

Substantial Amendment 3

Substantial Amendment 3, Approved by HUD 9/23/2021			
Previous Page #	New Page #	Section	Change/Addition/Deletion
76	77	III. PROJECTS AND ACTIVITIES	<p>Reorganized this section to provide a general overview of the GIP followed by a more specific overview of each individual round.</p> <p>Added “General” to “Round I” paragraph and capitalized Units of General Local Government for clarity.</p> <p>Shifted the following sentence, “The 2016-2017 GIP will be implemented in three rounds” and the “Round I” heading down two paragraphs.</p>
77	N/A	III. PROJECTS AND ACTIVITIES	<p>Separated “Rounds II and III” into separate “Round II” and “Round III” paragraphs and clarified the differences between the two rounds of funding.</p> <p>Added language to “Round III” regarding the funding of Hurricane Irma Infrastructure projects with Mitigation funds.</p>
78	N/A	III. PROJECTS AND ACTIVITIES	<p>Added “(Rounds I and II)” to header reading “2016-2017 GIP Application Process” for clarity.</p> <p>Removed paragraph under “2016-2017 GIP Application Process (Rounds I and II)” stating that applicants may check their submission’s status via email or online and replaced with “Additional information regarding applicant status is provided in the GIP Guidelines located here.”</p> <p>Added subheading “Rounds I and II” under “2016-2017 GIP Criteria and Scoring.”</p>
79	78	III. PROJECTS AND ACTIVITIES	Added “(Rounds I and II)” to Table 2 header.
79	N/A	III. PROJECTS AND ACTIVITIES	Replaced language regarding checking the status of applicant submissions with language referencing the program guidelines, where more information can be found.
N/A	79-80	III. PROJECTS AND ACTIVITIES	Added “Round III” section and language regarding the implementation of the GIP Round III to fund projects selected through the Hurricane Irma Infrastructure Program.

			Added "Table 3: 2016-2017 General Infrastructure Program (GIP) Scoring Criteria (Round III)."
N/A	145	VIII. APPENDICES	Inserted "Appendix G - Summary of Public Comments for Substantial Amendment 3"

Substantial Amendment Introduction

This Substantial Amendment modifies the state of Florida's Action Plan for CDBG-MIT. In an effort to serve additional applicants who are considered the most vulnerable population in the Hurricane Irma Housing Repair and Replacement Program, the Florida Department of Economic Opportunity (DEO) will transfer CDBG-DR Hurricane Irma Infrastructure Repair Program projects identified for the Community Development Block Grant—Mitigation General Infrastructure Program.

General Infrastructure Program Round III Projects

DEO has allocated more than \$346 million to the CDBG-DR Hurricane Irma Housing Repair and Replacement Program activity delivery category. However, as of September 2021, factors such as rising costs of materials and construction due to the industrial impacts of recent national disasters, as well as COVID-19 related production issues, have resulted in the current allocation of funding to the HRRP activity being less efficacious than originally anticipated. It is estimated the current CDBG-DR Hurricane Irma Housing Repair and Replacement Program allocation of \$346,186,147 is projected to fall short by more than \$170,000,000.

In order to mitigate these issues and serve more constituents through the CDBG-DR Hurricane Irma Housing Repair and Replacement Program, DEO will be moving a large portion of CDBG-DR Hurricane Irma Infrastructure Repair Program projects to DEO's CDBG-MIT General Infrastructure Program. DEO is amending its CDBG-MIT Action Plan to include these projects as Round III General Infrastructure Program projects.

Projects identified for transfer to the CDBG-MIT Round III General Infrastructure Program were originally evaluated, ranked, and competitively selected through the CDBG-DR Hurricane Irma Infrastructure Repair Program process. The application and scoring processes of the original CDBG-DR Hurricane Irma Infrastructure Repair Program Rounds I and II and the CDBG-MIT General Infrastructure Program are similar. Adopting the CDBG-DR Hurricane Irma Infrastructure Repair Program selected projects causes no change in eligibility criteria, beneficiaries, amount of funding awarded to selected projects, or allocations to CDBG-MIT programs.

improvements with respect to such construction, reconstruction or installation that promote energy efficiency) of public works, facilities (except for buildings for the general conduct of government), and site or other improvements.¹⁰¹

Table 1: 2016-2017 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

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

¹⁰¹ 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

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;
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.

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.

- **2016-2017 GIP Application Process (Rounds I and II)**

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 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.

Additional information regarding applicant status is provided in the GIP Guidelines located [here](#).

- **2016-2017 GIP Criteria & Scoring**
Rounds I and II

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.

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 2: 2016-2017 General Infrastructure Program (GIP) Scoring Criteria (Rounds I and II)

Scoring Criteria	Maximum
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

Round III

Projects identified for the CDBG-MIT Program General Infrastructure Program **Round III** were originally evaluated and ranked for the CDBG-DR Hurricane Irma Infrastructure Repair Program. The projects were competitively selected through the CDBG-DR Hurricane Irma Infrastructure Repair Program process. The threshold requirements include meeting all GIP eligibility criteria.

All CDBG-DR Hurricane Irma Infrastructure Repair Program applications were scored based on the following application elements. Maximum criteria values are noted in the rubric below. Scored criteria is listed below in priority order. A total of 105 points were available.

Table 3: 2016-2017 General Infrastructure Program (GIP) Scoring Criteria (Round III)

Scoring Criteria	Maximum Points
Overall LMI	30
Project Readiness	25
Management Capacity	15
Project Impact	15
Project Nature	10
Special Designation	10

The application and scoring processes of the original CDBG-DR Hurricane Irma Infrastructure Repair Program Rounds I and II and the CDBG-MIT General Infrastructure Program are similar. Adopting the CDBG-DR Hurricane Irma Infrastructure Repair Program selected projects causes no change in eligibility criteria, beneficiaries, the amount of funding that is awarded to selected projects, or allocations to CDBG-MIT programs.

Appendix G - Summary of Public Comments for Substantial Amendment 3

1. Responses to Public Comment

This document describes the comments received from the public following the release of Substantial Amendment 3 to the Community Development Block Grant – Mitigation (CDBG-MIT) draft State Action Plan.

- Release Date: August 5, 2021
- Comment Period: August 5, 2021 – September 7, 2021
- Approved by HUD: September 23, 2021
- Number of Comments Received: 0

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.