mitigation objectives. Round II will commence in 2021. \$175 million and any remaining unobligated funding from Round I will be made available in Round II. Projects will be ranked using the same prioritization methodology from Round I as their base. Round III will award the remaining program funding on a competitive basis to implement risk reduction and will incentivize the adoption of resilient policies on a regional basis. Round III will commence in 2022. All remaining unobligated funds will be made available to fund projects submitted for the \$150 million allocation for Round III. DEO will utilize the same application and prioritization methodology from earlier rounds as a base for Round III.

- **GIP Eligibility Criteria**

To be eligible for funding, an application must:

1. 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;
2. Have a beneficial impact upon the designated disaster area;
3. 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;
4. 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.
5. As a condition of consideration for CDBG-MIT project funding, applicants will be required to identify their plans for funding operations and maintenance costs (when applicable). Long-term maintenance and operating costs are ineligible under CDBG-MIT funding except as identified at 84 FR 45838 Section V.A.9.

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6. Be cost-effective and substantially reduce the risk of future damage, hardship, loss or suffering resulting from a major disaster. The grantee must demonstrate this by documenting that the project:
 - a) Addresses a problem that has been repetitive or a problem that poses a significant risk to public health safety if left unsolved;
 - b) Cost less than the anticipated value of the reduction in both direct damages and subsequent negative impacts to the area if future disasters were to occur;
 - c) Have been determined to be the most practical, effective and environmentally sound alternative after consideration of a range of options;
 - d) Contributes, to the extent practicable, to a long-term solution to the problem it is intended to address; and
 - e) Consider long-term changes to the areas and entities it protects and have manageable future maintenance and modifications requirements.

- GIP Application Process

Eligible applicants will be invited to submit applications proposing GIP projects for funding through the CDBG-MIT program. Responses will be evaluated to ensure the proposed projects meet the minimum criteria as outlined in the GIP Program Guideline application materials. Responses that meet minimum threshold requirements will then be evaluated according to the scoring criteria outlined below.

Applications must, at a high level, describe their infrastructure project and address how it will serve to mitigate risks attributable to threats identified in the State of Florida Action Plan Risk-Based Mitigation Needs Assessment. Plans must also include a proposed budget with a detailed description of anticipated costs by category, including support services and program management and administration.

DEO will host a webinar to provide an overview of the GIP Guidelines, specific to the application process. The webinar will include a live question and answer period. These questions and answers will be published on DEO's website within five business days after the webinar. DEO will also provide an opportunity for applicants to schedule 20-minute, one-on-one phone calls with DEO's mitigation staff. These calls will provide applicants an opportunity to ask questions and/or discuss issues specific to their project and the application process.

Applicants may check on the status of their submissions by sending an email to cdbg-mit@deo.myflorida.com or checking online at: www.floridajobs.org/CDBG-MIT. DEO is also establishing, and will advertise, a toll-free number for this purpose.

- GIP Criteria & Scoring

Applications will be evaluated to determine the mitigation value and cost effectiveness of the proposed project. An applicant's planning strategy and management capacity must be evident. The threshold/unscored requirements include meeting all GIP eligibility criteria (see previous page). Applicants that do not meet threshold eligibility requirements will not progress to the scoring stage.

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Each scored element of the applications is included in a Criteria Evaluation Rubric and has a value associated with it. If eligible applications exceed available funding, applicants will be funded in rank order based on evaluation scores. DEO reserves the option to fund all, a portion of or none of each application submitted by an applicant. Scored criteria is listed below in its order of importance. A total of 150 points are available.

Table 16: General Infrastructure Program (GIP) Scoring Criteria

Scoring Criteria	Maximum Points
Overall LMI Benefit	30
Value to Community (Resilience enhancement and lifelines served)	20
Detailed Project Description (Purpose, mitigation value, staff, anticipated outcomes, budget)	20
Special Designation (e.g. Fiscally-Constrained, Rural, Area of Critical State Concern)	15
Capacity Plan – Goals, stakeholders, quality controls, staffing, contractors (LMI hiring opportunities)	15
HUD- and State-Designated MID Areas Served	10
SoVI® Score	10
Implementation Plan	10
Budget	10
Leveraged Dollars	10

b. Critical Facility Hardening Program (CFHP) Overview

The CFHP will allow units of general local government (UGLG) and state agencies to harden critical buildings that serve a public safety purpose for local communities. This program will enable local police, fire, shelters and local emergency management facilities and other designated critical facilities to better withstand the effects of the previously-identified hazard risks. Examples of hardening against flood, fire, storms and coastal erosion include, but are not limited to, dry proofing, wet proofing, anchoring roof-mounted heating, shelters, ventilation and air-conditioning units and retrofitting building exteriors with hazard-resistant materials in accordance with national safety standards.

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The hardening program will encompass energy resiliency projects that help ensure that the most critical facilities in Florida communities have access to power throughout and following an emergency when local sources of power are down. Critical facilities include, but are not limited to, potable water facilities, waste water facilities, police departments, fire departments, hospitals, emergency operation centers and emergency shelters. Local units of government that apply for this program will need to identify critical facilities that have a need to update or replace existing power sources (such as generators or resiliency systems) so as to allow these facilities to safely maintain power during emergencies.

CFHP eligible activities under the HCDA include: clearance, demolition, removal, reconstruction and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements (including interim assistance, and financing public or private acquisition for reconstruction or rehabilitation, and reconstruction or rehabilitation, of privately owned properties, and including the renovation of closed school buildings)⁵¹; special projects directed to the removal of material and architectural barriers which restrict the mobility and accessibility of elderly and handicapped persons⁵²; and lead-based paint hazard evaluation and reduction, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992⁵³.

⁵¹ 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)(4): https://www.hud.gov/sites/documents/DOC_16364.PDF

⁵² 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)(5): https://www.hud.gov/sites/documents/DOC_16364.PDF

⁵³ 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)(25): https://www.hud.gov/sites/documents/DOC_16364.PDF

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Table 17: Critical Facility Hardening Program (CFHP)

Critical Facility Hardening Program	
Funding Dollars	\$75,000,000
Funding Percentage	12%
Project Minimum & Maximum	\$50,000 - \$15,000,000
HUD-MID Area Allocation Minimum	\$37,500,000
LMI Designation Allocation Minimum	\$37,500,000
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

- **CFHP Eligibility Criteria**

To be eligible for funding, an application must:

1. 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;
2. 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;
3. Consider the following for any flood mitigation project: high wind, continued sea level rise and ensure responsible floodplain and wetland management based on

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the history of flood mitigation efforts and the frequency and intensity of precipitation events;

4. 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 applicable). Long-term maintenance and operating costs are ineligible under CDBG-MIT funding except as identified at 84 FR 45838 Section V.A.9.
5. Be cost-effective and substantially reduce the risk of future damage, hardship, loss or suffering resulting from a major disaster. The grantee must demonstrate this by documenting that the project:
 - a. Addresses a problem that has been repetitive or a problem that poses a significant risk to public health safety if left unsolved;
 - b. Will not cost more than the anticipated value of the reduction in both direct damages and subsequent negative impacts to the area if future disasters were to occur;
 - c. Has been determined to be the most practical, effective and environmentally sound alternative after consideration of a range of options;
 - d. Contributes, to the extent practicable, to a long-term solution to the problem it is intended to address; and
 - e. Considers long-term changes to the areas and entities it protects and has manageable future maintenance and modifications requirements.

- CFHP Application Process

Eligible applicants will be invited to submit applications proposing GPS projects for funding through the CDBG-MIT program. Responses will be evaluated to ensure the proposed projects meet the minimum criteria as outlined in the GPS Program Guideline application materials. Responses that meet minimum threshold requirements will then be evaluated according to the scoring criteria outlined below.

Applications must, at a high level, describe what is being identified as a critical facility and address how and why it needs to be hardened to mitigate risks attributable to threats identified in the State of Florida Action Plan Risk-Based Mitigation Needs Assessment. Plans must also include a proposed budget with a detailed description of anticipated costs by category, including support services and program management and administration.

DEO will host a webinar to provide an overview of the CFHP Guidelines, specific to the application process. The webinar will include a live question and answer period. These questions and answers will be published on DEO's website within five business days after the webinar. DEO will also provide an opportunity for applicants to schedule 20-minute, one-on-one phone calls with DEO's mitigation staff. These calls will provide applicants an opportunity to ask questions and/or discuss issues specific to their project and the application process.

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Applicants may check on the status of their submissions by sending an email to cdbg-mit@deo.myflorida.com or checking online at: www.floridajobs.org/CDBG-MIT. DEO is also establishing, and will advertise, a toll-free number for this purpose.

- **CFHP Criteria & Scoring**

Applications will be evaluated to determine the mitigation value and cost effectiveness of the proposed project. An applicant’s planning strategy and management capacity must be evident. The threshold/unscored requirements include meeting all CFHP eligibility criteria (see previous page). Applicants that do not meet threshold eligibility requirements will not progress to the scoring stage.

Each scored element of the applications is included in a Criteria Evaluation Rubric and has a value associated with it. If eligible applications exceed available funding, applicants will be funded in rank order based on evaluation scores. DEO reserves the option to fund all, a portion of or none of each application submitted by an applicant. Scored criteria is listed below in its order of importance. A total of 150 points are available.

Table 18: Critical Facility Hardening Program (CFHP) Scoring Criteria

Scoring Criteria	Maximum Points
Overall LMI Benefit	30
Value to Community (Resilience enhancement and lifelines served)	20
Detailed Project Description (Purpose, mitigation value, staff, anticipated outcomes, budget)	20
Special Designation (e.g. Fiscally-Constrained, Rural, Area of Critical State Concern)	15
Capacity Plan – Goals, stakeholders, quality controls, staffing, contractors (LMI hiring opportunities)	15
HUD- and State-Designated MID Areas Served	10
SoVI® Score	10
Implementation Plan	10
Budget	10
Leveraged Dollars	10

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2. Planning and Administration Costs

Planning and Administrative Costs has a set aside of \$83,485,000 to support local, regional and statewide mitigation planning efforts. Planning funding can be used for: land use planning, hazard mitigation planning, modernization and resiliency planning, upgrading mapping capabilities and other plans or capabilities to better understand evolving disaster risks, and planning to reduce flood insurance premiums through the NFIP Voluntary Community Rating System Incentives Program. Public service activities like education and outreach that aim to support local, regional and statewide mitigation efforts and encourage best mitigation practices are also included in the General Planning Support Program.

a. General Planning Support (GPS) Program Overview

The GPS program will provide funding opportunities for the purpose of developing and updating state, regional and local plans. DEO recognizes that planning is an important aspect of mitigation and that not all UGLGs have access to full-time planning staff. The GPS program provides rarely available funds to create regional plans that will enable the state of Florida to withstand future disasters. Examples of projects include, but are not limited to:

- Land use, comprehensive and neighborhood planning;
- Regional mitigation planning;
- Modernization and resiliency planning;
- Upgrading mapping, data and other capabilities to better understand evolving disaster risks;
- Planning to reduce flood insurance premiums through the National Flood Insurance Program (NFIP) Voluntary Community Rating System Incentives Program; and
- Education and outreach designed to support local, regional and statewide mitigation efforts and encourage best mitigation practices.

The goal of the GPS program is to prepare Florida communities to respond to and recover from future disasters, including the five major priorities referenced in the State of Florida Mitigation Action Plan: flooding; tropical cyclones; severe storms; wildfires; and coastal erosion.

Eligible GPS activities under the HCDA include: activities necessary to develop a comprehensive community development plan, and to develop a policy-planning-management capacity so that the recipient of assistance under this title may more rationally and effectively determine its needs, set long-term goals and short-term objectives, devise programs and activities to meet these goals and objectives, evaluate the progress of such programs in accomplishing these goals and objectives, and carry out management, coordination, and monitoring of activities necessary for

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effective planning implementation⁵⁴; activities necessary to the development of energy use strategies related to a recipient's development goals, to assure that those goals are achieved with maximum energy efficiency, including items such as— an analysis of the manner in, and the extent to, which energy conservation objectives will be integrated into local government operations, purchasing and service delivery, capital improvements budgeting, waste management, district heating and cooling, land use planning and zoning, and traffic control, parking, and public transportation functions, and a statement of the actions the recipient will take to foster energy conservation and the use of renewable energy resources in the private sector, including the enactment and enforcement of local codes and ordinances to encourage or mandate energy conservation or use of renewable energy resources, financial and other assistance to be provided (principally for the benefit of low- and moderate-income persons) to make energy conserving improvements to residential structures, and any other proposed energy conservation activities⁵⁵; and provision of assistance by recipients under this title to institutions of higher education having a demonstrated capacity to carry out eligible activities under this subsection for carrying out such activities⁵⁶.

Table 19: General Planning Support (GPS) Program

General Planning Support (GPS) Program	
Funding Dollars	\$20,000,000
Funding Percentage	3%
Project Minimum & Maximum	\$20,000 - \$10,000,000
Application Type	Subrecipient
Applicant Eligibility	UGLG, state agencies, non-profits and educational institutions
Geographic Eligibility	HUD and State-Designated MIDS

⁵⁴ 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)(12): https://www.hud.gov/sites/documents/DOC_16364.PDF

⁵⁵ 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)(16): https://www.hud.gov/sites/documents/DOC_16364.PDF

⁵⁶ 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)(21): https://www.hud.gov/sites/documents/DOC_16364.PDF

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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

- GPS Eligibility Criteria

To be eligible for funding, an application must:

1. 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;
2. Have a beneficial impact upon the state-designated MID area;
3. Be cost-effective and result in an actionable plan that will provide strategies for high-impact mitigation activities.

- GPS Application Process

Eligible applicants will be invited to submit applications proposing GPS projects for funding through the CDBG-MIT program. Responses will be evaluated to ensure the proposed projects meet the minimum criteria as outlined in the GPS Program Guideline application materials. Responses that meet minimum threshold requirements will then be evaluated according to the scoring criteria outlined below.

Applications must, at a high level, describe the planning project and how it will be used to help to mitigate risks attributable to threats identified in the State of Florida Action Plan Risk-Based Mitigation Needs Assessment. Plans must also include a proposed budget with a detailed description of anticipated costs by category, including support services and program management and administration.

DEO will host a webinar to provide an overview of the GPS Guidelines, specific to the application process. The webinar will include a live question and answer period. These questions and answers will be published on DEO's website within five business days after the webinar. DEO will also provide an opportunity for applicants to schedule 20-minute, one-on-one phone calls with DEO's mitigation staff. These calls will provide applicants an opportunity to ask questions and/or discuss issues specific to their project and the application process.

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Applicants may check on the status of their submissions by sending an email to cdbg-mit@deo.myflorida.com or checking online at: www.floridajobs.org/CDBG-MIT. DEO is also establishing, and will advertise, a toll-free number for this purpose.

GPS Criteria & Scoring

Applications will be evaluated to determine the mitigation value and cost effectiveness of the proposed project. An applicant's strategy and management capacity must be evident. The threshold/unscored requirements include meeting all GPS eligibility criteria (see previous page). Applicants that do not meet threshold eligibility requirements will not progress to the scoring stage.

Each scored element of the applications is included in a Criteria Evaluation Rubric and has a value associated with it. If eligible applications exceed available funding, applicants will be funded in rank order based on evaluation scores. DEO reserves the option to fund all, a portion of or none of each application submitted by an applicant. Scored criteria is listed below in its order of importance. A total of 100 points are available.

Table 20: General Planning Support (GPS) Program Scoring Criteria

Scoring Criteria	Maximum Points
Value to Community (Resilience enhancement and lifelines served)	25
Detailed Project Description (Purpose, mitigation value, staff, anticipated outcomes, budget)	25
Capacity Plan – Goals, stakeholders, quality controls, staffing, contractors (LMI hiring opportunities)	20
Implementation Plan	15
Budget	10
Leveraged Dollars	5

b. 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% of its total grant (\$31,674,250) plus program income. Planning costs are subject to the 15% cap (\$95,022,750) defined in 42 U.S.C. 5305(a) (12). The state is proposing a budget of 5% (\$31,810,750).

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

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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 13% of the total grant amount on a combination of planning and indirect and direct program administration costs.

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VII. CITIZEN PARTICIPATION

The citizen participation plan for the CDBG-MIT allocation will provide a reasonable opportunity of at least 45 days for citizen comment and ongoing citizen access to information about the use of grant funds. Before DEO adopts this Action Plan or any substantial amendment to this Plan, DEO will publish the proposed Plan or Amendment on floridajobs.org/rebuildflorida/mitigation, DEO's main CDBG-MIT website. DEO and/or subrecipients will notify affected citizens through electronic mailings, press releases, statements by public officials, media advertisements, public service announcements, newsletters, contacts with neighborhood organizations and/or through social media. DEO will ensure that all citizens have equal access to information about the programs, including persons with disabilities (vision and hearing impaired) and limited English proficiency (LEP). A Spanish and Creole version of the Action Plan will be available.

DEO's website includes an Interpretive Translation Notice informing citizens in 15 different languages that translation services are available upon request. DEO consulted the "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI, Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons," published on January 22, 2007, in the Federal Register (72 FR 2732), in order to comply with citizen participation requirements. Upon subsequent publication of the Action Plan or substantial amendments, DEO will provide a reasonable opportunity of at least 45 days and have a method for receiving comments.

DEO will take comments via USPS mail or email at:

Attention: Office of Disaster Recovery
Florida Department of Economic Opportunity
107 East Madison Street
The Caldwell Building, MSC 160
Tallahassee, Florida 32399-2100
cdbg-mit@deo.myflorida.com

A. Publication

Before its adoption, the proposed Action Plan was published on the DEO website, floridajobs.org/rebuildflorida/mitigation for a 45-day citizen comment period on December 9, 2019. DEO incorporated and addressed citizen comments received during that period into the final Action Plan. A summary of public comments and responses can be found in **Appendix C**.

B. Public Website

DEO will maintain a public website that provides information accounting for how all grant funds are used and managed/administered, including: links to all Action Plans, Action Plan Amendments, CDBG-MIT program policies and procedures, performance reports, citizen participation requirements, and activity/program information for activities described in its action plan, including details of all contracts and ongoing procurement policies.

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DEO will make the following items available on <http://floridajobs.org/rebuildflorida/mitigation>: (1) the Action Plan (including all amendments); each Quarterly Performance Report (QPR) as created using the DRGR system; (2) Policies and Procedures Manual; (3) Program Guidelines; (4) executed CDBG-MIT contracts; and (5) status of services or goods currently being procured by DEO (e.g., phase of the procurement, requirements for proposals, etc.).

In addition to the specific items listed above, DEO will maintain another comprehensive website regarding all mitigation activities assisted with these funds. This includes reporting information on DEO's main website and additional in-depth program information on a separate site dedicated specifically to long-term disaster recovery and mitigation, rebuildflorida.gov. Both websites will be updated on a regular basis to reflect the most up-to-date information about the use of these funds and any changes in policies and procedures.

C. Public Engagement

Seeking input from stakeholders and communities around the state is an important component of the planning process. DEO used a variety of methods to inform local officials and the public on the purpose and goals of mitigation, understanding risks, threats and hazards in the MID areas and gathering feedback on how to craft programs that will meet the needs of communities as quickly as possible. In addition to gaining feedback, this process helped local stakeholders and members of the public understand what to expect from CDBG-MIT funding and allowed them to play a key role in shaping the outcomes of this plan. The outreach methods, along with the feedback obtained, are included below.

1. Webinars

Over the course of the planning period, DEO conducted two webinars to keep stakeholders informed of the process and to solicit feedback.

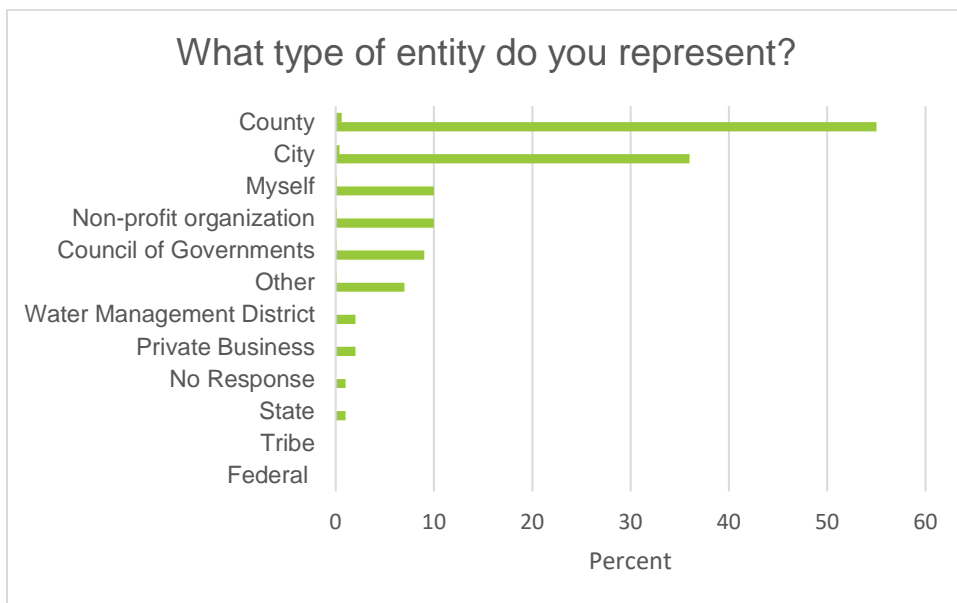
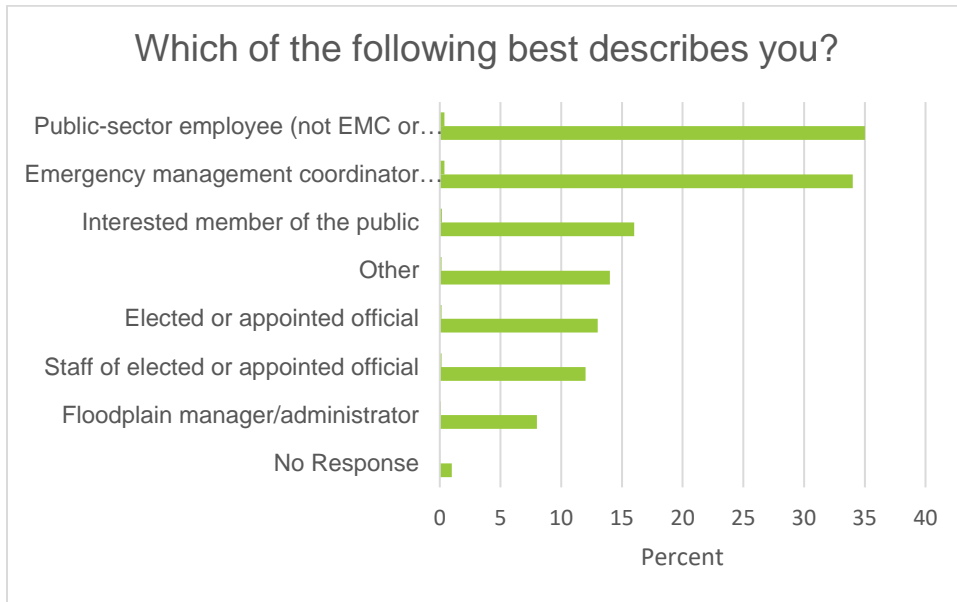
- The first webinar was held on October 16, 2019. There were 145 participants. The purpose of this live webinar was to provide an orientation and education regarding the state Action Plan planning and implementation process for CDBG-MIT professional partners and to set the stage for upcoming visits to communities.
- DEO will continue to hold webinars in response to participant feedback to promote an open line of communication with stakeholders.

2. Community Stakeholder Survey

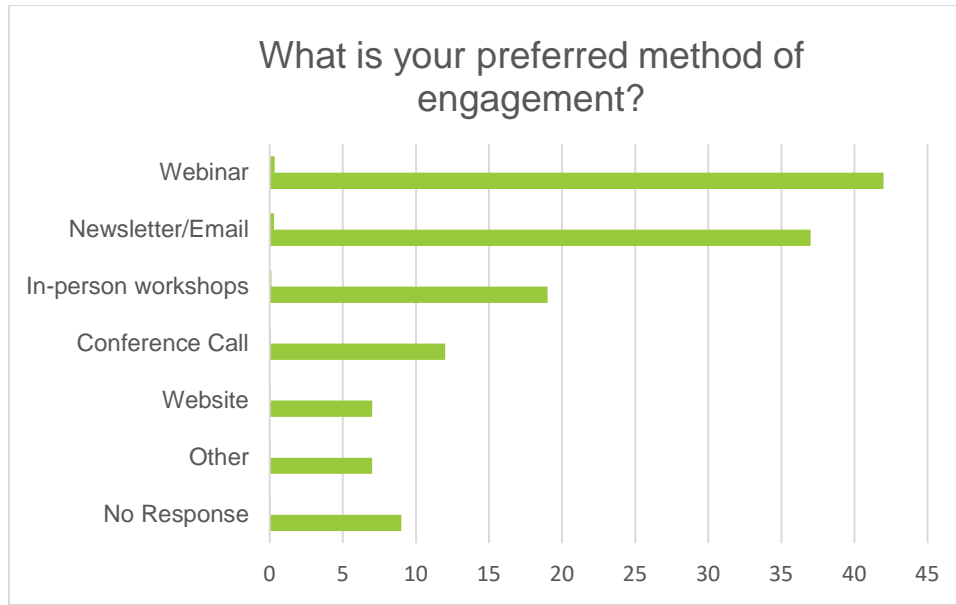
Prior to the publication of the Federal Register, DEO developed a survey to capture feedback from communities that were in the HUD-identified MIDs and to allow for additional input from communities that were not able to attend stakeholder meetings. The survey was opened on May 31, 2019 and closed November 30, 2019. The survey gathered feedback from Florida communities regarding their mitigation needs and priorities. In addition, survey respondents were asked to rank various mitigation program needs based on risks, hazards and threats. They were also given an opportunity to suggest additional program ideas. A Summary of Survey Responses is included in **Appendix B**.

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The cumulative results from the initial outreach survey follow:



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As displayed in preceding tables of the 133 survey respondents, most are those who described themselves as public-sector employees (26.3%). The second most common type of respondents were Emergency Management Coordinators at 25.5%. Most of the respondents represent their counties (41%); cities were the second-most represented (27%). The preferred method of communication is webinar (32%) followed closely by newsletter or email (28%).

These preliminary statistics were considered with the recognition that certain groups were underrepresented and will be specifically sought after in future survey efforts. During the public comment period DEO endeavored to incorporate feedback, particularly from those who were not reached during initial engagement efforts.

3. Regional Stakeholder Meetings

DEO, in partnership with MID communities, conducted regional workshops across the state to provide resources for long-term mitigation to local governments, businesses and other organizations. Seven regional workshops were held prior to the Action Plan's 45-day public comment period. CDBG-MIT information was presented to community members and an opportunity was provided to ask questions about the program and application processes. In addition to providing outreach to communities, these meetings provided DEO with an opportunity to focus on regionally-specific issues and challenges.

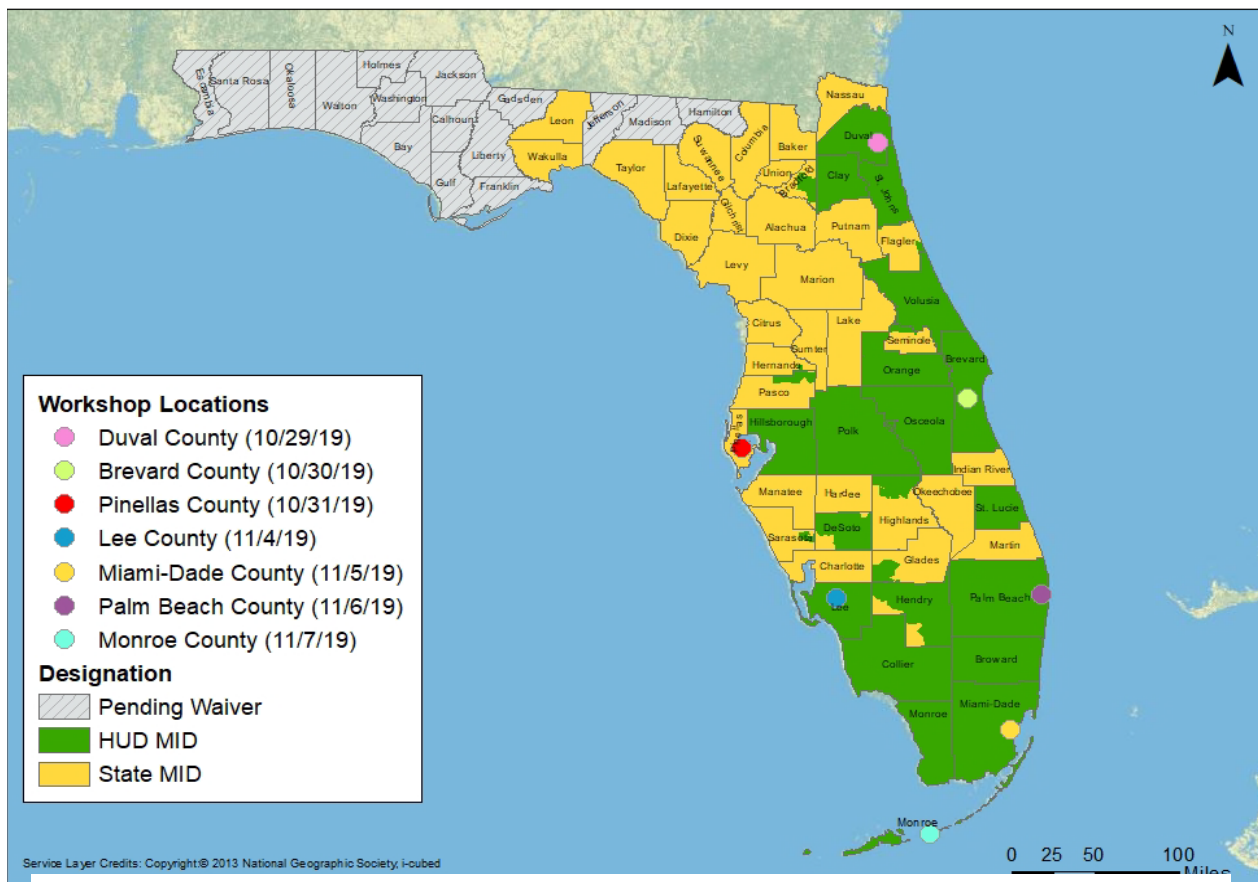
DEO staff traveled throughout the state and visited several of the HUD-identified MID areas. The state hosted one meeting for local leadership officials and members of the public in each region. At these meetings, participants were given a brief overview of the program with an opportunity to ask questions. The meetings were open dialogues with local government staff and question and answer sessions. Risks, hazards and threats were assessed, and DEO staff suggested various program options that may be available to strengthen those vulnerabilities. Community members also offered suggestions under various program planning categories provided by the DEO Mitigation Team. **Table 17** and **Figure 12** contains the dates and locations for each of these meetings.

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Table 21: Stakeholder Meetings with HUD-Identified MID Areas

Location	Date
Duval County	October 29, 2019
Brevard County	October 30, 2019
Pinellas County	October 31, 2019
Lee County	November 4, 2019
Miami-Dade County	November 5, 2019
Palm Beach County	November 6, 2019
Monroe County	November 7, 2019

Figure 14: Mitigation Regional Workshops



Source: Department of Economic Opportunity

During the regional workshops, DEO staff responded to each comment and question as thoroughly as possible. Participants were provided information on how to remain in contact with the Mitigation Team to ensure open lines of communication between state and local partners throughout each phase of the program. Overall, concerns were outlined

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regarding a wide range of topics including, but not limited to, climate change considerations, hardening of establishments, subrecipient eligibility and composition of the Citizen Advisory Committee. DEO has recorded and considered all observations from these meetings in the Action Plan.

D. Citizen Advisory Committee

The CDBG-MIT program will establish a committee of statewide representatives who will provide a forum for public participation and increased transparency in the implementation of CDBG-MIT programs. The committee will meet at least twice annually and will serve as a liaison between the state and local communities regarding all mitigation activities and will serve as an on-going public forum resource. Information regarding the selection process for committee members will be made available on the DEO website.

E. Website

DEO posts important information regarding the CDBG-MIT program on its website at www.floridajobs.org/CDBG-MIT. This includes links to the Federal Register, short informative summaries and overviews and webinar recordings for individuals who could not participate or may want reminders on program specifics.

F. Additional Outreach

In addition to the outreach described above, DEO had many one-on-one discussions with community members by phone. DEO also sent out emails with Federal Register content summaries and other information. Staff plans to facilitate the following outreach opportunities:

- Application Workshop for Subgrantees;
- Citizen Advisory Committee Trainings;
- Governor's Hurricane Conference;
- Newsletters; and
- Press Releases

DEO will continue to conduct outreach with communities in partnership with other organizations throughout the implementation of this Action Plan to ensure that all stakeholders are aware of the opportunities that exist and have an opportunity to provide feedback along the way.

G. Accessibility

The Action Plan was made available in English, Spanish and Creole and was posted on the DEO website, which has embedded technology to provide accessibility to the visually-impaired. DEO also posted a Babel Notice informing individuals of the interpretive and translational services available upon request. DEO will ensure that all citizens have equal access to information about the programs, including persons with disabilities and

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Limited English Proficiency (LEP) and that program information is available in the appropriate languages for the geographic area served by the jurisdiction.

Florida is committed to providing all citizens with equal access to information about the mitigation program, including persons with disabilities and Limited English Proficiency (LEP). Florida follows HUD's regulation, 24 CFR Part 1, "Nondiscrimination in Federally Assisted Programs of the Department of Housing and Urban Development Effectuation of Title VI of the Civil Rights Act of 1964," which requires all recipients of federal financial assistance from HUD provide meaningful access to LEP persons.

Persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English, may be entitled to language assistance with respect to a particular type of service, benefit or encounter. To address this need, DEO developed and implemented a Language Access Plan, which details how Florida will address the needs of LEP individuals.

The state of Florida Action Plan, any ensuing amendments, outreach materials, the application and related guidance materials will be published in languages selected based on the entire eligible area of the CDBG-MIT funds and a natural break in the numbers of LEP individuals. Recognizing there may be a need for individuals to have access to the document in additional languages, DEO will supply needed translation services to provide personalized translations of the Action Plan upon request.

H. Receipt of Comments

DEO will consider and respond to all written comments regarding the Action Plan or any Substantial Amendment.

DEO provided a 45-day timeframe for receiving public comments to the draft Action Plan. Comments were received via an e-mail address published on the mitigation website. A summary of the public comments as well as DEO's responses are included in **Appendix C**.

I. Public Comment and Substantial Amendments

DEO will engage citizens throughout the grant process to maximize the opportunity for input on proposed program changes that result in a substantial amendment. Program changes result in a substantial amendment when there is:

- a change in program benefit or eligibility criteria;
- the addition or deletion of an activity; and
- the allocation or reallocation of more than 25% of the total HUD CDBG-MIT allocation to the state.

Citizens will be provided with no less than 30 calendar days to review and provide comments on proposed substantial changes. A summary of all comments received will be included in the final Substantial Amendment submitted to HUD for approval.

When DEO develops a Technical Amendment or Non-Substantial Amendment, DEO will notify HUD, but is not required to undertake public comment. HUD will be notified at least five business days before the Amendment becomes effective.

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Every Amendment to the Action Plan (substantial and non-substantial) will be numbered and posted on the DEO website.

J. Complaints Process

DEO will handle citizen complaints and inquiries through a Constituent Services Management staff. All complaints and inquiries received by the state, its contractor and/or other program sources, will be reviewed by the Constituent Services Management staff for:

- Investigation, as necessary;
- Resolution; and
- Follow-up actions.

Citizens may file a written complaint or inquiry through the DEO mitigation email at CDBG-MIT@deo.myflorida.com or submit by postal mail to the following address:

Attention: Rebuild Florida Constituent Services
Florida Department of Economic Opportunity
107 East Madison Street
Caldwell Building, MSC 400
Tallahassee, FL 32399

The state will make every effort to provide a timely written response within 15 working days of the receipt of complaint, where practicable. The aim of the state will be to resolve complaints in a manner that is sensitive to the complainant's concerns and achieves a fair result.

Constituent Management staff will maintain files that include:

- The name of the person who filed the complaint;
- The date the complaint was received;
- A description of the complaint;
- The name of each person contacted in relation to the complaint;
- A summary of the results of the review or investigation of the complaint; and
- An explanation of the resolution (e.g., the reason the file was closed).

K. Citizen Participation and Applications for Assistance

Local governments are responsible for notifying citizens of planned or proposed mitigation activities and for obtaining citizen input in accordance with their Citizen Participation Plan. All beneficiaries applying for direct assistance must qualify as LMI as defined by the U.S. Department of Housing and Urban Development. Citizens can access the data via the HUD User Internet website at: <https://www.huduser.gov/portal/datasets/il.html>.

VIII. GENERAL ACTION PLAN REQUIREMENTS

A. Implementation Plan and Capacity Assessment

As directed by HUD in conjunction with this Action Plan, the state is submitting a detailed Implementation Plan. It will be provided under separate cover on February 3, 2020. The Implementation Plan outlines the following:

- Procedures to collect timely information on application status;
- A capacity assessment;
- Staffing plan;
- Procedures ensuring internal and interagency coordination;
- Procedures to provide technical assistance; and
- Accountability procedures.

B. Projection of Expenditures and Outcomes

As directed, in conjunction with this Action Plan, the state submitted to HUD a projection of expenditures and anticipated outcomes, broken down on a quarterly basis. These projections include measures to ensure compliance with the following:

- Requirement to expend at least 50% of funds to the benefit of LMI persons
- Requirement to expend at least 50% of funds to the benefit of HUD MIDs
- Requirement to expend 50% of CDBG-MIT funds within six years of HUD's execution of the grant agreement and 100% of CDBG-MIT funds within 12 years of HUD's execution of the grant agreement

C. Program Income

The state understands that when implementing certain activities with CDBG-MIT funds, there is potential for generating program income. When implementing activities that could generate program income, the state will develop and adopt program income policies and procedures for the specific program. The state does not anticipate program income from the administration of the projects and programs in this Action Plan, however any program income generated by CDBG-MIT funds under this grant will be returned to DEO, unless otherwise specified in program policies and procedures.

Program income may be retained by local government subgrantees for the repair, operation and maintenance of publicly-owned and operated projects with CDBG-MIT funds, provided that (1) the agency that owns and operates the project has entered into a written agreement with the grantee that commits the agency to providing not less than 50% of funds necessary for the annual repair, operating and maintenance costs of the project; and (2) the grantee adopts policies and procedures to provide for the grantee's regular, on-site inspection of the project in order to ensure its proper repair, operation and maintenance. As a state grantee, DEO retains the right to request a waiver from HUD later for the use of program income for this purpose.

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D. Plans to Minimize Displacement and Ensure Accessibility

The state will minimize displacement of persons or entities as a result of the implementation of CDBG-MIT projects by ensuring that all programs are administered in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) of 1970, as amended (49 CFR Part 24) and Section 104(d) of the Housing and Community Development Act of 1974 and the implementing regulations at 24 CFR Part 570.496(a), subject to any waivers or alternative requirements provided by HUD. While nonstructural mitigation (such as elevations, buyout and/or acquisition) programs may be necessary to achieve flood risk mitigation goals and may cause displacement, most of the programs detailed in this Action Plan will be implemented with the goal of minimizing displacement of families from their homes, whether rented or owned. Moreover, in the event displacement does occur, DEO will take into consideration the functional needs of the displaced persons in accordance with guidance outlined in Chapter 3 of HUD's Relocation Handbook.

Through subrecipient certifications the state will ensure federal accessibility requirements are met including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, and Titles II and III of the Americans with Disabilities Act. All reasonable accommodations will be made.

E. Protection of People and Property and Construction Methods

The state intends to promote high quality, durable, sustainable, mold resistant and energy efficient construction methods for all activities funded with CDBG-MIT resources as applicable. These include the following minimum standards:

- Construction standards will be based on the Florida Building Code and must meet or exceed applicable requirements;
- For rehabilitation construction, the state will follow the Green Building Retrofit Checklist to the extent applicable to the rehabilitation work undertaken, including the use of mold resistant products when replacing surfaces such as drywall. When older or obsolete products are replaced as part of the rehabilitation work, rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program (FEMP)-designated products and appliances or other equivalent.

F. Section 3

DEO has established compliant standards for construction. Construction contractors will be qualified through an invitation to bid process. To ensure full and open competition, through an invitation to bid process, DEO will follow 24 CFR 570.489(g) at a minimum. Contractors will comply with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1700lu) and its implementing regulations at 24 CFR part 153. Contractors selected under DEO will ensure, to the greatest extent feasible, that employment and business opportunities will be directed to qualified low and very low-income persons and business concerns that provide economic opportunities to low-income persons. Contractors will make every effort to recruit, target, and direct opportunities to Section 3 residents and businesses as well as notifying Section 3

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residents about training opportunities. DEO will provide Contractors with helpful resources to maximize these efforts including, but not limited to, a Section 3 Business Registry and examples of training and employment opportunities. Contractor procurement procedures will be monitored by DEO.

DEO will require both quality inspections and code compliance inspections on all projects. Site inspections will be required on all projects to ensure quality and compliance with building codes. The DEO will encourage and support subrecipients' efforts to update and strengthen local compliance codes to mitigate hazard risks due to sea level rise, high winds, storm surge, and flooding where applicable. In the project application, subrecipients will submit an explanation of both current and future planned codes to mitigate hazard risks. The DEO will provide technical guidance on hazard mitigation code examples.

G. Elevation Standards

As applicable, the state will, at a minimum, adhere to the advanced elevation requirements established in section V.B. I.D. of the FRN, subtitled "Elevation standards for new construction, repair of substantial damage, or substantial improvement." Future property damage will be minimized by requiring that any rebuilding be done according to the best available science for that area with respect to base flood elevations. Infrastructure hardening projects within a floodplain will be built with at least two feet of freeboard above Base Flood Elevation or with a minimum of three feet of freeboard if the project is a critical facility⁵⁷.

As applicable and within its policies and procedures on a program-by-program basis, the state or its subgrantees will document decisions to elevate structures. This documentation will address how projects will be evaluated and how elevation costs will be reasonably determined relative to other alternatives or strategies, such as the demolition of substantially-damaged structures with reconstruction of an elevated structure on the same site, property buyouts, or infrastructure improvements to reduce the risk of loss of life and property.

H. Natural or Green Infrastructure Standards

The state recognizes that natural or green infrastructure methods provide drainage functions to reduce storm water runoff while offering low-cost and attractive site design options. All commercial or institutional construction or retrofitting funded through programs within this Action Plan must utilize one of the following green infrastructure strategies to reduce runoff, retain water and improve water quality on the subject site:

1. Retaining or planting native vegetation;
2. Removing existing impervious surface area or utilizing pervious pavement;
3. Installing bio swales or other retention areas;

⁵⁷ <https://www.fema.gov/base-flood-elevation>

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4. Collecting rainwater for non-potable uses; and
5. Installing green roofs.

I. Green Building Standards

All replacement and/or reconstruction of substantially-damaged buildings must incorporate Green Building Standards must follow guidelines in the HUD CPD Green Building Retrofit Checklist. Any construction subject to the Green Building Standards must meet an industry-recognized standard and achieve certification under at least one of the following programs:

- ENERGYSTAR;
- Enterprise Green Communities;
- LEED;
- ICC-700 National Building Standard;
- EPA Indoor AirPlus; and
- Any other equivalent comprehensive green building program deemed acceptable to HUD and approved by DEO.

For construction projects completed, under construction or under contract prior to the date that assistance is approved for the project, adherence to the applicable standards to the extent feasible is encouraged, but not required.

All state-administered programs may use a third-party inspection service to ensure that Green Building Standards are met using standardized checklists developed from the above-listed programs.

J. Operation and Maintenance Plans

FRN-6109-N-02 allows for flexibility in the use of program income to address on-going operations and maintenance of mitigation projects. Such eligible uses include repair, operation and maintenance of publicly owned projects financed with CDBG-MIT funds. The state will request an appropriate waiver in order to avail itself of this flexibility for itself and subgrantees as appropriate.

Because site-specific mitigation projects are not included in this Action Plan and are addressed as an anticipatory activity in Section VI, and in furtherance of the state's mission and in accordance with federal requirements, the state will address the following requirements within its policies and procedures on a program-by-program basis, including specific benchmarks instituted to ensure operations and maintenance requirements are met:

- State or local resources must be identified for the operation and maintenance costs of projects assisted with CDBG-MIT funds;
- If operations and maintenance plans are reliant on any proposed changes to existing taxation policies or tax collection practices, those changes and relevant milestones must be expressly addressed; and

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- Any public infrastructure or facilities funded with CDBG-MIT resources must illustrate their ability to account for long-term operation and maintenance needs beyond an initial investment of CDBG-MIT funds.

K. Cost Verification Procedures

All construction activities that utilize CDBG-MIT funds must be reasonable and consistent with market costs at the time and place of construction. For infrastructure projects, the DEO will rely on licensed engineers responsible for project budget justification, construction code requirements and CDBG-MIT project funding maximums.

DEO will encourage subrecipients to consider the costs and benefits of the project when selecting CDBG-MIT-eligible projects. DEO may use an independent, qualified third-party architect, construction manager or other professional (e.g., a cost estimator) to verify the planned project costs and cost changes to the contract (e.g., change orders) during implementation are reasonable.

The proposed projects undergo application review which includes a cost verification. Each identified covered projects will be required to conduct a benefit cost analysis (BCA).

More detailed cost verification requirements for Covered Projects will be provided by the state in accordance with Section V.A.2.H. of the FRN, as applicable.

L. Monitoring Standards and Procedures

The state has adopted monitoring standards, including procedures to ensure program requirements (including non-duplication of benefits) are met, and to provide for continual quality assurance and adequate program oversight. These standards and procedures are included in the pre-award Implementation Plan as required by the Federal Register. Monitoring will be conducted by DEO, which will be supported by an external vendor procured through competitive solicitation to ensure that program activities progress toward timely completion and to allow for the early identification of potential issues and problems, so they can be prevented or corrected. Monitoring will also include environmental compliance under 24 CFR Part 58. DEO currently has staff that will oversee environmental compliance. Additionally, the current staff will be augmented by external vendors procured through competitive solicitation.

The DEO Office of Disaster Recovery monitoring program includes desk monitoring and onsite monitoring with priority and frequency based on the results of a risk assessment of each subrecipient. The purpose of the risk assessment is to define the scope and focus of the monitoring efforts, including establishing a framework for determining the appropriate level of monitoring consistent with available resources. In addition, the risk assessment will be required each state fiscal year to guarantee continuous review of risks. DEO monitoring is based on criteria consistent with HUD guidance in assessing program risk. The risk assessment provides the basis for developing individual monitoring strategies and documents the decisions and recommendations regarding where to apply staff and travel resources for monitoring, training and/or technical assistance.

The Florida Auditor General and staff will act as the state's independent auditor and conduct financial audits of the accounts and records of state agencies. When applicable,

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accounting policies and procedures of DEO will mirror the requirements of the Office of Auditor General.

The state of Florida is dedicated to the prevention of fraud, waste and abuse. DEO's Office of the Inspector General serves as DEO's internal auditor. Internal audit functions associated with Mitigation funding may be supported by external vendors procured through competitive solicitation. All suspected cases of fraud will be taken seriously, and complaints will be reported to DEO's Office of the Inspector General at OIG@deo.myflorida.com or 1-855-456-0650. If the Office of Inspector General has reasonable grounds to believe there has been a violation of criminal law, the Office will report expeditiously to the appropriate law enforcement agency.

IX. CERTIFICATIONS OF CONTROLS, PROCESSES AND PROCEDURES

A. Certification of Controls, Processes and Procedures

The State of Florida Department of Economic Opportunity submitted the Certification and Risk Analysis Documentation to HUD on December 6th, 2019 as required.

1. CDBG-MIT Certifications

24 CFR 91.225 and 91.325 are waived. Each grantee receiving a direct allocation of CDBG-MIT funds must make the following certifications with its action plan:

- a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with CDBG-MIT funding.
- b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. The grantee certifies that the action plan is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-MIT funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this notice. The grantee certifies that activities to be undertaken with CDBG-MIT funds are consistent with its action plan.
- d. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for CDBG-MIT funds.
- e. The grantee certifies that it will comply with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 135.
- f. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each local government receiving assistance from a State grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant). Start Printed Page 45870
- g. State grantee certifies that it has consulted with affected local governments in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including the method of distribution of funding, or activities carried out directly by the State.

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- h. The grantee certifies that it is complying with each of the following criteria:
- Funds will be used solely for necessary expenses related to mitigation activities, as applicable, in the most impacted and distressed areas for which the President declared a major disaster in 2015, 2016, or 2017 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.);
 - With respect to activities expected to be assisted with CDBG-MIT funds, the relevant action plan has been developed to give priority to activities that will benefit low- and moderate-income families;
 - The aggregate use of CDBG-MIT funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 50 percent (or another percentage permitted by HUD in a waiver published in an applicable Federal Register notice) of the CDBG-MIT grant amount is expended for activities that benefit such persons; and
 - The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-MIT funds by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) CDBG-MIT funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- i. The grantee certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations, and that it will affirmatively further fair housing.
- j. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, must certify that they will require local governments that receive grant funds to certify that they have adopted and are enforcing:
- A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
 - A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- k. The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out mitigation activities, as applicable, in a timely manner and that the grantee has reviewed the respective requirements of this notice. The grantee certifies to the accuracy of its Public Law

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115-56 Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced at section V.A.1.a of this notice and its implementation plan and capacity assessment and related submissions to HUD referenced at section V.A.1.b. (See Implementation Plan.)

- l. The grantee certifies that it considered the following resources in the preparation of its action plan, as appropriate: FEMA Local Mitigation Planning Handbook: https://www.fema.gov/media-library-data/20130726-1910-25045-9160/fema_local_mitigation_handbook.pdf; DHS Office of Infrastructure Protection: <https://www.dhs.gov/sites/default/files/publications/ip-fact-sheet-508.pdf>; National Association of Counties, Improving Lifelines (2014): https://www.naco.org/sites/default/files/documents/NACo_ResilientCounties_Lifelines_Nov2014.pdf; the National Interagency Coordination Center (NICC) for coordinating the mobilization of resources for wildland fire: <https://www.nifc.gov/nicc/>); the U.S. Forest Service's resources around wildland fire (<https://www.fs.fed.us/managing-land/fire/>); and HUD's CPD Mapping tool: <https://egis.hud.gov/cpdmaps/>.
- m. The grantee certifies that it will not use CDBG-MIT funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the State, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the State, local, and tribal government land use regulations and hazard mitigation plans and the latest-issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.
- n. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
- o. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.
- p. The grantee certifies that it will comply with applicable laws.

The Florida Department of Economic Opportunity hereby certifies the above, as authorized by the Executive Director.

DEO Executive Director

Date

2. SF-424

DEO submits this Action Plan to HUD along with a completed and executed Federal Form SF-424.

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X. CONCLUSION

A. Completeness and Compliance

This plan will be reviewed for completeness and compliance by HUD as part of the approval process.

DEO Implementation

A copy of the state Mitigation Program Implementation Timeline and other important information will be posted to DEO's website at the following location: www.floridajobs.org/CDBG-MIT once the action plan has been approved.

Pre-Award, Pre-Agreement and Reimbursement

The provisions of 24 CFR 570.489(b) and 570.200 (h) permit a state to reimburse itself for otherwise allowable costs incurred by itself or its recipients or subrecipients on or after the incident of the covered disaster. The provisions at 24 CFR 570.200(h) and 570.489(b) apply to grantees reimbursing costs incurred by itself or its recipients or subrecipients prior to the execution of a grant agreement with HUD. This includes, but is not limited to, activities supporting program development, Action Plan development and stakeholder involvement support, and other qualifying eligible costs incurred in response to an eligible disaster covered under Public Law 115-254.

DEO incurred pre-award costs and is seeking reimbursement for those costs that are reasonable and allowable under this regulation. DEO intends to recover the pre-award costs consistent with the authority cited in this section. These costs include the cost for salary, employer fringe benefits, and direct operating costs for each employee based on his or her individual percentage of time spent on the planning of the CDBG-MIT program during a pay period. Any cost associated with the mitigation efforts will be allocated based on the total time spent on CDBG-MIT activities versus other duties within a particular month.

The total cost of the contractors that assist DEO with mitigation research and analysis and help prepare the Risk-based Mitigation Needs Assessment and Action Plan, along with other costs associated with meetings, community outreach, and any other direct costs associated with the Action Plan, will be reimbursed by this CDBG-MIT grant. Additionally, once contracted, DEO may allow the drawdown of pre-agreement costs associated with eligible mitigation activities dating back to the date of the disaster(s) for subrecipients and DEO with appropriate documentation.

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XI. APPENDICES

Appendices are included herein as separate documents. These Appendices are referenced, in order, throughout this Action Plan.

Appendix A: Community Engagement Survey Questions

Appendix B: Survey Summary Report

Appendix C: Summary of Public Comments

Appendix D: List of SoVI® Variables

Appendix E: Program Expenditures Projections

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Appendix A - Community Engagement Survey Questions

List of Survey Questions Asked

1. Which of the following best describes you?
 - a. Elected or appointed official
 - b. Staff of elected or appointed official
 - c. Floodplain manager/administrator
 - d. Emergency management coordinator (EMC)
 - e. Public-sector employee (not an EMC or floodplain manager)
 - f. Interested member of the public
 - g. Other
2. What type of entity do you represent?
 - a. City
 - b. County
 - c. Council of Governments
 - d. Federal
 - e. Myself
 - f. Non-profit organization
 - g. Private Business
 - h. State
 - i. Tribe
 - j. Water Management District
 - k. Other
3. Which locality (city/town/county) are you associated with? (only answer if you work for or are directly associated with a city/town/county, otherwise skip)
4. What is the current status of your community's Local Hazard Mitigation Strategy?
 - a. Current
 - b. Being Revised
 - c. Expired with no plan to revise
 - d. No plan
 - e. I don't know
5. What is your biggest barrier to implementing hazard mitigation projects?
 - a. Capacity/staffing
 - b. Funding
 - c. Legal impediments (e.g., property rights, regulatory barriers)
 - d. Other

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6. Please indicate which staff members your jurisdiction currently employs [Select all that apply]:
 - a. Planners
 - b. Public works officials
 - c. Engineers
 - d. Emergency managers
 - e. Floodplain managers/admins
 - f. Grant managers Land surveyors
 - g. Environmental scientists
 - h. Personnel skilled in Geographic Information Systems (GIS)
 - i. We contract out these services
 - j. None of the above

 7. Taking into consideration your community's past experiences with natural hazards, please rate, on a scale from 1 to 4, your community's interest in pursuing the following activities (1 = Least Important, 4 = Most Important)
 - a. Preparedness, Coordination and Response Actions. (Examples: Implement or enhance communication infrastructure, such as radio and cell towers or tree maintenance where power and phone lines existed.)
 - b. Education and Awareness Programs. (Examples: Hazard safety education programs - home emergency kits, publicizing the location of the local emergency shelter, "Get A Plan" PSAs.)
 - c. Structure and Infrastructure Projects. (Examples: New stormwater systems, storm-proofing windows, elevating buildings, roads, etc.)
 - d. Local Plans and Regulations. (Examples: Development restrictions in flood zones, capital planning for mitigation projects, and revising building codes.)
 - e. Comment

 8. If additional, limited funding becomes available, please rate the following mitigation activities according to your community's current priorities: (1 = Most Important, 2 = Somewhat Important, 3 = Not Important)
 - a. Develop or refine an evacuation plan
 - b. Enhance the function of natural flood-mitigation features (e.g. streams, wetlands, etc.)
 - c. Enhanced maintenance of vulnerable utilities
 - d. Fortify critical facilities (e.g. transportation networks, hospitals, fire stations, etc.)
 - e. Improve community awareness of hazard risks
 - f. Prevent development in hazardous areas such as floodplains through buyouts/acquisitions
 - g. Replace inadequate or vulnerable bridges and causeways
 - h. Strengthen emergency services (e.g. Police, Fire, EMS, etc.)
-

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9. Which, if any, planning, mitigation or protection activities has your community or jurisdiction implemented recently (i.e. in the past five years)? [Select all that apply]
- a. Coastal resilience
 - b. Construction of a community hazard shelter
 - c. Dry brush removal
 - d. Encouraging purchase of flood insurance (i.e. participation in the NFIP)
 - e. Flood-proofing and/or flood retrofits
 - f. Levees, flood walls, or related infrastructure
 - g. Local channel conveyance improvements
 - h. Local drainage improvements
 - i. Natural hazard/disaster awareness training and/or education
 - j. Natural hazard/disaster warning system
 - k. Property buyouts or relocations
 - l. Property elevation
 - m. Reconstruction of noncompliant structures
 - n. Roadway bridges, culverts, and other forms of stormwater conveyance
 - o. Updated building codes
 - p. Updated land development ordinances
 - q. I don't know
 - r. Other
10. Which, if any, planning, mitigation, or protection activities has your community or jurisdiction identified as needed but not yet implemented? [Select all that apply]
- a. Coastal resilience
 - b. Construction of a community hazard shelter
 - c. Dry brush removal
 - d. Encouraging purchase of flood insurance (i.e. participation in the NFIP)
 - e. Flood-proofing and/or flood retrofits
 - f. Levees, flood walls, or related infrastructure
 - g. Local channel conveyance improvements
 - h. Local drainage improvements
 - i. Natural hazard/disaster awareness training and/or education
 - j. Natural hazard/disaster warning system
 - k. Property buyouts or relocations
 - l. Property elevation
 - m. Reconstruction of noncompliant structures
 - n. Roadway bridges, culverts, and other forms of stormwater conveyance
 - o. Updated building codes
 - p. Updated land development ordinances
 - q. I don't know
 - r. Other

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11. Are you currently, or have you in the past, coordinated with regional partners (neighboring communities and regional organizations such as Councils of Governments) to develop and implement hazard mitigation activities?
 - a. Yes
 - b. No
 - c. I don't know
 - d. Comment
12. If your Local Hazard Mitigation Strategy was completed prior to your community experiencing hurricane impacts in 2015-2017, are your prioritized mitigation activities still aligned with your community's needs?
 - a. Yes, our priorities are still aligned with the community's needs
 - b. No, our community's needs have changed
 - c. I don't know
 - d. N/A
 - e. Other
13. Which of the following describes your funding sources for natural hazard/disaster mitigation activities? [Select all that apply]
 - a. Federal Funding State General Revenue Funds
 - b. Bond Program
 - c. Grant Funding
 - d. Impact/Permitting Fees Special Tax Districts
 - e. We do not have a local funding source for mitigation activities
 - f. I don't know
 - g. Other
14. Are there any hazard issues specific to your community or region that you would like to emphasize, e.g. repetitive flooding at specific locations?
15. If you are interested in remaining informed of the state's development and implementation of the State Mitigation Action Plan, what is your preferred method of engagement?
 - a. Conference Call
 - b. In-person workshops
 - c. Newsletter/ Email
 - d. Webinar
 - e. Website
 - f. Other
16. If you would like to be included in future communications related to the State Mitigation Action Plan, please include your contact information below.
 - a. First Name
 - b. Last Name

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- c. Company Name
- d. Work Phone
- e. Email Address
- f. Address 1
- g. Address 2
- h. City
- i. State/Province (US/Canada)
- j. Postal Code
- k. FL County

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Appendix B - Survey Summary Report

Introduction

The Florida Department of Economic Opportunity is the governor-designated state authority responsible for administering all long-term disaster recovery funds awarded to the state from the U.S. Department of Housing and Urban Development (HUD). In April 2018, HUD announced the state of Florida would receive \$633,485,000 from its Community Development Block Grant Mitigation (CDBG-MIT) program. Florida will use these funds in communities that experienced major disaster-declared events during 2016 and 2017. The expenditure of the CDBG-MIT funds will be guided by programs and activities identified in the state Action Plan.

The CDBG-MIT survey was created in anticipation of the Federal Register to engage stakeholders across the state and to learn more about their experiences and the status of their recent and current mitigation activities. The use of the CDBG-MIT survey is just one of the methods DEO's Office of Disaster Recovery has employed to generate necessary feedback.

The following summary details preliminary results of the CDBG-MIT survey which solicited statewide feedback from representatives of jurisdictions, organizations and businesses. The mitigation needs reflected in the survey helped to inform the development of the programs and activities in the Action Plan.

Survey Summary

The CDBG-MIT survey was deployed on May 31, 2019 and was closed for comments on November 30, 2019. The survey was made available on the DEO mitigation website and promoted through DEO communication channels.

The central question guiding the survey was "What are the current conditions regarding mitigation efforts throughout the state of Florida?" Respondents described various vulnerabilities and areas of needed improvement that fell within four major categories:

1. repetitive flooding;
2. infrastructure;
3. planning, building and design;
4. and equity.

Flooding is one of the predominant issues faced throughout most jurisdictions. The concerns include vulnerable infrastructure, repetitive flooding of homes and businesses, impacts to sewer systems and transportation networks. There is a great need to fortify and harden community lifelines such as transportation networks and hospitals and to enhance maintenance of vulnerable utilities. According to the survey, funding is the biggest barrier that communities have faced in their efforts to complete their structural and infrastructural projects.

Most activities completed by responding jurisdictions have been minor water conveyance improvements including drainage improvements and promotion of prevention measures such as natural hazard training. The purchase of flood insurance was encouraged. Activities that have been identified as needed, but not yet implemented, primarily include

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larger-scale infrastructural improvements to roadway bridges, culverts and other forms of stormwater conveyance, coastal resilience activities, and property buyouts and relocations.

The survey indicates a need for improvements to regulations regarding development standards, and regional coordination of resiliency planning. Funding allocations are needed to enable building to higher standards as opposed to just supporting a retrofitting project. Related was an issue identified as the “slow-rolling” nature of mitigation funding sources and mentions of how this hampers progress in mitigation plans.

Respondents recognized the vulnerable nature of their elderly and low-income populations. There were comments regarding the difficulties these populations face in hardening homes and in having access to evacuation routes and shelters.

These mitigation priorities confirm and supplement the extensive research conducted during the risk-based needs assessment conducted by DEO. It also adds texture to needs identified in the Enhanced State Hazard Mitigation Plan.

Survey Descriptive Statistics

The survey is composed of 16 questions. Two are open-response questions and 14 are multiple-choice questions which consisted of single-choice, ranked-choice and “select all that apply” selection questions.

Most of the survey responders were city and county representatives. These respondents are especially valuable because of their technical knowledge and the likelihood that they are familiar with the status of mitigation projects in their areas.

- Type of Entities represented
 - 41.3% County
 - 27.0% City
 - 7.5% Myself
 - 7.5% Non-profit organization
 - 6.7% Council of Governments
 - 5.2% Other
 - 1.5% Private Business
 - 1.5% Water Management District
 - 1.0% State
 - <1% No Responses
 - 0.0% Tribe
 - 0.0% Federal
- Top 3 respondent types:
 - 26.3% Public-sector employee (not an EMC or floodplain manager)
 - 25.5% Emergency Management Coordinator (EMC)
 - 12.0% Interested member of the public

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Geographic Information

This report finds that 26 of 51 MID areas had representatives that responded to the survey. While the CDBG-MIT survey does provide a high-level insight into mitigation conditions across the state, certain counties are not represented directly by survey results. Other counties such as Brevard, Miami-Dade and Monroe, which had multiple respondents, may be over-represented.

- Representatives from 27 unique cities
- Representatives from 26 unique counties
- Representatives from nine regional or multi-jurisdictional organizations, partnerships or entities

Cities
Atlantic Beach, Bonita Springs, City of Clewiston, City of Crystal River, City of Doral, City of Hialeah, City of Marco Island, City of Margate, City of Miami, City of Miami Beach, City of Naples, City of North Port, City of Riviera Beach, City of St. Cloud, City of Sunny Isles Beach, City of Venice, Cocoa, Doral, Gulf Coast, Homestead, Islamorada, Jacksonville, Key Biscayne (North Bay Village), Key West, Lynn Haven, Marathon, Marianna, Miami Shores Village, Miami, North Bay Village, Orlando, Panama City Beach, Quincy, Sanford, St. Petersburg, Tampa, Town of Fort Myers Beach, Treasure Island, Village of Estero, Village of Key, Biscayne, Village of Palmetto Bay

Counties
Brevard, Calhoun, Volusia, DeSoto, Flagler, Franklin, Hardee, Hendry, Highlands, Jefferson, Marion, Miami-Dade, Monroe, Nassau, Okeechobee, Orange, Osceola, Palm Beach, Pasco, Pinellas, Putnam, St. Lucie, Sumter, Union, Washington, Bay County

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Appendix C - Summary of Public Comments

Responses to Public Comment

This document describes the comments received from the public following the release of the initial Community Development Block Grant – Mitigation (CDBG-MIT) draft State Action Plan. Each section addresses comments and questions that correspond to specific topics mentioned in the draft Action Plan.

- Release Date: December 6, 2019
- Comment Period: December 6, 2019-January 20, 2020
- Approved by HUD: TBA

Comments were received via email. The duration of the public comment period as well 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.

DEO staff carefully reviewed and considered all comments. Minor corrections (such as typographical errors) have been made and are *not* included in the summary below. DEO received commentary on the State Action Plan from many entities, including, but not limited to, State Agency partners, county and city officials, nonprofit organizations, healthcare facilities and private citizens. The commentary topics fall into the following categories: Housing, Risk Assessment, Accessibility, Program Details, Clarity & Definition Overall, Application Process, Waiver, Funding, HUD Requirements and Miscellaneous.

List of Those that Submitted Comment:

AdventHealth North Pinellas
Affordable Homeownership Foundation
Agency for Persons with Disabilities
City of Blountstown
Broward County Environmental Planning and Community Resilience Division
City of Everglades City
City of Hollywood Florida
City of Jacksonville
City of Largo
City of Miami Gardens, Florida
DeSoto County Hospital/DeSoto Memorial Hospital
Equal Justice Works
FAIR Foundation
Fawcett Memorial Hospital

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Federation of Manufactured Home Owners of Florida
Florida City Community Redevelopment Agency
Florida Department of Corrections
Florida Division of Emergency Management
Florida Hospital Association
Florida Housing Coalition
Florida Policy Institute
Florida Wildlife Federation, Inc.
Global Center for Climate Resilience
International Code Council
Islamorada, Village of Islands, FL
Jackson South Community Hospital
Lakewood Ranch Medical Center
Lee Health
Manatee Memorial Hospital
Memorial Healthcare System
Miami-Dade County
Monroe County Board of County Commissioners
Nemours Children's Hospital
Niklaus Children's Health System
Orlando Health, Inc.
Putnam County Public Works
RISE Orange County
Schneider Electric North America
Talquin Electric Cooperative
Town of Cutler Bay
U.S. Department of Energy, Office of Electricity
Several Comments from Private Citizens

The following is a summary of comments received as well as the response.

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Comment and Response Summary

Public Comment related to Housing

Comments received supported the addition of a housing program including, but not limited to, voluntary home buyouts, relocation, reconstruction, structure elevation, dry flood proofing of non-residential and historical residential structures, mobile home upgrades and retrofitting of homes. Accessibility for Low-to-Moderate Income (LMI) persons to receive these types of services was emphasized regarding these specific types of mitigation activities. DEO received public comment related to housing from the following organizations: Affordable Housing Foundation, City of Largo, Equal Justice Works, Florida Housing Coalition, Federation of Manufactured Home Owners of Florida, Florida Policy Institute, Miami-Dade County and Monroe County Board of County Commissioners.

Response: While DEO recognizes the need for housing activities in Florida's communities, this need is being addressed through the Community Development Block Grant – Disaster Recovery (CDBG-DR) grant. These funds are administered through DEO. At this time, the CDBG-MIT program will not pursue housing as a program activity.

Public Comment related to Risk Assessment

Comments were received requesting further explanation on sea level rise, the Social Vulnerability Index, clarification on mitigation need statements, data resources consulted, list discrepancies, Hurricane Michael references, compounding risk factor considerations, the addition of the Federal Emergency Management Agency's Building Resilient Infrastructure and Communities program (FEMA BRIC) and DEO's Adaptation Action Areas. Commenters also emphasized critical lifelines and supported the importance of continuing functionality of the energy sector and highlighted the environmental risk of harmful algal blooms. DEO received public comment related to the Risk Assessment from the Florida Division of Emergency Management, Global Center for Climate Resilience, Miami-Dade County, Sarasota County, US Department of Energy and the University of Florida.

Response: In response to public comments on the Risk Assessment, several areas of the Risk Assessment were clarified, bolstered, deleted, or otherwise edited to strengthen the Action Plan Risk Assessment.

Public Comment related to Accessibility

DEO received comments recommending that a strategy be developed to increase community lifelines and mitigate disaster risks for Florida's vulnerable populations (i.e. persons with disabilities, including intellectual and developmental disabilities) and meaningful access to information for Limited English Proficiency (LEP) persons and organizations. Commenters also suggested a transparent roadmap for how vulnerable populations can best access benefits DEO received public comment related to accessibility from the following organizations: Agency for Persons with Disabilities and the Florida Policy Institute.

Response: DEO has added language to strengthen the Community Development Block Grant – Mitigation (CDBG-MIT) program's commitment to vulnerable populations.

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Additionally, DEO will continue to consult with our state partners and nonprofits to address the needs of Florida's vulnerable populations.

Public Comment related to Program Details

Comments were received suggesting inclusion for the needs of persons with access and functional needs within the program areas, expanding the eligibility requirements to community-based organizations, nonprofits, state agencies, electric cooperatives and hospitals, emphasizing energy efficient building activities, exceeding Florida Building Code standards, expansion of the activities in the Critical Facility Generator Program, the inclusion of Urgent Need in the Critical Facility Generator Program and inclusion of private properties in the Match Program. Clarification was requested regarding the definitions of local units of government and shelters. DEO received public comment related to program details from the following organizations: AdventHealth North Pinellas, DeSoto Memorial Hospital, Fawcett Memorial Hospital, Florida Department of Corrections, Florida Division of Emergency Management, Florida Hospital Association, International Code Council, Jackson South Community Hospital, Lakewood Ranch Medical Center, Lee Health, Manatee Memorial Hospital, Miami-Dade County, Memorial Healthcare System, Nemours Children's Hospital, Nicklaus Children's Hospital, Orlando Health Inc. and Talquin Electric Cooperative Inc.

Response: We have designated Units of General Local Government (UGLG) and State Agencies as the primary applicants for the Infrastructure program. UGLG, educational institutions and State Agencies can apply for General Program Planning. DEO has also outlined how community-based organizations and nonprofits can apply for funding within some program areas as co-applicants through UGLG and State Agency partners. We will expand on how eligible entities can apply in our forthcoming application documents and provide technical assistance.

Public Comment related to Application Process

Comments were made recommending that DEO differentiate between and allow subrecipients to submit budget estimates and consult larger state building construction programs, allow State Small Cities jurisdictions, hospitals, and school districts to be direct subrecipients, a 2-month application window for Planning project submissions and a 4-month application window for Infrastructure project submissions, staggered application cycles, multiple project submission, and public-private partnerships. DEO received public comment related to the application process from the following organizations: AdventHealth North Pinellas, City of Jacksonville, DeSoto Memorial Hospital, Fawcett Memorial Hospital, Florida Department of Corrections, Florida Hospital Association, Jackson South Community Hospital, Lakewood Ranch Medical Center, Lee Health, Manatee Memorial Hospital, Memorial Healthcare System, Miami-Dade County, Nemours Children's Hospital, Nicklaus Children's Hospital and Orlando Health Inc.

Response: DEO will take all recommendations into account as we develop the application process and scoring criteria.

Public Comment related to Waiver

Comments were received supporting the inclusion of Hurricane Michael-impacted areas as potential recipients of mitigation funding from private citizens. Commenters mentioned

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the extensive damage and devastation caused by Hurricane Michael, as well as the strain on resources in counties that are unable to take on large scale mitigation projects and activities.

Response: On December 12, 2019 DEO submitted a substantial waiver to include all Florida counties in mitigation activities. DEO is currently awaiting a response from HUD.

Public Comment related to Funding

Comments were received regarding the funding allocation for DEO's proposed Planning budget. The following requests were made:

- Increase the amount of funding allocated above the 50 percent allocated to HUD MID counties and zip codes,
- Decrease funding for the General Planning Support Program,
- Increase the funding for the General Planning Support Program,
- Prohibit funds from having to go directly through counties,
- Set aside \$150 million for Monroe County,
- Set aside 10% of the General Infrastructure Program for beach nourishment activities,
- Identify the amount of funds for improved code enforcement.

DEO received public comment from the following organizations: Broward County Environmental Planning and Community Resilience Division, County of Volusia, Florida City Community Redevelopment Agency, Florida Division of Emergency Management, Miami-Dade County, International Code Council, University of Florida, and private citizens.

Response: At this time, DEO is not submitting any covered projects or specific set asides. Many, if not all of the projects requested fall within the existing proposed mitigation programs. We have also designated Units of General Local Government (UGLG) and State Agencies as eligible applicants for the program.

Public Comment related to HUD Requirements and Policies and Procedures.

Comments were received requesting clarification regarding the definition of match maximums and planning, adding a HUD MID area, the rationale for a 12-year grant program and inclusion of Benefit Cost Analysis standards. DEO received comments related to HUD requirements and Policies and Procedures from the following organizations: City of Everglades City, City of Jacksonville and Florida Division of Emergency Management.

Response: Per the Federal Register, the maximum allowable match amount for the U.S. Army Corps of Engineers is capped at \$250,000. There are two separate planning categories: one for DEO planning, and one for General Program Planning and Administration. Benefit Cost Analysis standards and processes are outlined in our Policies and Procedures documents. CDBG-MIT funding has been described as once-in-a-generation funding to undertake and support projects and programs that are transformative and long-term. Due to the lasting and far reaching impact of mitigation activities, HUD extended the life of the grant to 12 years.

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Public Comment related to Low-to-Moderate Income.

Comments received supporting an increase of the Low-to-Moderate Income (LMI) requirement above the HUD designated 50 percent. DEO received public comment related to LMI from Florida Policy Institute and Miami Dade County.

Response: HUD requires a minimum of 50 percent of all funds to benefit LMI populations. DEO will make all reasonable efforts to exceed HUD's requirements.

Public Comment Related to Policies and Procedures.

Comments were received requesting clarification on Policies and Procedures. DEO received public comment related to Policies and Procedures from City of Jacksonville and Florida Division of Emergency Management.

Response: As a point of clarification, Policies and Procedures are separate from the Mitigation Program Guidelines. The guidelines will further explain the specifics of each program areas. These will be made available to the public prior to the program application period.

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Appendix D: List of SoVI® Variables

**List of SoVI® 2006-10 Variables (n=29). Daggers notate new variables added.
SoVI® 2010-14 uses the same list of variables.**

VARIABLE	DESCRIPTION
QASIAN	Percent Asian
QBLACK	Percent Black
QSPANISH	Percent Hispanic
QINDIAN	Percent Native American
QAGEDEP	Percent Population under 5 years or 65 and over
QFAM†	Percent Children Living in Married Couple Families
MEDAGE	Median Age
QSSBEN	Percent Households Receiving Social Security Benefits
QPOVTY	Percent Poverty
QRICH	Percent Households Earning over \$200,000 annually
PERCAP	Per Capita Income
QESL	Percent Speaking English as a Second Language with Limited English Proficiency
QFEMALE	Percent Female
QFHH	Percent Female Headed Households
QNRRES	Nursing Home Residents Per Capita
HOSPTEPC	Hospitals Per Capita (County Level ONLY)
QNOHLTH†	Percent of population without health insurance (County Level ONLY)
QED12LES	Percent with Less than 12 th Grade Education
QCVLUN	Percent Civilian Unemployment
PPUNIT	People per Unit
QRENTER	Percent Renters
MDHSEVAL	Median Housing Value
MDGRENT	Median Gross Rent
QMOHO	Percent Mobile Homes
QEXTRCT	Percent Employment in Extractive Industries
QSERV	Percent Employment in Service Industry
QFEMLBR	Percent Female Participation in Labor Force
QNOAUTO†	Percent of Housing Units with No Car
QUNOCCHU†	Percent Unoccupied Housing Units

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Appendix E: Program Expenditures Projections

Programs	Allocations	2020					Remaining Funds
		Qtr 1	Q2	Q3	Q4	Total	
General Infrastructure	\$ 475,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 475,000,000
Critical Facility Hardening Program	\$ 75,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 75,000,000
General Planning Support	\$ 20,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 20,000,000
DEO Administration	\$ 31,674,250	\$ -	\$ 700,000	\$ 650,000	\$ 650,000	\$ 2,000,000	\$ 29,674,250
DEO Planning	\$ 31,810,750	\$ -	\$ 650,000	\$ 600,000	\$ 600,000	\$ 1,850,000	\$ 29,960,750
	\$ 633,485,000	\$ -	\$ 1,350,000	\$ 1,250,000	\$ 1,250,000	\$ 3,850,000	\$ 629,635,000

Programs	Allocations	2021					Remaining Funds
		Qtr 1	Q2	Q3	Q4	Total	
General Infrastructure	\$ 475,000,000	\$ -	\$ 4,000,000	\$ 4,000,000	\$ 4,000,000	\$ 12,000,000	\$ 463,000,000
Critical Facility Hardening Program	\$ 75,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 4,000,000	\$ 71,000,000
General Planning Support	\$ 20,000,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 2,000,000	\$ 18,000,000
DEO Administration	\$ 31,674,250	\$ 650,000	\$ 650,000	\$ 650,000	\$ 650,000	\$ 2,600,000	\$ 27,074,250
DEO Planning	\$ 31,810,750	\$ 600,000	\$ 600,000	\$ 600,000	\$ 600,000	\$ 2,400,000	\$ 27,560,750
	\$ 633,485,000	\$ 2,750,000	\$ 6,750,000	\$ 6,750,000	\$ 6,750,000	\$ 23,000,000	\$ 606,635,000

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Programs	Allocations	2022					Remaining Funds
		Otr 1	Q2	Q3	Q4	Total	
General Infrastructure	\$ 475,000,000	\$ 7,000,000	\$ 7,000,000	\$ 7,000,000	\$ 7,000,000	\$ 28,000,000	\$ 435,000,000
Critical Facility Hardening Program	\$ 75,000,000	\$ 2,500,000	\$ 2,500,000	\$ 2,500,000	\$ 2,500,000	\$ 10,000,000	\$ 61,000,000
General Planning Support	\$ 20,000,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 2,000,000	\$ 16,000,000
DEO Administration	\$ 31,674,250	\$ 650,000	\$ 650,000	\$ 650,000	\$ 650,000	\$ 2,600,000	\$ 24,474,250
DEO Planning	\$ 31,810,750	\$ 600,000	\$ 600,000	\$ 600,000	\$ 600,000	\$ 2,400,000	\$ 25,160,750
	\$ 633,485,000	\$ 11,250,000	\$ 11,250,000	\$ 11,250,000	\$ 11,250,000	\$ 45,000,000	\$ 561,635,000

Programs	Allocations	2023					Remaining Funds
		Otr 1	Q2	Q3	Q4	Total	
General Infrastructure	\$ 475,000,000	\$ 10,000,000	\$ 10,000,000	\$ 10,000,000	\$ 10,000,000	\$ 40,000,000	\$ 395,000,000
Critical Facility Hardening Program	\$ 75,000,000	\$ 2,500,000	\$ 2,500,000	\$ 2,500,000	\$ 2,500,000	\$ 10,000,000	\$ 51,000,000
General Planning Support	\$ 20,000,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 2,000,000	\$ 14,000,000
DEO Administration	\$ 31,674,250	\$ 650,000	\$ 650,000	\$ 650,000	\$ 650,000	\$ 2,600,000	\$ 21,874,250
DEO Planning	\$ 31,810,750	\$ 600,000	\$ 600,000	\$ 600,000	\$ 600,000	\$ 2,400,000	\$ 22,760,750
	\$ 633,485,000	\$ 14,250,000	\$ 14,250,000	\$ 14,250,000	\$ 14,250,000	\$ 57,000,000	\$ 504,635,000

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Program	Allocation	2024					Remaining Funds
		Otr 1	Q2	Q3	Q4	Total	
General Infrastructure	\$ 475,000,000	\$ 10,000,000	\$ 10,000,000	\$ 10,000,000	\$ 10,000,000	\$ 40,000,000	\$ 355,000,000
Critical Facility Hardening Program	\$ 75,000,000	\$ 2,500,000	\$ 2,500,000	\$ 2,500,000	\$ 2,500,000	\$ 10,000,000	\$ 41,000,000
General Planning Support	\$ 20,000,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 2,000,000	\$ 12,000,000
DEO Administration	\$ 31,674,250	\$ 650,000	\$ 650,000	\$ 650,000	\$ 650,000	\$ 2,600,000	\$ 19,274,250
DEO Planning	\$ 31,810,750	\$ 600,000	\$ 600,000	\$ 600,000	\$ 600,000	\$ 2,400,000	\$ 20,360,750
	\$ 633,485,000	\$ 14,250,000	\$ 14,250,000	\$ 14,250,000	\$ 14,250,000	\$ 57,000,000	\$ 447,635,000
Program	Allocation	2025					Remaining Funds
		Otr 1	Q2	Q3	Q4	Total	
General Infrastructure	\$ 475,000,000	\$ 15,000,000	\$ 15,000,000	\$ 15,000,000	\$ 15,000,000	\$ 60,000,000	\$ 295,000,000
Critical Facility Hardening Program	\$ 75,000,000	\$ 3,000,000	\$ 3,000,000	\$ 3,000,000	\$ 3,000,000	\$ 12,000,000	\$ 29,000,000
General Planning Support	\$ 20,000,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 2,000,000	\$ 10,000,000
DEO Administration	\$ 31,674,250	\$ 650,000	\$ 650,000	\$ 650,000	\$ 650,000	\$ 2,600,000	\$ 16,674,250
DEO Planning	\$ 31,810,750	\$ 600,000	\$ 600,000	\$ 600,000	\$ 600,000	\$ 2,400,000	\$ 17,960,750
	\$ 633,485,000	\$ 19,750,000	\$ 19,750,000	\$ 19,750,000	\$ 19,750,000	\$ 79,000,000	\$ 368,635,000

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Program	Allocation	2026					Remaining Funds
		Otr 1	Q2	Q3	Q4	Total	
General Infrastructure	\$ 475,000,000	\$ 22,000,000	\$ 22,000,000	\$ 22,000,000	\$ 22,000,000	\$ 88,000,000	\$ 207,000,000
Critical Facility Hardening Program	\$ 75,000,000	\$ 3,000,000	\$ 3,000,000	\$ 3,000,000	\$ 3,000,000	\$ 12,000,000	\$ 17,000,000
General Planning Support	\$ 20,000,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 2,000,000	\$ 8,000,000
DEO Administration	\$ 31,674,250	\$ 650,000	\$ 650,000	\$ 650,000	\$ 650,000	\$ 2,600,000	\$ 14,074,250
DEO Planning	\$ 31,810,750	\$ 650,000	\$ 650,000	\$ 650,000	\$ 650,000	\$ 2,600,000	\$ 15,360,750
	\$ 633,485,000	\$ 26,800,000	\$ 26,800,000	\$ 26,800,000	\$ 26,800,000	\$ 107,200,000	\$ 261,435,000
Program	Allocation	2027					Remaining Funds
		Otr 1	Q2	Q3	Q4	Total	
General Infrastructure	\$ 475,000,000	\$ 12,000,000	\$ 12,000,000	\$ 12,000,000	\$ 12,000,000	\$ 48,000,000	\$ 159,000,000
Critical Facility Hardening Program	\$ 75,000,000	\$ 3,000,000	\$ 2,000,000	\$ 2,000,000	\$ 2,000,000	\$ 9,000,000	\$ 8,000,000
General Planning Support	\$ 20,000,000	\$ 400,000	\$ 400,000	\$ 400,000	\$ 400,000	\$ 1,600,000	\$ 6,400,000
DEO Administration	\$ 31,674,250	\$ 600,000	\$ 600,000	\$ 600,000	\$ 600,000	\$ 2,400,000	\$ 11,674,250
DEO Planning	\$ 31,810,750	\$ 650,000	\$ 650,000	\$ 650,000	\$ 650,000	\$ 2,600,000	\$ 12,760,750
	\$ 633,485,000	\$ 16,650,000	\$ 15,650,000	\$ 15,650,000	\$ 15,650,000	\$ 63,600,000	\$ 197,835,000

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Program	Allocation	2028					Remaining Funds
		Otr 1	Q2	Q3	Q4	Total	
General Infrastructure	\$ 475,000,000	\$ 12,000,000	\$ 12,000,000	\$ 12,000,000	\$ 12,000,000	\$ 48,000,000	\$ 111,000,000
Critical Facility Hardening Program	\$ 75,000,000	\$ 2,000,000	\$ 2,000,000	\$ 2,000,000	\$ 2,000,000	\$ 8,000,000	\$ -
General Planning Support	\$ 20,000,000	\$ 400,000	\$ 400,000	\$ 400,000	\$ 400,000	\$ 1,600,000	\$ 4,800,000
DEO Administration	\$ 31,674,250	\$ 600,000	\$ 600,000	\$ 600,000	\$ 600,000	\$ 2,400,000	\$ 9,274,250
DEO Planning	\$ 31,810,750	\$ 650,000	\$ 650,000	\$ 650,000	\$ 650,000	\$ 2,600,000	\$ 10,160,750
	\$ 633,485,000	\$ 15,650,000	\$ 15,650,000	\$ 15,650,000	\$ 15,650,000	\$ 62,600,000	\$ 135,235,000
Program	Allocation	2029					Remaining Funds
		Otr 1	Q2	Q3	Q4	Total	
General Infrastructure	\$ 475,000,000	\$ 10,000,000	\$ 10,000,000	\$ 10,000,000	\$ 10,000,000	\$ 40,000,000	\$ 71,000,000
Critical Facility Hardening Program	\$ 75,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
General Planning Support	\$ 20,000,000	\$ 300,000	\$ 300,000	\$ 300,000	\$ 300,000	\$ 1,200,000	\$ 3,600,000
DEO Administration	\$ 31,674,250	\$ 600,000	\$ 600,000	\$ 600,000	\$ 600,000	\$ 2,400,000	\$ 6,874,250
DEO Planning	\$ 31,810,750	\$ 650,000	\$ 650,000	\$ 650,000	\$ 650,000	\$ 2,600,000	\$ 7,560,750
	\$ 633,485,000	\$ 11,550,000	\$ 11,550,000	\$ 11,550,000	\$ 11,550,000	\$ 46,200,000	\$ 89,035,000

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Program	Allocation	2030					Remaining Funds
		Otr 1	Q2	Q3	Q4	Total	
General Infrastructure	\$ 475,000,000	\$ 7,000,000	\$ 7,000,000	\$ 7,000,000	\$ 7,000,000	\$ 28,000,000	\$ 43,000,000
Critical Facility Hardening Program	\$ 75,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
General Planning Support	\$ 20,000,000	\$ 300,000	\$ 300,000	\$ 300,000	\$ 300,000	\$ 1,200,000	\$ 2,400,000
DEO Administration	\$ 31,674,250	\$ 600,000	\$ 600,000	\$ 600,000	\$ 600,000	\$ 2,400,000	\$ 4,474,250
DEO Planning	\$ 31,810,750	\$ 650,000	\$ 650,000	\$ 650,000	\$ 650,000	\$ 2,600,000	\$ 4,960,750
	\$ 633,485,000	\$ 8,550,000	\$ 8,550,000	\$ 8,550,000	\$ 8,550,000	\$ 34,200,000	\$ 54,835,000

Program	Allocation	2031					Remaining Funds
		Otr 1	Q2	Q3	Q4	Total	
General Infrastructure	\$ 475,000,000	\$ 6,000,000	\$ 6,000,000	\$ 6,000,000	\$ 6,000,000	\$ 24,000,000	\$ 19,000,000
Critical Facility Hardening Program	\$ 75,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
General Planning Support	\$ 20,000,000	\$ 300,000	\$ 300,000	\$ 300,000	\$ 300,000	\$ 1,200,000	\$ 1,200,000
DEO Administration	\$ 31,674,250	\$ 580,000	\$ 580,000	\$ 560,000	\$ 550,000	\$ 2,270,000	\$ 2,204,250
DEO Planning	\$ 31,810,750	\$ 650,000	\$ 650,000	\$ 650,000	\$ 610,750	\$ 2,560,750	\$ 2,400,000
	\$ 633,485,000	\$ 7,530,000	\$ 7,530,000	\$ 7,510,000	\$ 7,460,750	\$ 30,030,750	\$ 24,804,250

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Program	Allocation	2032					Remaining Funds
		Otr 1	Q2	Q3	Q4	Total	
General Infrastructure	\$ 475,000,000	\$ 5,000,000	\$ 5,000,000	\$ 5,000,000	\$ 4,000,000	\$ 19,000,000	\$ -
Critical Facility Hardening Program	\$ 75,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
General Planning Support	\$ 20,000,000	\$ 300,000	\$ 300,000	\$ 300,000	\$ 300,000	\$ 1,200,000	\$ -
DEO Administration	\$ 31,674,250	\$ 550,000	\$ 550,000	\$ 550,000	\$ 554,250	\$ 2,204,250	\$ -
DEO Planning	\$ 31,810,750	\$ 600,000	\$ 600,000	\$ 600,000	\$ 600,000	\$ 2,400,000	\$ -
	\$ 633,485,000	\$ 6,450,000	\$ 6,450,000	\$ 6,450,000	\$ 5,454,250	\$ 24,804,250	\$ -
Grand Totals	\$ 633,485,000					\$ 633,485,000	\$ -

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