

Non-Substantial Amendment 5

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Previous Page #	New Page #	Section	Change/Addition/Deletion
6	N/A	Executive Summary	Updated Table 1: 2016-2017 CDBG-MIT Program Allocation to reflect the reallocation of \$3,561,083.32 from the General Infrastructure Program to the Housing Oversubscription Program. Updated the percentages of funding and the MID areas and LMI allocation minimums accordingly.
73	63	Projects & Activities	Updated Table 20: Allocation of 2016 and 2017 CDBG-MIT Funds to reflect the reallocation of \$3,561,083.32 from the General Infrastructure Program to the Housing Oversubscription Program. Updated the percentages of funding and the MID areas and LMI allocation minimums accordingly.
74	64	Projects & Activities	Updated Table 22: Budget Adjustment of 2016-2017 CDBG-MIT Funds to reflect the reallocation of \$3,561,083.32 from the General Infrastructure Program to the Housing Oversubscription Program.
77	67	Projects & Activities	Updated Table 23: 2016-2017 General Infrastructure Program (GIP) to reflect to removal of \$3,561,083.32 from the General Infrastructure Program to be reallocated to the Housing Oversubscription Program. Updated the HUD MID area allocation minimum, funding percentage, the LMI minimum, and Applicant maximum accordingly.
88	75-76	Projects & Activities	<p>Updated 3.3.2.3 2016 and 2017 Housing Programs, Housing Oversubscription Program (HOP) with the following:</p> <ul style="list-style-type: none"> • Added paragraph on the benefit of mitigation activities in housing and examples of such activities. • Updated language on Hurricane Irma impacts to include a statement regarding Hurricane Irma CDBG-DR assisted homes' ability to better withstand 2022 disasters Ian and Nicole. • Moved sentence referring readers to the action plan for more information down to the final paragraph of the HOP and updated the link within. • Added language on DEO's intent to utilize MIT funds to better repair homes, and provided examples of mitigation hardening of homes, including elevation. • Removed language stating that HOP activities will follow the mission of the HRRP, and additional language made duplicative by the addition of the first paragraph.

			<ul style="list-style-type: none"> • Updated final HOP paragraph: <ul style="list-style-type: none"> ○ Specified the Hurricane Irma HRRP. ○ Made minor updates to the tense of verbiage regarding the allocation of funds to the HOP. ○ Added language stating the HOP will “fund the incorporation of mitigation measures...” ○ Added sentence referring readers to the Action Plan for more information, moved from a different HOP paragraph, as noted above.
N/A	76-77	Projects & Activities	Added language stating that “in order to qualify for assistance through the HOP, a project must meet one or more of the following criteria: ...” Resilient Home Construction Standards (RHCS); Green Building Standard for Replacement and New Construction of Residential Housing; Elevation Standards for New Construction, Repair of Substantial Damage, or Substantial Improvement.
88	77	Projects & Activities	Updated Table 30: 2016-2017 Housing Oversubscription Program (HOP) to reflect the addition of \$3,561,083.32 in funding to the Housing Oversubscription Program reallocated from the General Infrastructure Program. Updated the funding percentage, HUD MID area allocation minimum, and the LMI minimum accordingly.
N/A	N/A	Entire Document	<p>Removed bullets from Definitions section</p> <p>Added section number to 1.0 Executive Summary, shifting all section numbers up by one</p> <p>Updated all Heading 3 to include section numbers</p> <p>Added headers to pages</p> <p>Updated font from Arial 12 to Calibri 11</p> <p>Updated Header fonts, colors, and text size</p> <p>Updated table numbers</p> <p>Resized images throughout document for consistency</p> <p>Changes resulted in a change in overall document length from 149 pages to 128 pages.</p>

Table 1: 2016-2017 CDBG-MIT Program Allocation

Allocation of 2016-2017 CDBG-MIT Funds				
Program	Allocation	Percent of Overall Funding	HUD-MID Area Allocation Minimum	LMI Designation Allocation Minimum
Infrastructure	\$520,449,502.84	82.16%	\$260,224,751.42	\$260,224,751.42
General Infrastructure	\$446,974,973.84	70.6%	\$ 223,487,486.92	\$223,487,486.92
Critical Facility Hardening Program	\$73,474,529	11.5%	\$36,737,265	\$36,737,265
Housing	\$45,554,289.16	7.2%	\$22,777,144.58	\$22,777,144.58
Housing Oversubscription	\$45,554,289.16	7.2%	\$22,777,144.58	\$22,777,144.58
Planning and Administrative Costs	\$67,481,208	10.5%		
General Planning Support	\$20,000,000	3%	\$10,000,000	\$10,000,000
DEO Administration	\$31,674,250	5%		
DEO Planning	\$15,806,958	2.5%		
Total Allocation	\$633,485,000	100%	\$293,001,896	\$293,001,896

Table 2: 2018 CDBG-MIT Program Allocation

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

Each program is further described in Section III. 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.

3.1.3 Covered Projects

In the CDBG-MIT Federal Register, a covered project is defined as an infrastructure project having a total project cost of \$100 million or more, with at least \$50 million in CDBG funds regardless of source (CDBG-DR, CDBG National Disaster Resilience [NDR], CDBG-MIT, or CDBG). The State of Florida does not anticipate any projects that meet the definition of a covered project. If it is determined that a project will meet the definition of a covered project, the State will include the covered project in a substantial Action Plan amendment and follow the public hearing process before committing to funding.

3.2 Program Budgets

DEO is the lead agency and responsible entity for administering more than \$633 million in CDBG-MIT funds allocated to the state for mitigation and resiliency efforts as a result of major disaster events in 2016 and 2017 and an additional \$46,926,000 which was allocated for mitigation activities as a result of major declared disaster events in 2018, for a total CDBG-MIT allocation of \$680,411,000.

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

Allocation of 2016 and 2017 CDBG-MIT Funds				
Program	Allocation	Percent of Overall Funding	HUD-MID Area Allocation Minimum	LMI Designation Allocation Minimum
Infrastructure	\$520,449,502.84	82.16%	\$260,224,751.42	\$260,224,751.42
General Infrastructure	\$446,974,973.84	70.6%	\$223,487,486.92	\$223,487,486.92
Critical Facility Hardening Program	\$73,474,529	11.5%	\$36,737,265	\$36,737,265
Housing	\$45,554,289.16	7.2%	\$22,777,144.58	\$22,777,144.58
Housing Oversubscription	\$45,554,289.16	7.2%	\$22,777,144.58	\$22,777,144.58
Planning and Administrative Costs	\$67,481,208	10.5%		
General Planning Support	\$20,000,000	3%	\$10,000,000	\$10,000,000
DEO Administration	\$31,674,250	5%		
DEO Planning	\$15,806,958	2.5%		
Total Allocation	\$633,485,000	100%	\$293,001,896	\$293,001,896

Table 21: Allocation of 2018 CDBG-MIT Funds

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

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

Budget Adjustment of 2016 and 2017 CDBG-MIT Funds				
Program	Original Program Budget	June 13, 2022 Amended Program Budget	May 4, 2023 Amended Program Budget	Amount Adjusted
Infrastructure	\$550,000,000	\$524,010,586.16	\$520,449,502.84	-\$3,561,083.32
General Infrastructure	\$475,000,000	\$450,536,057.16	\$446,974,973.84	-\$3,561,083.32
Critical Facility Hardening Program	\$75,000,000	\$73,474,529	\$73,474,529	-
Housing	\$0	\$41,993,205.84	\$45,554,289.16	+\$3,561,083.32
Housing Oversubscription	\$0	\$41,993,205.84	\$45,554,289.16	+\$3,561,083.32
Planning and Administrative Costs	\$83,485,000	\$67,481,208	\$67,481,208	-
General Planning Support	\$20,000,000	\$20,000,000	\$20,000,000	-
DEO Administration	\$31,674,250	\$31,674,250	\$31,674,250	-
DEO Planning	\$31,810,750	\$15,806,958	\$15,806,958	-
Total Allocation	\$633,485,000	\$633,485,000	\$633,485,000	-

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

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

General Infrastructure Program (GIP)	
Funding Dollars	\$446,974,973.84
Funding Percentage	70.6%
HUD-MID Area Allocation Minimum	\$223,487,486.92
LMI Designation Allocation Minimum	\$223,487,486.92
Applicant Minimum & Maximum	\$500,000 - \$446,974,973.84
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

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

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. Each round will have a competitive application process.

The 2016-2017 GIP will be implemented in three rounds:

Round I of the GIP will have a total allocation of \$150 million and a minimum project cost of \$500,000 and no maximum limit. The state anticipates that regional coalitions and local governments or local public entities will act as partners in the implementation of this program.

Round II of the GIP will have a minimum project threshold of \$2 million per project. Round II will make strategic investments on a competitive basis to implement programs and projects that align with mitigation objectives. Projects will be ranked using the same prioritization methodology from Round I as their base.

Round III of the GIP will fund projects that were competitively selected through the CDBG-DR Hurricane Irma Infrastructure Repair Program Rounds I and II. The minimum award for those projects is \$500,000. The CDBG-DR Hurricane Irma Infrastructure Repair Program projects meet all CDBG-MIT GIP requirements.

2016-2017 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;

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 29: 2016-2017 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

2016 and 2017 DEO Administration & Planning

In accordance with the Federal Register, DEO’s aggregate total for indirect costs and administrative and technical assistance expenditures will not exceed 5% 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 planning budget of 2.5% (\$15,806,958).

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

Eligible project delivery costs are presumed included as a portion of the overall CDBG-MIT grant funding allocation provided to each subrecipient. DEO will limit spending to a maximum of 13% of the total grant amount on a combination of planning and indirect and direct program administration costs.

3.3.2.3 2016 and 2017 Housing Programs

Housing Oversubscription Program (HOP)

The HOP is a housing recovery program that will create long-lasting mitigation benefits by strengthening existing, storm damaged homes to create more resilient housing. The CDBG-MIT-funded HOP program intends to rehabilitate and reconstruct homes to increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters. Per FR Vol. 84, No. 169, mitigation housing programs may include: elevation, which may be accompanied by rehabilitation, reconstruction, or new construction activities to support resilient housing; flood proofing; and wind, water, fire, earthquake retrofitting or “hardening” of single- and multifamily units to withstand future disasters. More resilient homes better enable a community to quickly recover from the impacts of future disasters and lessen the impacts on local housing stock and reduce homelessness resulting from disasters. For example, elevated homes will be able to better withstand storm surge and other flooding events. It is imperative that qualifying homeowners for HOP receive recovery and mitigation assistance as residential resilience combined with other CDBG-MIT funded actions form a comprehensive mitigation effort.

Hurricane Irma (2017) had a devastating impact on the Florida housing market, destroying thousands of homes. The Hurricane Irma HRRP is a state-run housing program administered under the State of Florida Action Plan for Disaster Recovery. Homes impacted by Hurricanes Ian (2022) and Nicole (2022) that had been served by the Hurricane Irma HRRP, through rehabilitation or reconstruction, were better able to withstand the impacts of the 2022 disasters.

Acknowledging these positive outcomes, DEO intends to utilize CDBG-MIT funding to repair, reconstruct, or replace Hurricane Irma damaged properties to create more resilient housing through the implementation of mitigation measures and Resilient Home Construction Standards such as elevation, floodproofing, storm hardening, and retrofitting. For homes located inside the floodplain, the program will elevate the lowest floor, including the basement, at least 2 feet above the base flood elevation or the high-water mark, whichever is higher. Homes located outside the designated floodplain will be elevated at least 2 feet above the highwater mark.

At present, the Hurricane Irma HRRP program is oversubscribed, with the number of HRRP applications for assistance exceeding the available program funds needed to move forward with repair or replacement of damaged homes. Consequently, HRRP applicants potentially eligible for assistance are unable to be served unless further funding becomes available. CDBG-MIT funds have been allocated to the HOP to help address HRRP funding limitations, serve homeowners in the state's recovery process, and fund the incorporation of mitigation measure to better mitigate against future disasters. The HRRP awarded applicants based on specific prioritization of vulnerable populations. For additional details of the Hurricane Irma HRRP, please refer to the state action plan on DEO's CDBG-DR website at <https://www.floridajobs.org/cdbg-dr/hurricane-irma>.

To qualify for assistance through the HOP, a project must meet one or more of the following criteria:

- **Resilient Home Construction Standards (RHCS):** Typical housing mitigation programs may include buyouts (potentially accompanied by additional housing or homeownership assistance for relocated families); elevation (which may be accompanied by rehabilitation, reconstruction, or new construction activities to support resilient housing); flood proofing; and wind, water, fire, earthquake retrofitting or "hardening" of single- and multi-family units to withstand future disasters. In compliance with HUD goals, as expressed in Federal Register Notice Vol. 83, No. 28, February 9, 2018, the program has established RHCS to enhance property resistance to future wind-borne disasters. This standard includes resiliency and mitigation measures that are intended to provide enhanced construction materials for specific housing components including roofing, windows, and doors. The RHCS will be applied to all homes that have verified remaining unmet needs due to Hurricane Irma which will be repaired by the program.
- **Green Building Standard for Replacement and New Construction of Residential Housing:** As outlined in FR Vol. 83 No. 28, grantees must meet the following Green Building Standards for:
 - All new construction of residential buildings and
 - All replacement of substantially damaged residential buildings. Replacement of residential buildings may include reconstruction (i.e., demolishing and rebuilding a housing unit on the same lot in substantially the same manner) and may include changes to structural elements such as flooring systems, columns, or load-bearing interior or exterior walls.

Green Building Standards: For purposes of program implementation, the Green Building Standard means that the grantee will require that all construction covered by RHCS, as described above and detailed in FR Vol. 83, No. 28, will meet an industry-recognized standard that has achieved certification under at least one of the following programs: (i) ENERGY STAR (Certified Homes and Multifamily High-Rise), (ii) Enterprise Green Communities, (iii) LEED (New Construction, Homes, Midrise, Existing Buildings Operations and Maintenance, or Neighborhood Development), (iv) ICC-700 National Green Building Standard, (v) EPA Indoor AirPlus (ENERGY STAR a prerequisite) or (vi) any other equivalent comprehensive Mitigation Policy Manual 95 | Page green building program acceptable to HUD. Grantees must identify, in each project file, which Green Building Standard will be used on any building.

- Elevation Standards for New Construction, Repair of Substantial Damage, or Substantial Improvement:**
 The following elevation standards apply to new construction, repair of substantial damage, or substantial improvement of structures located in an area delineated as a flood hazard area or equivalent in FEMA’s data source identified in 24 CFR 55.2(b)(1). To mitigate risks identified in a grantee’s Mitigation Needs Assessment, all structures, defined at 44 CFR 59.1, designed principally for residential use and located in the 100-year (or 1 percent annual chance) floodplain that receive assistance for new construction, repair of substantial damage, or substantial improvement, as defined at 24 CFR 55.2(b)(10), must be elevated with the lowest floor, including the basement, at least two feet above the base flood elevation. Alternatively, grantees may choose to adopt the design flood elevation standards of ASCE-24 if it results in an elevation higher than two feet above base flood elevation.

 - Mixed-use structures with no dwelling units and no residents below two feet above base flood elevation must be elevated or floodproofed, in accordance with FEMA flood proofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above base flood elevation.
 - All Critical Actions, as defined at 24 CFR 55.2(b)(3), within the 500-year (0.2 percent annual chance) floodplain must be elevated or food proofed (in accordance with the FEMA standards) to the higher of the 500-year floodplain elevation or three feet above the 100-year floodplain elevation. If the 500-year floodplain is unavailable, and the Critical Action is in the 100-year floodplain, then the structure must be elevated or floodproofed at least three feet above the 100-year floodplain elevation. Critical Actions are defined as an “activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons, or damage to property.” For example, Critical Actions include hospitals, nursing homes, police stations, fire stations and principal utility lines.

Grantees are reminded that the use of recovery funds, including elevation of structures, must comply with all applicable federal accessibility standards. Applicable state, local, and tribal codes and standards for floodplain management that exceed these requirements, including elevation, setbacks, and cumulative substantial damage requirements, must be followed.

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

Housing Oversubscriptions Program (HOP)	
Funding Dollars	\$45,554,289.16
Funding Percentage	7.2%
HUD-MID Area Allocation Minimum	\$22,777,144.58
LMI Designation Allocation Minimum	\$22,777,144.58
Applicant Minimum & Maximum	\$350,000, except in Monroe County which has a maximum assistance of \$650,000
Application Type	Citizen
Applicant Eligibility	Eligible Applicants who have been awarded through the CDBG-DR Hurricane Irma HRRP
Geographic Eligibility	HUD and State designated MIDs
National Objectives Fulfilled	LMI
Hazard Risks Addressed	Flooding, Severe Storms, Tropical Cyclones, Coastal Erosion, Wildfires
Lifelines Protected	Safety and Security, Food, Water and Shelter