

STATE OF FLORIDA

ACTION PLAN *for* DISASTER RECOVERY AMENDMENTS 1-16



Submitted to the U.S. Department of Housing and Urban Development (HUD) in fulfillment of requirements for the Community Development Block Grant-Disaster Recovery (CDBG-DR) program for recovery from Hurricane Irma.

Introduction of Amendments

Amendment 1 (Substantial)	iii
Adds multiple clarifying changes and corrections to the following sections of the Action Plan: Unmet Needs Assessment, General Action Plan Requirements, and Projects and Activities as well as updating Projected Expenditures to include the additional allocation and inserting public comments received on the original posting of the Action Plan.	
Amendment 2 (Non-Substantial)	vii
Amends the definition of multi-family Rental Projects eligible for rehabilitation or reconstruction assistance as properties with five or more units.	
Amendment 3 (Non-Substantial)	vii
Updates Appendix 11 projected expenditures	
Amendment 4 (Non-Substantial)	viii
Adds information about Florida’s Construction Lien law and DEO’s policy to pay for bonding. Adds clarification on methodology and eligibility for Housing Repair and Replacement Program. Revises Workforce Recovery Training Program eligible subrecipients, adds Workforce Training Program areas, and clarifies Section 3 program requirements.	
Amendment 5 (Non-Substantial)	viii
Corrects typos, adds clarifying statements to Economic Revitalization Activities introduction, Revises Workforce Recovery Training Program eligible subrecipients, adds Workforce Recovery Training Program areas, and clarifies Section 3 program requirements.	
Amendment 6 (Substantial)	ix
Removes Public Assistance and Business Assistance to New Floridians from Puerto Rico program, Reallocates funds to Business Recovery Grant Program, updates Scope, Budget, Table of Contents accordingly.	
Amendment 7 (Non-Substantial)	ix
Updates Workforce Affordable Rental Program Budget Chart. Edits eligibility citations. Deletes Limited Temporary Relocation Assistance for Homeowners (Optional Relocation) and Limited Temporary Relocation Assistance for Tenants sections, adds Temporary Housing Assistance Benefit policy for Housing Repair and Replacement Program beneficiaries. Clarifies the responsibilities of Florida Housing Finance Corporation in Workforce Affordable Housing Land Acquisition and Workforce Affordable Rental New Construction, adds clarification in Voluntary Home Buyout.	
Amendment 8 (Non-Substantial)	x
Clarifies definition of “substantially damaged” property; removes language on process to appeal quality of construction and rehabilitation work, HRRP applicants may file a complaint via the DEO website or by contacting ODR Constituent Management; , removes an outdated program budget table which can be located on the DEO website; updates Program Budget; adds clarifying language on the determination of the age of mobile homes and adds information regarding mobile home relocations; updates project expenditures in Appendix 11.	
Amendment 9 (Substantial)	xiii
Updates the Infrastructure budget tables and activity breakdowns to reflect an increase in budget due to the additional allocation of \$38 million from HUD, removes duplicative language regarding Monitoring Standards and Procedures.	
Amendment 10 (Substantial)	xiii
Inserts clarifying information and makes changes to the Temporary Housing Assistance Benefit, removes Temporary Rental Assistance language, adds language for associated expenses, adds informations about Extended Temporary Hotel Assistance and Alternative Lodging Assistance.	

Amendment 11 (Non-Substantial) xiv

Removes Land Acquisition for Affordable Workforce Housing Program from the Program Budget table and Program Activities, as the land acquisition process occurs as a part of the Workforce Affordable New Construction Program: Leveraging Other Sources of Financing. Reallocated funds from Land Acquisition for Affordable Workforce Housing to Workforce Affordable Rental New Construction Program:Leveraging Other Sources of Funding. Amends Program Budget, Updates Projected Expenditures

Amendment 12 (Non-Substantial) xv

Updates and clarifies information on affordability periods, Adds definition and information for affordable rent, and inserts recapture policy

Amendment 13 (Non-Substantial) xvi

Updates projected expenditures in Appendix 11.

Amendment 14 (Substantial) xvi

Removes the Business Recovery Grant Program, provides justification for the removal of the BRGP, and reallocates funds from the BRGP to the Infrastructure Repair Program. Updates Infrastructure Repair budget breakdown and General Infrastructure allocation information.

Amendment 15 (Non-Substantial) xvi

Updates projected expenditures in Appendix 11.

Amendment 16 (Non-Substantial) xvii

Updates projected expenditures, Makes formatting and typographical corrections throughout the document.

Amendment 1 (Substantial)

Substantial Amendment 1 Revision 1 Updates, Approved by HUD 3/1/2019			
Previous Page #	New Page #	Section	Change/Addition/Deletion
7	13	Introduction and Background	Added “and infrastructure” to clarify sentence.
8	14	Unmet Needs Assessment	Correcting the Public Law associated with this funding; referencing \$791, clarifying sentence
9	15	Unmet Needs Assessment	Updated Source to Florida Department of Emergency Management
15	21	Unmet Needs Assessment	Clarified "Miami-Dade" and added new communities
16	22	Unmet Needs Assessment	Corrected Hamilton to both “individual and public assistance”
18	25	Unmet Needs Assessment	Switched graphic Maps; updated for new communities and added a descriptive paragraph
19	26	Unmet Needs Assessment	Changed "these hurricanes" to reflect "Hurricane Irma". Also added the percentage for the state as a whole for comparison.
24	31-36	Unmet Needs Assessment	Updated and inserted new income block maps for HUD identified most impacted areas
27	37	Unmet Needs Assessment	Clarified meaning of sentence; Changed language to add more detailed reference for location of Citizen Participation and Outreach information
NA	41	Unmet Needs Assessment	Inserted a link to the HUD 2017 continuum of care Homeless Assistance Program for populations and subpopulations to provide additional resources for the public to reference.
35	46	Unmet Needs Assessment	Changed "hotel" to plural "hotels"; Added the word "to" for clarity
36	48	Unmet Needs Assessment	Updated Table 10
35-37	46	Unmet Needs Assessment	Changed kids to use the consistent term "children"
38	47-48	Unmet Needs Assessment	Updated statistics, Figure 41 and Table 11
39	50-54	Unmet Needs Assessment	Updated the language referencing Table 12 and 13; Updated tables
41	54	Unmet Needs Assessment	Updated Table 14 and language above it
42	55	Unmet Needs Assessment	Split into two sentences and clarified that many "renters" live in older buildings.
42	55	Unmet Needs Assessment	Changed "desirable" to reflect that older building codes and lack of maintenance have tangible consequences for resiliency in the face of disaster.

43	56	Unmet Needs Assessment	Added "residing" to clarify sentence; inserted a sentence updating table 16
44	57-58	Unmet Needs Assessment	Updated Table 16
49	60	Unmet Needs Assessment	Change sentence from personal pronoun usage "we" to make consistent with language across the document; Cite the ALICE study in footnote
52	63	Unmet Needs Assessment	Corrected spacing and hyphenation for low- and moderate-income
54	65	Unmet Needs Assessment	Updated statistic
55	66	Unmet Needs Assessment	Updated language and inserted sentence that Table 24 was updated
55	67	Unmet Needs Assessment	Updated Table 24
56	68	Unmet Needs Assessment	Added to the sentence to clarify that all requirements discussed are related to mortgaged homes and homeowners. There may be other requirements mandating a homeowner to carry flood insurance outside of the mortgage requirements, such as previous disaster funding.
60	72-74	Unmet Needs Assessment	Updated Table 26; Changed "Association" to "Administration"; Added language to complete sentence for clarity
63	74	Unmet Needs Assessment	Updated Table 27 and language above it
63	75-76	Unmet Needs Assessment	Updated Table 28 and language above it
65	76-77	Unmet Needs Assessment	Updated Table 29 and language above it
67	79	Unmet Needs Assessment	Added "Program" to National Flood Insurance to clarify the reference; Removed the word "a"; Added "applicant's property" to clarify what SBA inspectors inspect; Clarifies this language for easier comprehension; Change sentence from personal pronoun usage "we" to make consistent with language across the document' Changed "rentals" to "rental units" for clarity and added a comma after number of rental units; Capitalize "t" in Table; Changed "twenty" to "20"; Updated statistics
68	80	Unmet Needs Assessment	Updated Table 30
69	81-83	Unmet Needs Assessment	Updated Tables 31-32; Inserted new language on Infrastructure impacts

70	84	Unmet Needs Assessment	The second sentence is duplicative of the previous sentence. Deleted second sentence; Changed "HMGP" to "CDBG-DR" to correct the sentence; Simplified sentence; Changed the sentence to remove reference to "us" and keep the style of the sentence consistent with the rest of the document; Changed the sentence to remove reference to "we" and keep the style of the sentence consistent with the rest of the document
70	84	Unmet Needs Assessment	Updated statistics
72-73	85-86	Unmet Needs Assessment	Updated Tables 34-35
73	87	Unmet Needs Assessment	Clarified sentence and adjusted verb tense in the sentence.
75	89	General Action Plan Requirements	Moved sentence "Additionally, DEO has chosen to fund the creation of new affordable housing through the Florida Housing Finance Corporation." to end of paragraph; Corrected underscore to close parentheses
75	91	General Action Plan Requirements	DEO updated its language to included "outreach material"; DEO included additional language regarding AFFH; DEO added language to include monitoring and analysis will be performed.
76	92	General Action Plan Requirements	Updated current sentence is to accurately reflect URA requirements; Changed "and" to "any" and added parentheses around "d" in 104(d) to correct typographical errors; Program decision made for affordability on single family rental rehab to be one year, unless local governments have higher affordability periods established; Added to address new FRN requirement that clarified rental affordability period for newly constructed rental units; Added to address new FRN requirement that clarified rental affordability period for newly constructed rental units; removed "give priority to"
77	92	General Action Plan Requirements	Change "beneficiary" to "any single housing unit" since rental property owners may submit more than one property. The intent of the \$150,000 cap is a limitation at the property level, not the beneficiary level.
78	92 -93	General Action Plan Requirements	changed "as well as" to "and"; changed "think" to "evaluate"; Deleted sentences to eliminate repetition
80	96	General Action Plan Requirements	Re-written to align with later provisions in the Action Plan that DEO will procure the qualified pool of contractors
81	97	General Action Plan Requirements	Added "rules" and "HUD guidance"; Corrected citation; Updated Monitoring Standards and Procedures section

83	97	Projects and Activities	Removed "in the impacted and distressed Florida counties " because "most impacted and distressed" is a particularly defined term and designated by HUD.
83	97	Projects and Activities	Updated the reference to Federal Register to "Vol. 83, No. 157 published on Tuesday, August 14, 2018" and included the new counties and zip codes.
84	98	Projects and Activities	acknowledging the requirement and commit to meeting it in two separate sentences; Added "Federal", updated statistics
84	99	Projects and Activities	Added "costs"; Added "will be"; Rephrased and simplified sentence; Delete repetitive sentence
85	100-101	Projects and Activities	Updated Program Budget and added Program Budget Comparison
85	102	Projects and Activities	Updated language
88	104	Projects and Activities	Deleted repetitive sentence; Added "small rental property owners"; Clarified sentence; updated figure and table
88	104	Projects and Activities	Adding "The program will pay contractors directly and no funds will be paid to homeowners."
89	105	Projects and Activities	Added Cost Verification language; Updating sentence for consistency of outreach materials.
90	108	Projects and Activities	added hyphen to case-by-case and added period at end of sentence.
91	109	Projects and Activities	Inserted new section "Subrogation"; Moved sentence after bullet list; Changed "factors" to "characteristics"; Deleted repetitive sentence; Clarifying the intent of the sentence
91	110	Projects and Activities	Change "beneficiary" to "any single housing unit" since rental property owners may submit more than one property; Revised language to eliminate run-on sentence and to clarify the calculation for determining housing award amount; changed the elevation requirement to 2+BFE instead of 3+BFE; removed "by federal assistance" and changed "or" to "of"; Inserted language to provides more flexibility for the applicant.
92	111-112	Projects and Activities	Clarified prioritization is for LMI individuals (homeowners) and landlords who serve LMI populations; Corrected applicable FR Notice; Updated for the new required affordability periods; Added "Urgent Need" as National Objective; Clarified language; Added URA reference for clarity to limit assistance only to that required by the Act
93	112-114	Projects and Activities	Inserted small site built or modular units; clarified intent of sentence; Clarified prioritization is for LMI individuals; Updated for the new required affordability periods; added new communities; Added FHFC language clarifying Request for Applications process

95	109-111	Projects and Activities	Added language for potential use of the funding and potential increase in maximum award due to Hurricane Michael. Updated the Summary eligibility Requirements.
96	111-114	Projects and Activities	Deleted land scarcity to clarify the intent of the sentence; Added language to the Workforce Affordable Rental New Construction of set asides to account for populations of extremely low income, homeless, and persons of disability. DEO added a definition of "workforce". FHFC will also include ranking and criteria in their program guidelines when finalized. The budget was increased to \$100,000,000 for the Workforce Affordable Rental New Construction: Leveraging CDBG-DR Funds with Other sources of Financing; Added language regarding criteria and prioritizing proposed projects.
97	117-118	Projects and Activities	DEO updated the Voluntary Home Buyout Program.
	118	Projects and Activities	Added Affordability Periods section
101	121-123	Projects and Activities	Inserted language for the Infrastructure Repair and Mitigation Program.
156	178	Appendix 11	Updated Projected Expenditures to include the additional allocation.
	188	Public Comment	DEO has updated the public comment responses to reflect accurate affordability periods.
	192	Public Comment	DEO has updated the public comment response.

Amendment 2 (Non-Substantial)

Non-Substantial Amendment 2			
Previous Page #	New Page #	Section	Change/Addition/Deletion
118	188	Affordability Periods	DEO has amended the definition of multi-family Rental Projects eligible for rehabilitation or reconstruction assistance as properties with five or more units. Previous language defined multi-family projects as rental properties with eight or more units. These rehabilitation or reconstructed multi-family projects will continue to have a 15-year affordability period for low-to moderate-income tenants.

Amendment 3 (Non-Substantial)

Non-Substantial Amendment 3			
Previous Page #	New Page #	Section	Change/Addition/Deletion
178	178	Appendix 11	Updated projected expenditures.

Amendment 4 (Non-Substantial)

Non-Substantial Amendment 4			
Previous Page #	New Page #	Section	Change/Addition/Deletion
N/A	94-96	Protection of People and Property; Construction Methods	Added information about Florida's Construction Lien law and DEO's policy to pay for bonding and/or repayment of a legally enforceable construction lien on behalf of the residential property owner
104	105	Program Details	Deleted "The determination may be established based on the calculation that the cost of rehabilitation is close to or exceeds the cost to reconstruct" and added "A structure is not suitable for rehabilitation if the cost of repair is unreasonable based on program standards as specified in the Housing Repair and Replacement Program Guidelines for Single Family Housing and Rental Properties."
N/A	110 - 111	Program Details	Added Housing Repair and Replacement Program application selection pilot methodology
120-121	122-123	Projects and Activities	Revised Workforce Recovery Training Program eligible subrecipients, added Workforce Training Program areas, and clarified Section 3 program requirements.

Amendment 5 (Non-Substantial)

Non-Substantial Amendment 5			
Previous Page #	New Page #	Section	Change/Addition/Deletion
83-84	84-85	Unmet Needs Assessment	Correct typos in Business and Employment data <ul style="list-style-type: none"> • Page 83, last paragraph, verified real property losses of \$281,064,990 • Page 83, last paragraph, median verified loss of \$31,633 • Page 84, last paragraph, potential unmet need of \$910,830,911
120	121	Projects and Activities	Correct typos in Affordability Periods
120	121	Projects and Activities	Added clarifying statements to Economic Revitalization Activities introductory section to explain how these activities will address unmet housing recovery needs in accordance with Federal Register 5844, Volume 83, Number 28.
120-121	122-123	Projects and Activities	Revise Workforce Recovery Training Program eligible subrecipients, added Workforce Recovery Training Program areas, and clarified Section 3 program requirements.

Amendment 6 (Substantial)

Substantial Amendment 6, Approved by HUD 1/23/20			
Previous Page #	New Page #	Section	Change/Addition/Deletion
10	NA	Table of Contents	Update Table of Contents to delete Public Assistance and Business Assistance to New Floridians from Puerto Rico entries
100	103	Projects and Activities	Remove Business Assistance to New Floridians from Puerto Rico, increase Program Budget for Business Recovery Grant to \$66,000,000
101	103	Projects and Activities	Increase Business Recovery Grant Total Budget, MID Budget Breakdown, Maximum Award, and Estimated # of Units
102	103	Projects and Activities	Remove Public Services and Business Assistance to New Floridians from Puerto Rico rows in Program Budget
121-122	123-125	Projects and Activities	Revise Business Recovery Grant Program scope, allocation for activity, eligible applicants, minimum award, and maximum award
122	NA	Projects and Activities	Remove Public Assistance and Business Assistance to New Floridians from Puerto Rico program

Amendment 7 (Non-Substantial)

Non-Substantial Amendment 7			
Previous Page #	New Page #	Section	Change/Addition/Deletion
103	91	<i>Program Budget Chart</i> Workforce Affordable Rental New Construction Program: Leveraging Other Sources of Financing	Changed "Average Award per Unit" from \$60,000 to \$78,000 and updated "Estimated # of Units created" accordingly from 1,670 to 1,282
103	91	<i>Program Budget Chart</i> Workforce Affordable Rental New Construction Program: Small Rental Developments	Changed "Average Award per Unit" from \$125,000 to \$225,000 and updated "Estimated # of Units created" accordingly from 160 to 88
114 -115	103-107	Limited Temporary Relocation Assistance for Homeowners and Tenants	Deleted the <i>Limited Temporary Relocation Assistance for Homeowners (Optional Relocation)</i> and Limited Temporary Relocation Assistance for Tenants sections and added DEO's Temporary Housing Assistance Benefit policy for Housing Repair and Replacement Program beneficiaries
116	108	Workforce Affordable Rental New Construction Program	Deleted the sentence "Development will be new construction and may include re-development of uninhabitable dwellings." As FHFC will complete all new construction activity.

117-118	110	Workforce Affordable Rental New Construction: Leveraging CDBG-DR Funds with Other Sources of Financing	Changed Eligibility citation from 105(a)(4) (i.e., clearance, demolition, removal, reconstruction, and rehabilitation) to 105(a)(2)(i.e., acquisition and construction).
118-119	111	Workforce Affordable Rental New Construction: Funding for Small Rental Developments	Changed Eligibility citation from 105(a)(4) (i.e., clearance, demolition, removal, reconstruction, and rehabilitation) to 105(a)(2)(i.e., acquisition and construction).
119	111	Land Acquisition for Affordable Workforce Housing	Changed Eligibility citation from 105(a)(4) (i.e., clearance, demolition, removal, reconstruction, and rehabilitation) to 105(a)(2)(i.e., acquisition and construction).
119	111	Land Acquisition for Affordable Workforce Housing	Deleted the “Florida Housing Finance Corporation may consider increasing the per unit limit amount” notation, which erroneously repeats per-unit from previous categories.
120	112	Voluntary Home Buyout Program	Added clarification that it is the responsibility of the subrecipients to support and provide appraisals, title and legal services, homeowner counseling services, environmental review, and related buyout processes.
120	112	Voluntary Home Buyout Program	Changed “Hazard Mitigation Grant Program (HMGP)” to “Hazard Mitigation Assistance (HMA) grant programs” to recognize that Hazard Mitigation Grant Program (HMGP), Pre-Disaster Mitigation (PDM) Program, and Flood Mitigation Assistance (FMA) Program as options that subrecipients may use to leverage CDBG-DR funding as a match.
178	174	Appendix 11	Updated projected expenditures

Amendment 8 (Non-Substantial)

Non-Substantial Amendment 8			
Previous Page #	New Page #	Section	Change/Addition/Deletion
82	83	General Action Plan Requirements	Revised the sentence, “Any building that has a total cost of repairs greater than 50 percent is considered substantially damaged and will require the entire home to be brought into code compliance” to clarify that any building that has a total cost of repairs greater than 50 percent is considered substantially damaged as determined by the local jurisdiction and is subject to code compliance requirements.

85	N/A	General Action Plan Requirements	<p>Removed statements explaining the process for applicants to appeal the quality of construction and rehabilitation work.</p> <p>Rebuild Florida Housing Repair and Replacement Program applicants may file a complaint at any time via the Homeowner Complaint Form located on the DEO website. Applicants may also file a complaint or request information by contacting the Office of Disaster Recovery's Constituent Services Management staff by telephone, e-mail, or mail.</p>
90	90-94	Projects and Activities	<p>Removed table that displays June 28, 2018 Program Budget and October 9, 2018 Proposed Program Budget with the Amount Adjusted</p> <p>The Action Plan amendments displayed on the DEO website (www.floridajobs.org/cdbg-dr) documents the changes and adjustments made to the State of Florida Action Plan for Disaster Recovery and the CDBG-DR Program Budget</p> <p>Added table that displays the Program Budget as of November 4, 2019 (Non-Substantial Amendment #7) and the March 6, 2020 Amended Program Budget (Non-Substantial Amendment #8) with the Amount Adjusted.</p> <p>Added justification language to support amended Program Budget.</p>
91	91	Projects and Activities Program Budget	<p>Changed Housing Repair Program (Total Budget is \$346,186,147)'s MID Budget Breakdown to \$276,948,917.60 (80%) and \$69,237,229.40 (20%) for accuracy.</p>
91	91	Projects and Activities Program Budget	<p>Removed \$30,882,761 from the Voluntary Home Buyout Program and updated the Total Budget to \$44,117,239.</p> <p>Updated MID Budget Breakdown to \$35,293,791.20 (80%) and \$8,823,447.80 (20%).</p>
91	91	Projects and Activities Program Budget	<p>Removed \$5,549,344.00 from the Workforce Recovery Training Program and updated the Total Budget to \$14,450,656.</p> <p>Updated MID Budget Breakdown to \$11,560,524.80 (80%) and \$2,890,131.00 (20%).</p>
91	91	Projects and Activities Program Budget	<p>Removed \$25,160,095 from the Business Recovery Grant Program and updated the Total Budget to \$40,839,905.</p> <p>Updated MID Budget Breakdown to \$32,671,924 (80%) and \$8,167,981 (20%).</p> <p>Changed the Business Recovery Grant Program's Estimated Number of Units from 250 to 157.</p>

92	92	Projects and Activities Program Budget	<p>Updated total Infrastructure Repair and Mitigation Program budget from \$85,819,653 to \$147,411,853, to include \$30,882,761 transfer from the Voluntary Home Buyout Program Budget, \$5,549,344 from the Workforce Recovery Training Program Budget, and \$25,160,095 from the Business Recovery Grant Program.</p> <p>Updated MID Budget Breakdown to \$117,929,482.40 (80%) to \$29,482,370.60 (20%).</p>
91-92	92	Projects and Activities	<p>Removed the statement, “Florida will receive an additional \$634 million to support additional unmet need, including infrastructure and mitigation efforts through the CDBG-DR program. The additional funding for these programs will be allocated into the budget when the federal guidance is released.”</p> <p>The U.S. Department of Housing and Urban Development (HUD) published federal guidance for CDBG-Mitigation on August 23, 2019.</p>
107	106	Projects and Activities	Added clarifying language that mobile homes to be rehabilitated must be no more than five years old at the time of the damage assessment.
N/A	106	Projects and Activities	Added information regarding mobile home unit relocations
113	113	Projects and Activities	Updated Allocation of Activity to \$44,117,239 for the Voluntary Home Buyout Program
115	N/A	Projects and Activities	Removed sentence, “Further, subrecipients will be required to demonstrate that successful graduates of this training are referred to businesses supported by or working on any CDBG-DR funded projects to meet their contracted Section 3 goals” to ensure that DEO does not inadvertently violate the Family Educational Rights and Privacy Act.
115	116	Projects and Activities	Updated Allocation of Activity to \$14,450,656 for the Workforce Recovery Training Program
116	117	Projects and Activities	Changed the funds set aside for technical assistance portion of the Business Recovery Grant Program is changed from \$6,000,000 to \$3,500,000.
117	118	Projects and Activities	Updated Allocation of Activity to \$40,839,905 for the Business Recovery Grant Program.
119	N/A	Projects and Activities	Updated Allocation of Activity to \$147,411,853 for the Infrastructure Repair Program.
174	175	Appendix 11	Updated Projected Expenditures

Amendment 9 (Substantial)

Draft Substantial Amendment, Revision 9, Approved by HUD 6/1/2020			
Previous Page #	New Page #	Section	Change/Addition/Deletion
89	87	Projects and Activities	Updated total CDBG-DR Program budget to \$812,235,745 to include additional allocation of HUD funds
91	88	Projects and Activities	Updated total Infrastructure budget from \$147,411,853 to \$186,049,598, to include additional allocation of HUD funds
91	88	Projects and Activities	Updated MID Budget Breakdown: 80% from \$117,929,482.40 to \$147,294,168.60 and 20% from \$29,482,370.60 to \$36,823,542.15.
118	113	Projects and Activities	Updated language to include additional allocation of HUD funds to address unmet Infrastructure needs
119	N/A	Projects and Activities	Removed duplicative language regarding monitoring standards and procedures from the Infrastructure Repair Program section. <i>Monitoring Standards and Procedures</i> within III. General Action Plan Requirements contains all information related to DEO's Disaster Recovery monitoring standards and procedures.
119	114	Projects and Activities	Infrastructure Repair and Mitigation Activities Updated Allocation for Activity from \$147,411,853 to \$186,049,598.

Amendment 10 (Substantial)

Draft Substantial Amendment 10, Approved by HUD 7/31/20			
Previous Page #	New Page #	Section	Change/Addition/Deletion
102	99	Projects and Activities	Modified 120% AMI to 80% AMI for eligibility for the Temporary Housing Assistance Benefit.
102	99	Projects and Activities	Changed the Temporary Housing Assistance Benefit cap from \$10,000 to \$20,000.
N/A	99	Projects and Activities	Added language that the reevaluation for continued Temporary Housing Assistance Benefit is available on a case-by-case basis following extenuating circumstances.
102-106	N/A	Projects and Activities	Removed language for rental option within the Temporary Housing Assistance Benefit (THAB). Alternative Assistance, including rental assistance, will be considered on a case-by-case basis following excessive time of displacement or other substantiated extenuating circumstances and approval from the DEO Housing Exceptions Panel.

103	100	Projects and Activities	Removed Temporary Rental Assistance and added information about Extended Temporary Hotel Assistance and Alternative Lodging Assistance
104	101	Projects and Activities	Updated the Temporary Housing Assistance Benefit cap from \$10,000 to \$20,000 and added information explaining that the maximum may be waived in areas with spiking rates, as defined by the General Services Administration (GSA) publication, with approval on a case-by-case basis.
101	N/A	Projects and Activities	Modified Payment of Benefit section to require direct payment to the temporary housing service provider in lieu of the applicant.
105-106	103	Projects and Activities	Added language for Associated Expenses
107	101	Projects and Activities	Added information regarding the extension of Temporary Housing Assistance Benefits.
N/A	101-102	Projects and Activities	<p>Added clarifying language throughout the Temporary Housing Assistance Benefit's Termination or Discontinuation of Assistance section.</p> <p>Added language regarding the timeframes in which an applicant must vacate the temporary housing accommodation and reoccupy their home. The previous language did not integrate the time necessary for the applicant to vacate temporary housing and move their belongings back into their home following the final Housing Repair and Replacement Program inspection. The added language clarifies that the applicant must vacate the temporary lodging no more than five business days following the final Program inspection.</p>

Amendment 11 (Non-Substantial)

Non-Substantial Amendment 11			
Previous Page #	New Page #	Section	Change/Addition/Deletion
87	87	Projects and Activities	<p>Updated the statement expressing that administrative and technical assistance expenditures will not exceed 5 percent of the total grant, which is now \$40,611,787.25, plus program income.</p> <p>Added sentence explaining DEO's total budget for administrative and planning costs.</p> <p>Removed Land Acquisition for Affordable Workforce Housing Program from the Program Budget table as the land acquisition process occurs as a part of the Workforce Affordable New Construction Program: Leveraging Other Sources of Financing.</p>

87	87	Projects and Activities	<p>Reallocated \$20,000,000 from the Land Acquisition for Affordable Workforce Housing Program to the Workforce Affordable Rental New Construction Program: Leveraging Other Sources of Financing.</p> <p>Updated the Total Budget for the Workforce Affordable Rental New Construction Program: Leveraging Other Sources of Financing to \$120,000,000.</p> <p>Updated MID Budget Breakdown to \$96,000,000 (80%) and \$24,000,000 (20%).</p> <p>Updated the Minimum Set-Aside for Keys to reflect \$35,000,000.</p>
90	90	Projects and Activities	<p>Updated the Amended Program Budget table to include the Amended Program Budget, Non-Substantial Amendment #11 with the Amount Adjusted.</p> <p>Added justification language to support the amended Program Budget.</p>
91	91	Projects and Activities	Removed Land Acquisition for Workforce Affordable Rental Program from Housing Activities
104	104	Projects and Activities	Removed language on Land Acquisition for Workforce Affordable Rental Program
105	105	Projects and Activities	Updated Allocation for Activity to \$120,000,000 for the Workforce Affordable Rental New Construction Program: Leveraging CDBG-DR Funds with Other Sources of Financing
106-107	106	Projects and Activities	Removed Land Acquisition for Affordable Workforce Housing Program details.
167	166	Appendix 11	Updated projected expenditures

Amendment 12 (Non-Substantial)

Non-Substantial Amendment 12			
Previous Page #	New Page #	Section	Change/Addition/Deletion
79	79	General Action Plan Requirements	Updated affordability period for single-family rental units from a minimum of 1 year to a minimum of 5 years.
79	N/A	General Action Plan Requirements	Removed “unless local governments have established higher affordability periods” to clarify that affordability periods for single-family rental units will be a minimum of 5 years.
N/A	108	Projects and Activities	Added clarifying language to specify that Affordability Periods apply to Rebuild Florida’s Housing programs
108	109	Projects and Activities	Updated affordability period for single-family rental units from a minimum of 1 year to a minimum of 5 years.
109	N/A	Projects and Activities	Removed “unless local governments have established higher affordability periods” to clarify that affordability periods for single-family rental units will be a minimum of 5 years.

N/A	109	Projects and Activities	Added the definition of affordable rent for rental activities.
N/A	109	Projects and Activities	Added provision that clearly describes the terms of recapture, the specific circumstances under which these provisions will be used, and how the provisions will be enforced.

Amendment 13 (Non-Substantial)

Non-Substantial Amendment 13			
Previous Page #	New Page #	Section	Change/Addition/Deletion
167	167	Appendix 11	Updated projected expenditures.

Amendment 14 (Substantial)

Substantial Amendment 14, Approved by HUD 11/19/2020			
Previous Page #	New Page #	Section	Change/Addition/Deletion
88,90,111	N/A	Projects and Activities	Changed Infrastructure Repair and Mitigation Program to Infrastructure Repair Program for accuracy
88	N/A	Projects and Activities	Removed Business Recovery Grant Program from the Program Budget table and increased Total Program Budget for Infrastructure Repair Program to \$226,889,503. Updated Infrastructure Repair Program's MID Budget Breakdown and added Maximum Award for Round 2 of the Competitive Application Cycle
89-90	89-90	Projects and Activities	Updated the Amended Program Budget table and added justification language for Substantial Amendment 14. Removed "is necessary" and added "in order" for clarity.
109	N/A	Projects and Activities	Removed Business Recovery Grant Program information from listed Economic Revitalization Activities
111-112	N/A	Projects and Activities	Removed Program Information on Business Recovery Grant Program
112	113	Projects and Activities	Updated General Infrastructure Program allocation for activity and maximum award
N/A	192	Appendices and Supporting Documentation	Inserted Appendix 17: 30-day Public Comment Period for Substantial Amendment 14

Amendment 15 (Non-Substantial)

Non-Substantial Amendment 15			
Previous Page #	New Page #	Section	Change/Addition/Deletion
167	165	Appendix 11	Updated projected expenditures.

Amendment 16 (Non-Substantial)

Non-Substantial Amendment 16			
Previous Page #	New Page #	Section	Change/Addition/Deletion
165	163	Appendix 11	Updated projected expenditures.
0-191	0-189	Entire Document	Completed formatting changes throughout the document, removed extraneous spaces and indentions, justified text throughout. Document shifted up to three pages.

Table of Contents

I. INTRODUCTION AND BACKGROUND	8
II. UNMET NEEDS ASSESSMENT	9
Section 1: Introduction	9
Background	9
Section 2: Florida Disaster Recovery Program	10
Community Profile: Summary of Impact and Presidentially Declared Counties	10
Hurricane Irma	10
Demographic Profile of the Impacted Area	19
Impact on Low-and-Moderate-Income Populations	21
Impact on Special Needs Populations	43
Section 3: Unmet Needs Assessment	39
Summary of Impacts and Unmet Needs	40
Housing Impact	41
Housing Types Affected	44
Single Family	45
Rental Housing	46
Affordable Housing	50
HUD-Assisted Properties and Programs	52
Mobile Homes	53
Residential Properties in the Flood Zone	56
Housing Funds Made Available	61
FEMA Individual Assistance (IA)	61
National Flood Insurance Program (NFIP) Coverage	62
Small Business Administration (SBA) Home Loans	63
Private Insurance Proceeds	63
Housing Unmet Need	65
Housing Impact Methodology	65
Infrastructure Impact	67
Public Assistance	68
HMGP and Resilience	69
Economic Impact	70
Business and Employment	70

Florida Keys Considerations	73
III. GENERAL ACTION PLAN REQUIREMENTS	75
1. Connection Between Needs and Allocation of Funds	75
2. Public Housing, Affordable Housing and Housing for Vulnerable Populations.....	75
3. Minimize or Address Displacement.....	77
4. Maximum Assistance and Cost Reasonableness Assessment.....	77
5. Elevation Standards.....	78
6. Planning and Coordination.....	79
7. Infrastructure Activities.....	80
8. Leveraging Funds.....	81
9. Protection of People and Property; Construction Methods	81
10. Program Income	82
11. Monitoring Standards and Procedures	82
12. Broadband Infrastructure.....	83
IV. PROJECTS AND ACTIVITIES	84
1. Method of Distribution	84
2. Program Budget	85
3. Basis for Allocations	89
4. Program Details.....	89
Housing Activities	89
Housing Repair Program.....	91
Temporary Housing Assistance Benefit (THAB)	97
Overview.....	97
Community Service Referrals	Error! Bookmark not defined.
Temporary Housing Assistance Benefit (THAB)	98
THAB Eligibility.....	98
THAB Assistance Types.....	99
THAB Maximum Benefit	99
Payment of Benefit.....	99
Associated Expenses.....	99
Extension of Benefit	100
Termination or Discontinuation of Assistance	100
Accessibility/Disability Accommodations.....	101
Mobile Homes and Manufactured Homes	101

Workforce Affordable Rental New Construction Program	102
Voluntary Home Buyout Program	105
Affordability Periods	106
Economic Revitalization Activities.....	107
Workforce Recovery Training Program	108
Infrastructure Repair and Mitigation Activities	109
Infrastructure Repair Program	109
Use of CDBG-DR as Match.....	110
Ineligible Activities	111
Method of Distribution	111
V. LOCATION, MITIGATION MEASURES AND URGENT NEED	112
1. Presidentially-Declared County.....	112
2. Mitigation Measures	112
3. Use of Urgent Need.....	112
VI. Citizen Participation	113
Publication.....	113
1. Public Website.....	113
2. Consultation	114
Webinars	114
Local Government Stakeholder Meetings.....	114
Community Stakeholder Survey.....	115
Economic Recovery Workshops	117
Florida Keys Workforce Affordable Housing Outreach	118
Website	118
Additional Outreach	118
3. Accessibility	119
4. Receipt of Comments	119
5. Substantial Amendment.....	119
6. Summary of Public Comments	119
7. Citizen Complaints.....	120
VII. Certification and Risk Analysis Documentation	121
1. CDBG-DR Certifications	121
2. SF-424.....	123
VIII. CONCLUSION	124

1. Complete and Compliant	124
2. Pre-Award, Pre-Agreement and Reimbursement	124
3. Uniform Relocation Act	124
4. Disaster Recovery Program Implementation	125
5. Citizen Participation and Applications for Assistance	125
IX. APPENDICES AND SUPPORTING DOCUMENTATION	126
Appendix 1: 2017 Family Income Limits for IA Declared Counties	126
Appendix 2: 2016 Populations by LMI for IA Declared Counties	134
Appendix 3: Insurance claims by county for Hurricane Irma	153
Appendix 4: LMI population counts by block group and county for Irma impacted counties.....	155
Appendix 5: National Flood Insurance claims and payments.	156
Appendix 6: FEMA Applicant Breakdown by < 30 Percent Low/Moderate Income, Age, and Access/Functional Needs.	158
Appendix 7: FEMA applicant breakdown by < 30 percent low/moderate income, county and housing assistance received.....	158
Appendix 8: FEMA applicant breakdown by < 50 percent low/moderate income, age and access/functional needs.	160
Appendix 9: FEMA applicant breakdown by < 50 percent low/moderate income, county and housing assistance received.....	160
Appendix 10: FEMA applicant breakdown by < 80 percent low/moderate income, age and access/functional needs.....	162
Appendix 11: Projected Expenditures.....	163
Appendix 12: 14 – day Public Comment Period for initial CDBG-DR Action Plan	164
Appendix 13: 30 – day Public Comment Period for Substantial Amendment 1	176
Appendix 14: 30 – day Public Comment Period for Substantial Amendment 6	186
Appendix 15: 30 – day Public Comment Period for Substantial Amendment 9	187
Appendix 16: 30 – day Public Comment Period for Substantial Amendment 10	188
Appendix 17: 30 – day Public Comment Period for Substantial Amendment 14	189

LIST OF TABLES

Table 1: Data sources utilized in the assessment of impacts and unmet needs.....	10
Table 2: Maximum storm surges from Hurricane Irma.....	13
Table 3: Declared county list for presidential disaster declarations 4337 (Hurricane Irma)	17
Table 4: Demographic profile information –American Community Survey data, 2016 release	20
Table 5: LMI population counts by block group and county for Irma impacted counties	22
Table 6: Changes in Homelessness population by state continuum of care area, 2015-2016	33
Table 7: Shelter Occupancy by County for Hurricane Irma	36
Table 8: Estimated Number of Maria Evacuees Enrolled in Florida Schools, by County.	37
Table 9: Estimated Maria Evacuees as a Function of School Enrollments	38
Table 10: Data Sources Used in the Assessment of Impacts and Unmet Needs.....	39
Table 11: Estimated Impact, Support and Unmet Needs.....	40
Table 12: FEMA IA owner Applicant summary in the Hurricane Irma IA Impacted Counties.....	41
Table 13:FEMA IA renter Applicant summary in the Hurricane Irma IA Impacted Counties	43
Table 14: FEMA IA Applicants by Housing Type	44
Table 15:Rental units by year built.....	47
Table 16: 2017 Hurricane Impact to Homeowner units and rental units	47
Table 17: Percentage of Income Spent on Housing by Owner/Renter Status and Household Income, FL, 2015...	49
Table 18: Cost Burden Data, Florida Summary.....	49
Table 19: Cost of Living.....	50
Table 20: Poverty Levels	51
Table 21: Impacts to Rental Programs	52
Table 22: Impact to Public Housing	53
Table 23: Displaced Households.....	53
Table 24: MOBILE HOMES WITH VERIFIED LOSS BY COUNTY	55
Table 25: Substantially Damaged Determined (SD) Structures and Respective Communities.....	56
Table 26: Hurricane Irma FEMA Housing Assistance Program Funding Breakdown.....	59
Table 27: FEMA Applicant Breakdown by Assessed Damage and Receipt of FEMA Housing Assistance	61
Table 28: NFIP Property Claims and Totals.....	62
Table 29: Hurricane Irma Insurance Claims Data	63
Table 30: Total Derived Impacts and Unmet Needs for Housing.....	67
Table 31: Remaining unmet need identified in infrastructure damage	68
Table 32: Infrastructure Cost breakdown by category.....	69
Table 33: Public assistance projects by category, Hurricane Irma	69
Table 34: Total Derived Impacts and Unmet Needs for Businesses.....	71
Table 35: Ratios Used in Estimating Business Operations Losses	72
Table 36: Statewide 2017-2025 Projections and Supply Demand	73
Table 37: Florida IA and PA Declared Counties	84

LIST OF FIGURES

Figure 1: Hurricane Irma Sustained Winds in South Florida.....	21
Figure 2: Hurricane Irma Makes Landfall in West Palm Beach.....	21
Figure 3: Hurricane Irma sustained winds in southcentral, southwest and west Florida	22
Figure 4: Hurricane Irma sustained winds in northcentral Florida and south Georgia	23
Figure 5: Hurricane Irma modeled preliminary flood observations in south Florida	24
Figure 6: Hurricane Irma modeled estimated flooding around Jacksonville, FL	25
Figure 7: Hurricane Irma and rainfall estimates.....	26
Figure 8: Declared counties for presidential disaster declarations 4337 (Hurricane Irma)	29
Figure 9: HUD initial assessment of most impacted counties and ZIP Codes	30
Figure 10: Low-to-moderate income by block group for HUD identified most impacted area – Brevard County .	35
Figure 11: Low-to-moderate income by block group for HUD identified most impacted area – Broward County	35
Figure 12: Low-to-moderate income by block group for HUD identified most impacted area – Clay County	36
Figure 13: Low-to-moderate income by block group for HUD identified most impacted area – Collier County....	36
Figure 14: Low-to-moderate income by block group for HUD identified most impacted area – Duval County.....	36
Figure 15: Low-to-moderate income by block group for HUD identified most impacted area – Hillsborough Co.	36
Figure 16: Low-to-moderate income by block group for HUD identified most impacted area – Lee County	37
Figure 17: Low-to-moderate income by block group for HUD identified most impacted area – Miami-Dade Co.	37
Figure 18: Low-to-moderate income by block group for HUD identified most impacted area – Monroe Co.	37
Figure 19: Low-to-moderate income by block group for HUD identified most impacted area – Osceola County .	37
Figure 20: Low-to-moderate income by block group for HUD identified most impacted area – Orange County..	35
Figure 21: Low-to-moderate income by block group for HUD identified most impacted area – Palm Beach Co. .	38
Figure 22: Low-to-moderate income by block group for HUD identified most impacted area – Polk County	38
Figure 23: Low-to-moderate income by block group for HUD identified most impacted area – St. Lucie Co.....	38
Figure 24: Low-to-moderate income by block group for HUD identified most impacted area – Volusia County ..	39
Figure 25: Low-to-moderate income by block group for HUD identified most impacted area – ZIP Code 32091 (Bradford)	39
Figure 26: Low-to-moderate income by block group for HUD identified most impacted area – ZIP Code 32136 (Flagler).....	39
Figure 27: Low-to-moderate income by block group for HUD identified most impacted area – ZIP Code 34266 (DeSoto).....	39
Figure 28: Low-to-moderate income by block group for HUD identified most impacted area – ZIP Code 32084 (St. Johns).....	40
Figure 29: Low-to-moderate income by block group for HUD identified most impacted area – ZIP Code 32145 (St. Johns).....	40
Figure 30: Low-to-moderate income by block group for HUD identified most impacted area – ZIP Code 32771(Seminole)	40
Figure 31: Low-to-moderate income by block group for HUD identified most impacted area – ZIP Code 33440 (Hendry).....	40
Figure 32: Low-to-moderate income by block group for HUD identified most impacted area – ZIP Code 33523 (Pasco)	41

Figure 33: Low-to-moderate income by block group for HUD identified most impacted area – Zip Code 33825 (Highlands)..... 41

Figure 34: Low-to-moderate income by block group for HUD identified most impacted area – ZIP Code 33870 (Highlands)..... 41

Figure 35: Low-to-moderate income by block group for HUD identified most impacted area – ZIP Code 33935 (Hendry)..... 41

Figure 36: Percent of non-English-speaking population 43

Figure 37: Age dependent (< 5 Years or > 65 Years) populations by tract..... 44

Figure 38: Percent of population living below poverty line by tract..... 45

Figure 39: Percent unemployment by tract 45

Figure 40: Percent mobile home populations by tract..... 45

Figure 41: Breakdown of Impacts, Support and Unmet Need by Recovery Category 54

Figure 42: Median House Value 60

Figure 43: Renter Populations 61

Figure 44: Mobile Home Populations..... 70

Figure 45: Properties in a Flood Zone..... 76

Figure 46: HUD Housing Unmet Needs Methodology as of May 2018..... 82

Figure 47: HUD Business Unmet Needs Methodology as of May 2018 89

I. INTRODUCTION AND BACKGROUND

The U.S. Department of Housing and Urban Development (HUD) announced that the state of Florida will receive \$616 million in funding to support long-term recovery efforts following Hurricane Irma through the Florida Department of Economic Opportunity's (DEO) Community Development Block Grant Disaster Recovery (CDBG-DR) Program. This funding is designed to address needs that remain after other assistance has been exhausted, including federal assistance as well as private insurance. DEO is the lead agency and responsible entity for administering the CDBG-DR funds allocated to the state. This action plan details how this funding, along with subsequent allocations, will be allocated to address remaining unmet needs in Florida.

Hurricane Irma, a Category 4 hurricane, made landfall on September 10, 2017 in the middle of the Florida Keys and then turned northward making a second landfall near Marco Island and progressing northward through the center of the state. Irma capped an active hurricane season by impacting nearly the entire Florida peninsula with strong winds, rain, and storm surges. There were many reports of hurricane force winds in southeast Florida, through the center of the state and tropical storm force winds into the northern parts of the state.

Hurricane Irma brought moderate storm surge to coastal areas in the keys, and along the east coast from north of Miami all the way through the northern border of the state. South Florida counties saw storm surges of more than eight feet, with Monroe and Miami-Dade recording observed surges over 15 feet in some locations. Storm surges along the St. Johns River and its tributaries were also predicted to be extreme in some cases. Fresh water outflows from rivers slowed retreat of the storm surges in Jacksonville, lengthening the flooding period over the days following Irma.

Hurricane 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 and in Oviedo (north of Orlando) a measurement of 14.6 inches was recorded. The entire southwestern seaboard of Florida received between 6 – 14 inches of rain and localized heavy rainfall was seen through Pasco and Polk counties as Irma moved northward.

The most significant concentration of damage occurred in the Florida Keys, where the hurricane made landfall. Hurricane Irma left this chain of islands connected by a span of 40 bridges with 1,200 homes destroyed and an additional 3,000 homes significantly damaged.

On September 20, 2017, less than two weeks following Hurricane Irma's landfall in Florida, Hurricane Maria struck Puerto Rico as a Category 4 hurricane. The devastation caused by this storm left many Puerto Ricans homeless and seeking refuge in the state of Florida. On October 2, 2017, Governor Rick Scott signed an executive order declaring a state of emergency in all 67 counties for Hurricane Maria. Governor Scott said, "Our state is an incredible melting pot, and the success and growth we've seen over the years is credited to the wonderful people that live in Florida. As Puerto Rico rebuilds, Florida remains committed to doing everything we can to help the families impacted by Hurricane Maria and aid in the recovery process."

Florida remains committed to helping communities impacted by Hurricane Irma and Maria rebuild their lives, homes, businesses and infrastructure through the provision of disaster recovery funding through the Community Development Block Grant- Disaster Recovery program.

II. UNMET NEEDS ASSESSMENT

Section 1: Introduction

This unmet needs assessment covers Florida's housing, infrastructure and business damage and recovery efforts in the wake of Hurricane Irma (September 2017). Irma was a devastating Category 4 hurricane that made initial landfall in the middle Keys, secondary landfall near Marco Island in southeast Florida and then moved up the center of the state, bringing strong winds, rain, storm surges and tornados.

As the State continues its long-term recovery efforts from this storm, a focus on identifying impacts and addressing unmet needs is key. State and local government agencies, as well as civic organizations and community leaders will continue to address the challenges from these events for years to come.

Background

The Supplemental Appropriations for Disaster Relief Requirements, 2017 (Pub. L. 115-56, approved September 8, 2017) (Appropriations Act) appropriates federal funds to states or units of general local government (UGLGs) for disaster recovery efforts.

A \$7.39 billion appropriation of Community Development Block Grant-Disaster Recovery (CDBG-DR) funds will be distributed to the various states that received a presidential disaster declaration in 2017, including Texas, Florida, Puerto Rico and the U.S. Virgin Islands. These funds are to be used in order to satisfy a portion of unmet need that still remains after other federal assistance, such as the Federal Emergency Management Agency (FEMA), Small Business Administration (SBA) or private insurance has been allocated. The Florida Department of Economic Opportunity is the lead agency and responsible entity for administering the CDBG-DR funds allocated to the state.

The U.S. Department of Housing and Urban Development (HUD) uses the best available data to identify and calculate unmet needs for disaster relief, long-term recovery, restoration of infrastructure and housing and economic revitalization. Based on this assessment, HUD notified the state of Florida that it will receive an allocation of \$615,922,000 in disaster recovery funds to assist in recovery from the hurricane.

On April 10, 2018 HUD notified the state that it would receive an additional \$791 million to address remaining unmet needs and mitigation.

The Disaster Relief Appropriations Act requires that the state or local government must expend the funds within six years of the executed agreement between HUD and the grantee unless an extension is granted by HUD. In order to ensure that the funds assist the most impacted areas, 80 percent must be expended on disaster recovery in HUD-identified "most impacted and distressed" areas. All of the allocated funds must be used for eligible disaster-related activities. To ensure that fraud, waste, and misuse of funds does not occur, effective controls must be in place and monitored for compliance.

The unmet needs assessment, which evaluates the three core aspects of recovery – housing, infrastructure and economic development - forms the basis for the decisions outlined in the action plan. This assessment was developed with the help of many state and local stakeholders as well as the public, through county and local risk assessments and the public comment period, to determine how unmet needs can be addressed with these limited federal funds.

TABLE 1: DATA SOURCES UTILIZED IN THE ASSESSMENT OF IMPACTS AND UNMET NEEDS

Data Sources Utilized in The Assessment of Impacts and Unmet Needs	
Data	Source
Hurricane Wind Speeds	National Oceanic and Atmospheric Administration, National Weather Service (Ruskin, Tallahassee)
Hurricane Surge Data	Federal Emergency Management Agency
Presidential Disaster Declaration Areas	Federal Emergency Management Agency
Most Impacted Counties and ZIP Codes	U.S. Department of Housing and Urban Development
Socio-economic and demographics	United States Census Bureau
Low-Moderate Income Breakdown by counties	U.S. Department of Housing and Urban Development
Homelessness	National Homeless Information Project, Florida Coalition for the Homeless
Shelter Needs	Red Cross, Florida Department of Emergency Management

Section 2: Florida Disaster Recovery Program

Community Profile: Summary of Impact and Presidentially Declared Counties

Hurricane Irma

Hurricane Irma was a Category 4 hurricane (on the Saffir-Simpson Hurricane Wind Scale). It made landfall in the middle of the Florida Keys, then turned northward making a second landfall near Marco Island and continued to progress north through the center of the state. Irma capped an active hurricane season by impacting nearly the entire Florida peninsula with strong winds, rain and storm surges. There were many reports of hurricane force winds in southeast Florida (Figure 1)¹, through the center of the state (Figure 2) and tropical storm force winds into the northern parts of the state (Figure 3).

¹ http://www.nhc.noaa.gov/data/tcr/AL092016_.pdf

HURRICANE IRMA'S OBSERVED TOP WIND GUSTS (50+ MPH)

Map showing observed top wind gusts (50+ MPH) from Hurricane Irma across Florida. The map displays various locations with their corresponding wind gust speeds in MPH. A north arrow is in the top right corner. The map was generated on Monday, September 11, 2017, at 2:11 AM.

Locations and Wind Gusts (MPH):

- 74, 72, 63, 79, 57, 59, 74, 67, 54, 72, 79, 67, 73, 84, 89, 54, 68, 68, 89, 68, 75, 142, 100, 99, 130, 96, 77, 71, 56, 60, 56, 52, 87, 74, 54, 85, 84, 53, 77, 77, 50, 84, 79, 82, 87, 52, 82, 93, 94, 86, 91, 76, 66, 79, 87, 55, 78, 91, 59, 75, 71, 53, 84, 65, 73, 54, 56, 73, 71, 75, 68, 50, 56, 73, 54, 56

Map Generated: 2:11 AM Mon Sep 11, 2017

12 STORMTRAC WEATHER

IRMA

LATEST DETAILS

Name: IRMA
Location: 16.9°N, 59.1°W
Wind: 185 mph
Movement: W at 14 mph
Pressure: 926 mb

Sun 8:00 AM EDT
145 mph

Sat 8:00 AM EDT
150 mph

Fri 8:00 AM EDT
155 mph

Thu 8:00 AM EDT
160 mph

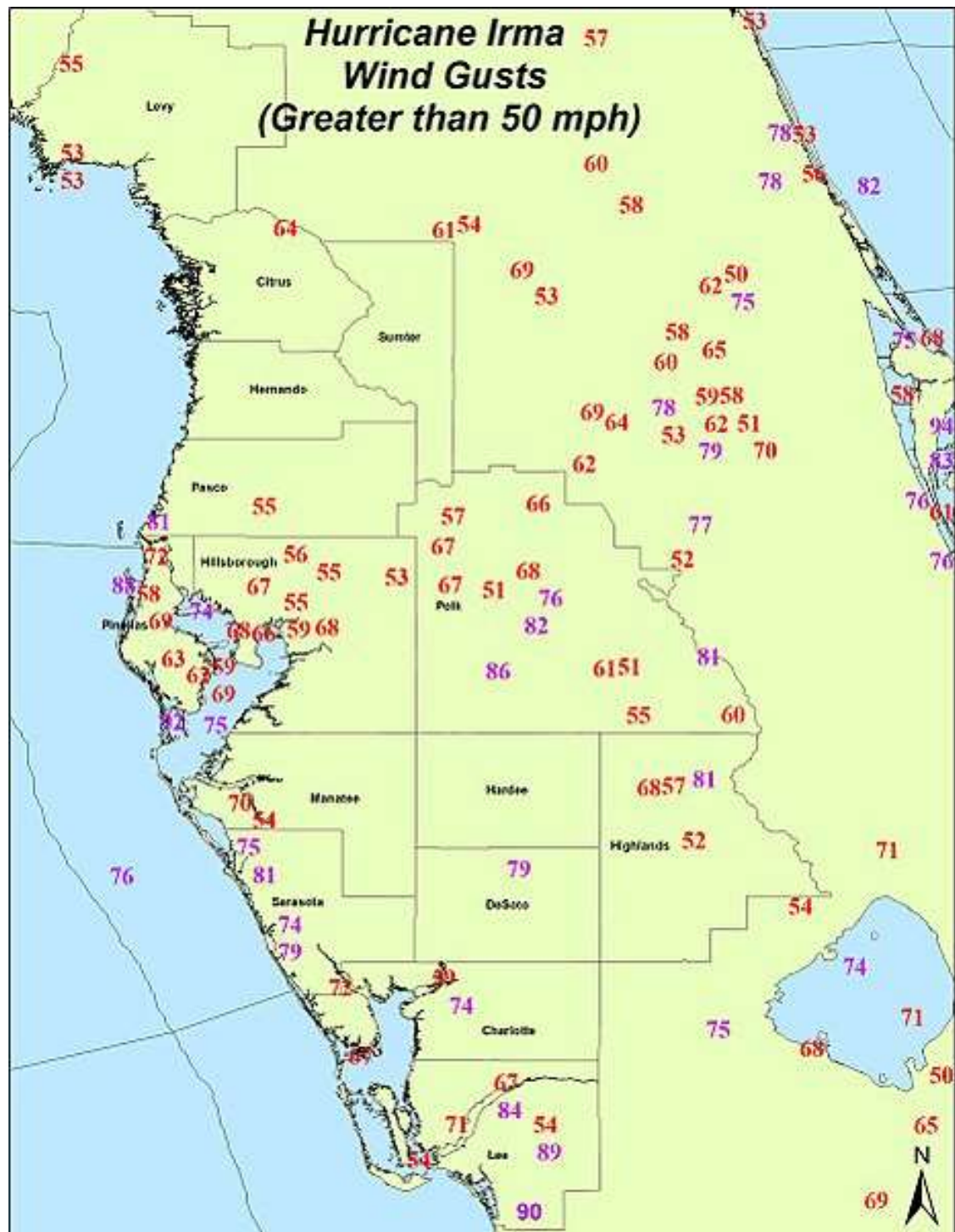
Wed 8:00 AM EDT
175 mph

West Palm
Cuba
Jamaica
Dominican Republic
Puerto Rico
Leeward Islands

Cancún
Belize

³ [West Palm Beach Local News](#), CBS12 News

FIGURE 3: HURRICANE IRMA SUSTAINED WINDS IN SOUTHCENTRAL, SOUTHWEST AND WEST FLORIDA⁴



⁴ National Weather Service Tampa Bay bureau (Ruskin, Florida) – <https://twitter.com/NWSTampaBay/status/907387005285400576>

FIGURE 4: HURRICANE IRMA SUSTAINED WINDS IN NORTHCENTRAL FLORIDA AND SOUTH GEORGIA⁵**Peak measured wind gusts on 11 Sep 17 (MPH)**

Moody AFB, GA	62
Valdosta Airport, GA	56
Cross City Airport, FL	56
Tallahassee Airport, FL	55
Dothan Airport, AL	55
Moultrie Airport, GA	54
I S Adel, GA	53
Shell Point, FL	51
Tifton Airport, GA	51
Thomasville, GA	51
Saint George Island, FL	50
Ozark, AL	49
Keaton Beach, FL	48
Apalachicola Airport, FL	48
Fitzgerald, GA	47
Marianna Airport, FL	46
I WNW Blue Mountain Beach, FL	46
Bainbridge, GA	46
Panama City Airport, FL	45
I S Panama City, FL	45

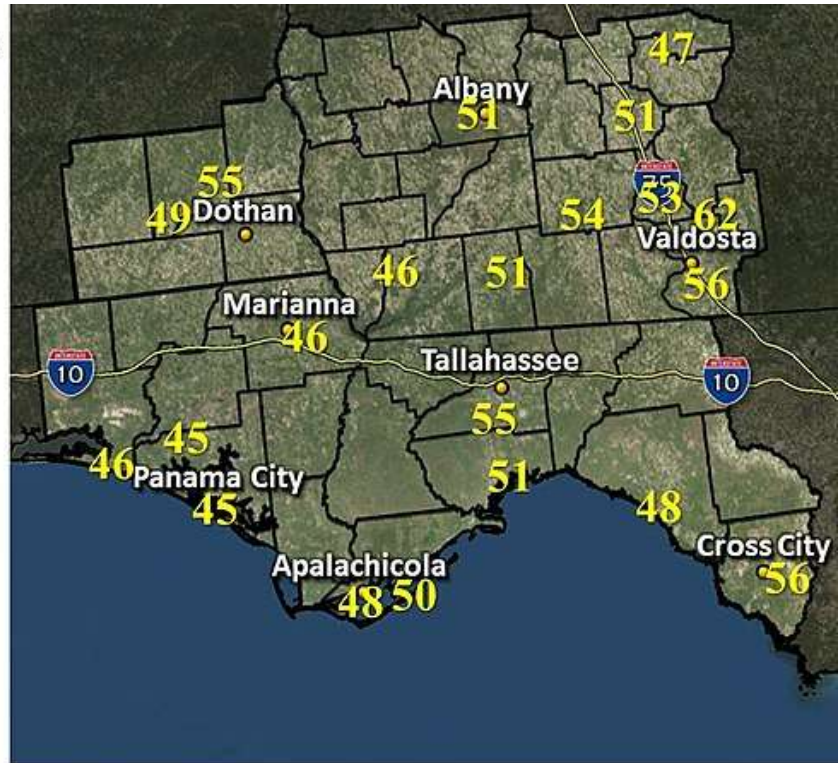


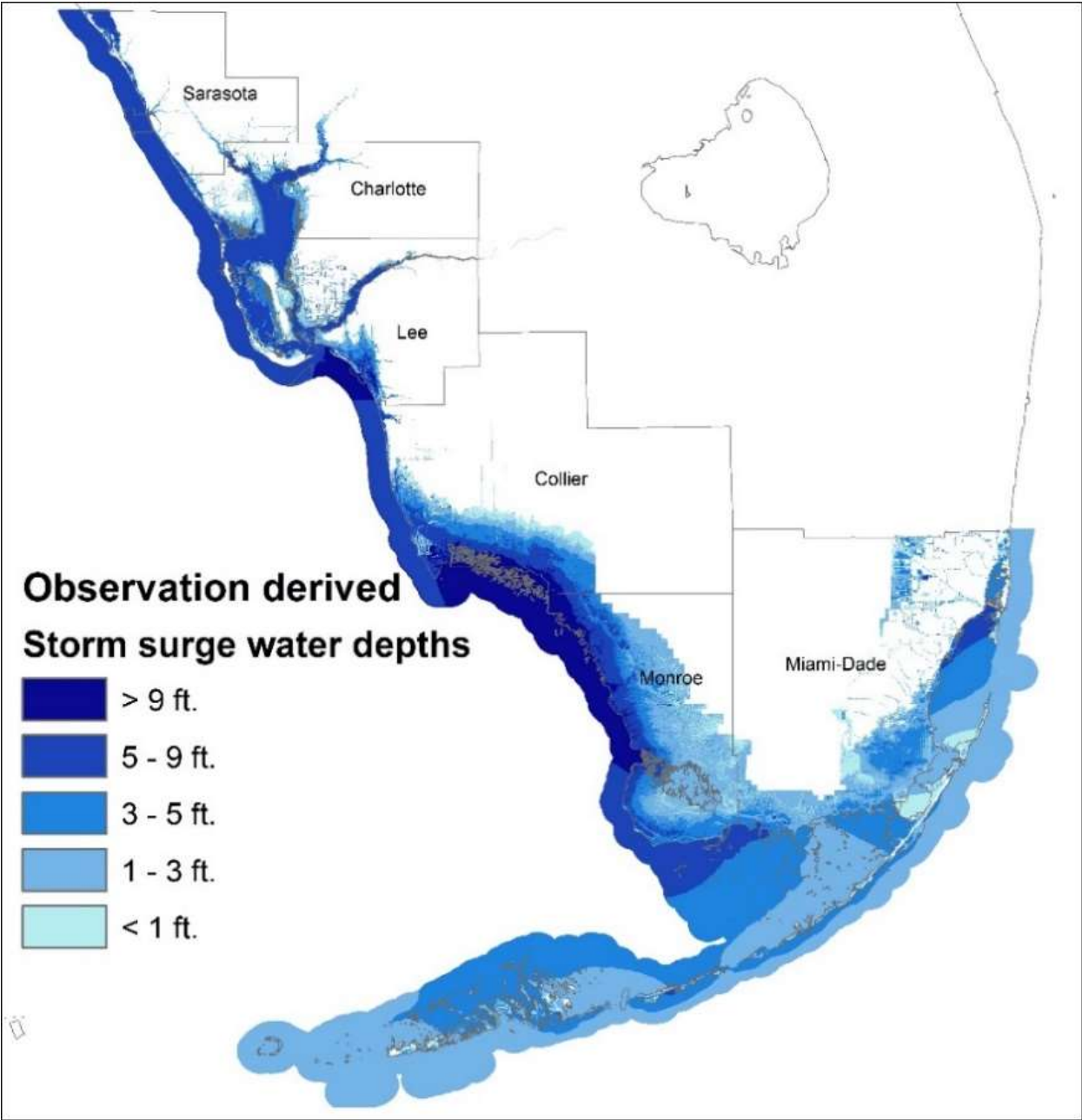
TABLE 2: MAXIMUM STORM SURGES FROM HURRICANE IRMA

Maximum Storm Surges from Hurricane Irma	
County	Maximum Storm Surge (ft.)
Charlotte	9.3
Collier	15.8
Lee	12.4
Miami-Dade	9.5
Monroe	15.6
Sarasota	8.5

Source: National Weather Service

⁵ National Weather Service Tallahassee office- <https://twitter.com/NWSTallahassee/status/907526929519140864>

FIGURE 5: HURRICANE IRMA MODELED PRELIMINARY FLOOD OBSERVATIONS IN SOUTH FLORIDA



Source: National Weather Service

FIGURE 6: HURRICANE IRMA MODELED ESTIMATED FLOODING AROUND JACKSONVILLE, FL

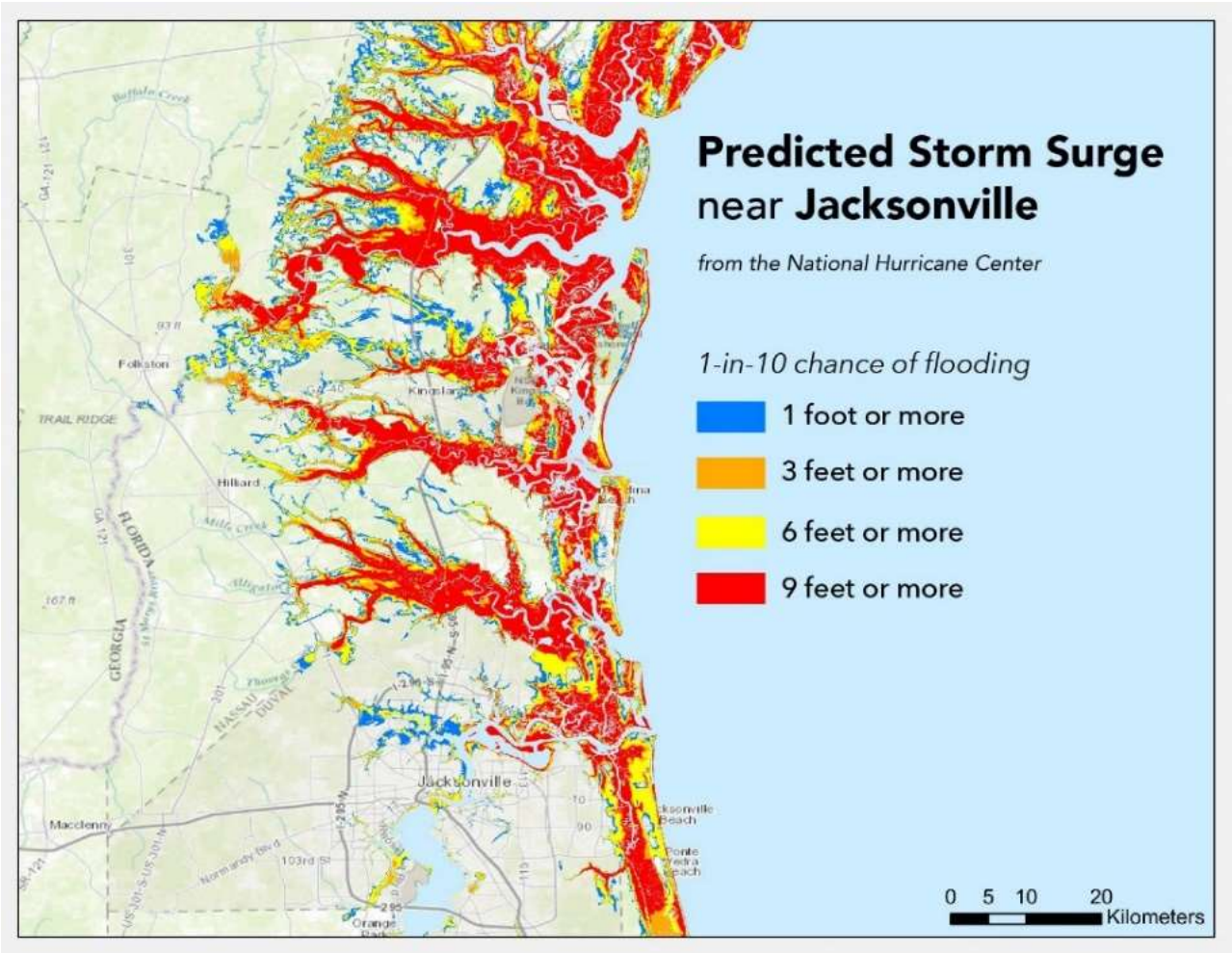
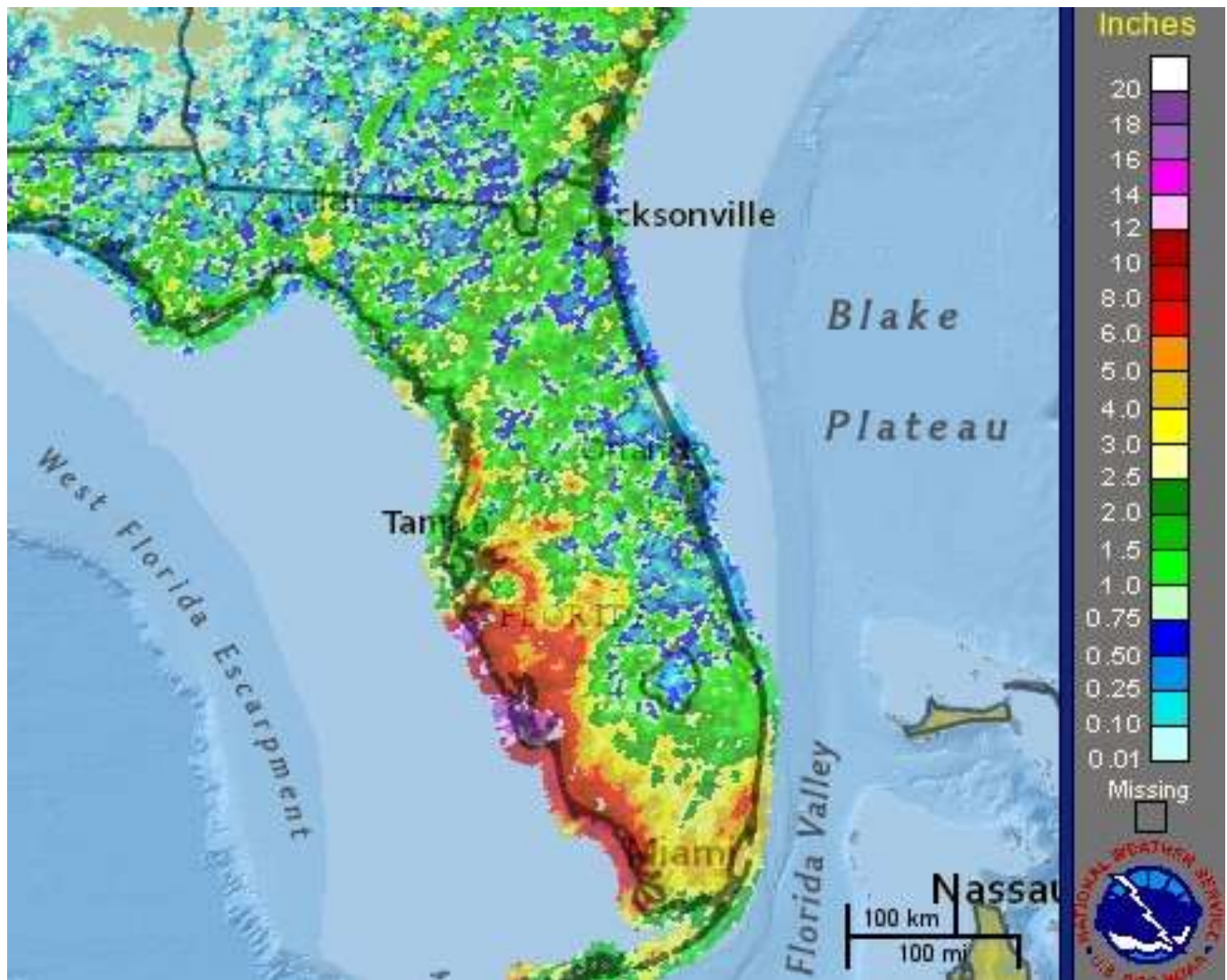


FIGURE 7: HURRICANE IRMA AND RAINFALL ESTIMATES⁶

⁶ National Weather Service



A major disaster declaration was issued for Hurricane Irma on September 10, 2017. The declaration for FEMA 4337 (Irma) included the following counties listed in Table 3 (and shown in Figure 7). Of these areas, HUD further identified those most impacted and distressed counties and ZIP codes across the disaster area (Figure 8). Included in these areas are Brevard, Broward, Clay, Collier, Duval, Hillsborough, Lee, Miami-Dade, Monroe, Orange, Osceola, Palm Beach, Polk, St. Lucie and Volusia counties; and 11 separate ZIP codes outside of these areas (32084 and 32145 in St. Johns County, 32091 in Bradford County, 32136 in Flagler County, 32771 in Seminole County, 33935 and 33440 in Hendry County, 33523 in Pasco County, 33825 and 33870 in Highlands County and 34266 in DeSoto County).

TABLE 3: DECLARED COUNTY LIST FOR PRESIDENTIAL DISASTER DECLARATIONS 4337 (HURRICANE IRMA)⁷

List for Presidential Disaster Declaration 4337 (Hurricane Irma)			
County	Declaration Type	County	Declaration Type
Alachua	Individual and Public Assistance	Orange	Individual and Public Assistance
Baker	Individual and Public Assistance	Osceola	Individual and Public Assistance
Bradford	Individual and Public Assistance	Palm Beach	Individual and Public Assistance
Brevard	Individual and Public Assistance	Pasco	Individual and Public Assistance
Broward	Individual and Public Assistance	Pinellas	Individual and Public Assistance
Charlotte	Individual and Public Assistance	Polk	Individual and Public Assistance
Citrus	Individual and Public Assistance	Putnam	Individual and Public Assistance
Clay	Individual and Public Assistance	Sarasota	Individual and Public Assistance
Collier	Individual and Public Assistance	Seminole	Individual and Public Assistance
Columbia	Individual and Public Assistance	St. Johns	Individual and Public Assistance
DeSoto	Individual and Public Assistance	St. Lucie	Individual and Public Assistance
Dixie	Individual and Public Assistance	Sumter	Individual and Public Assistance
Duval	Individual and Public Assistance	Suwannee	Individual and Public Assistance
Flagler	Individual and Public Assistance	Union	Individual and Public Assistance
Gilchrist	Individual and Public Assistance	Volusia	Individual and Public Assistance
Glades	Individual and Public Assistance	Bay	Public Assistance Only
Hardee	Individual and Public Assistance	Calhoun	Public Assistance Only
Hamilton	Individual and Public Assistance	Escambia	Public Assistance Only
Hendry	Individual and Public Assistance	Franklin	Public Assistance Only
Hernando	Individual and Public Assistance	Gadsden	Public Assistance Only
Highlands	Individual and Public Assistance	Gulf	Public Assistance Only
Hillsborough	Individual and Public Assistance	Hamilton	Public Assistance Only
Indian River	Individual and Public Assistance	Holmes	Public Assistance Only
Lafayette	Individual and Public Assistance	Jackson	Public Assistance Only
Lake	Individual and Public Assistance	Jefferson	Public Assistance Only

⁷ <https://www.fema.gov/disaster/4337>

Lee	Individual and Public Assistance	Leon	Public Assistance Only
Levy	Individual and Public Assistance	Liberty	Public Assistance Only
Manatee	Individual and Public Assistance	Madison	Public Assistance Only
Marion	Individual and Public Assistance	Okaloosa	Public Assistance Only
Martin	Individual and Public Assistance	Santa Rosa	Public Assistance Only
Miami-Dade	Individual and Public Assistance	Taylor	Public Assistance Only
Monroe	Individual and Public Assistance	Wakulla	Public Assistance Only
Nassau	Individual and Public Assistance	Walton	Public Assistance Only
Okeechobee	Individual and Public Assistance	Washington	Public Assistance Only
Total: 49 Individual and Public Assistance and 18 Public Assistance Only Counties			

FIGURE 8: DECLARED COUNTIES FOR PRESIDENTIAL DISASTER DECLARATIONS 4337 (HURRICANE IRMA)

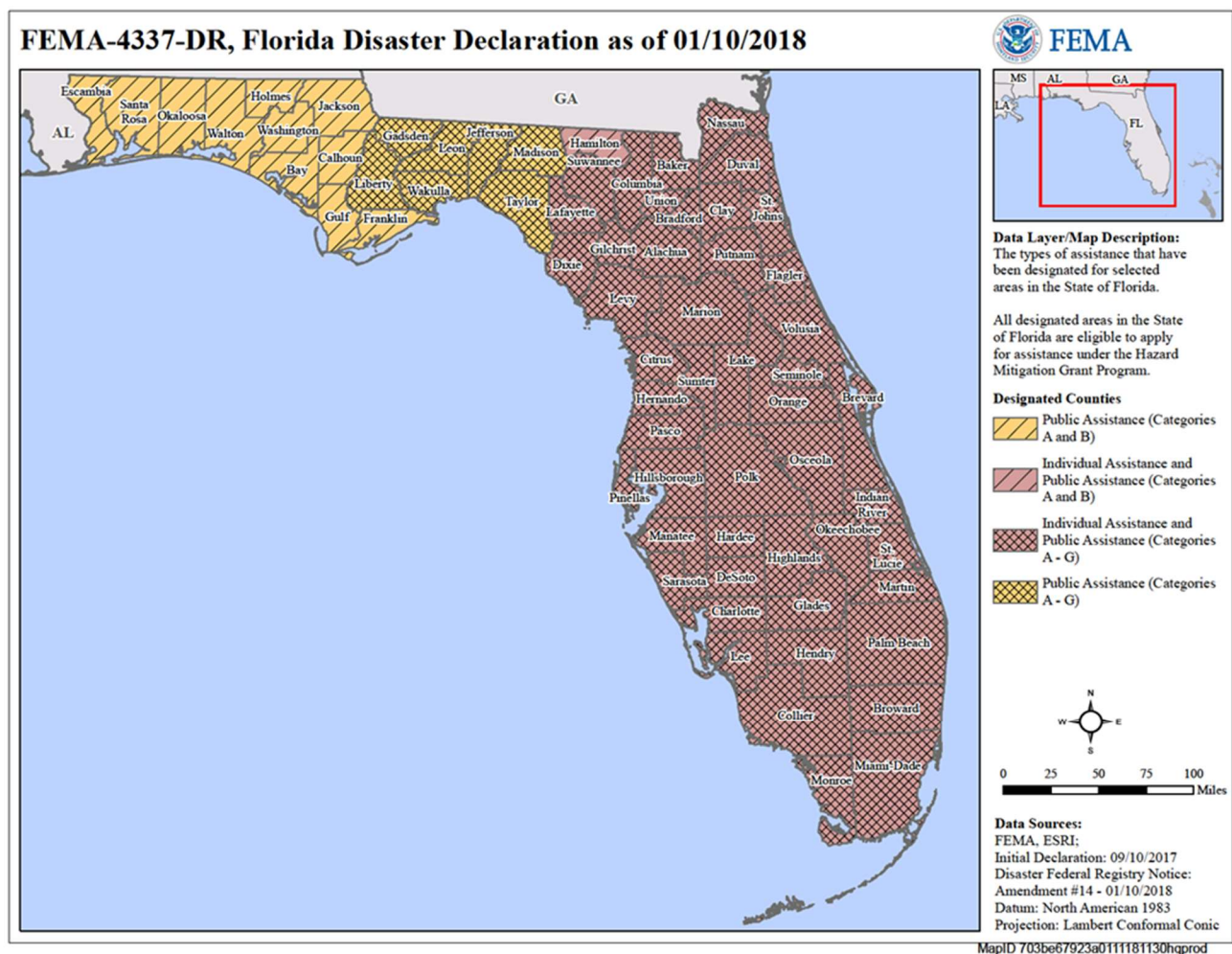
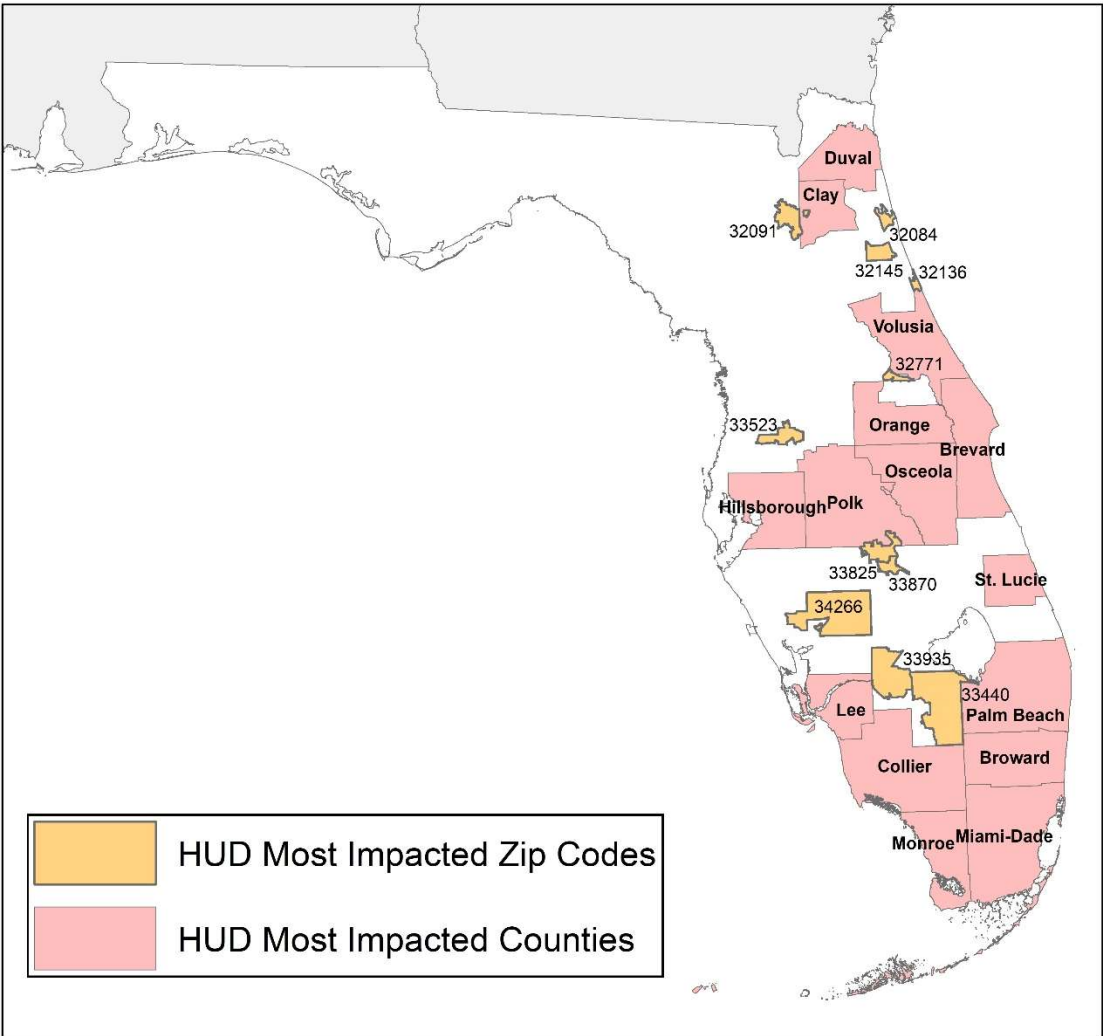


FIGURE 9: HUD INITIAL ASSESSMENT OF MOST IMPACTED COUNTIES AND ZIP CODES



The map above details HUD’s identified most impacted and distressed communities. Initially, in February 2018, HUD identified 10 counties and 4 ZIP codes as the most impacted and distressed communities from Hurricane Irma. Then, in August 2018, HUD expanded the most impacted and distressed communities to include 5 new counties and 8 new ZIP codes. The map above has been updated to include all most impacted and distressed communities as of August 2018.

Demographic Profile of the Impacted Area

Table 4 profiles socio-economics and demographics across Florida’s Hurricane Irma impacted counties. Most of Florida’s 20 million people (92 percent) reside in the impacted area covered in this assessment. The population characteristics of those impacted differs in a few notable ways from the overall state population.

First, the areas impacted by Hurricane Irma have a greater percentage of older residents (23 percent) per county than the entire state of Florida (20 percent). These impacted counties also have more occupied housing units, more people with disabilities, lower median and per capita incomes and more people living in poverty than the

state as whole. Poverty is an indicator of places that might see greater impacts from disasters because of a general lack of ability to prepare for shocks and stresses.

TABLE 4: DEMOGRAPHIC PROFILE INFORMATION –AMERICAN COMMUNITY SURVEY DATA, 2016 RELEASE⁸

Demographic Profile Information- American Community Survey Data, 2016 Release		
Socio-Demographic Characteristics	Designated Counties	Florida
Population		
Population estimates, July 1, 2016, (V2016)	19,098,534	20,612,439
Age and Sex		
Persons under 5 years, percent, July 1, 2016, (V2016)	5.13%	5.50%
Persons 65 years and over, percent, July 1, 2016, (V2016)	22.76%	19.90%
Race and Hispanic Origin		
White alone, percent, July 1, 2016, (V2016)	82.86%	77.60%
Black or African American alone, percent, July 1, 2016, (V2016)	12.54%	16.80%
American Indian and Alaska Native alone, percent, July 1, 2016, (V2016)	0.70%	0.50%
Asian alone, percent, July 1, 2016, (V2016)	1.93%	2.90%
Native Hawaiian and Other Pacific Islander alone, percent, July 1, 2016, (V2016)	0.12%	0.10%
Two or More Races, percent, July 1, 2016, (V2016)	1.86%	2.10%
Hispanic or Latino, percent, July 1, 2016, (V2016)	17.13%	24.90%
Population Characteristics		
Veterans, 2012-2016	1,321,223	1,480,133
Foreign born persons, percent, 2012-2016	11.69%	19.90%
Housing		
Housing units, July 1, 2016, (V2016)	8,585,434	9,301,642
Owner-occupied housing unit rate, 2012-2016	70.95%	64.80 %
Median value of owner-occupied housing units, 2012-2016	\$148,596	\$166,800
Median gross rent, 2012-2016	\$900	\$1,032

⁸ <https://www.census.gov/quickfacts/fact/table/US/PST045216>

Demographic Profile Information- American Community Survey Data, 2016 Release		
Socio-Demographic Characteristics	Designated Counties	Florida
Building permits, 2016	107,885	116,240
Households, 2012-2016	6,837,763	7,393,262
Persons per household, 2012-2016	2.64	2.64
Language other than English spoken at home, percent of persons age 5 years+, 2012-16	18.16%	28.30%
Education		
High school graduate or higher, percent of persons age 25 years+, 2012-2016	84.70%	87.20%
Bachelor's degree or higher, percent of persons age 25 years+, 2012-2016	21.95%	27.90%
Health		
With a disability, under age 65 years, percent, 2012-2016	10.54%	8.60 %
Persons without health insurance, under age 65 years, percent	16.71%	15.30%
Economy		
In civilian labor force, total, percent of population age 16 years+, 2012-2016	51.98%	58.50%
Median household income (in 2016 dollars), 2012-2016	\$46,124	\$48,900
Per capita income in past 12 months (in 2016 dollars), 2012-2016	\$25,343	\$27,598
Persons in poverty, percent	16.24%	14.70%

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) aiding in the prevention or elimination of slums or blight, or (3) meeting a need having particular urgency (urgent need).⁹

Low- to moderate-income households are defined as households that do not exceed 80 percent of the median income for their area, as determined by HUD. These income categories are grouped into the following classifications:¹⁰

⁹ These National Objective definitions and corresponding language are set by HUD regulation.

¹⁰ The term "Low-and Moderate-Income" is defined in the Housing and Community Development Act of 1974 as:

The terms "persons of low- and moderate-income" and "low- and moderate-income persons" mean families and individuals whose incomes do not exceed 80 percent of the median income of the area involved, as determined by the Secretary with adjustments for smaller and larger families. The term "persons of low income" means families and individuals whose incomes do not exceed 50 percent of the median income of the area involved, as determined by the Secretary with adjustments for smaller and larger families. The term "persons of moderate income" means families and individuals whose incomes exceed

- Very low income: has an annual income at 30 percent or below the area median income,
- Low income: has an annual income at 31 to 50 percent of the area median income, and
- Moderate income: has an annual income at 51 to 80 percent of the area median income.

For the purpose of CDBG-Disaster Recovery programs, grantees must meet specific criteria and agree to terminology consistent with the original language of the Housing Act and reporting designations in the HUD Disaster Recovery Grant Reporting (DRGR) system.¹¹

Please refer to *Appendix 1: HUD Income Limits* for income categories in the declared counties.

Every impacted county has areas that meet HUD's 51 percent LMI threshold criteria, but some counties have much larger LMI populations than others. Table 5 below illustrates the count of block groups and sum of populations by low-to-moderate income levels within impacted counties. What becomes clear when looking at the number of people who have low- to moderate-income is that every county has multiple areas (block groups) characterized by very low-income levels. When block group populations are examined, additional LMI concentrations within each county become apparent, as illustrated in Figure 10 through Figure 35 below. These figures show counties and ZIP codes designated as "most impacted" by HUD's initial assessment of FEMA loss data.

See *Appendix 2* for LMI Maps for Individual Assistance (IA) designated counties detailing block group level LMI information for every presidentially declared county.

TABLE 5: LMI POPULATION COUNTS BY BLOCK GROUP AND COUNTY FOR IRMA IMPACTED COUNTIES¹²

LMI Population Counts by Block Group and County for Irma Impacted Counties						
County	Block Groups Counts and Populations by LMI Category					
	< 51% Count	< 51% Population	51% - 75% County	51% - 75% Population	> 75% Count	>% Population
Alachua	84	36,570	39	32,995	32	38,880
Baker	9	6,500	3	2,355	0	0
Bradford	15	7,280	3	2,060	0	0
Brevard	239	124,655	66	55,205	13	12,430
Broward	530	301,035	301	337,725	109	144,730
Charlotte	91	42,185	16	13,230	1	785
Citrus	78	39,680	9	8,495	1	740
Clay	71	43,605	10	10,540	0	0
Collier	130	60,935	48	56,340	15	18,805
Columbia	33	18,330	6	3,875	1	795

50 percent, but do not exceed 80 percent, of the median income of the area involved, as determined by the Secretary with adjustments for smaller and larger families.

¹¹ HUD Program Income Limits are published annually for use across all HUD funded program and contain incongruous terminology to the Housing Act. Terminology published in the annual income limits is applied to other HUD funded formula allocation programs to support individual income group targets within the LMI category:

<https://www.huduser.gov/portal/datasets/il.html>

¹² <https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-block-groups-places/>

LMI Population Counts by Block Group and County for Irma Impacted Counties

County	Block Groups Counts and Populations by LMI Category					
	< 51% Count	< 51% Population	51% - 75% County	51% - 75% Population	> 75% Count	>% Population
DeSoto	16	6,360	7	6,010	3	2,170
Dixie	8	3,450	4	3,045	1	240
Duval	309	174,210	131	116,280	50	46,705
Flagler	41	22,080	11	14,000	0	0
Gilchrist	7	3,150	6	4,815	0	0
Glades	9	2,480	2	1,840	0	0
Hardee	11	3,510	8	6,725	1	1,385
Hendry	14	5,755	11	10,850	0	0
Hernando	74	43,545	31	24,500	2	1,050
Highlands	52	23,315	23	14,440	4	2,760
Hillsborough	590	220,115	223	162,995	68	62,740
Indian River	69	31,560	19	16,970	5	4,665
Lafayette	5	2,265	1	1,040	0	0
Lake	88	65,640	54	46,305	6	5,310
Lee	366	133,379	105	71,890	43	33,320
Levy	23	12,800	6	4,050	0	0
Manatee	126	62,360	54	41,050	28	36,835
Marion	142	83,610	27	23,225	6	5,640
Martin	72	29,855	20	15,120	2	2,525
Miami-Dade	833	382,809	473	481,015	288	352,200
Monroe	46	12,800	25	15,455	5	6,505
Nassau	34	19,940	5	3,775	1	470
Okeechobee	20	8,275	8	7,880	0	0
Orange	240	221,340	108	200,260	27	41,685
Osceola	40	57,520	28	50,780	8	9,685
Palm Beach	504	229,305	248	218,540	134	152,300
Pasco	204	96,330	89	67,870	15	14,245
Pinellas	533	206,415	152	104,430	36	27,130
Polk	242	135,695	77	66,955	12	11,405
Putnam	42	17,685	17	12,460	2	2,120
Sarasota	180	97,210	61	46,010	11	10,325
Seminole	194	93,675	31	29,800	10	9,850
St. Johns	69	36,065	12	12,595	1	1,150
St. Lucie	95	75,350	32	24,805	14	12,735
Sumter	27	15,910	14	11,525	0	0
Suwannee	20	10,780	5	3,575	1	935
Union	7	3,625	2	1,740	0	0
Volusia	204	114,020	68	60,830	17	12,625

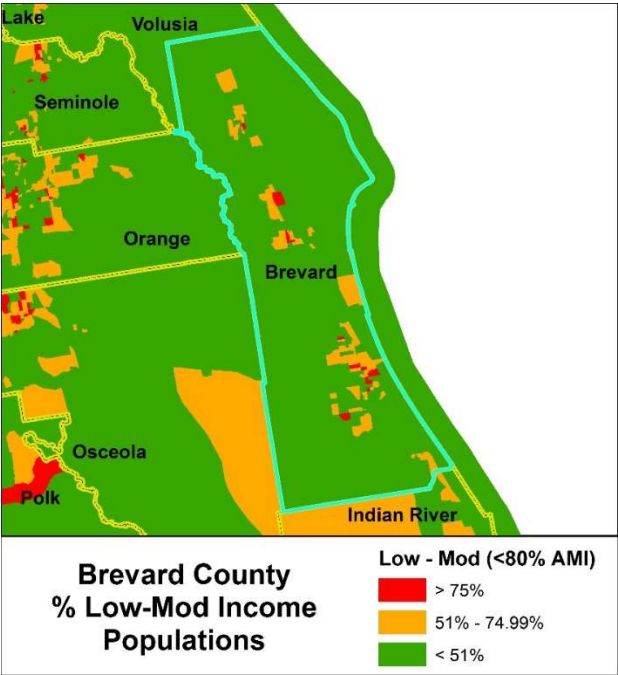


FIGURE 10: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – BREVARD COUNTY

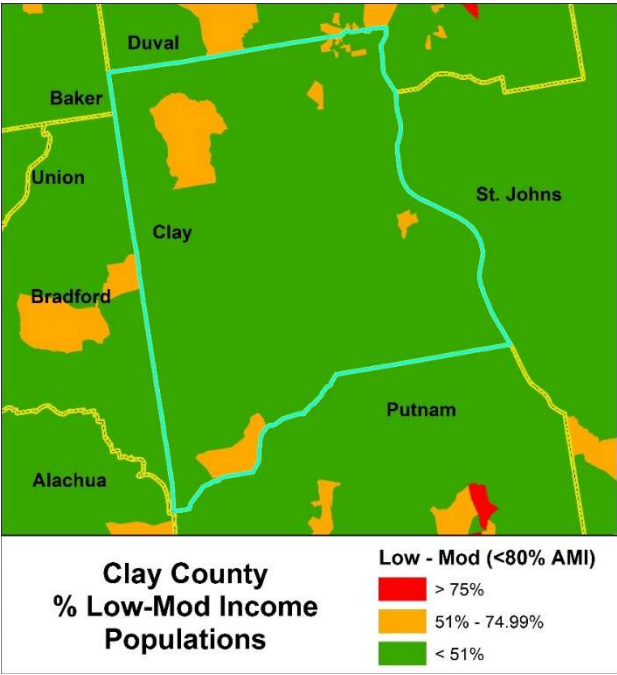


FIGURE 12: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – CLAY COUNTY

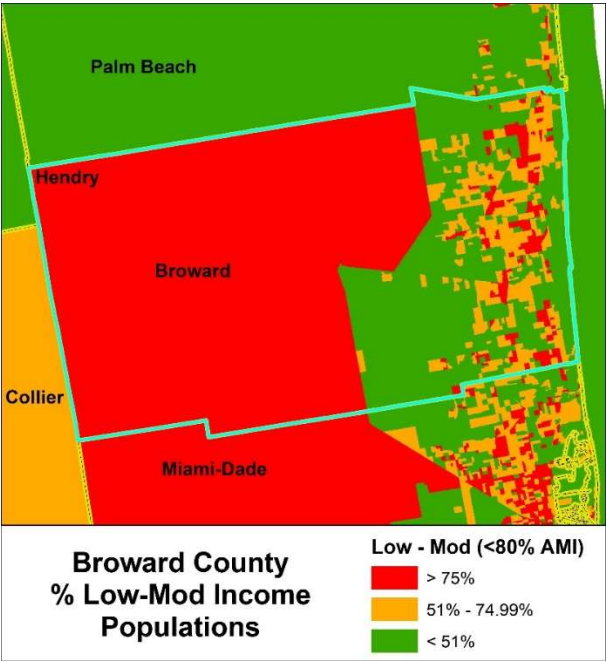


FIGURE 11: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – BROWARD COUNTY

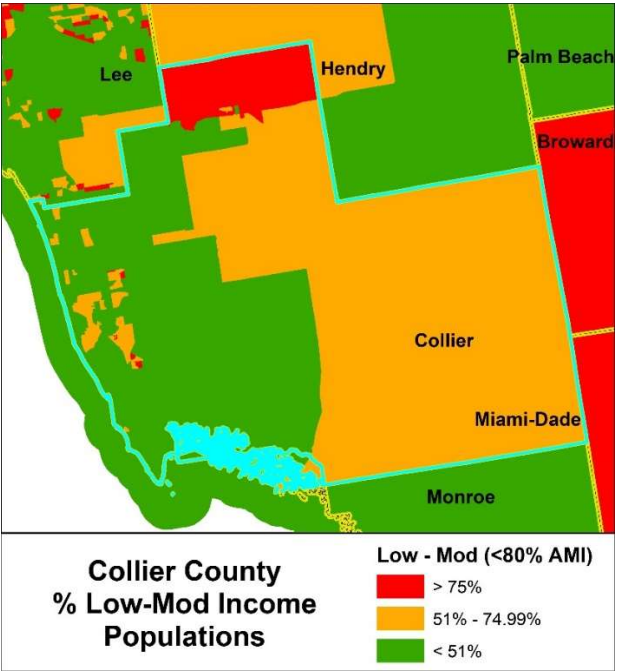


FIGURE 13: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – COLLIER COUNTY

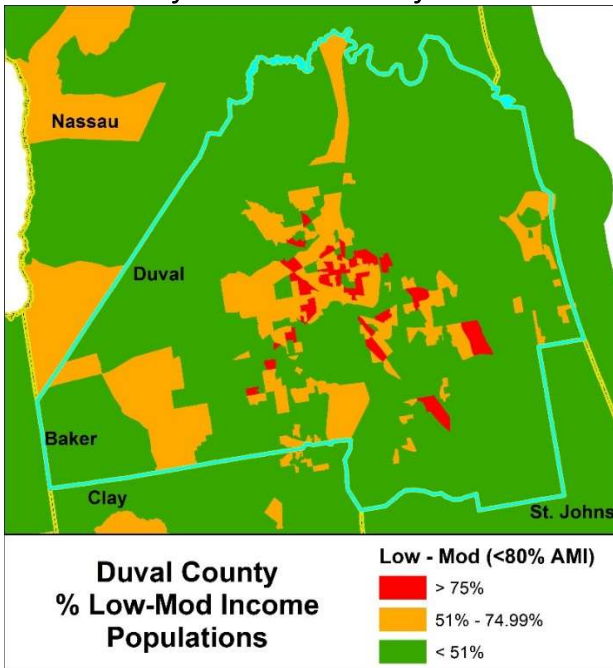


FIGURE 14: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – DUVAL COUNTY

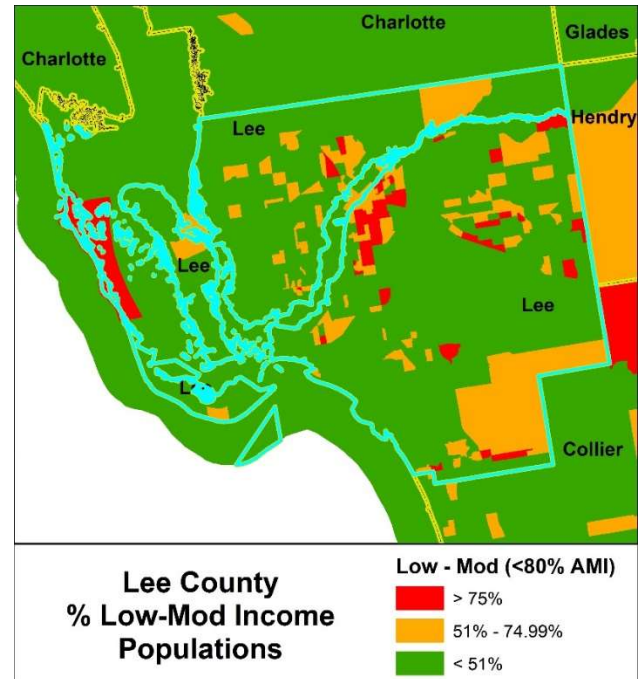


FIGURE 16: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – LEE COUNTY

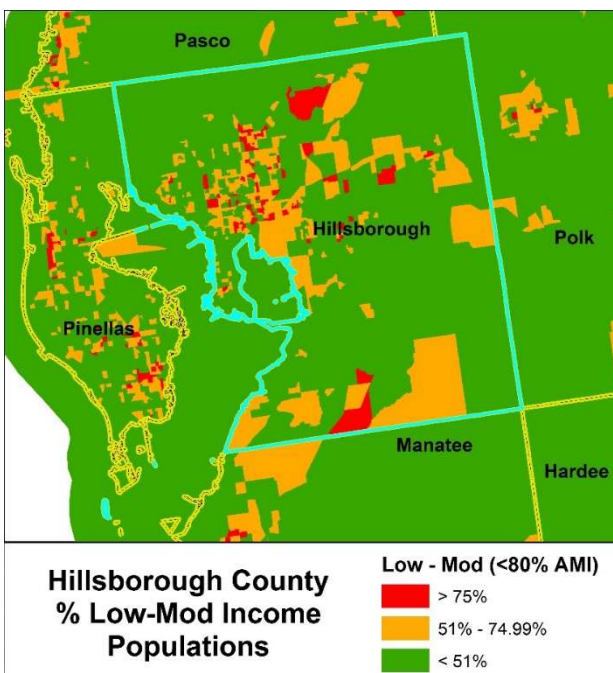


FIGURE 15: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – HILLSBOROUGH COUNTY

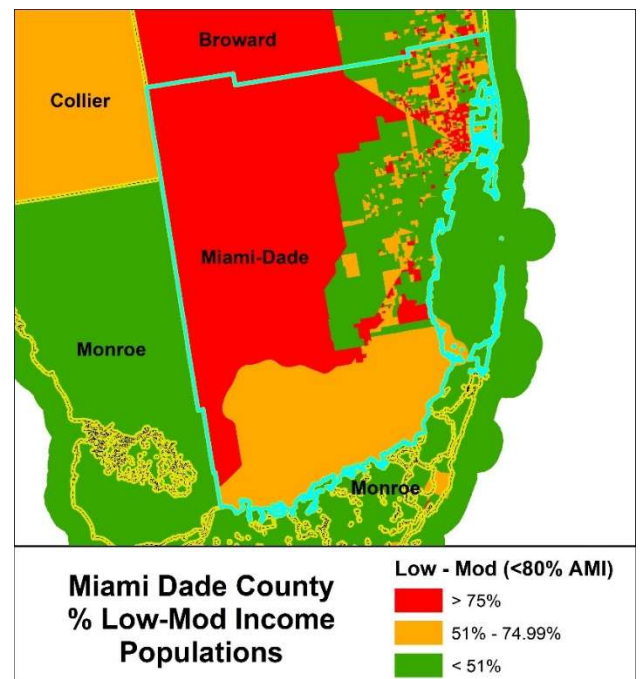


FIGURE 17: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – MIAMI-DADE COUNTY

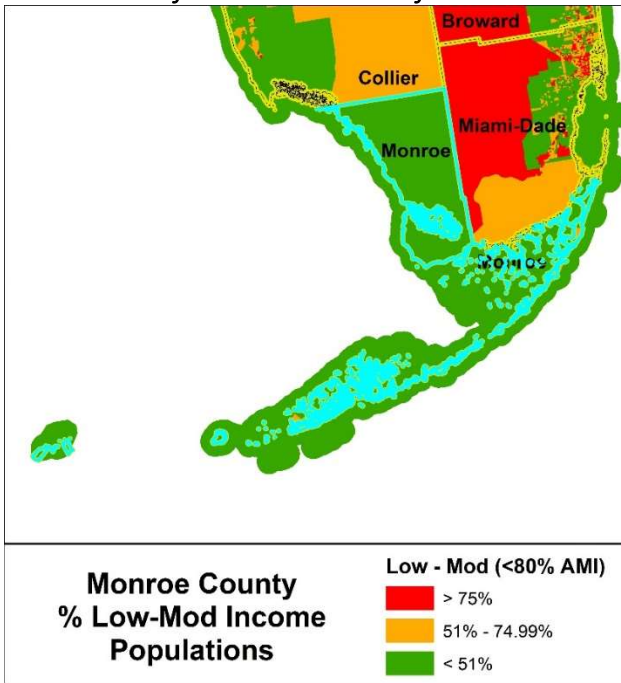


FIGURE 18: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – MONROE COUNTY

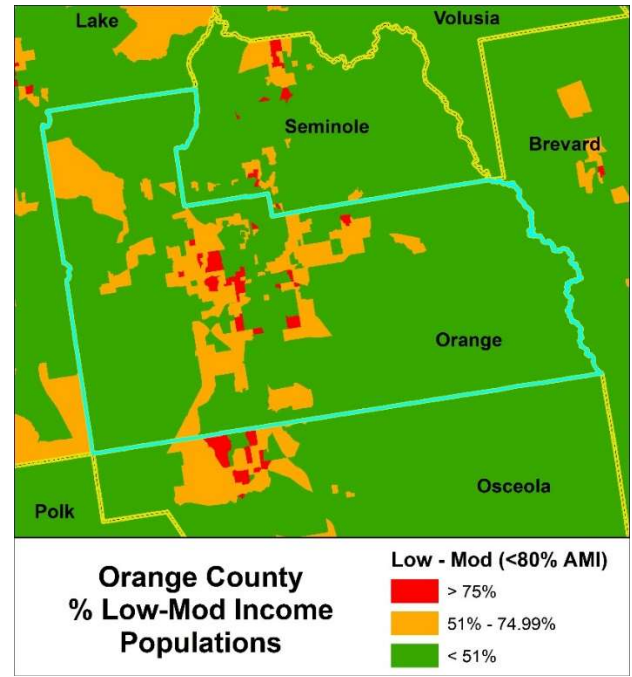


FIGURE 20: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ORANGE COUNTY

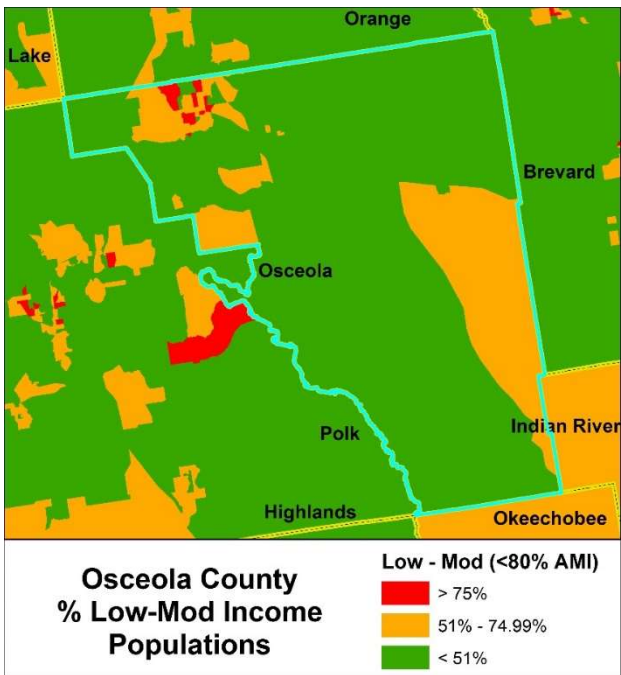


FIGURE 19: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – OSCEOLA COUNTY

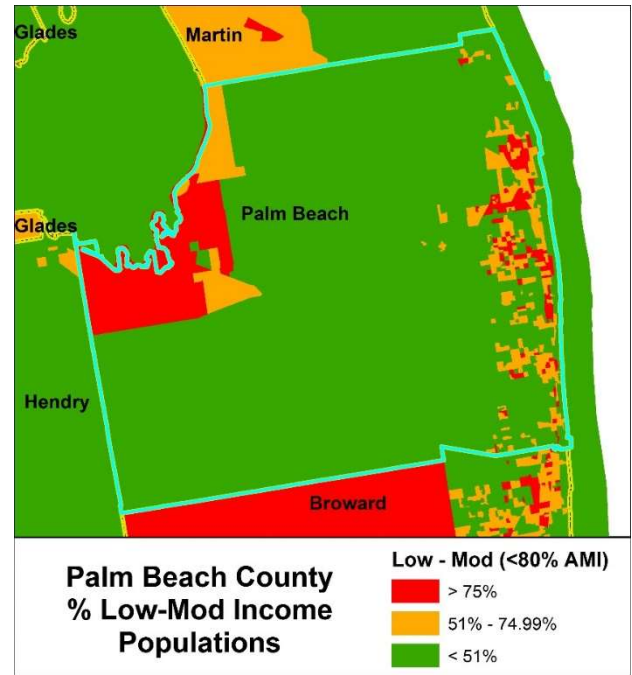


FIGURE 21: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – PALM BEACH COUNTY

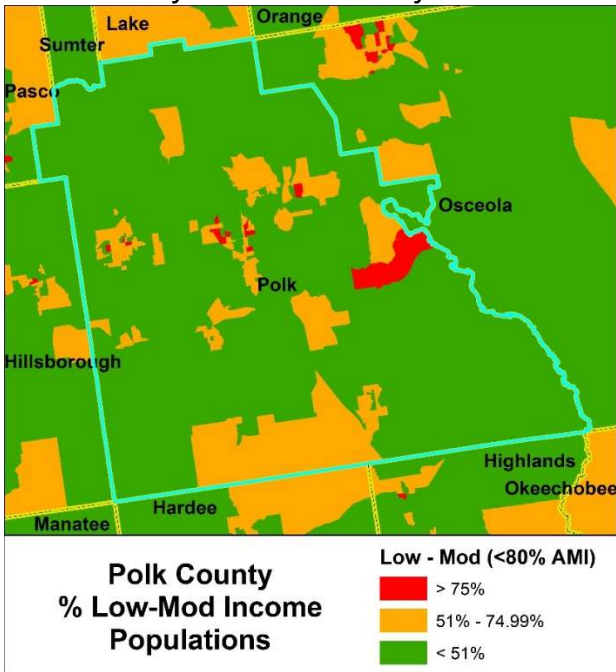


FIGURE 22: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – POLK COUNTY

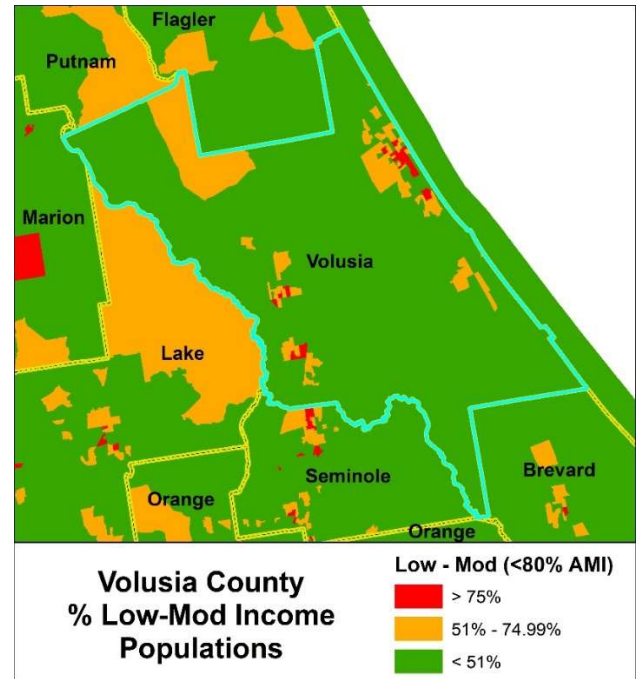


FIGURE 24: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – VOLUSIA COUNTY

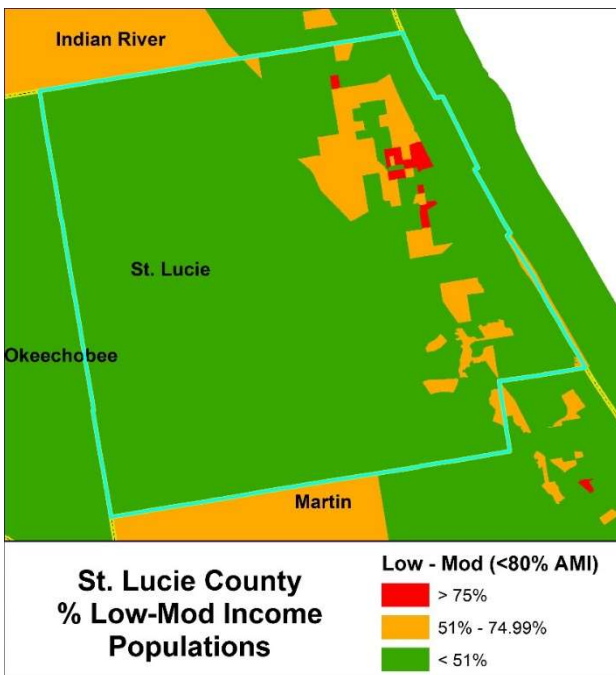


FIGURE 23: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ST. LUCIE COUNTY

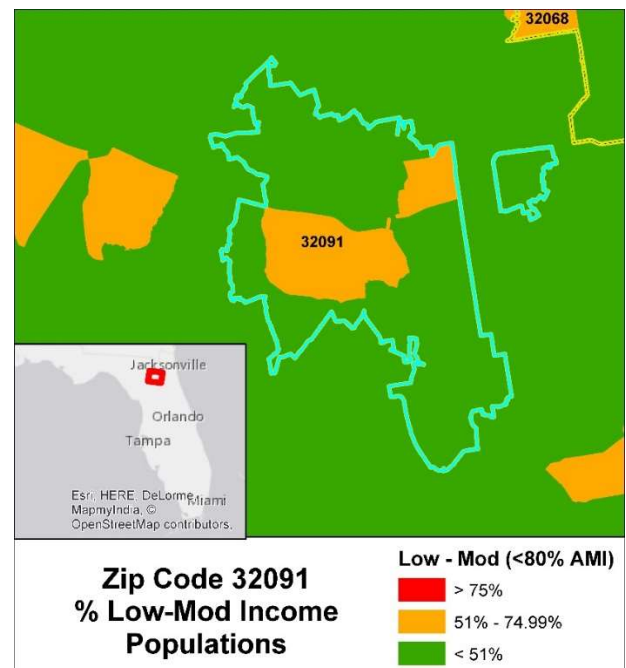


FIGURE 25: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ZIP CODE 32091 (BRADFORD)

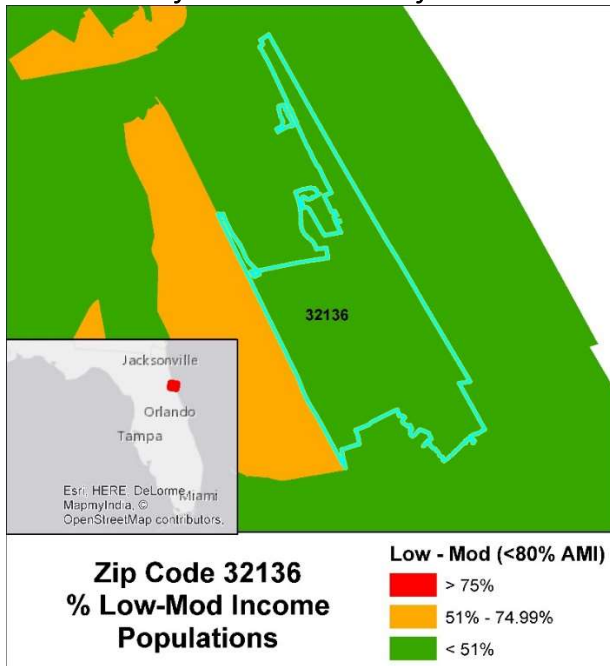


FIGURE 26: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ZIP CODE 32136 (FLAGLER)

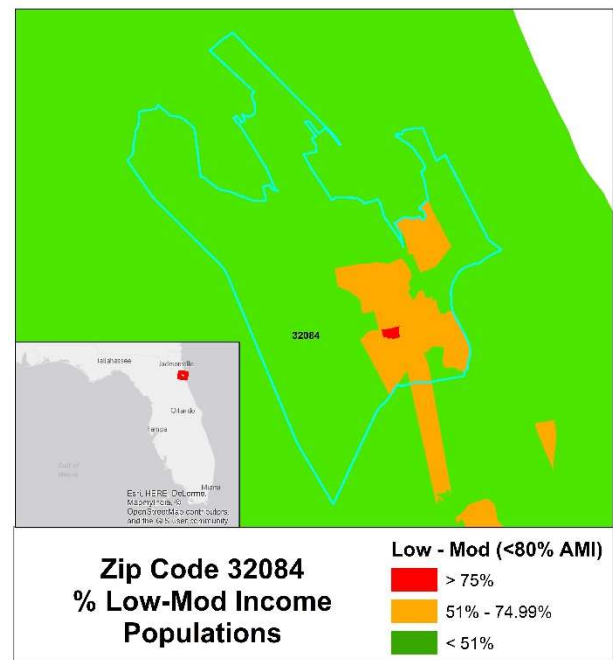


FIGURE 28: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ZIP CODE 32084 (ST. JOHNS)

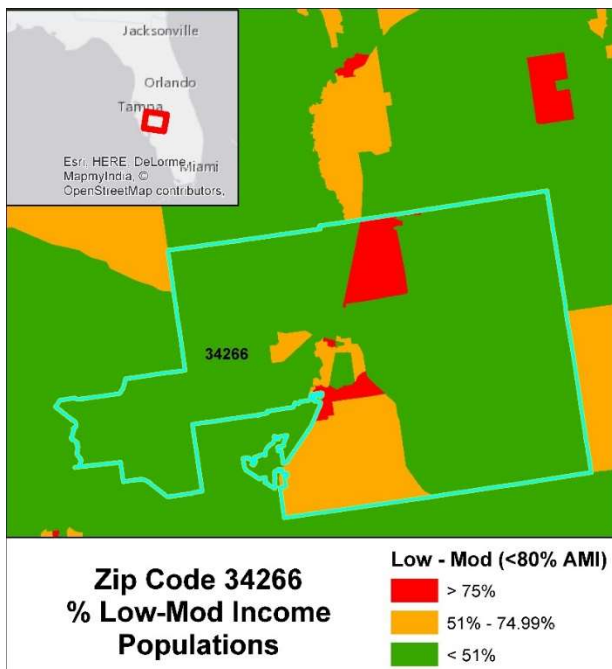


FIGURE 27: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ZIP CODE 34266 (DeSOTO)

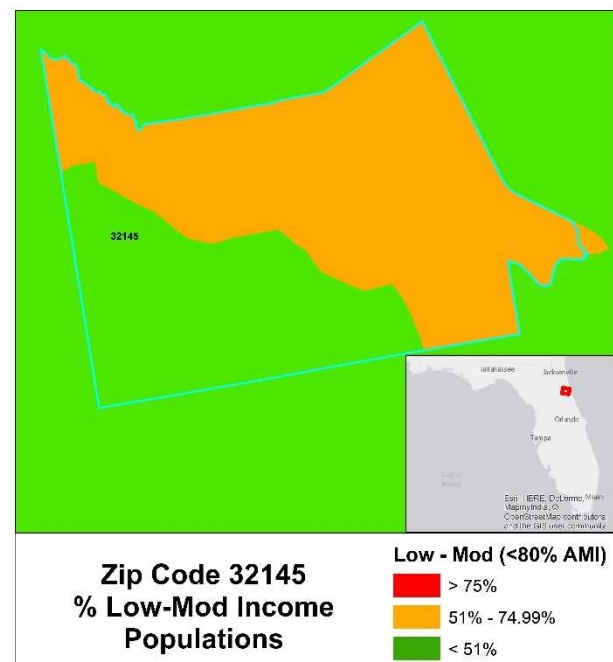


FIGURE 29: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ZIP CODE 32145 (ST. JOHNS)

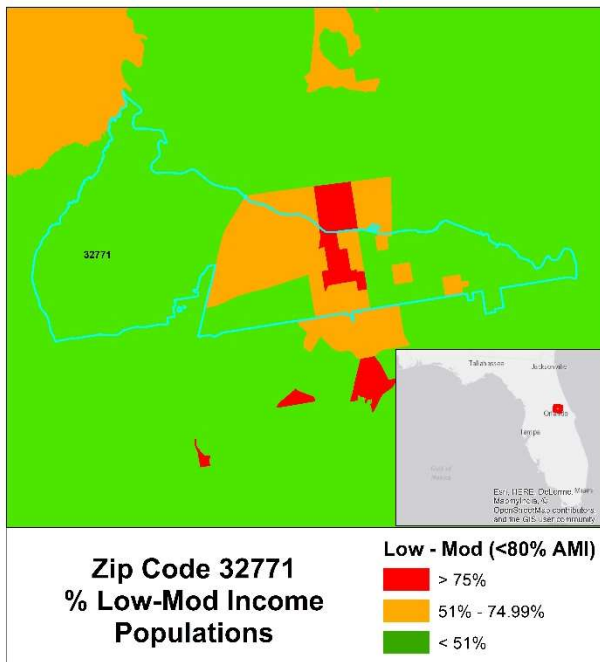


FIGURE 30: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ZIP CODE 32771(SEMINOLE)

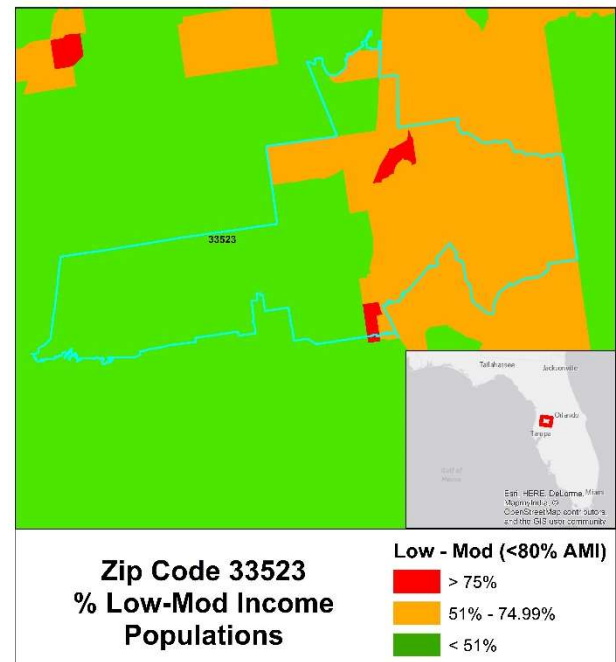


FIGURE 32: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ZIP CODE 33523 (PASCO)

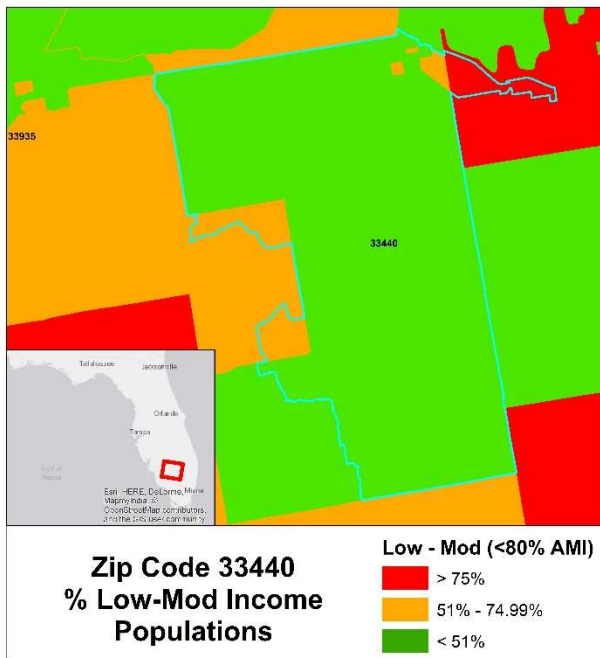


FIGURE 31: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ZIP CODE 33440 (HENDRY)

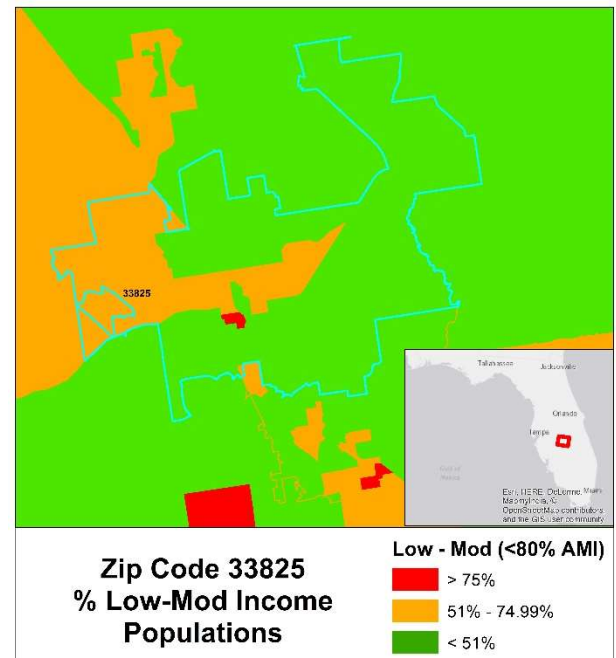


FIGURE 33: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ZIP CODE 33825 (HIGHLANDS).

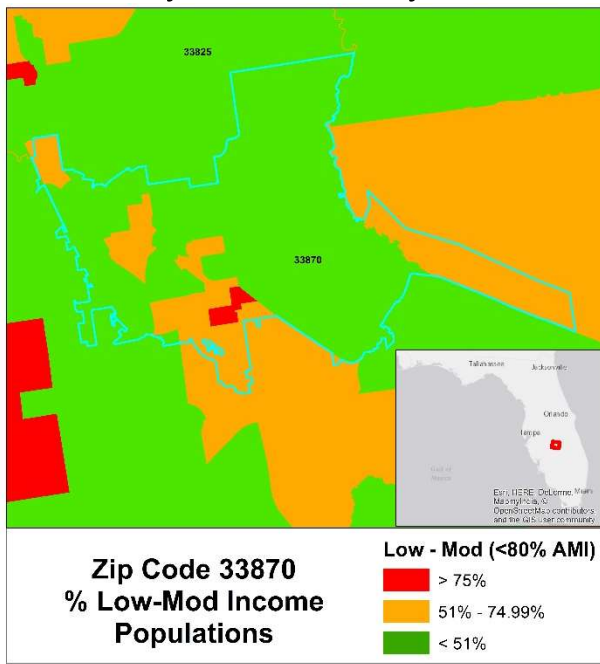


FIGURE 34: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ZIP CODE 33870 (HIGHLANDS)

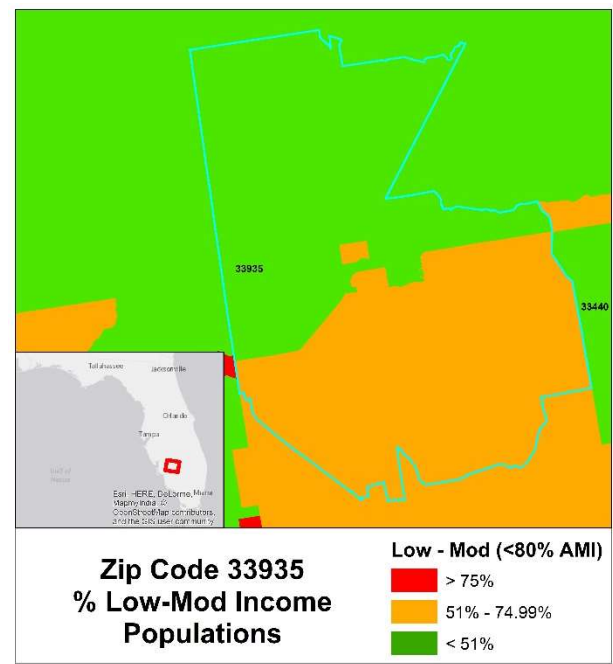


FIGURE 35: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ZIP CODE 33935 (HENDRY).

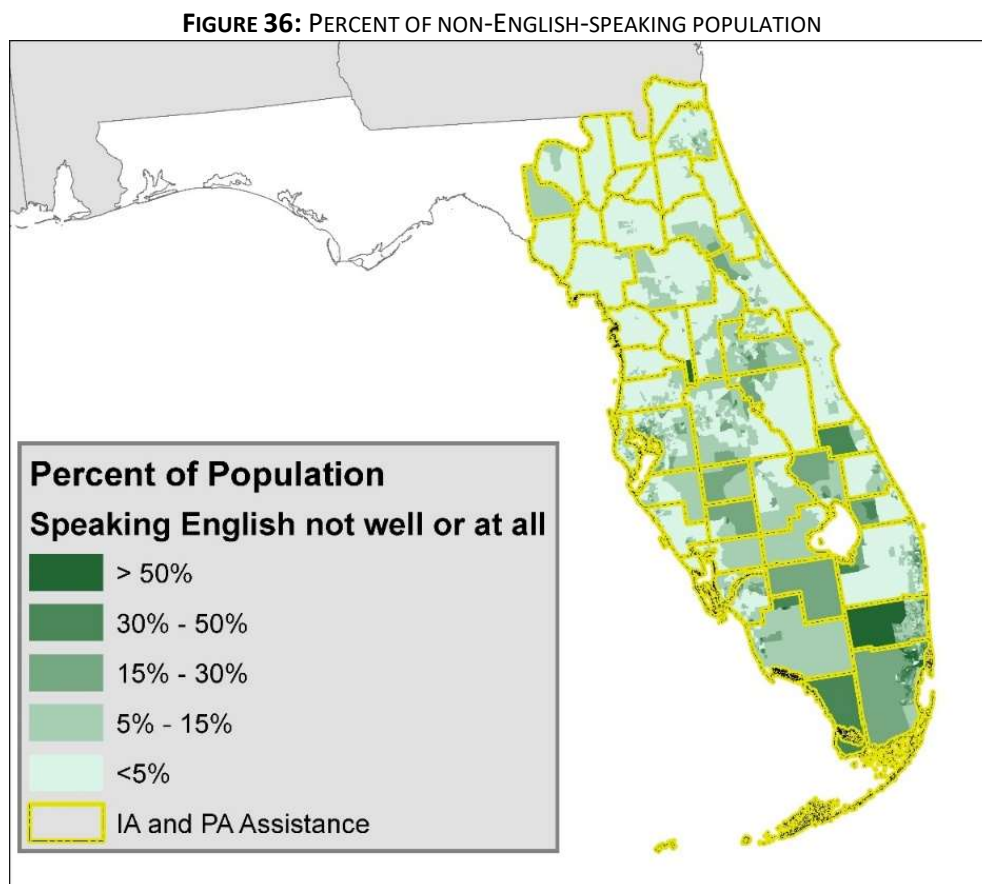
Impact on Special Needs Populations

Individuals with limited access to resources and with functional needs will require assistance with accessing and/or receiving disaster resources. These individuals could be children, older adults, pregnant women, individuals from diverse cultures, transportation disadvantaged, the homeless, individuals with chronic medical disorders and/or a pharmacological dependency. These individuals could also have disabilities, live in institutions, have limited English proficiency or may be non-English speaking.

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 individuals are able to access disaster recovery resources.

According to U.S. Census data, more than 18 percent of the population in the impacted counties speaks a language other than English at home and has limited English comprehension levels. Many counties throughout central and south Florida have non-English speaking population percentages well over 30 percent. Residents in these places, where a high percentage of the population speak different languages and English comprehension skills are limited, might require special attention in identification of and recruitment of program participants.¹³ Outreach to those eligible for assistance will require consideration of the language needs of these populations (see the *Section VI: Citizen Participation* for more information).

The map below shows concentrations of limited English by census tract (Figure 36).

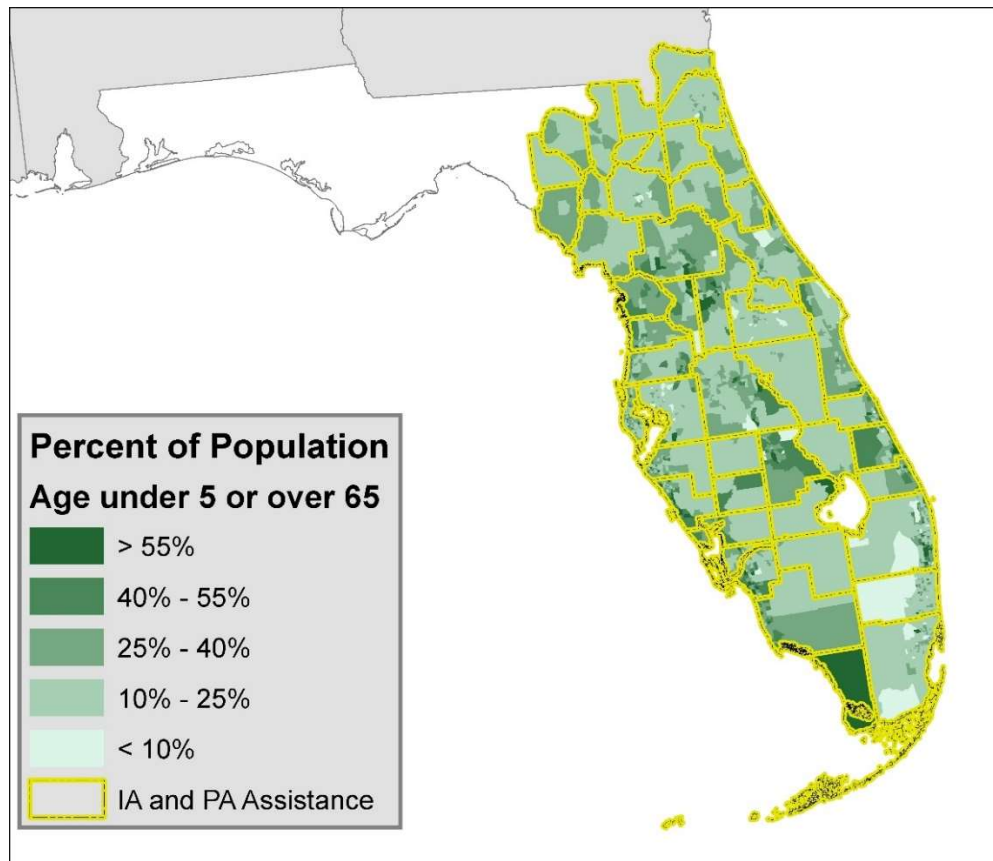


Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

¹³ Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Table 16001. County-level percent calculations by the Florida Department of Revenue and Fiscal Affairs - Health and Demographics Section.

Populations over the age of 65 or households with children under the age of five increase vulnerability. The map below (Figure 37) shows concentrations of households with elderly and young populations, by census tract. Concentrations of these age-dependent populations are noticeable in Citrus, Hernando, Indian River, Pasco and Volusia counties, in particular, as well as areas north and east of Lake Okeechobee and across Monroe County.

FIGURE 37: AGE DEPENDENT (< 5 YEARS OR > 65 YEARS) POPULATIONS BY TRACT



Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

Additionally, the map on the following page (Figure 38) shows relative concentrations of poverty across a majority of south central Florida and through the center of the state up to Jacksonville, followed by a map of larger concentrations of unemployment across the region (Figure 39). Another population of note, those living in mobile homes (Figure 40), is widespread across the state. Nearly 10 percent of the nation's mobile homes are located in Florida. This vulnerable subgroup should be monitored during recovery to ensure property mitigation and remediation are occurring on these fragile homes.

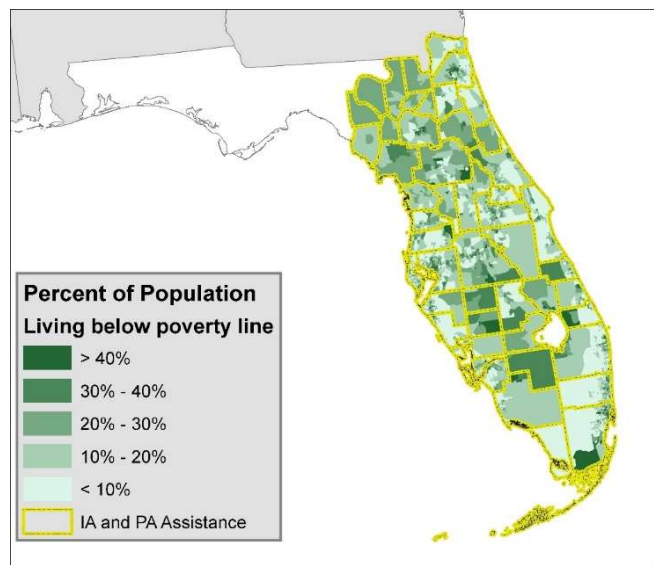


FIGURE 38: PERCENT OF POPULATION LIVING BELOW POVERTY LINE BY TRACT

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

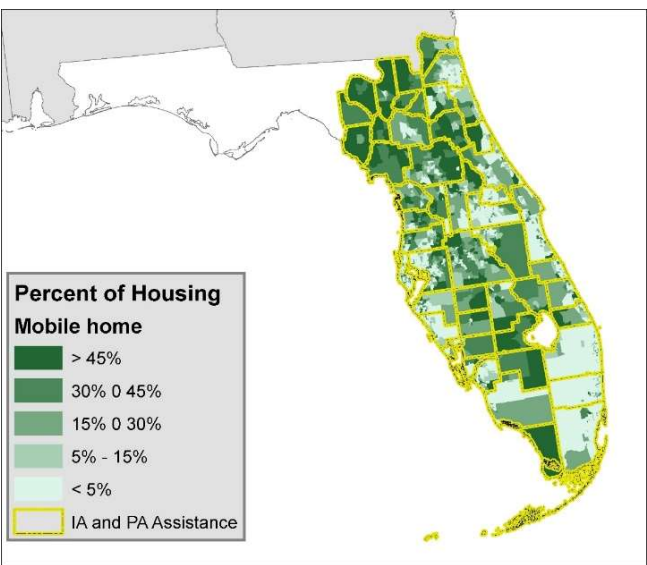


FIGURE 40: PERCENT MOBILE HOME POPULATIONS BY TRACT

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

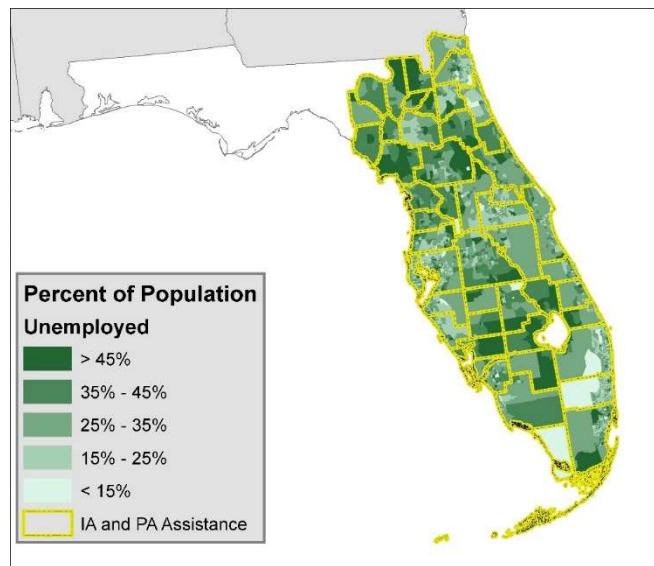


FIGURE 39: PERCENT UNEMPLOYMENT BY TRACT

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

Transitional Housing/Homelessness

The rain, winds and flooding from Hurricane Irma impacted community members across all walks of life. Table 6 below, shows the homeless population of each of 27 regional Continuum of Care (CoC) areas impacted by the hurricane. These areas are utilized by the state in collecting homeless data.¹⁴ A comparison between one-day homeless estimates in 2015 and 2016 reveals decreases in both sheltered (4 percent decrease) and unsheltered homelessness (10 percent decrease). Statewide across the 27 CoCs, the estimate of one-day homelessness taken from the annual Point-in-Time count held each January yielded a 7 percent drop in homelessness from 35,900 to 33,466. Seven (7) CoCs showed an increase in homelessness, while 20 CoCs reported decreases in one-day prevalence. This data continues a trend of decreasing homelessness since 2010 in the state of Florida. In the table below, numbers in red highlight values that have decreased between 2015 and 2016. These are estimates however, because homeless populations continue to be a difficult group to count accurately. For more information and data please see [HUD 2017 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations](#).

TABLE 6: CHANGES IN HOMELESSNESS POPULATION BY STATE CONTINUUM OF CARE AREA, 2015-2016

Changes in Homelessness Population by State Continuum Area, 2015-2016									
CoC Name	Total Homeless, 2016	Sheltered Homeless, 2016	Unsheltered Homeless, 2016	Total Homeless, 2015	Sheltered Homeless, 2015	Unsheltered Homeless, 2015	Total Difference 2016-2015	Sheltered Change 2016-2015	Unsheltered Change 2016-2015
Sarasota/Bradenton/Manatee, Sarasota Counties CoC	1,468	804	664	1,198	721	477	270	83	187
Tampa/Hillsborough County CoC	1,817	1,048	769	1,931	1,175	756	114	127	13
St. Petersburg/Clearwater/Largo/Pinellas County CoC	2,777	1,638	1,139	3,387	2,215	1,172	610	577	33
Lakeland/Winter Haven/Polk County CoC	635	375	260	464	227	237	171	148	23
Daytona Beach/Daytona/Volusia, Flagler Counties CoC	1,005	424	581	1,325	550	775	320	126	194

¹⁴ http://www.nhipdata.org/local/upload/file/Florida%20Homeless%20Report%202016%20%2009_30_16%20-%20final%20report.pdf

CoC Name	Total Homeless, 2016	Sheltered Homeless, 2016	Unsheltered Homeless, 2016	Total Homeless, 2015	Sheltered Homeless, 2015	Unsheltered Homeless, 2015	Total Difference 2016-2015	Sheltered Change 2016-2015	Unsheltered Change 2016-2015
Tallahassee/Leon County CoC	869	721	148	863	646	217	6	75	69
Orlando/Orange, Osceola, Seminole Counties CoC	1,613	1,480	133	2,112	1,820	292	499	340	159
Gainesville/Alachua, Putnam Counties CoC	844	419	425	870	317	553	26	102	128
Fort Pierce/St. Lucie, Indian River, Martin Counties CoC	2,382	248	2,134	2,412	236	2,176	30	12	42
Jacksonville-Duval, Clay Counties CoC	1,959	1,518	441	1,853	1,427	426	106	91	15
Saint Johns County CoC	1,064	255	809	1,161	198	963	97	57	154
Palm Bay/Melbourne/Brevard County CoC	827	644	183	1,072	684	388	245	40	205
Ocala/Marion County CoC	823	295	528	787	259	528	36	36	0
Hendry, Hardee, Highlands Counties CoC	1,071	313	758	1,218	278	940	147	35	182
Columbia, Hamilton, Lafayette, Suwannee Counties CoC	1,145	96	1049	1,115	66	1,049	30	30	0

CoC Name	Total Homeless, 2016	Sheltered Homeless, 2016	Unsheltered Homeless, 2016	Total Homeless, 2015	Sheltered Homeless, 2015	Unsheltered Homeless, 2015	Total Difference 2016-2015	Sheltered Change 2016-2015	Unsheltered Change 2016-2015
Pasco County CoC	1,019	159	860	1,019	159	860	NA	NA	NA
Citrus, Hernando, Lake, Sumter Counties CoC	595	303	292	731	267	464	136	36	172
Miami/Dade County CoC	4,235	3,253	982	4,152	3,145	1,007	83	108	25
Ft Lauderdale/Broward County CoC	2,302	1,520	782	2,615	1,796	819	313	276	37
Punta Gorda/Charlotte County CoC	388	134	254	562	162	400	174	28	146
Ft Myers/Cape Coral/Lee County CoC	439	256	183	614	300	314	175	44	131
Monroe County CoC	575	305	270	615	301	314	40	4	44
West Palm Beach/Palm Beach County CoC	1,332	507	825	1,421	596	825	89	89	0
Naples/Collier County CoC	545	328	217	389	345	44	156	17	173
TOTALS	24,027	17,043	14,686	33,886	13,002	18,286	3,873	4,323	2,132
% CHANGE 2015-2016							-7%	-4%	-10%

Emergency Shelters

Emergency sheltering for Hurricane Irma was moderate with approximately 443,000 people seeking emergency shelter at Red Cross shelter facilities.¹⁵ The American Red Cross reported nearly 700 shelters open across the state, staying open for days and sheltering thousands of people (Table 7). The massive evacuation ordered for coastal Florida in the days preceding Irma resulted in residents seeking shelter in hotels, motels, homes of friends and families, as well as public shelters across the state. Table 7 shows the locations of open shelters and the maximum number of people sheltered within each county during Irma's emergency period.

TABLE 7: SHELTER OCCUPANCY BY COUNTY FOR HURRICANE IRMA

Shelter Occupancy by County for Hurricane Irma					
County	Shelters in Operation	Total Sheltered (All Days)	County	Shelters in Operation	Total Sheltered (All Days)
Alachua	23	4,754	Leon	15	2,149
Baker	4	285	Levy	10	677
Bay	2	0	Liberty	1	0
Bradford	7	603	Madison	2	63
Brevard	27	9,689	Manatee	29	47,227
Broward	30	28,112	Marion	13	6,924
Calhoun	4	249	Martin	12	6,174
Charlotte	9	4,925	Miami-Dade	39	51,757
Citrus	7	394	Monroe	5	382
Clay	11	1,560	Nassau	7	487
Collier	31	12,163	Okaloosa	2	142
Columbia	4	460	Okeechobee	4	2,602
De Soto	3	1,558	Orange	30	10,558
Dixie	2	643	Osceola	14	8,128
Duval	20	6,045	Palm beach	20	46,689
Escambia	5	471	Pasco	17	4,501
Flagler	6	3,061	Pinellas	18	35,204
Gadsden	4	424	Polk	25	4,867
Gilchrist	4	717	Putnam	8	974
Glades	5	916	Saint Johns	11	2,637
Hamilton	2	51	Saint Lucie	14	9,157
Hardee	2	3,412	Santa Rosa	2	0
Hendry	10	3,037	Sarasota	16	20,320
Hernando	10	7,238	Seminole	11	3,861
Highlands	11	3,478	Sumter	7	3,609
Hillsborough	29	20,985	Suwannee	9	1,551
Holmes	3	92	Taylor	2	870
Indian River	6	4,478	Union	1	17

¹⁵ Red Cross data provided by FDEM

Shelter Occupancy by County for Hurricane Irma					
County	Shelters in Operation	Total Sheltered (All Days)	County	Shelters in Operation	Total Sheltered (All Days)
Jackson	2	136	Volusia	25	9,927
Jefferson	1	199	Wakulla	1	374
Lafayette	2	193	Walton	2	125
Lake	16	9,766	Washington	3	42
Lee	20	31,490	Grand Total	697	443,579

Hurricane Maria Evacuees to Florida

Hurricane Maria's impact on Puerto Rico left a majority of the island without power and destroyed much of the infrastructure including schools, homes and critical facilities. As a result, populations of evacuees headed to Florida and other states to find schools, jobs and safe living quarters. According to Florida's State Emergency Response Team (SERT) since October 3, 2017, more than 313,000 individuals have arrived in Florida from Puerto Rico. Estimates of evacuees from Puerto Rico to Florida were generated by FDEM operations at airports by the Florida Department of Education (Table 8) and by FEMA Transitional Sheltering Assistance Program. As of February 2018, 3,600 Maria evacuees still reside in hotels across the country with many of those receiving assistance in Florida. Utilizing true counts of student populations to extrapolate the number of people residing in Florida produces an estimated population of nearly 60,000 evacuees in the state (Table 9). Evacuee populations are higher in central Florida, including Orange, Osceola, Polk and Hillsborough, where more than 50 percent of the estimated total are approximated to be residing. These evacuee populations may lead to a decreased number of affordable housing units, decreased availability of public resources and strains on local and regional response and recovery resources.

TABLE 8: ESTIMATED NUMBER OF MARIA EVACUEES ENROLLED IN FLORIDA SCHOOLS, BY COUNTY.

Estimated Number of Maria Evacuees Enrolled in Florida Schools by County				
School Districts	K-12 Students (2015)	Post-Maria Increase	% Increase	Date Gathered
Statewide	209,270	10,324	4.9	
Orange	36,143	2,590	7.2	12/05/2017
Osceola	19,991	1,960	9.8	12/05/2017
Miami-Dade	19,010	788	4.1	12/05/2017
Broward	15,940	642	4	12/05/2017
Polk	10,467	700	6.7	12/05/2017
Hillsborough	23,661	854	3.6	12/05/2017

Estimated Number of Maria Evacuees Enrolled in Florida Schools by County				
School Districts	K-12 Students (2015)	Post-Maria Increase	% Increase	Date Gathered
Seminole	8,146	362	4.4	12/05/2017
Palm Beach	9,824	351	3.6	12/05/2017
Florida Virtual School	N/A	331	N/A	12/05/2017
Volusia	6,630	288	4.3	12/05/2017

TABLE 9: ESTIMATED MARIA EVACUEES AS A FUNCTION OF SCHOOL ENROLLMENTS

Estimated Maria Evacuees as a Function of School Enrollments	
Categories	Data
Total Population in Puerto Rico	3,529,385
Total ages 3 - 17 Enrolled in Puerto Rico	615,556
Total Households in Puerto Rico	1,571,744
School children per household in Puerto Rico	0.74
People per household in Puerto Rico	2.25
Total families with children in PR	836,321
Percent of families with school aged children in PR	53.21%
Percent of families without school children in PR	46.79%
Total children from Puerto Rico Enrolled in Florida Schools	10,324
Estimate of households with children in school in Florida	14,027
Estimate of school family population	31,497
Estimate of total evacuee households in Florida	26,362
Estimate of total evacuee population in Florida	59,196
Average LMI percent in Puerto Rico	48.81%

Estimated Maria Evacuees as a Function of School Enrollments	
Categories	Data
Estimate of LMI PR Families with children in Florida	15,375
Estimate of LMI PR Families in Florida	28,896

Section 3: Unmet Needs Assessment

Understanding where impacts and unmet needs remain following Hurricane Irma requires analysis of various datasets pertaining to housing, infrastructure and economy. In some instances, data on impacts and support can be collected from open source federal datasets and in others, close collaboration with states and locals is required to ensure appropriate data is used. Data gathered and analyzed in the assessment of impacts and unmet needs is listed in Table 10 below. Table 10 has been updated to reflect all data sources used throughout the unmet needs assessment.

TABLE 10: DATA SOURCES USED IN THE ASSESSMENT OF IMPACTS AND UNMET NEEDS

Data Sources Used in the Assessment of Impacts and Unmet Needs		
Data	Source	Date
Housing		
FEMA Housing Assistance - Owners	Open FEMA Dataset	9/23/2018
FEMA Housing Assistance - Renters	Open FEMA Dataset	9/23/2018
FEMA FIDA Applicant Report	FEMA Regional Office	9/12/2018
SBA Home Applicant Report	Small Business Administration	9/16/2018
Hurricane Irma Flood Claims	National Flood Insurance Program	9/05/2018
Hurricane Irma Insurance Claims	Florida Office of Insurance Regulation	9/22/2018
SBA Business Applicant Report	Small Business Administration	9/16/2018
Infrastructure		
PA Project Worksheet Summary - Irma	Florida Department of Emergency Management	8/29/2018
Public Assistance Funded Project Details	Open FEMA Dataset	9/23/2018
Economy		
SBA Business Applicant Report	Small Business Administration	02/11/2018

Note: Informational data on demographics and the storm can be found in Table 1. Table 10 addresses the sources used to help determine the remaining unmet need.

Summary of Impacts and Unmet Needs

Analysis of available datasets indicates that residual need from Hurricane Irma can be found across housing, infrastructure and economic sectors. Estimated total impacts (Table 11) from these storms is about \$16.5 billion across the three sectors and total estimated unmet needs top \$10.3 billion. Evidence (discussed in greater detail below) indicates that the housing sector has the most remaining unmet need (64.94 percent), followed by the economy (26.72 percent) and infrastructure (8.34 percent), indicating that any program focused on housing recovery will have a high impact on overall recovery across the state (Figure 41 and Table 11).

However, it is noteworthy that unmet needs for infrastructure projects has increased by 5% of overall unmet needs between the initial allocation of funding and the current allocation of funding. This adjustment in both the scope and scale of impacts and residual needs points to the fact that infrastructure recovery and resilience projects are also key to a successful recovery across the state. Specific investment in infrastructure can support lives and livelihoods by creating a significant return on investment across both the housing and economic sectors.

FIGURE 41: BREAKDOWN OF IMPACTS, SUPPORT AND UNMET NEED BY RECOVERY CATEGORY

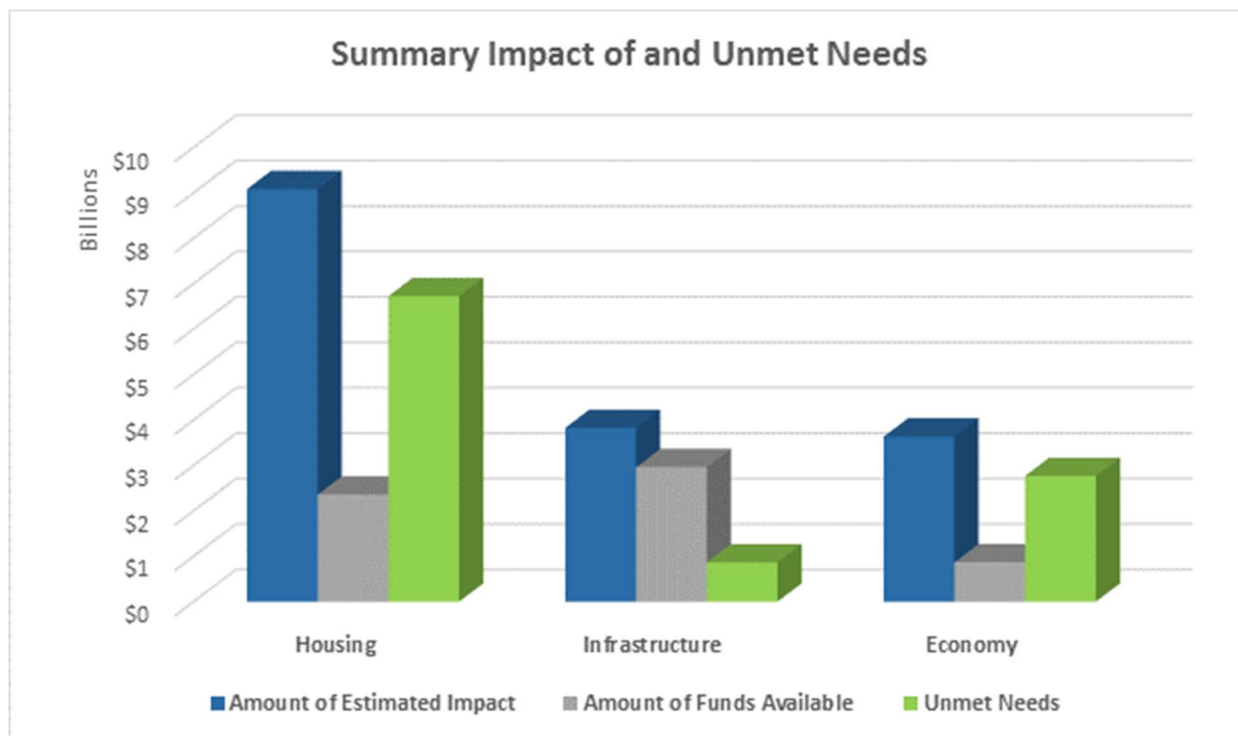


TABLE 11: ESTIMATED IMPACT, SUPPORT AND UNMET NEEDS

Estimated Impact, Support and Unmet Needs				
Summary of Impacts/Support	Housing	Infrastructure	Economy	Total
Amount of Estimated Impact	\$9,078,545,706	\$3,822,535,087	\$3,631,322,666	\$16,532,403,459
Amount of Funds Available	\$2,357,387,008	\$2,960,178,503	\$866,054,771	\$6,183,620,282
Unmet Needs	\$6,721,158,698	\$862,356,583	\$2,765,267,895	\$10,348,783,176
Percent of Total Unmet Needs	64.94%	8.34%	26.72%	100%

Housing Impact

Table 12 below shows the FEMA Real Property Verified Loss (RPFVL) determinations for owner occupied housing in the Florida Individual Assistance (IA) declared counties. FEMA Real Property Verified Losses are those losses to real property (physical structures) identified by FEMA upon inspection. As noted in Table 12 and 13, each county has a different number of homes inspected by FEMA. In some instances, inspection rates or the number of applicant homes visited by FEMA were less than 50 percent. These inspection statistics include homeowner and rental housing units. Losses in renter occupied housing is more difficult to obtain as certain because FEMA does not inspect rental property for real property damages. Table 12 shows that inspection rates for rental properties was higher than owner-occupied housing for this disaster and indicates an average FEMA payout to renters at more than \$1,000. With less than 50 percent of applicants served, DEO recognizes the unmet need for housing repair assistance. Table 12 has been updated to reflect the most current FEMA data at this time.

TABLE 12: FEMA IA OWNER APPLICANT SUMMARY IN THE HURRICANE IRMA IA IMPACTED COUNTIES¹⁶

FEMA IA Owner Occupied Applicants in the Hurricane Irma IA Impacted Counties								
County	# of Applicants	Number Inspected	% Inspected	Number with Inspected Damage	% With Inspected Damage	Number Receiving Repair Assistance	Total FEMA Verified Loss Amount	Average FEMA Verified Loss Amount
Alachua	9,746	3,817	39.16%	1,676	43.91%	2,992	\$3,691,165	\$2,202
Baker	1,793	731	40.77%	402	54.99%	541	\$918,724	\$2,285
Bradford	2,255	1,227	54.41%	717	58.44%	807	\$2,579,305	\$3,597
Brevard	35,362	13,565	38.36%	7,899	58.23%	8,267	\$16,148,609	\$2,044
Broward	129,637	41,451	31.97%	19,067	46.00%	32,723	\$24,535,420	\$1,287
Charlotte	8,416	2,611	31.02%	1,229	47.07%	2,245	\$2,471,358	\$2,011
Citrus	8,771	2,804	31.97%	1,328	47.36%	2,732	\$1,820,491	\$1,371
Clay	9,756	3,559	36.48%	1,976	55.52%	2,619	\$10,604,687	\$5,367
Collier	39,616	13,713	34.61%	8,061	58.78%	10,796	\$20,160,367	\$2,501
Columbia	4,286	1,710	39.90%	796	46.55%	1,318	\$1,607,552	\$2,020
DeSoto	2,526	1,456	57.64%	970	66.62%	950	\$2,662,790	\$2,745
Dixie	1,354	619	45.72%	412	66.56%	465	\$590,891	\$1,434
Duval	45,188	16,873	37.34%	8,550	50.67%	13,152	\$22,123,522	\$2,588
Flagler	5,507	1,916	34.79%	1,153	60.18%	1,397	\$4,731,723	\$4,104
Gilchrist	1,073	445	41.47%	206	46.29%	280	\$290,515	\$1,410
Glades	1,253	849	67.76%	541	63.72%	372	\$982,636	\$1,816
Hamilton	444	292	65.77%	206	70.55%	79	\$185,163	\$899
Hardee	2,476	1,357	54.81%	936	68.98%	806	\$2,498,150	\$2,669
Hendry	4,987	3,125	62.66%	2,030	64.96%	1,621	\$3,560,324	\$1,754
Hernando	9,151	3,179	34.74%	1,552	48.82%	2,694	\$2,728,800	\$1,758
Highlands	15,013	6,863	45.71%	4,559	66.43%	3,909	\$6,782,107	\$1,488
Hillsborough	48,793	15,510	31.79%	6,342	40.89%	13,301	\$10,029,360	\$1,581

¹⁶ <https://www.fema.gov/openfema-dataset-individual-assistance-housing-registrants-large-disasters-v1>

FEMA IA Owner Occupied Applicants in the Hurricane Irma IA Impacted Counties								
County	# of Applicants	Number Inspected	% Inspected	Number with Inspected Damage	% With Inspected Damage	Number Receiving Repair Assistance	Total FEMA Verified Loss Amount	Average FEMA Verified Loss Amount
Indian River	6,065	2,512	41.42%	1,415	56.33%	1,627	\$2,547,955	\$1,801
Lafayette	645	176	27.29%	50	28.41%	213	\$77,305	\$1,546
Lake	22,777	8,155	35.80%	4,592	56.31%	5,108	\$5,611,481	\$1,222
Lee	64,613	21,820	33.77%	12,307	56.40%	18,050	\$26,460,393	\$2,150
Leon	1	1	100.00%	0	0.00%	0	\$0	\$0
Levy	2,754	1,031	37.44%	490	47.53%	874	\$581,179	\$1,186
Manatee	15,037	5,094	33.88%	2,302	45.19%	3,840	\$3,469,041	\$1,507
Marion	27,014	8,725	32.30%	4,710	53.98%	8,876	\$7,362,376	\$1,563
Martin	4,625	1,744	37.71%	792	45.41%	1,065	\$1,042,841	\$1,317
Miami-Dade	222,309	73,047	32.86%	37,076	50.76%	62,678	\$50,815,293	\$1,371
Monroe	19,563	9,519	48.66%	6,445	67.71%	8,097	\$55,347,406	\$8,588
Nassau	4,331	1,535	35.44%	851	55.44%	1,221	\$2,107,763	\$2,477
Okeechobee	3,478	2,054	59.06%	1,273	61.98%	872	\$2,032,527	\$1,597
Orange	68,781	22,663	32.95%	11,352	50.09%	16,265	\$15,778,386	\$1,390
Osceola	19,728	8,120	41.16%	5,075	62.50%	3,458	\$7,651,763	\$1,508
Palm Beach	70,460	20,947	29.73%	9,306	44.43%	18,797	\$10,796,126	\$1,160
Pasco	24,661	8,307	33.68%	3,891	46.84%	6,632	\$6,171,614	\$1,586
Pinellas	70,178	16,448	23.44%	6,830	41.52%	20,470	\$7,159,990	\$1,048
Polk	55,701	23,232	41.71%	13,826	59.51%	15,565	\$22,284,197	\$1,612
Putnam	8,692	4,147	47.71%	2,539	61.22%	2,976	\$4,628,437	\$1,823
Sarasota	17,069	4,446	26.05%	1,930	43.41%	4,600	\$2,720,126	\$1,409
Seminole	27,855	7,639	27.42%	3,819	49.99%	7,011	\$6,495,527	\$1,701
St. Johns	8,029	3,095	38.55%	1,555	50.24%	2,321	\$5,979,050	\$3,845
St. Lucie	18,213	6,718	36.89%	3,723	55.42%	3,833	\$6,959,116	\$1,869
Sumter	4,503	1,849	41.06%	1,063	57.49%	1,332	\$1,716,242	\$1,615
Suwannee	3,150	1,251	39.71%	533	42.61%	1,012	\$680,840	\$1,277
Union	754	380	50.40%	185	48.68%	188	\$292,361	\$1,580
Volusia	32,093	9,578	29.84%	5,111	53.36%	8,779	\$9,973,969	\$1,951
Grand Total	1,210,482	411,905	34.03%	213,649	51.87%	329,826	\$408,446,963	\$2,013

TABLE 13: FEMA IA RENTER APPLICANT SUMMARY IN THE HURRICANE IRMA IA IMPACTED COUNTIES¹⁷

FEMA IA Renter Applicants in the Hurricane Irma IA Impacted Counties								
County	# of Applicants	Number Inspected	% Inspected	Number with Inspected Damage	% With Inspected Damage	Number Receiving Repair Assistance	Total FEMA Verified Loss Amount	Average FEMA Verified Loss Amount
Alachua	12,258	5,289	43.15%	277	5.24%	3,519	\$3,190,222	\$907
Baker	1,094	420	38.39%	24	5.71%	372	\$312,710	\$841
Bradford	1,297	670	51.66%	98	14.63%	440	\$475,615	\$1,081
Brevard	28,893	13,891	48.08%	1,225	8.82%	9,024	\$9,414,005	\$1,043
Broward	177,922	70,362	39.55%	3,116	4.43%	53,930	\$62,094,179	\$1,151
Charlotte	6,262	2,597	41.47%	206	7.93%	1,988	\$1,931,287	\$971
Citrus	5,565	1,904	34.21%	118	6.20%	1,655	\$1,432,304	\$865
Clay	6,046	2,375	39.28%	276	11.62%	1,762	\$2,090,510	\$1,186
Collier	32,531	15,584	47.91%	1,379	8.85%	11,127	\$13,611,274	\$1,223
Columbia	3,834	1,581	41.24%	81	5.12%	1,073	\$921,237	\$859
DeSoto	1,933	1,124	58.15%	153	13.61%	738	\$697,362	\$945
Dixie	581	223	38.38%	18	8.07%	188	\$157,911	\$840
Duval	66,736	31,090	46.59%	2,316	7.45%	21,023	\$21,029,640	\$1,000
Flagler	3,641	1,431	39.30%	172	12.02%	1,144	\$1,376,351	\$1,203
Gilchrist	502	195	38.84%	18	9.23%	140	\$141,066	\$1,008
Glades	505	338	66.93%	67	19.82%	175	\$192,837	\$1,102
Hamilton	174	97	55.75%	11	11.34%	18	\$13,892	\$772
Hardee	1,599	773	48.34%	75	9.70%	585	\$525,956	\$899
Hendry	3,150	1,974	62.67%	222	11.25%	1,047	\$1,068,817	\$1,021
Hernando	6,067	2,382	39.26%	146	6.13%	1,828	\$1,818,857	\$995
Highlands	8,465	4,665	55.11%	471	10.10%	3,118	\$3,220,323	\$1,033
Hillsborough	81,279	30,318	37.30%	1,160	3.83%	23,935	\$22,298,403	\$932
Indian River	5,293	2,486	46.97%	231	9.29%	1,540	\$1,533,314	\$996
Lafayette	330	91	27.58%	3	3.30%	124	\$102,440	\$826
Lake	15,904	6,273	39.44%	321	5.12%	4,676	\$4,666,701	\$998
Lee	61,059	28,545	46.75%	2,182	7.64%	21,218	\$21,575,432	\$1,017
Leon	1,545	539	34.89%	38	7.05%	459	\$361,134	\$787
Levy	16,003	6,281	39.25%	330	5.25%	5,146	\$5,153,807	\$1,002
Manatee	21,808	7,956	36.48%	512	6.44%	7,273	\$6,820,962	\$938
Marion	581	223	38.38%	18	8.07%	188	\$157,911	\$840
Martin	3,671	1,443	39.31%	89	6.17%	989	\$1,003,899	\$1,015
Miami-Dade	375,875	152,612	40.60%	8,172	5.35%	116,082	\$135,519,464	\$1,167
Monroe	20,102	12,268	61.03%	2,847	23.21%	8,619	\$19,526,067	\$2,265

¹⁷ <https://www.fema.gov/openfema-dataset-individual-assistance-housing-registrants-large-disasters-v1>

FEMA IA Renter Applicants in the Hurricane Irma IA Impacted Counties

County	# of Applicants	Number Inspected	% Inspected	Number with Inspected Damage	% With Inspected Damage	Number Receiving Repair Assistance	Total FEMA Verified Loss Amount	Average FEMA Verified Loss Amount
Nassau	2,119	843	39.78%	69	8.19%	633	\$683,851	\$1,080
Okeechobee	1,792	1,035	57.76%	97	9.37%	514	\$491,570	\$956
Orange	94,244	37,554	39.85%	1,899	5.06%	27,307	\$26,963,854	\$987
Osceola	16,981	7,980	46.99%	667	8.36%	4,315	\$4,696,189	\$1,088
Palm Beach	88,806	33,508	37.73%	1,414	4.22%	27,055	\$32,157,993	\$1,189
Pasco	23,151	9,148	39.51%	544	5.95%	6,765	\$6,832,511	\$1,010
Pinellas	75,600	25,782	34.10%	917	3.56%	24,055	\$23,786,615	\$989
Polk	47,441	22,673	47.79%	1,751	7.72%	15,995	\$15,325,745	\$958
Putnam	5,372	2,459	45.77%	188	7.65%	1,878	\$1,635,173	\$871
Sarasota	13,766	4,976	36.15%	304	6.11%	4,167	\$4,391,694	\$1,054
Seminole	29,398	9,728	33.09%	520	5.35%	10,198	\$10,501,617	\$1,030
St. Johns	4,577	2,016	44.05%	234	11.61%	1,392	\$1,531,806	\$1,100
St. Lucie	14,873	7,349	49.41%	817	11.12%	4,332	\$4,997,070	\$1,154
Sumter	2,622	1,079	41.15%	64	5.93%	715	\$625,270	\$875
Suwannee	2,066	713	34.51%	29	4.07%	668	\$521,327	\$780
Union	576	230	39.93%	13	5.65%	169	\$136,393	\$807
Volusia	30,434	12,822	42.13%	1,138	8.88%	9,806	\$11,204,601	\$1,143
Grand Total	1,426,323	587,895	41.22%	37,037	6.30%	445,107	\$490,919,168	\$1,016

Housing Types Affected

More than 2.6 million applicants throughout the state filed for FEMA IA as a result of Hurricane Irma. Of those who specified housing unit type, more than 57 percent live in houses or duplexes, 22 percent live in apartments and nearly 8 percent live in mobile homes (Table 14). Table 14 has been updated to reflect the most current FEMA data available at this time.

TABLE 14: FEMA IA APPLICANTS BY HOUSING TYPE

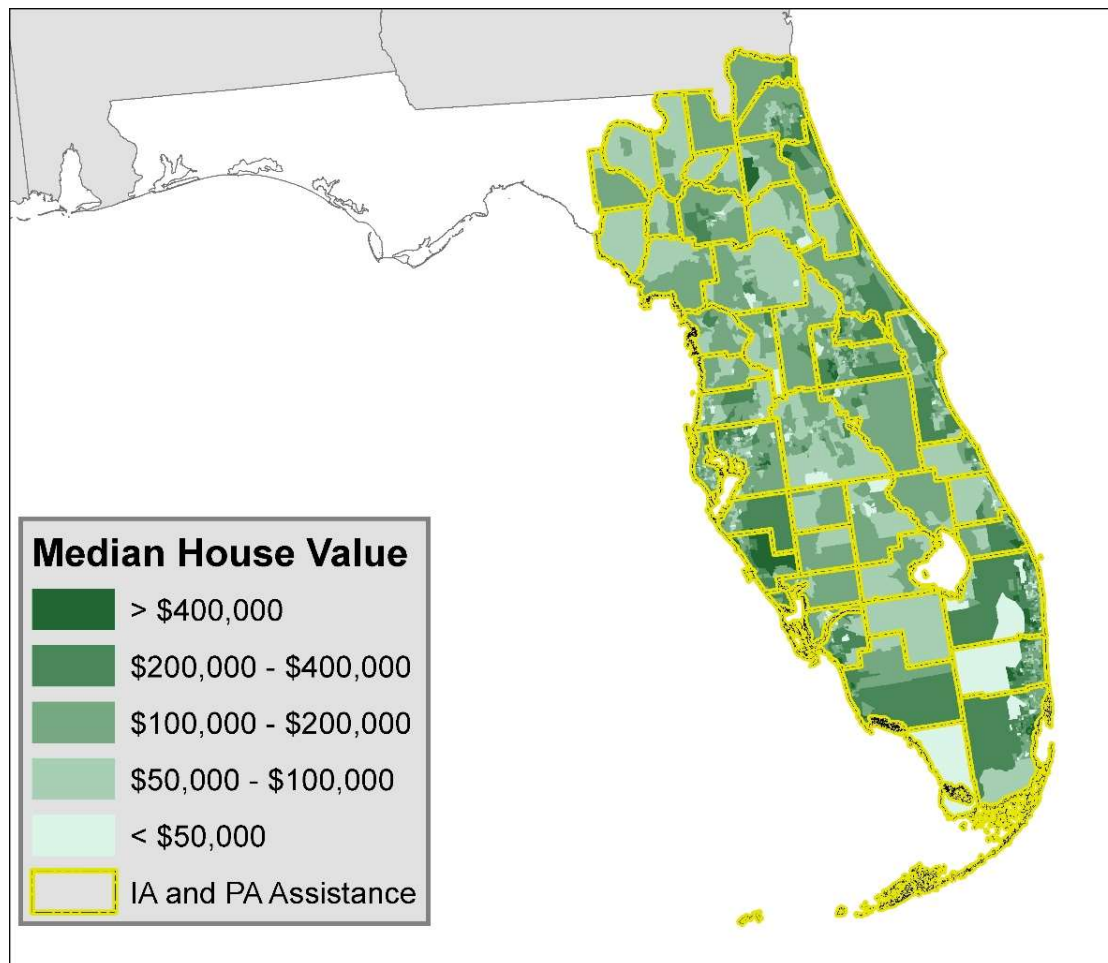
FEMA IA Applicants by Housing Type					
Residence Type	Number of Applicants	Percent of Total	% Owners	% Renters	% Not Specified
Apartment	586,129	22.16%	0.18%	99.73%	0.09%
Assisted Living Facility	2,109	0.08%	0.38%	99.29%	0.33%
Boat	2,777	0.11%	76.92%	22.40%	0.68%
College Dorm	761	0.03%	0.13%	98.55%	1.31%
Condo	113,709	4.30%	54.31%	45.56%	0.14%
Correctional Facility	266	0.01%	0.00%	99.25%	0.75%
House/Duplex	1,516,385	57.34%	61.21%	38.66%	0.13%

FEMA IA Applicants by Housing Type					
Residence Type	Number of Applicants	Percent of Total	% Owners	% Renters	% Not Specified
Military Housing	639	0.02%	0.47%	99.53%	0.00%
Mobile Home	204,017	7.72%	65.08%	34.66%	0.26%
Townhouse	100,124	3.79%	32.10%	67.29%	0.60%
Travel Trailer	107,274	4.06%	46.58%	53.34%	0.08%
Other	10,027	0.38%	63.87%	35.73%	0.40%
Unknown	192	0.01%	41.67%	53.65%	4.69%
Total	2,644,409	100.00%	45.93%	53.92%	0.15%

Single Family

Housing values range from millions to below \$50,000 in different regions of the state. Higher value homes are concentrated along the coast from Jacksonville through Brevard and into Palm Beach, Broward and Miami-Dade counties (Figure 42). However, there are pockets along the entire coast with lower house values, especially in some of the harder hit areas in south central, south east and central Florida.

FIGURE 42: MEDIAN HOUSE VALUE



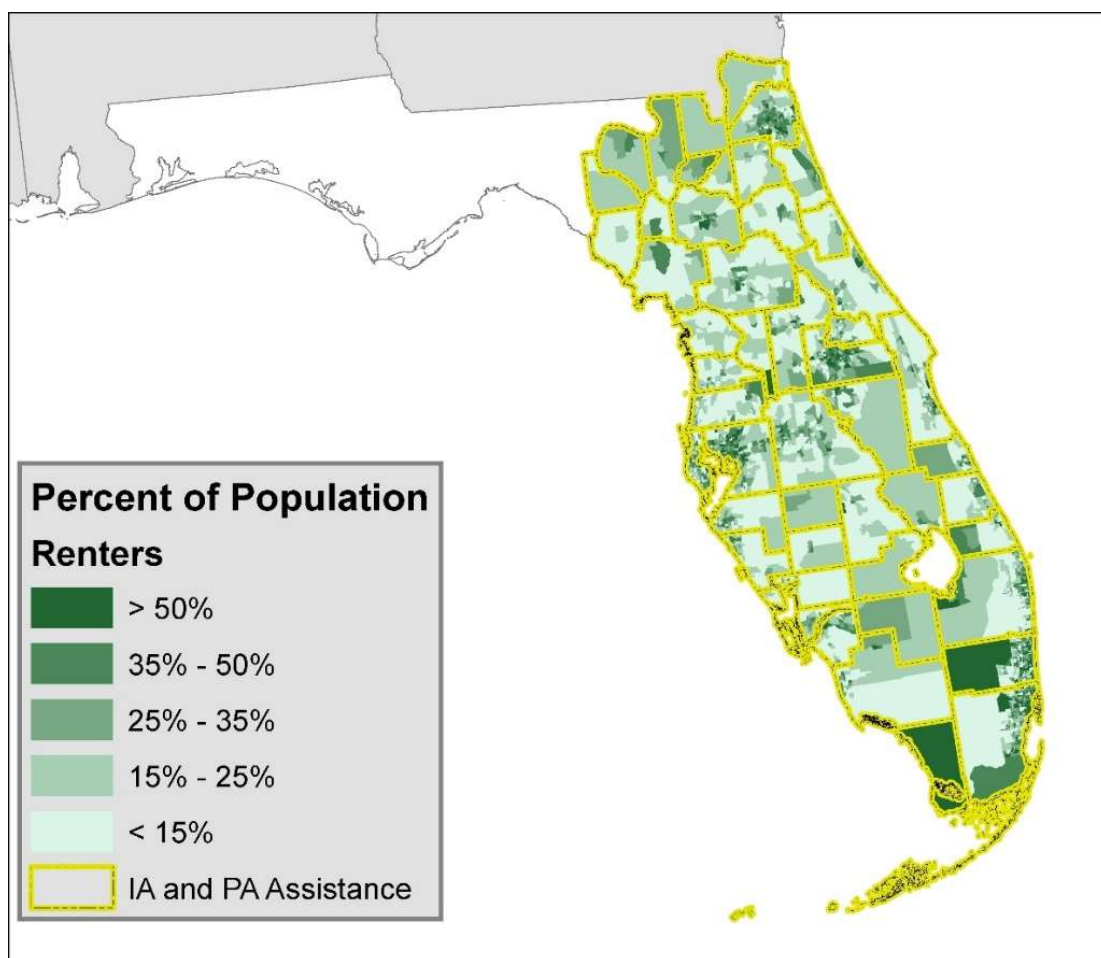
Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

There are over 9.6 million housing units across the entire impacted area, most of which are owner-occupied units. However, many of the impacted counties have substantial rental populations for a total of 2.4 million. Renter households may be adversely impacted during disasters due to the focus on repair of single-family homes during disaster recovery.

Rental Housing

Rental housing is an important component of affordable housing for impacted areas. Many areas in south and central Florida have large rental populations (Figure 43). Many renters live in older buildings (Table 14). Older building codes and in some cases, the lack of regular maintenance can make these units less resilient to disaster impacts. The median rent for the state is \$1,032 monthly.¹⁸

FIGURE 43: RENTER POPULATIONS



Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

Rental units in non-urban counties are primarily single family and mobile home units, with the majority of renters residing in those unit types as opposed to multi-family complexes. This is due to the rural nature of the communities. Some impacted counties have a substantial percentage of multi-family housing including apartments, townhomes

¹⁸ <https://www.census.gov/quickfacts/fact/table/US/PST045216>

and condos. Areas with more multi-family homes face distinctly different sets of challenges in recovery, including navigating multiple insurance carriers and absentee owners unable/unwilling to commit resources to address shared problems (such as damaged roofs).

Based on Table 16, as well as input from federal and state departments and agencies, local communities, stakeholder groups and citizens, Florida's rental housing needs include:

- Rental programs to assist currently displaced low-and moderate-income households;
- Rental programs to repair or replace damaged rental units, particularly those that service low- and moderate-income households;
- Rental needs that were exacerbated by the influx of Puerto Rican populations following Hurricane Maria.

Table 16 has been updated to reflect all data sources used through the unmet needs assessment.

TABLE 15: RENTAL UNITS BY YEAR BUILT¹⁹

Rental Units by Year Built		
Year Built	Number of Units	Percentages
Built 2010 or later:	67,195	2.58%
Built 2000 to 2009:	477,626	18.33%
Built 1980 to 1999:	943,492	36.21%
Built 1960 to 1979:	773,660	29.69%
Built 1940 to 1959:	271,692	10.43%
Built 1939 or earlier:	72,277	2.77%
Total Units	2,605,942	100%

TABLE 16: 2017 HURRICANE IMPACT TO HOMEOWNER UNITS AND RENTAL UNITS

2017 Hurricane Irma Impact to Homeowner				
High Damage Properties as Percentage of State Total of High Damage				
County	Total HO Units with Real Property Damage over \$20,000	Total Rental Units with Major-Low or Greater Personal Property Damage	Total Properties with High Damage	Percentage of State Damaged HO & Rental Properties/Units with High Damage Level
Alachua	9	50	59	0.94%
Baker	1	1	2	0.03%
Bradford	5	12	17	0.27%
Brevard	47	164	211	3.36%
Broward	39	303	342	5.45%
Charlotte	1	31	32	0.51%
Citrus	3	6	9	0.14%
Clay	149	92	241	3.84%
Collier	55	208	263	4.19%
Columbia	4	12	16	0.25%
DeSoto	5	12	17	0.27%

¹⁹ ACS 2012-2016, B25127 - VACANCY STATUS

Dixie	1	1	2	0.03%
Duval	45	308	353	5.62%
Flagler	7	29	36	0.57%
Gilchrist		5	5	0.08%
Glades	2	4	6	0.10%
Hardee	7	9	16	0.25%
Hendry	10	15	25	0.40%
Hernando	5	11	16	0.25%
Highlands	11	71	82	1.31%
Hillsborough	16	147	163	2.60%
Indian River	5	15	20	0.32%
Lake	6	32	38	0.61%
Lee	52	302	354	5.64%
Manatee	2	43	45	0.72%
Marion	16	69	85	1.35%
Martin	2	9	11	0.18%
Miami-Dade	71	833	904	14.40%
Monroe	471	880	1,351	21.52%
Nassau	7	9	16	0.25%
Okeechobee	7	8	15	0.24%
Orange	26	262	288	4.59%
Osceola	12	88	100	1.59%
Palm Beach	8	179	187	2.98%
Pasco	10	55	65	1.04%
Pinellas	6	108	114	1.82%
Polk	32	201	233	3.71%
Putnam	6	24	30	0.48%
Sarasota	2	19	21	0.33%
Seminole	9	60	69	1.10%
St. Johns	19	19	38	0.61%
St. Lucie	16	91	107	1.70%
Sumter	4	7	11	0.18%
Suwannee	2	2	4	0.06%
Union		1	1	0.02%
Volusia	12	247	259	4.12%
Total	1225	5054	6279	100.02%

The table below uses Census data to describe the extent to which owner and renter households at different annual income levels (expressed in dollars) pay more than 30 percent of their income for housing costs. For other tables and charts, a unit is considered “affordable” if the household pays no more than 40 percent of income for housing, consistent with the threshold used in the *Rental Market Study*. These tables and charts express income as a percentage of “area median income” (AMI), adjusted for region and household size. In this report, a “low-income” household has an income at or below 60 percent AMI, consistent with the *Rental Market Study* measure.

For owners, housing costs include mortgages, taxes, insurance, utilities and association fees. For renters, housing costs include rent and utilities. Additionally, renters with incomes below \$35,000 per year are the most likely to spend more than 30 percent of their income for housing costs. The lowest income owners are also heavily impacted by housing costs. Three-quarters of owners with incomes below \$20,000 per year spend more than 30 percent of income for housing

TABLE 17: PERCENTAGE OF INCOME SPENT ON HOUSING BY OWNER/RENTER STATUS AND HOUSEHOLD INCOME, FLORIDA, 2015

Percentage of Income Spent on Housing by Owner/Renter Status and Household Income, Florida, 2015						
Annual Household Income	Owner Households			Renter Households		
	# Spending Less than 30%	# Spending Over 30%	% Spending Over 30%	# Spending Less than 30%	# Spending Over 30%	% Spending Over 30%
Less than \$20,000	145,920	448,569	76%	40,344	591,991	94%
\$20,000 to \$34,999	362,211	365,613	50%	81,255	464,425	85%
\$35,000 to \$49,999	419,170	257,897	38%	196,640	203,272	51%
\$50,000 to \$74,999	690,818	226,327	25%	307,015	87,307	22%
\$75,000 or more	1,630,575	153,602	9%	353,176	20,139	5%

Source: U.S. Census Bureau, 2015 American Community Survey.

TABLE 18: COST BURDEN DATA, FLORIDA SUMMARY

Cost Burden Data, Florida Summary			
Income by Cost Burden (Owners and Renters)	Cost burden > 30%	Total Households in Income Group	% Cost Burdened (>30%)
Household Income <= 30% HUD Area Median Family Income (HAMFI)	661,620	893,285	74%
Household Income >30% to <=50% HAMFI	656,545	863,460	76%
Household Income >50% to <=80% HAMFI	716,630	1,245,595	58%
Total	2,034,795	3,002,340	67.77%
Income by Cost Burden (Renters only)	Cost burden > 30%	Total	
Household Income <= 30% HAMFI	388,880	518,385	75%
Household Income >30% to <=50% HAMFI	365,835	418,755	87%
Household Income >50% to <=80% HAMFI	357,370	512,555	70%
Total	1,112,085	1,449,695	76.71%
Income by Cost Burden (Owners only)	Cost burden > 30%	Total	
Household Income <= 30% HAMFI	272,730	374,905	73%
Household Income >30% to <=50% HAMFI	290,705	444,705	65%
Household Income >50% to <=80% HAMFI	359,260	733,040	49%
Total	922,695	1,552,650	59.42%

Source: Most recent HUD CHAS data, which is a special tabulation of 2010-2014 ACS data, <https://www.huduser.gov/portal/datasets/cp.html>

Affordable Housing

The need for affordable rental housing in Florida was great even before the 2017 storms occurred. Florida's existing shortage of affordable housing was further exacerbated by Hurricanes Irma and Maria. To plan for and achieve sustainable growth in affordable housing there must first be an understanding of the population of working households with a continued inability to reach a threshold level of monetary security and survivability. According to an annual study for Florida that focuses on understanding Asset Limited, Income Constrained, employed (ALICE) households across the state, every county impacted by Irma already has a significant percentage of households that earn more than the Federal Poverty Level (FPL) but less than what it costs to survive in Florida. The ALICE population represents those among us who are working. However, due to child care costs, transportation challenges, high cost of living and other variables, they are living paycheck to paycheck. The bare-minimum Household Survival Budget increased by an average of 19 percent from 2007 to 2015 (Table 18), while the rate of inflation was 14 percent. This threshold, affording only a very modest living, is still significantly more than the Federal Poverty Level of \$11,770 for a single adult and \$24,250 for a family of four. Table 19 shows the total percent of those living in poverty according to the federal definition and those living under ALICE conditions. Combined, this percentage identifies a lack of ability to procure housing under current economic conditions. According to a recent analysis from the Urban Institute²⁰, the need for more affordable housing is evident across the state. Low levels of affordable rental housing for extremely-low income (< 30 percent AMI) households across the disaster affected counties shows a clear need for additional housing.

HUD Comprehensive Housing Affordability Strategy (CHAS) data show more than 1.1 million cost-burdened renter households in Florida with incomes at or below 80 percent of area median income (AMI).²¹ Florida Housing Finance Corporation administers federal and state housing dollars on behalf of the state, including Low Income Housing Tax Credits. In its rental portfolio of approximately 176,000 active rental units serving mainly households with incomes at or below 60 percent of AMI, fourth quarter 2017 occupancy rates were over 97 percent, higher than the state or nation's rental stock as a whole.

TABLE 19: COST OF LIVING

Cost of Living			
Monthly Costs	Single Adult	One Adult, One Child, One Preschooler	2007-2015 Percent Increase
Housing	\$609	\$842	22%
Child Care	N/A	\$1,015	10%
Food	\$165	\$547	14%
Transportation	\$326	\$653	2%
Health Care	\$164	\$628	>48%*
Miscellaneous	\$145	\$408	19%
Taxes	\$189	\$395	20%
Monthly Total	\$1,598	\$4,488	19%
Annual Total	\$19,176	\$53,856	

²⁰ United Way ALICE Report: Florida accessible at <http://www.uwof.org/alice>

²¹ The Shimberg Center for Housing Studies, University of Florida, 2016 Rental Market Study, July 2016, <http://www.floridahousing.org/press/publications/2016-rental-market-study>. Prepared for Florida Housing Finance Corporation, the study uses a 40 percent cost burden measure rather than the national 30 percent measure to assist Florida Housing with policy decisions in targeting program resources.

TABLE 20: POVERTY LEVELS

Poverty Levels				
County	Total Households	% ALICE and Poverty	Total Number of Extremely-Low Income (ELI) Renter Households ²²	Number of Affordable Rental Units for every 100 ELI Households ²³
Alachua	96,427	46%	15,953	33
Baker	8,205	46%	644	61
Bradford	8,770	50%	802	60
Brevard	225,682	34%	14,531	41
Broward	673,870	44%	54,914	24
Charlotte	72,671	40%	3,017	45
Citrus	60,541	43%	3,777	45
Clay	71,733	33%	3,060	26
Collier	134,906	33%	7,043	40
Columbia	24,238	45%	2,206	54
DeSoto	11,238	58%	850	67
Dixie	6,051	55%	*	24
Duval	343,467	37%	33,926	42
Flagler	39,281	45%	1,795	40
Gilchrist	6,187	50%	*	33
Glades	3,920	65%	*	24
Hamilton	4,688	57%	*	24
Hardee	7,618	65%	690	67
Hendry	11,345	64%	1,045	54
Hernando	70,713	42%	4,341	36
Highlands	41,116	49%	3,284	66
Hillsborough	503,154	42%	47,090	32
Indian River	55,494	40%	4,230	38
Lafayette	2,493	57%	*	24
Lake	126,519	41%	7,231	54
Lee	263,694	43%	16,408	34
Levy	15,516	50%	1,072	63
Manatee	134,690	43%	8,617	65
Marion	125,227	47%	9,022	47
Martin	65,101	41%	3,058	22
Miami-Dade	857,712	61%	121,930	36
Monroe	31,391	46%	2,937	45
Nassau	29,674	37%	1,612	52
Okeechobee	13,046	58%	1,235	48
Orange	457,736	43%	42,171	18
Osceola	98,301	60%	8,436	22

²² <http://apps.urban.org/features/rental-housing-crisis-map/>²³ <http://apps.urban.org/features/rental-housing-crisis-map/s>

Poverty Levels				
County	Total Households	% ALICE and Poverty	Total Number of Extremely-Low Income (ELI) Renter Households ²²	Number of Affordable Rental Units for every 100 ELI Households ²³
Palm Beach	545,780	40%	36,812	31
Pasco	192,628	42%	10,156	43
Pinellas	400,209	41%	29,631	32
Polk	227,122	51%	18,090	40
Putnam	28,165	52%	2,444	51
Sarasota	177,807	33%	7,936	27
Seminole	162,739	37%	7,383	23
St. Johns	83,247	28%	3,891	29
St. Lucie	108,811	46%	8,702	38
Sumter	48,039	42%	1,028	58
Suwannee	15,649	48%	1,699	79
Union	3,883	70%	*	24
Volusia	209,657	42%	15,534	34

* Value not provided for counties with population below 20,000 and sample size below 50.

Source: HUD CHAS data, <https://www.huduser.gov/portal/datasets/cp.html>

Of the FEMA applicants to the IA program from impacted counties, nearly 50 percent live in rental housing; 1,113,657 of whom are also of low- and moderate-income.

HUD-Assisted Properties and Programs

Public Housing was established to provide housing options to low-income families, the elderly and persons with disabilities. Public Housing comes in many forms and is designed to help vulnerable populations. Tables 20 through 22 display additional data from HUD on Hurricane Irma's impact to HUD-assisted and/or HUD-insured properties. All data is for areas approved for FEMA Individual Assistance. HUD's rental programs provide assistance through multifamily housing, public housing and housing choice vouchers. These programs provide assistance to more than 230,000 housing units in the impacted areas. Tables 21-23²⁴ detail the number of reported impacts and identify the number of displaced households from HUD-assisted properties and programs.

TABLE 21: IMPACTS TO RENTAL PROGRAMS

Multifamily Housing		
Number of Properties	Total Number of Units	Total Number of Assisted Units
910	106,513	45,902
Number of Properties with No Reported Damage	Total Number of Units with No Reported Damage	Total Number of Assisted Units with No Reported Damage
277	31,372	9,765
Number of Properties with Minor Damage	Total Number of Units with Minor Damage	Total Number of Assisted Units with Minor Damage
506	58,012	29,032

²⁴ HUD Hurricane Irma SITREP 12 April 2018

Number of Properties with Modest Damage	Total Number of Units with Modest Damage	Total Number of Assisted Units with Modest Damage
93	13,939	5,748
Number of Properties with Major Damage	Total Number of Units with Major Damage	Total Number of Assisted Units with Major Damage
12	1,587	910
Number of Properties Awaiting Assistance	Total Number of Units Awaiting Assistance	Total Number of Assisted Units Awaiting Further Assistance
22	1,603	447

TABLE 22: IMPACT TO PUBLIC HOUSING

Public Housing	
Number of PHAs	Total Number of Units
76	31,232
Number of PHAs with No Reported Damage	Total Number of Assisted Units with No Reported Damage
53	29,453
Number of PHAs with Reported Damage	Number of Damaged Units
23	1,779

TABLE 23: DISPLACED HOUSEHOLDS

Displaced Households		
Program	Displaced	Returned/Rehoused
Multifamily Housing	793	299
Public Housing	239	238
Housing Choice Vouchers	22	19
Total	1,054	556

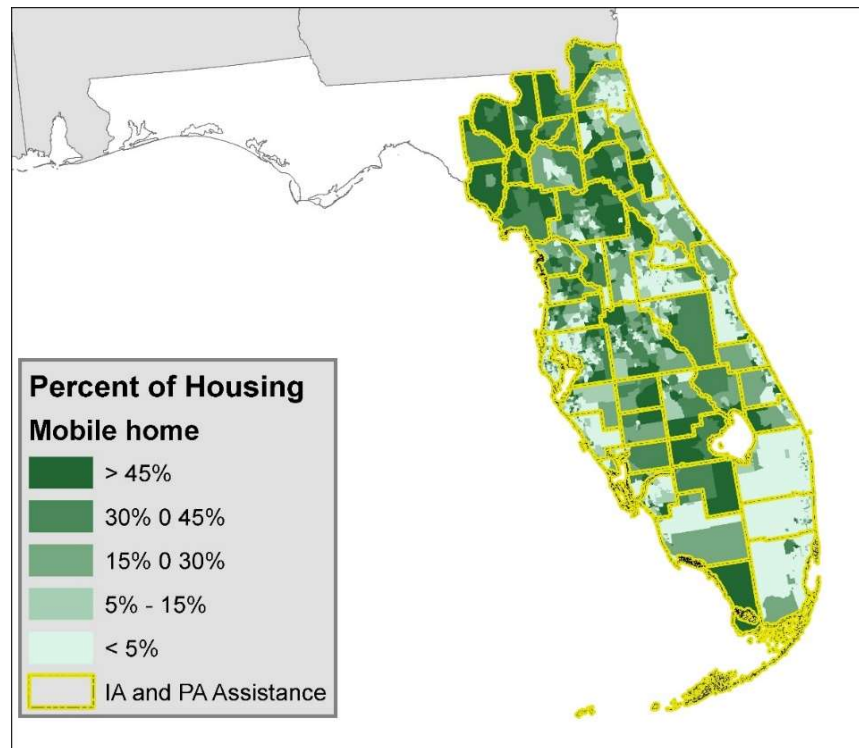
Mobile Homes

Mobile home affordability and ease of general maintenance provides housing independence and choice to residents across the state (Figure 44). However, wind and flood damage to mobile homes can be difficult to repair due to the integrated nature of the building components. In addition, when considering the feasibility of repairing a structure, the cost of making those repairs to mobile homes may be disproportionately high compared to the overall value of the structure.

The full extent of damage to mobile homes may not be realized in the early months after an event and can go unreported in the initial damage inspection. Damage such as water saturation of the particle board material that makes up the floor framing and decking can cause unsafe deterioration over time. The potential for mold and mildew in the home's structure or insulation can develop over time as well.

Of the FEMA IA applicants in the state-assessed areas, 205,432 of them reside in mobile home units.

FIGURE 44: MOBILE HOME POPULATIONS



Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

Mobile home damage was widespread across the state, from the Keys through central and north Florida. Because mobile home construction is less protective against wind hazards, impacts to these structures, often not immediately apparent, can result in compounded losses if not mitigated. Twenty-five counties, noted below have damaged mobile homes representing a potential cohort of unmet needs. Nineteen of these counties have more than 1,000 mobile homes with FEMA verified losses, indicating possible concentrations of damage and unmet needs. This less protective housing type is also concentrated in certain areas, as illustrated in the map above. These areas, including counties in south, central and north Florida are the most-impacted counties in terms of simple count of the number of homes with documented FEMA verified loss.

In total across the state, there were 53,435 mobile homes with FEMA Real Property Verified Losses identified by FEMA inspectors. Table 24 shows the number of mobile homes and FEMA verified property losses by county. Table 24 has been updated with the most current FEMA, SBA and NFIP data available at this time.

TABLE 24: MOBILE HOMES WITH VERIFIED LOSS BY COUNTY

Mobile Homes with Verified Loss by County							
County	Count of Mobile Homes with FEMA Real Property Verified Losses	Total FEMA Real Property Verified Loss	Average FEMA Real Property Verified Loss	County	Count of Mobile Homes with FEMA Real Property Verified Losses	Total FEMA Real Property Verified Loss	Average FEMA Real Property Verified Loss
Alachua	590	\$916,212	\$1,553	Lee	2,849	\$5,873,326	\$2,062
Baker	236	\$488,042	\$2,068	Levy	318	\$273,824	\$861
Bradford	316	\$839,386	\$2,656	Manatee	864	\$1,048,461	\$1,213
Brevard	1,918	\$4,159,645	\$2,169	Marion	2,287	\$2,699,387	\$1,180
Broward	2,306	\$2,146,538	\$931	Martin	326	\$404,970	\$1,242
Charlotte	334	\$620,878	\$1,859	Miami-Dade	3,209	\$3,703,487	\$1,154
Citrus	694	\$840,293	\$1,211	Monroe	1,736	\$13,634,984	\$7,854
Clay	596	\$1,762,135	\$2,957	Nassau	454	\$956,330	\$2,106
Collier	2,265	\$7,333,037	\$3,238	Okeechobee	747	\$1,014,317	\$1,358
Columbia	430	\$678,368	\$1,578	Orange	2,253	\$2,184,778	\$970
DeSoto	459	\$935,580	\$2,038	Osceola	1,260	\$1,678,627	\$1,332
Dixie	241	\$272,906	\$1,132	Palm Beach	1,787	\$1,641,225	\$918
Duval	918	\$1,387,555	\$1,511	Pasco	1,447	\$1,776,341	\$1,228
Flagler	310	\$1,249,793	\$4,032	Pinellas	2,068	\$1,662,335	\$804
Gilchrist	140	\$149,909	\$1,071	Polk	5,519	\$7,609,166	\$1,379
Glades	323	\$583,273	\$1,806	Putnam	1,486	\$2,036,069	\$1,370
Hamilton	125	\$98,753	\$790	Sarasota	424	\$525,157	\$1,239
Hardee	365	\$812,052	\$2,225	Seminole	500	\$773,801	\$1,548
Hendry	1,334	\$2,036,276	\$1,526	St. Johns	588	\$1,602,272	\$2,725
Hernando	611	\$996,259	\$1,631	St. Lucie	705	\$690,878	\$980
Highlands	1,649	\$2,127,276	\$1,290	Sumter	598	\$862,596	\$1,442
Hillsborough	1,686	\$2,343,934	\$1,390	Suwannee	350	\$412,533	\$1,179
Indian River	394	\$557,598	\$1,415	Union	120	\$183,895	\$1,532
Lafayette	24	\$31,818	\$1,326	Volusia	1,348	\$1,942,120	\$1,441
Lake	1,928	\$1,846,511	\$958	Grand Total	53,435	\$90,404,906	\$1,704

Residential Properties in the Flood Zone

Many people across the state reside in areas at risk of flooding. Residential construction occurred without any regulated understanding of flood zones prior to the 1968 establishment of the National Flood Insurance Program (NFIP). Since then, counties and municipalities have only regulated residential (and other) construction in the flood zone when said counties were participants in the National Flood Insurance Program. Of these counties, those participating in the Community Rating System (CRS) provide discounted flood insurance in exchange for implementing and enforcing regulations about where and how construction could take place. Today, while many counties and cities across the state participate in CRS, there are still 16 counties and many more municipalities that do not participate and are not required to enforce the full suite of mitigation and flood reduction measures available. Furthermore, while all banks providing federally backed mortgages require homeowners to carry flood insurance, those homeowners who do not have a mortgage have no mortgage requirement to carry flood insurance. In Florida, there are 3,135,904 residential structures in the 100-year flood zone, yet only 1,763,729 policies in force²⁵ (both inside and outside of the flood zone). Table 26 provides a breakdown of parcels, residences and applicants to the Hurricane Irma FEMA Housing Assistance Program. Table 26 has been updated with the most current FEMA, SBA and NFIP data available at this time. The number of residential units inside the 100-year flood zone and the dollar losses of these units from Hurricane Irma are ready indicators of a growing challenge across the state in finding safe, resilient and sustainable homes for residents. Table 25 shows the number of structures determined to be substantially damaged by community. The data in Table 25 was collected by the Florida Division of Emergency Management.

TABLE 25: SUBSTANTIALLY DAMAGED DETERMINED (SD) STRUCTURES AND RESPECTIVE COMMUNITIES

Substantially Damaged Determined (SD) Structures and Respective Communities						
County	Community	Assigned Branch	Contacted	SD List Received?	SD Obtained by?	SD Structures
ALACHUA	ALACHUA COUNTY	2	YES	Y	LETTER	7
BAKER	BAKER COUNTY	2	YES	Y	FCAC	1
FLAGLER	TOWN OF BEVERLY BEACH	2	YES	Y	LETTER	8
LEE	CITY OF BONITA SPRINGS	4	YES	Y	LETTER	6
BRADFORD	BRADFORD COUNTY	2	YES	Extension Requested		
BREVARD	BREVARD COUNTY	3	YES	NO SD	FCAC	0
LEE	CITY OF CAPE CORAL	4	YES	N		
CHARLOTTE	CHARLOTTE COUNTY	4	YES	Y	FCAC	1
CLAY	CLAY COUNTY	2	YES	Y	FCAC	76
COLLIER	COLLIER COUNTY	4	YES	Y	FCAC	288
COLUMBIA	COLUMBIA COUNTY	1	YES	NO SD	FCAC	0
MIAMI-DADE	CITY OF CORAL GABLES	5	YES	NO SD	LETTER	0
VOLUSIA	CITY OF DAYTONA BEACH	3	NO	N		
DESOTO	DESOTO COUNT	4	YES	Y - ONGOING	FCAC	2

²⁵ <https://bsa.nfipstat.fema.gov/reports/1011.htm>

Substantially Damaged Determined (SD) Structures and Respective Communities						
County	Community	Assigned Branch	Contacted	SD List Received?	SD Obtained by?	SD Structures
LEE	VILLAGE OF ESTERO	4	YES	Y	LETTER	1
COLLIER	EVERGLADES CITY	4	YES	Y - ONGOING		130
VOLUSIA COUNTY/FLAGLER FLAGLER	CITY OF FLAGLER BEACH	2	YES	Y - PENDING	FCAC	8
	FLAGLER COUNTY	2	YES	Y - PENDING		Unknown
LEE	TOWN OF FORT MYERS BEACH	4	NO	N		
LEE	CITY OF FORT MYERS	4	YES	Y	FCAC	1
ST. LUCIE	CITY OF FORT PIERCE	3	NO	N		
GLADES	GLADES COUNTY	4	NO	N		
HENDRY	HENDRY COUNTY	4	NO	N		
HERNANDO	HERNANDO COUNTY	3	NO	Y	LETTER	12
HIGHLANDS	HIGHLANDS COUNTY	4	YES	Y	FCAC	1
HILLSBOROUGH	HILLSBOROUGH COUNTY	3	NO	Extension Requested		
VOLUSIA	CITY OF HOLLY HILL	3	YES	NO SD	FCAC	0
BROWARDY	CITY OF HOLLYWOOD	5	YES	Y - PENDING		Unknown
INDIAN RIVER	INDIAN RIVER COUNTY	3	YES	NO SD	FCAC	0
MONROE	VILLAGE OF ISLAMORADA	5	YES	Y	LETTER	67
DUVAL	CITY OF JACKSONVILLE BEACH	2	YES	Y - PENDING		Unknown
DUVAL	CITY OF JACKSONVILLE	2	YES	Y - PENDING	FCAC	Unknown
MIAMI-DADE	VILLAGE OF KEY BISCAYNE	5	YES	NO SD	FCAC	0
MONROE	CITY OF KEY COLONY BEACH	5	YES	Y - PENDING	FCAC	3
MONROE	CITY OF KEY WEST	5	YES	Y	FCAC	5
OSCEOLA	CITY OF KISSIMMEE	3	YES	NO SD	LETTER	0
LAKE	LAKE COUNTY	3	NO	Y	LETTER	15
POLK	CITY OF LAKELAND	3	YES	Y	LETTER	45
MONROE	CITY OF LAYTON	5	YES	Y - PENDING	FCAC	7
LEE	LEE COUNTY	4	YES	Y	FCAC	9
MANATEE	MANATEE COUNTY	4	YES	NO SD	FCAC	0
MONROE	CITY OF MARATHON	5	YES	Y	FCAC	1402
COLLIER	CITY OF MARCO ISLAND	4	YES	Y	LETTER	2
MARTIN	MARTIN COUNTY	3	NO	NO SD	LETTER	0

Substantially Damaged Determined (SD) Structures and Respective Communities						
County	Community	Assigned Branch	Contacted	SD List Received?	SD Obtained by?	SD Structures
MIAMI-DADE	CITY OF MIAMI BEACH	5	YES	NO SD	FCAC	0
MIAMI-DADE	CITY OF MIAMI GARDENS	5	YES	NO SD	LETTER	0
MIAMI-DADE	MIAMI SHORES VILLAGE	5	YES	NO SD	LETTER	0
MIAMI-DADE	CITY OF MIAMI	5	YES	Y - PENDING		Unknown
MIAMI-DADE	MIAMI-DADE COUNTY	5	YES	Y	LETTER	26
MONROE	MONROE COUNTY	5	YES	Y	FCAC	714
GLADES	CITY OF MOORE HAVEN	4	YES	NO SD		0
COLLIER	CITY OF NAPLES	4	YES	Y		2
NASSAU	NASSAU COUNTY	2	YES	Y - PENDING	FCAC	Unknown
DUVAL	CITY OF NEPTUNE BEACH	2	YES	NO SD	FCAC	0
VOLUSIA	CITY OF NEW SMYRNA BEACH	3	YES	Y	FCAC	2
MIAMI-DADE	CITY OF NORTH BAY VILLAGE	5	NO	N		
MIAMI-DADE	CITY OF NORTH MIAMI BEACH	5	YES	NO SD	FCAC	0
ORANGE	ORANGE COUNTY	3	NO	Y	LETTER	Unknown
CLAY	CITY OF ORANGE PARK	2	YES	NO SD	FCAC	0
VOLUSIA	CITY OF ORMOND BEACH	3	YES	NO SD	LETTER	0
BREVARD	CITY OF PALM BAY	3	YES	Y	LETTER	6
PALM BEACH	PALM BEACH COUNTY	5	YES	NO SD	LETTER	0
PASCO	PASCO COUNTY	3	YES	N		
PINELLAS	PINELLAS COUNTY	3	YES	NO SD	LETTER	0
POLK	POLK COUNTY	3	YES	Y	LETTER	40
VOLUSIA	TOWN OF PONCE INLET	3	YES	NO SD	FCAC	0
VOLUSIA	CITY OF PORT ORANGE	3	YES	y	FCAC	5
PUTNAM	PUTNAM COUNTY	2	YES	Y	LETTER	13
BREVARD	CITY OF ROCKLEDGE	3	YES	NO SD	FCAC	0
SARASOTA	SARASOTA COUNTY	4	NO	N		
SEMINOLE	SEMINOLE COUNTY	3	NO	Extension Requested		
VOLUSIA	CITY OF SOUTH DAYTONA	3	YES	NO SD	LETTER	0
ST. JOHNS	CITY OF ST. AUGUSTINE	2	YES	Y	FCAC	23
ST. JOHNS	ST. JOHNS COUNTY	2	YES	Y	FCAC	72
ST. LUCIE	ST. LUCIE COUNTY	3	NO	N		
BROWARD	CITY OF TAMARAC	5	YES	NO SD	LETTER	0

Substantially Damaged Determined (SD) Structures and Respective Communities						
County	Community	Assigned Branch	Contacted	SD List Received?	SD Obtained by?	SD Structures
INDIAN RIVER	CITY OF VERO BEACH	3	YES	NO SD	FCAC	0
VOLUSIA	VOLUSIA COUNTY	3	YES	Y - PENDING	FCAC	3
BREVARD	CITY OF WEST MELBOURNE	3	YES	NO SD	FCAC	0
PALM BEACH	CITY OF WEST PALM BEACH	5	YES	NO		

FIGURE 45: PROPERTIES IN A FLOOD ZONE

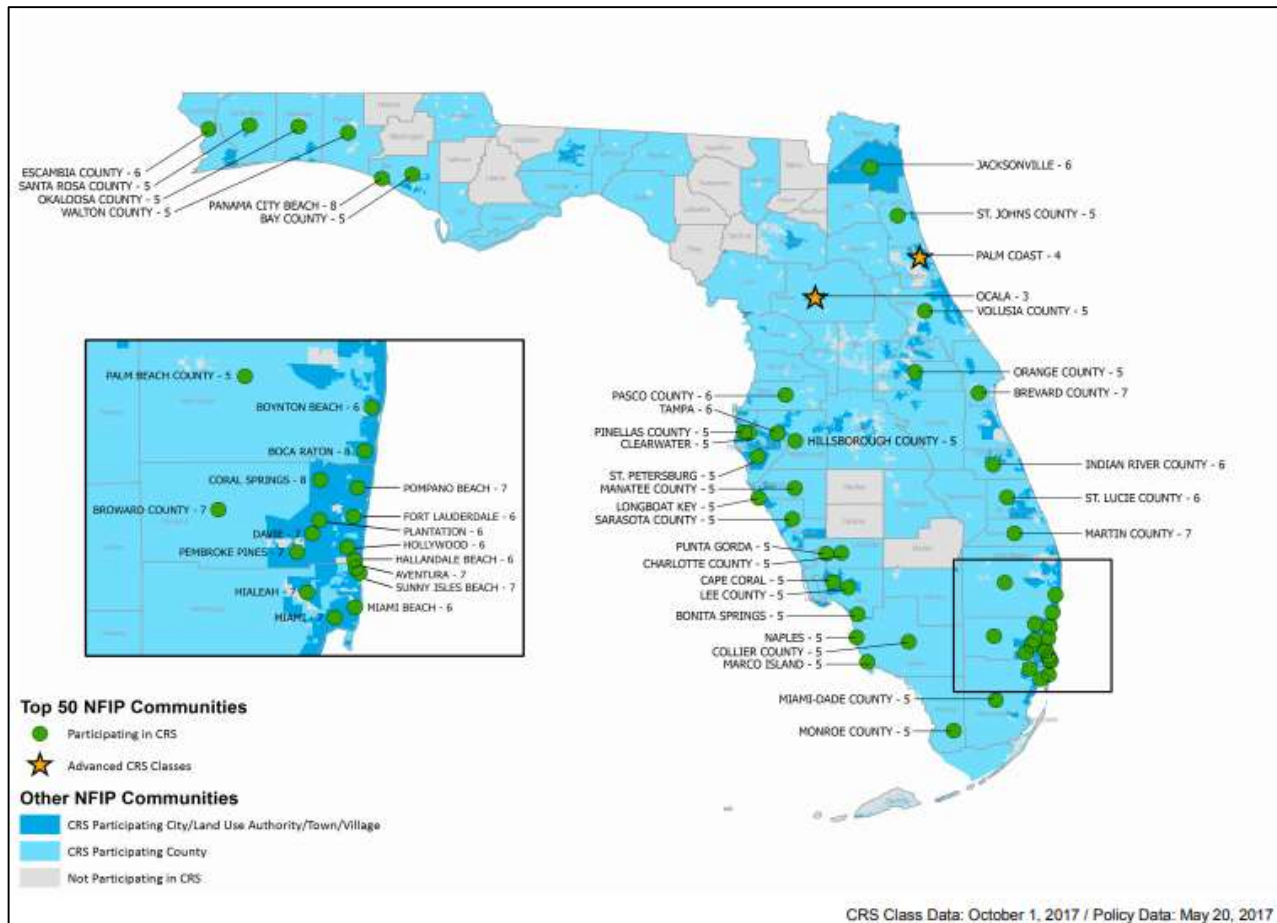


TABLE 26: HURRICANE IRMA FEMA HOUSING ASSISTANCE PROGRAM FUNDING BREAKDOWN

Hurricane Irma FEMA Housing Assistance Program Funding Breakdown							
Count	Number of Parcels in Flood Zone	Number of Residential Structures in Flood Zone	Number of Applicants in Flood Zone	Number of Applicants with losses in Flood Zone	FEMA Estimated Damage to Homes in Flood Zone	Total Housing Assistance Provided to those with flood losses	Unmet Estimated Needs (FEMA) inside Flood zone
Alachua	19,795	36,145	1,839	112	\$532,280	\$413,169	\$119,111

Baker	42,847	35,985	239	49	\$325,214	\$216,936	\$108,278
Bradford	6,739	4,436	673	181	\$900,355	\$682,276	\$218,079
Brevard	76,201	67,165	3,700	530	\$1,613,196	\$1,106,822	\$506,374
Broward	352,667	450,302	57,182	2,762	\$3,545,704	\$2,693,958	\$851,746
Charlotte	114,121	55,798	5,552	473	\$1,029,880	\$751,271	\$278,609
Citrus	34,489	22,535	2,369	241	\$372,881	\$307,817	\$65,064
Clay	16,382	14,461	1,665	441	\$6,285,037	\$3,281,417	\$3,003,620
Collier	293,716	252,508	43,044	5,638	\$15,389,799	\$11,814,672	\$3,575,126
Columbia	9,846	5,996	621	83	\$326,235	\$238,737	\$87,498
DeSoto	7,329	3,234	415	129	\$805,035	\$621,958	\$183,076
Dixie	8,736	4,171	358	70	\$69,463	\$68,401	\$1,062
Duval	65,552	87,252	5,657	661	\$4,943,779	\$2,670,529	\$2,273,249
Flagler	19,721	11,097	1,103	287	\$2,227,184	\$1,288,007	\$939,177
Gilchrist	4,326	1,919	171	25	\$51,824	\$42,605	\$9,219
Glades	20,015	7,722	150	29	\$30,493	\$28,404	\$2,089
Hardee	4,804	2,451	346	113	\$826,174	\$686,227	\$139,947
Hendry	10,349	5,306	1,543	294	\$386,156	\$276,623	\$109,533
Hernando	23,879	13,475	1,064	206	\$861,949	\$716,964	\$144,985
Highlands	17,847	8,601	948	194	\$317,384	\$200,957	\$116,427
Hillsborough	120,646	171,987	17,037	792	\$2,075,214	\$1,748,562	\$326,652
Indian River	43,007	28,865	996	133	\$340,312	\$180,546	\$159,766
Lafayette	4,037	1,317	177	16	\$35,243	\$33,643	\$1,600
Lake	41,050	46,819	2,308	396	\$687,736	\$533,989	\$153,746
Lee	230,917	205,763	38,044	3,542	\$10,177,270	\$7,153,437	\$3,023,833
Levy	20,652	9,387	232	25	\$13,989	\$12,788	\$1,201
Manatee	45,023	63,385	5,833	570	\$933,116	\$759,798	\$173,317
Marion	30,266	22,843	3,112	380	\$701,062	\$607,908	\$93,155
Martin	24,347	24,020	691	50	\$76,805	\$47,169	\$29,636
Miami-Dade	284,941	415,782	252,775	13,238	\$18,717,407	\$12,534,309	\$6,183,098
Monroe	83,064	37,832	35,844	6,082	\$51,861,515	\$37,610,100	\$14,251,415
Nassau	34,846	28,721	794	150	\$594,702	\$381,643	\$213,059
Okeechobee	16,632	7,226	1,284	344	\$663,468	\$339,829	\$323,639
Orange	51,458	90,272	6,518	527	\$885,339	\$577,281	\$308,058
Osceola	33,847	26,102	4,562	671	\$1,267,746	\$866,680	\$401,066
Palm Beach	186,680	230,498	9,831	780	\$1,058,791	\$839,387	\$219,404
Pasco	92,119	73,738	11,389	958	\$1,759,455	\$1,569,785	\$189,670
Pinellas	168,935	184,041	32,358	1,304	\$1,249,952	\$746,023	\$503,928
Polk	87,172	53,223	5,202	987	\$2,462,923	\$1,718,572	\$744,351
Putnam	22,619	12,070	1,237	296	\$918,791	\$559,784	\$359,006
Sarasota	94,793	93,011	4,265	332	\$538,106	\$449,027	\$89,079
Seminole	21,596	35,603	2,091	268	\$680,071	\$476,361	\$203,709
St. Johns	53,459	35,614	3,185	489	\$3,074,109	\$1,314,419	\$1,759,690
St. Lucie	41,182	30,558	1,445	136	\$477,794	\$341,393	\$136,401
Sumter	11,526	5,060	775	135	\$261,446	\$249,893	\$11,553

Suwannee	19,317	8,728	486	54	\$38,140	\$29,307	\$8,832
Union	2,850	1,039	110	18	\$31,354	\$28,618	\$2,737
Volusia	135,379	95,560	7,835	819	\$3,471,285	\$2,716,067	\$755,218
Total	3,151,721	3,129,623	579,055	46,010	\$145,893,163	\$102,534,068	\$43,359,088

Housing Funds Made Available

The main federal funding sources that are available for impacted residents in the immediate aftermath of a disaster are FEMA Individual Assistance, low-interest loans from the U.S. Small Business Administration and insurance proceeds from the National Flood Insurance Program (NFIP). These three funding streams account for the majority of the housing recovery funds made available before CDBG-DR funds are made available.

FEMA Individual Assistance (IA)

The FEMA Individual Assistance program (IA) consists of a multitude of services for individuals in disaster declared counties. Specifically, housing funds, made available through the Housing Assistance (HA) program help to bridge the gap from sheltering/interim housing to permanent housing. These funds can be used for limited basic home repairs and replacement of essential household items, as well as rental payments for temporary housing. FEMA IA is limited to restoring a home to a basic level of, “safe and sanitary living or functioning condition,” and may not account for the full extent of the home’s damage or need.

There were 2,644,409 applicants to FEMA’s Housing Assistance Program and a total of \$709 million in housing assistance provided across the 49 presidentially declared counties. Of these, 208,605 had a FEMA Real Property Verified Loss (RPFVL) assessment; however, this does not mean that the applicant received funding (Table 27). Of the applicants with a RPFVL, 52,295 received FEMA housing assistance in the form of repair or replacement funds. An estimated \$374,800,260 in damage was assessed for the applicants with an FVL. This has resulted in \$253,366,730 in housing assistance to date. Interestingly, an additional \$455,689,714 in housing assistance has been provided to more than 378,000 additional applicants who did not have recorded FEMA property loss.²⁶

TABLE 27: FEMA APPLICANT BREAKDOWN BY ASSESSED DAMAGE AND RECEIPT OF FEMA HOUSING ASSISTANCE

FEMA Applicant Breakdown by Assessed Damage and Receipt of FEMA Housing Assistance			
Hurricane Irma Impact Areas	FEMA IA Applicants	Amount	Average Value
Universe	2,644,409	\$709,056,445	\$268
FEMA FVL	208,605	\$374,800,260	\$1,797
Received HA	52,295	\$253,366,730	\$4,845
Received No HA	156,010		
No FEMA FVL	2,435,804		
Received HA	378,049	\$455,689,714	\$1,205
Received No HA	2,057,755		

²⁶ FEMA FL_FICO_Data_20180531 from NFIP

National Flood Insurance Program (NFIP) Coverage

The National Flood Insurance Program (NFIP) provides insurance coverage to any property owner willing to pay the associated premiums. As of May 31, 2018, the NFIP has paid out on 28,300 claims across the state totaling more than \$920,364,435 in property, contents and increased cost of compliance payouts (Table 28). Table 28 has been updated with the most current NFIP data available at this time.

TABLE 28: NFIP PROPERTY CLAIMS AND TOTALS

NFIP Property Claims and Totals					
County	Claims Submitted	Building Payments	Content Payments	ICC Payments	Total Paid
Alachua	84	\$3,377,865	\$534,750	\$5,446	\$3,918,060
Baker	21	\$667,624	\$181,803	\$15,000	\$864,427
Bradford	82	\$2,436,925	\$567,608		\$3,004,534
Brevard	758	\$15,667,875	\$3,432,058		\$19,099,933
Broward	1,602	\$17,571,594	\$2,785,253		\$20,356,847
Charlotte	223	\$2,633,819	\$477,479		\$3,111,298
Citrus	16	\$111,908			\$111,908
Clay	760	\$47,466,307	\$11,153,102	\$195,557	\$58,814,967
Collier	2,625	\$47,819,294	\$8,761,961	\$14,750	\$56,596,005
Columbia	37	\$1,349,661	\$265,875	\$13,155	\$1,628,691
DeSoto	56	\$1,822,382	\$314,079		\$2,136,461
Dixie	3				\$0
Duval	1,969	\$114,409,588	\$23,182,505		\$137,592,094
Escambia	2			\$16,490	\$16,490
Flagler	709	\$32,546,376	\$7,907,660	\$33,400	\$40,487,436
Gilchrist	9	\$75,332	\$1,343		\$76,675
Glades	3	\$65,010	\$31,397		\$96,406
Hardee	23	\$809,206	\$240,683		\$1,049,889
Hendry	19	\$162,115	\$63,580		\$225,694
Hernando	69	\$919,291	\$230,271		\$1,149,562
Highlands	65	\$543,360	\$88,488		\$631,847
Hillsborough	298	\$4,554,404	\$643,874		\$5,198,278
Indian River	115	\$3,314,809	\$533,127		\$3,847,935
Lake	98	\$1,582,360	\$205,199		\$1,787,558
Lee	1,956	\$34,648,248	\$5,142,147	\$19,728	\$39,810,122
Leon	1				\$0
Levy	1	\$3,909			\$3,909
Manatee	96	\$363,488	\$16,464		\$379,952
Marion	57	\$2,603,805	\$396,624		\$3,000,429
Martin	46	\$706,583	\$123,408		\$829,991
Miami-Dade	3,676	\$79,722,129	\$13,540,592		\$93,262,720
Monroe	7,917	\$229,151,672	\$32,863,565	\$154,629	\$262,169,866
Nassau	171	\$4,275,192	\$998,661		\$5,273,853
Okeechobee	14	\$121,793	\$67,439		\$189,231

NFIP Property Claims and Totals					
County	Claims Submitted	Building Payments	Content Payments	ICC Payments	Total Paid
Orange	196	\$3,317,678	\$354,966		\$3,672,644
Osceola	174	\$2,093,816	\$290,668		\$2,384,484
Palm Beach	409	\$3,588,539	\$523,797		\$4,112,336
Pasco	184	\$3,258,123	\$167,550		\$3,425,673
Pinellas	212	\$738,347	\$80,483		\$818,830
Polk	241	\$5,057,760	\$1,834,415		\$6,892,175
Putnam	170	\$3,402,680	\$499,394	\$21,150	\$3,923,224
Sarasota	123	\$890,715	\$162,389		\$1,053,103
Seminole	198	\$4,509,481	\$762,994		\$5,272,475
St. Johns	1,639	\$50,925,059	\$7,110,274	\$126,550	\$58,161,882
St. Lucie	208	\$8,083,223	\$2,580,969		\$10,664,192
Sumter	16	\$77,739	\$15,445		\$93,184
Suwannee	3	\$6,944	\$4,948		\$11,893
Union	5	\$127,212	\$24,113		\$151,326
Volusia	938	\$47,103,241	\$5,900,704		\$53,003,945
Total	28,297	\$784,684,481	\$135,064,104	\$615,855	\$920,364,434

Small Business Administration (SBA) Home Loans

As of February 11, 2018, the Small Business Administration (SBA) had provided \$778,200,627 in repair assistance available to 26,577 homeowner applicants in Hurricane Irma-impacted areas (this does not include the overall amount of funding applied for by applicants). The low-interest loans are made available for the purposes of home repair and personal property loss. The average loan for this disaster event was \$29,281 and the median loan is \$21,700.

Private Insurance Proceeds

Detailed (homeowner level) information on private insurance for Irma is not readily available because many of the insurance claims are still being processed. However, aggregated data for these disasters shows that residences bore the brunt of impacts from Irma (Table 29). Furthermore, damage from this hurricane (as indicated by the number of insurance claims) is heavily tilted toward residential properties over businesses. Table 29 has been updated with the most current FEMA, SBA and NFIP data available at this time.

TABLE 29: HURRICANE IRMA INSURANCE CLAIMS DATA²⁷

Hurricane Irma Insurance Claims Data						
Lines of Business	Sub-Lines	Number of Claims	Closed Claims (paid)	Closed Claims (not paid)	Number Claims Open	Percent Claims Closed
		839,570	513,367	262,275	63,928	92.4%

²⁷ <https://www.flor.com/Office/HurricaneSeason/HurricaneIrmaClaimsData.aspx>

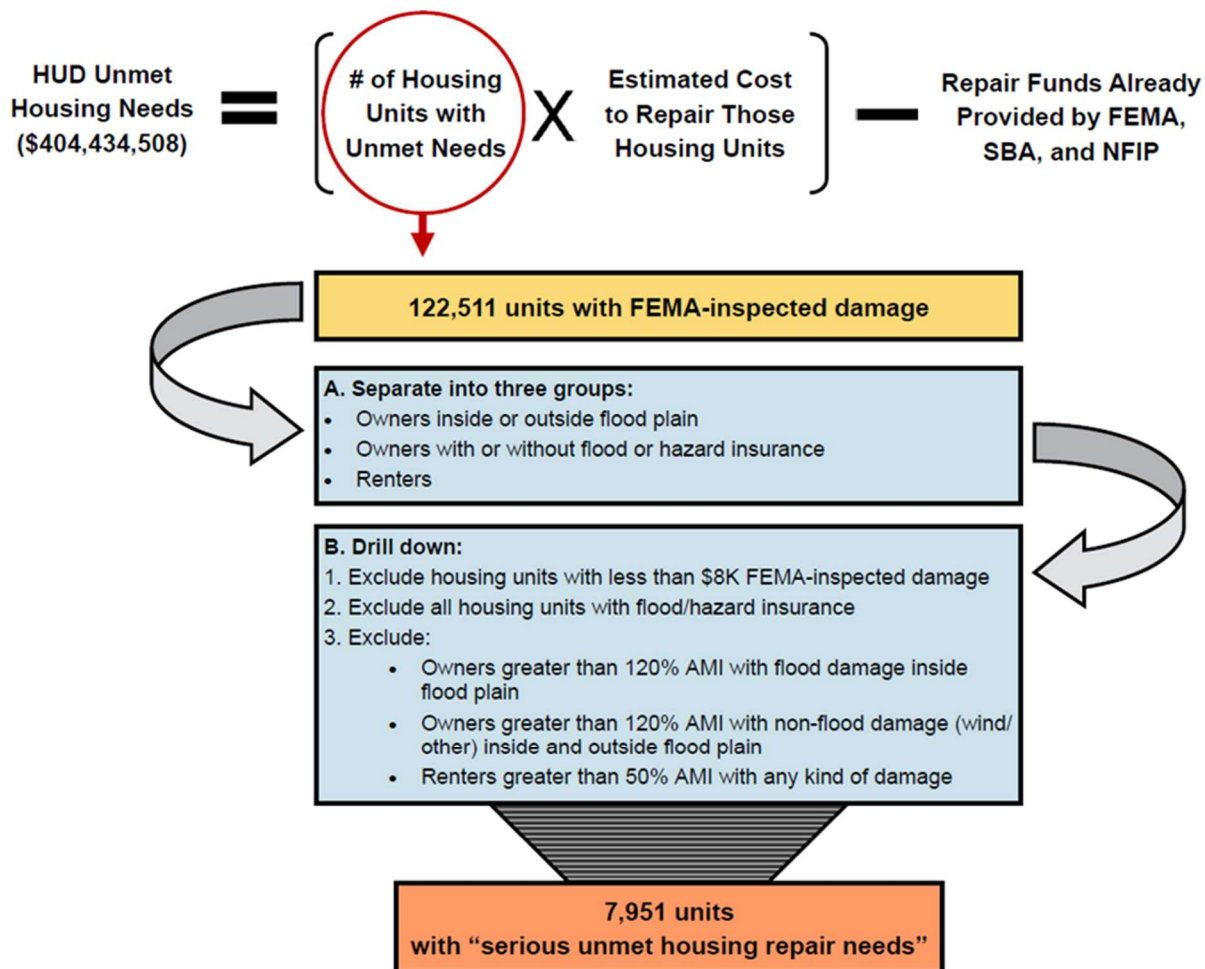
Hurricane Irma Insurance Claims Data						
Lines of Business	Sub-Lines	Number of Claims	Closed Claims (paid)	Closed Claims (not paid)	Number Claims Open	Percent Claims Closed
Residential Property	Homeowners	665,520	398,467	215,152	51,901	92.2%
	Dwelling	104,103	64,142	30,964	8,997	91.4%
	Mobile Homeowners	60,562	47,437	12,123	1,002	98.3%
	Commercial/ Residential	9,385	3,321	4,036	2,028	78.4%
Commercial Property		59,987	19,365	25,195	15,427	74.3%
Private Flood		1,824	1,064	638	122	93.3%
Business Interruption		4,004	1,798	1,788	418	89.6%
Other Lines of Business		91,852	67,644	21,654	2,554	97.2%
Total		1,836,807	1,116,605	573,825	146,377	89.67%

Housing Unmet Need

Housing Impact Methodology

HUD calculates “unmet housing needs” as the number of housing units with unmet needs multiplied by the estimated cost to repair those units, subtracted by the repair funds already provided by FEMA and SBA (Figure 46).

FIGURE 46: HUD HOUSING UNMET NEEDS METHODOLOGY AS OF MAY 2018



Because complete data sources are often difficult to obtain after a major disaster event, HUD stated that empirically justified calculations may be used to determine the average cost to fully repair a home. Generally, this is accomplished by, “using the average real property damage repair costs determined by the Small Business Administration (SBA) for its disaster loan program for the subset of homes inspected by both SBA and FEMA. Because SBA is inspecting for full repair costs, it is presumed to reflect the full cost to repair the home, which is generally more than the FEMA estimates on the cost to make the home habitable.”²⁸

²⁸ Federal Register Vol. 78, No. 43 /Tuesday, March 5, 2013

FEMA verified loss values are substantially lower than SBA real property loss values. We can infer impacts from the SBA data in the same manner we did for Hurricanes Hermine and Matthew by accounting for all FEMA and SBA applicants sustaining any damage. Previously approved impact assessment methodologies have used the combined data from the Small Business Administration estimates of damage and repair needs, FEMA IA Housing Assistance data and National Flood Insurance Program data to triangulate the real need, as opposed to the FEMA estimated losses. Utilizing SBA loan values as an indicator of the amount of support any individual household will require to repair hurricane damages provides more comprehensive look at recovery than simply looking at a FEMA-inspected damage. SBA sends “construction specialists” trained to evaluate the true cost of repairing or replacing a damaged structure to each homeowner’s property, returning a more comprehensive estimate of recovery than original estimates from FEMA. FEMA-ineligibility also results in under-representation of impacted populations. Accounting, for this under-representation, provides a more accurate picture of overall housing impact across a study area. For Irma, when using the average verified loss amount (\$33,204) of all SBA applicants with real property losses (48,211) and applying it to those who were disqualified from SBA loan assistance and those for whom a FEMA loss was established, the full extent of housing impact caused by Hurricane Irma increases to more than \$8.5 billion (before any deductions for funds already provided are calculated).

In an effort to more finely calibrate the impact amount, the housing impact for this needs assessment was calculated using only SBA data compared with FEMA applicant information. Here, the median SBA real property damage amount of \$24,127 is used to account for outliers in the SBA data (a few very high and very low damage amounts) that were impacting the average. When applied to the total number of FEMA applicants without a FEMA Verified Loss (FVL), SBA applicants who were not approved and FEMA data about the number of rental units with damages (86,031), this results in an adjusted housing impact of \$7.6 billion. A complete breakdown of the total housing loss can be found in Table 29. Resiliency costs are determined to be 20 percent based off previous state action plans and an understanding that it will cost more to repair homes while bringing them up to code. Therefore, 20 percent in additional resiliency costs were applied to account for the additional cost of compliance in coastal areas, for a total impact of nearly \$9.1 billion. After deducting the funds already provided by FEMA, SBA, the National Flood Insurance Program (NFIP) and Pubic Housing Funds (\$2.4 million) the remaining unmet need for housing is approximately \$6.7 billion when accounting for required additional resilience measures (Table 30). A complete breakdown of the funds already provided can also be found in Table 30.

TABLE 30: TOTAL DERIVED IMPACTS AND UNMET NEEDS FOR HOUSING²⁹

Total Derived Impacts and Unmet Needs for Housing	
Data	Dollars
Small Business Administration Verified Loss of All SBA Applicants	
SBA applicants with a real estate verified loss	\$1,604,109,132
SBA applicants without a real estate verified Loss (Estimate)	\$1,995,037,503
SBA Applicants with verified Relocation Losses	\$347,375
SBA Applicants with verified Reconstruction Losses	\$26,938,471
Total verified loss of FEMA applicants referred to SBA (Estimate)	\$3,626,432,481
Estimated Small Business Administration Verified Loss of FEMA Applicants not Referred to SBA	
Total FEMA applicants with FEMA inspected damage	208,031
Total SBA applicants	125,383
Potential unmet need population	82,648
Median verified loss	\$24,127
Verified loss of FEMA applicants not referred to SBA (Estimate)	\$1,994,048,296
Total verified loss of all homeowner applicants across FEMA and SBA (Estimate)	\$5,620,480,777
Estimated Small Business Administration Verified Loss of Rental Property Owners	
FEMA renter applicants with personal property damage	86,031
Median verified loss	\$24,127
Total verified loss of rental property owners (Estimated)	\$2,075,669,937
Other Housing Damage Estimates	
Real estate damage to public housing	\$2,412,700
Total housing verified loss	\$7,698,563,414
Accounting for 20% resilience addition	\$9,238,276,097
Duplication of Benefits	
FEMA repair payments	\$709,056,445
SBA home loan current real estate payments	\$660,240,927
SBA home loan current relocation payments	\$7,765,900
SBA home loan current reconstruction payments	\$17,678,300
SBA business loan payments to landlords	\$37,281,000
NFIP building payments	\$920,364,436
Public housing funds	\$5,000,000
Total benefit	\$2,357,387,008
Total unmet housing need	\$5,341,176,406
Accounting for 20% resilience addition	\$6,880,889,089

Note: SBA home loans specifically refer to loans received for repairs or replacement of a primary residence. SBA rental property owner payments refer to SBA business disaster loan program funds.

Infrastructure Impact

Infrastructure systems affected by Hurricane Irma included mainly roadways, bridges and state beaches with little reported damage to wastewater treatment systems or drinking water. The immediate recovery efforts were well-

²⁹ Values from SBA Home Loan Report, FEMA Individual Assistance Data, Survey of 62 Public Housing Authorities across declared region and the National Flood Insurance Program.

documented by the individual recovery support functions and by the initial project worksheets being submitted for public assistance.^{30,31}

Public Assistance

The FEMA Public Assistance (FEMA-PA) Program is designed to provide immediate assistance to impacted jurisdictions for emergency protective measures and permanent repairs to infrastructure and community facilities. The federal share of assistance is generally not less than 75 percent of the eligible project cost, requiring the state to contribute the remaining 25 percent in cost share. In some instances, the federal cost share can be as high as 100 percent.

The Florida Division of Emergency Management has preliminarily identified more than 35,000 damaged infrastructure sites with a total estimated repair cost of \$4.3 billion across all public assistance categories. The federal share of \$3.9 billion in funding will be provided to approved projects (Table 31). These categories include:

Category A: Debris Removal

Category B: Emergency Protective Measures

Category C: Roads and Bridges

Category D: Water Control Facilities

Category E: Buildings and Equipment

Category F: Utilities

Category G: Parks, Recreational and Other Facilities

Based on this data, a remaining unmet need of \$338,324,908 (applicant share) in identified infrastructure damage eligible under FEMA-PA Categories C-G remains.

TABLE 31: REMAINING UNMET NEED IDENTIFIED IN INFRASTRUCTURE DAMAGE

Category	Projects	Damage Sites	Sum of Approx. Cost	Sum of Federal Share	Sum of Non-Federal Share
A (Debris)	2,029	2,636	\$1,471,995,952	\$1,131,559,798	\$340,436,154
B (Emergency Measures)	1,531	2,944	\$997,239,502	\$813,643,981	\$183,595,521
C (Roads and Bridges)	467	1,237	\$112,003,450	\$84,002,587	\$28,000,862
D (Water Control Facilities)	139	377	\$77,368,742	\$58,026,557	\$19,342,186
E (Buildings and Equipment)	3,606	12,737	\$535,008,060	\$401,256,045	\$133,752,015
F (Utilities)	506	1,296	\$277,655,727	\$208,241,795	\$69,413,932
G (Other)	1,156	4,374	\$351,263,653	\$263,447,740	\$87,815,913
All Categories	9,434	25,601	\$3,822,535,086	\$2,960,178,503	\$862,356,583
Total without A and B	5,874	20,021	\$1,353,299,632	\$1,014,974,724	\$338,324,908

Notably, FEMA eligible damage to public utilities, roads and other municipal property across the state does not fully capture the extent of challenges brought to light by Irma's impacts. Specifically, more than \$860 million in project

³⁰ <http://www.floridadisaster.org/eoc/Irma2016/>

³¹ <https://www.fema.gov/media-library-data/1477681864977-04968ad6e3d2fab698e94c45322ea7c3/PDARReportFEMA4280DRFL.pdf>

funds for public assistance across all categories (table below) were deemed ineligible between the initial assessment and this assessment. Although some public infrastructure did not fully fail as a direct result of Hurricane Irma, the need to improve existing infrastructure is necessary to create a more resilient Florida.

TABLE 32: INFRASTRUCTURE COST BREAKDOWN BY CATEGORY

Category	Initial Assessment Project Costs	Current Project Costs	Difference
A (Debris)	\$1,598,719,947	\$1,471,995,952	(\$126,723,994)
B (Emergency Measures)	\$1,125,549,377	\$997,239,502	(\$128,309,875)
C (Roads and Bridges)	\$225,657,659	\$112,003,450	(\$113,654,209)
D (Water Control Facilities)	\$120,200,948	\$77,368,742	(\$42,832,206)
E (Buildings and Equipment)	\$529,785,546	\$535,008,060	\$5,222,514
F (Utilities)	\$287,922,730	\$277,655,727	(\$10,267,004)
G (Other)	\$386,593,984	\$351,263,653	(\$35,330,331)
All Categories	\$4,274,430,191	\$3,822,535,086	(\$451,895,105)
Total without A and B	\$1,550,160,868	\$1,353,299,632	(\$196,861,236)

Failure to support vital infrastructure can have serious cascading effects on Florida's communities.

TABLE 33: PUBLIC ASSISTANCE PROJECTS BY CATEGORY, HURRICANE IRMA³²

Public Assistance Projects by Category, Hurricane Irma			
Infrastructure Category	Approximate Cost	Estimated Federal Share	Estimated Applicant Share
A (Debris)	\$1,598,719,947	\$1,253,931,051	\$344,788,896
B (Emergency Measures)	\$1,125,549,377	\$869,001,418	\$256,547,959
C (Roads and Bridges)	\$225,657,659	\$169,243,244	\$56,414,415
D (Water Control Facilities)	\$120,200,948	\$90,150,711	\$30,050,237
E (Buildings and Equipment)	\$529,785,546	\$397,356,849	\$132,428,697
F (Utilities)	\$287,922,730	\$215,942,048	\$71,980,683
G (Other)	\$386,593,984	\$289,952,194	\$96,641,790
Total	\$4,274,430,191	\$3,285,577,515	\$988,852,677
Total without A&B	\$1,550,160,867	\$1,162,645,046	\$387,515,822

HMGP and Resilience

The Hazard Mitigation Grant Program (HMGP) will be a critical part of long-term resilience improvements for infrastructure in the impacted area. HMGP is generally calculated at 15 percent of the total amount of IA and PA allocated to a disaster event. Fifteen percent of the total PA funds provided by FEMA (\$2,960,178,503) in addition

³² Data as of 2/27/18 from FDEM reflecting FEMA and State PACs working with each county's applicants to determine the entire scope of all damages that will be captured on project worksheets.

to the FEMA Individual Housing Program Assistance Program funds made available (\$1,021,180,392) is the expected amount of HMGP funds to be made available for mitigation and resilience activities statewide. For these disasters, the estimated federal share of HMGP is \$597,203,834.

Calculating that HMGP assistance to any jurisdiction is capped at 75 percent of the identified need (the remaining 25 percent being a required local match), it can be assumed that jurisdictions will be required to provide \$149,300,959 in local match, representing an unmet need for resilience improvements. HUD has announced that Florida will receive an additional allocation of \$791 million and it is anticipated that a portion of this funding may be used for HMGP match and resilience to alleviate local match requirements. CDBG-DR funds can be used as a state/local match in specific instances where a particular project meets a national objective.

Economic Impact

Business and Employment

Using SBA business data to understand the financial impact to livelihoods provides a more comprehensive understanding of impacts and recovery across the state. The Small Business Administration makes low-cost disaster loans available to qualified businesses. According to SBA business loan information, approximately 3,902 applicants had a verified property loss of \$281,064,990 and another 18,555 applicants either withdrew or were declined. The average verified loss for all applicants was \$72,031 and the median loss was \$31,633. Employing the general methodology put forth for the housing impact and unmet needs allows for the identification of both the true impact and possible additional estimated impacts for businesses who did not qualify for loans.

Estimated impacts and support provided by the SBA to businesses capture the total loss of \$1,362,990,312 by summing the verified real property losses of \$281,064,990, the estimated losses of \$586,950,315 (18,555) applicants either declined or withdrawn from the program), the median verified loss of \$31,633, the amount of verified and estimated reconstruction loss of \$41,687,948, and the amount of verified and estimated relocation (rebuild elsewhere) losses of \$34,141. DEO then used the same method to sum the verified and estimated losses to furniture, machinery, inventory and business operating expenses (\$271,346,408), conservatively accounting for the percentages of applicants with damages as a percentage of those with real verified losses (Table 29).

According to this method, total business impacts from Irma were \$1,181,049,661. Accounting for 20 percent in extra costs associated with resilience measures such as more stringent building codes, cost of compliance measures, elevations or freeboard requirements increases the total cost of repairs to \$1,362,990,312. SBA payouts to businesses totaled \$270,341,250 for these lines of loss, leaving a potential unmet need of \$910,830,911 or \$1,072,724,362 when accounting for resilience additions.

FIGURE 47: HUD BUSINESS UNMET NEEDS METHODOLOGY AS OF MAY 2018

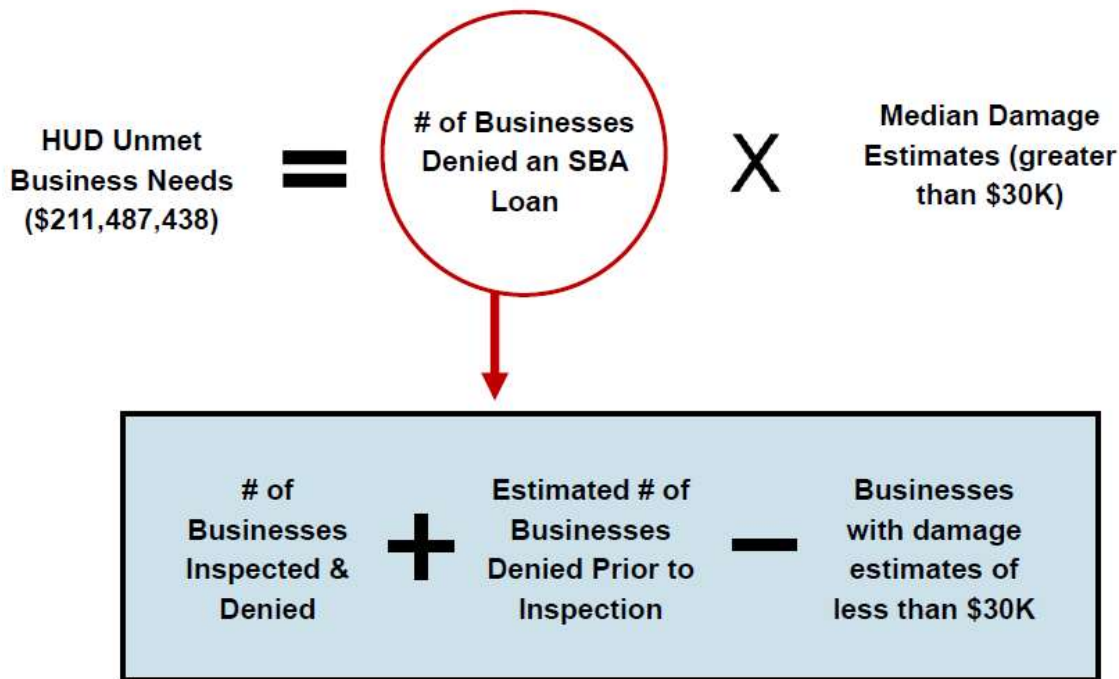


Figure 47 describes HUD's unmet needs methodology for business recovery. Based on this methodology, DEO derived a similar methodology to calculate the total derived impacts and unmet needs for businesses across Florida, as shown in Table 34. Table 35 shows the breakdown of business operational verified losses.

TABLE 34: TOTAL DERIVED IMPACTS AND UNMET NEEDS FOR BUSINESSES

Total Derived Impacts and Unmet Needs for Businesses	
Data	Dollars
Small Business Administration Verified Business Property Loss of All SBA Applicants	
SBA applicants with a real estate verified loss (Repairs)	\$281,064,990
SBA applicants without a real estate verified loss (Repair Estimate)	\$586,950,315
SBA verified reconstruction loss (Rebuild)	\$32,678,948
Estimated reconstruction loss (Rebuild)	\$9,009,000
SBA verified relocation loss (Move)	\$24,831
Estimated relocation loss (Move)	\$9,310
Total real estate losses for businesses referred to SBA (Estimate)	\$909,703,253
Small Business Administration Verified Business Operating Loss of All SBA Applicants	
Verified furniture loss	\$5,429,600
Furniture Loss (Estimate)	\$1,832,600
Verified machinery loss	\$22,361,300
Machinery loss (Estimate)	\$6,500,000

Total Derived Impacts and Unmet Needs for Businesses	
Data	Dollars
Verified inventory loss	\$8,825,700
Inventory Loss (Estimate)	\$13,946,208
Verified EIDL Loss	\$135,301,000
EIDL Loss (Estimate)	\$77,150,000
Sum of operational losses	\$271,346,408
Total verified loss for all businesses (Estimate)	\$1,181,049,661
Accounting for 20% resilience addition	\$1,362,990,312
Duplication of Benefits	
SBA repair payments	\$92,996,800
SBA reconstruction payments	\$7,239,200
SBA relocation payments	\$122,500
SBA furniture payments	\$5,061,500
SBA machinery payments	\$19,926,950
SBA inventory payments	\$9,693,300
SBA EIDL payments	\$135,301,000
Total Benefit	\$270,341,250
Total unmet business repair/replace payments	\$809,467,253
Total unmet business operation payments	\$101,363,658
Total unmet business needs	\$910,830,911
Accounting for 20% resilience addition	\$1,072,724,362

TABLE 35: RATIOS USED IN ESTIMATING BUSINESS OPERATIONS LOSSES

Ratios Used in Estimating Business Operations Losses					
Operational Loss Category	Count of Businesses with Verified Losses	Median Verified Loss	Denominator (Businesses without a verified loss)	Ratio of Estimated Additional Losses	Estimated Additional Losses to Businesses
Furniture	539	\$3,400	18,555	2.9%	\$1.8 Million
Machinery	1,250	\$5,200	18,555	6.7%	\$6.5 Million
Inventory	564	\$5,200	18,555	14.5%	\$13.9 Million
EIDL	3,086	\$25,000	18,555	16.6%	\$77 Million

Table 36 below shows the projected supply demand for employment in construction-related occupations. This demonstrates the overall demand for skilled workers to fill the supply gap in these occupations, especially as Florida tries to recover following Hurricane Irma.

TABLE 36: STATEWIDE 2017-2025 PROJECTIONS AND SUPPLY DEMAND

Statewide 2017-2025 Projections and Supply Demand							
Occupation	2017 Employment	2025 Employment	Growth	Growth Percent	Total Job Openings	Median Wage	Long Term Supply Gap or Overage
Construction Laborers	83,289	97,474	14,185	17.0	87,430	\$13.73	Under Supplied
Carpenters	67,186	76,264	9,078	13.5	60,421	\$18.33	Under Supplied
First-Line Supervisors of Construction Trades and Extraction Workers	50,675	58,184	7,509	14.8	47,007	\$27.80	Under Supplied
Electricians	41,069	46,843	5,774	14.1	40,101	\$20.33	Under Supplied
Painters, Construction and Maintenance	32,289	37,482	5,193	16.1	29,334	\$15.27	Under Supplied
Plumbers, Pipefitters, and Steamfitters	27,243	30,300	3,057	11.2	25,685	\$19.33	Under Supplied
Roofers	21,402	25,315	3,913	18.3	22,269	\$15.70	Under Supplied

Florida Keys Considerations

Hurricane Irma made landfall in the Florida Keys as a Category 4 storm. While no part of this island chain was spared, the City of Marathon and the Lower Keys from Mile Marker 16-40 was hit the hardest. Approximately 1,200 homes were destroyed throughout the Keys, with an additional almost 3,000 homes receiving major damage, resulting in the exacerbation of housing challenges already faced by this community.

In the Florida Keys, limited land and strict local building codes, combined with the need to ensure safe evacuation of residents and the protection of important environmental resources, drives up the cost of residential development. With the lowest unemployment rate in the state, most business owners in the community say that their biggest challenge is employee retention due to the limited supply of affordable housing. This issue has been exacerbated greatly by Hurricane Irma. Mobile homes and older single-family homes that served as housing for their workforce were significantly damaged and are now required to be rebuilt to new building codes and standards and may be replaced in a safer area to move residence out of harm's way. The cost of redevelopment will result in higher rents or pressure to sell to someone who will rebuild a second home or vacation rental property, leading to less affordable housing stock for the workforce.

The Florida Keys, as a chain of islands connected by over 40 bridges at the southernmost tip of the state, is uniquely vulnerable to hurricanes. Therefore, the legislature passed a law mandating that growth be managed to ensure that the population of the Keys could be evacuated within 24 hours of hurricane landfall. Transportation models have

determined the Keys can no longer meet this requirement and phased evacuation was adopted. This process requires hotel occupants to leave first (48 hours prior to hurricane landfall), followed by mobile home residents (at 36 hours) and lastly, all other Keys residents (24 hours prior to landfall).

In addition to phased evacuation, a complex building permit allocation system called the Rate of Growth Ordinance (ROGO) was put into place to manage growth and limit development due to safety considerations. The difficulty of acquiring a building permit further drove up the value of land and building costs, making it a greater challenge to develop housing at cost that is affordable to the average worker. It has also created a rare environment where, in addition to land and houses, there is a market for the rights to develop a housing unit. These rights are often bought and sold as a commodity.

Many residents in the Keys work more than one job to make ends meet due to the high cost of living and limited availability of affordable housing. For example, while the median household income is \$57,290, much of the workforce pays more than 30 percent of their income on housing, including police officers and teachers. Service industry employees, a large portion of the local workforce, may pay upwards of 50 percent of their income on housing. While this is not unique in many resort communities, the fact that the Florida Keys is a linear chain of islands, makes a commute to live in more affordable areas challenging for the Upper Keys and virtually impossible for the Lower Keys. Even with this challenge, only 65 percent of employees live within Monroe County, with over 20 percent living in counties to the north of the Keys. Affordable workforce housing was a major challenge prior to Hurricane Irma. Given the number of significantly damaged structures and the high cost of rebuilding to current resiliency standards, it is likely that without funding to support the rebuilding of homes and the construction of new affordable housing units, this county's economy, in addition to its residents, will experience major issues well into the future.

III. GENERAL ACTION PLAN REQUIREMENTS

1. Connection Between Needs and Allocation of Funds

Federal Register/Vol. 83, No. 28/Friday, February 9, 2018, Section II, Use of Funds, states: “The Appropriations Act requires that prior to the obligation of CDBG-DR funds a grantee shall submit a plan detailing the proposed use of all funds, including criteria for eligibility, and how the use of these funds will address long-term recovery and restoration of infrastructure and housing and economic revitalization in the most impacted and distressed areas.”

The programs and funding outlined in this Action Plan were informed by the findings of the unmet needs assessment along with meetings and feedback from communities impacted by Hurricane Irma, as required by HUD. As outlined in the assessment, the largest portion of unmet need resulting from Hurricane Irma are related to housing, particularly repair to single family homes, reducing vulnerability through buyout programs and the exacerbation of the need for new affordable rental stock due to both Hurricanes Irma and Maria. In addition, there are unmet needs associated with business recovery and the need to bolster workforce sectors that will support long-term recovery. There are also infrastructure needs that will address flooding from Hurricane Irma and increase the resiliency of neighborhoods and other areas within communities in the future.

Therefore, in compliance with the use of funds required by the Federal Register and informed by the unmet needs assessment, the allocation of CDBG-DR program funds primarily considers and addresses unmet housing needs. Any economic revitalization and infrastructure activities approved by DEO will have documented contribution to the long-term recovery and restoration of housing in the Most Impacted and Distressed areas.

2. Public Housing, Affordable Housing and Housing for Vulnerable Populations

DEO will identify and address the rehabilitation, reconstruction, and replacement of the following types of housing affected by the disaster:

- Low- and moderate-income housing units,
- Public housing authority housing stock, including HUD-assisted housing, and
- Affordable housing, including housing for the homeless, emergency shelters, transitional and permanent housing.

DEO consulted with Public Housing Authorities (PHA) located in the most-impacted and distressed areas and agencies dedicated to serving vulnerable populations as part of the Action Plan development. A PHA as defined by HUD includes, “Any state, county, municipality or other governmental entity or public body or agency or instrumentality of these entities that is authorized to engage or assist in the development or operation of low-income housing under the U.S. Housing Act of 1937.” In addition to requesting that they be invited to local meetings, the state developed and distributed a survey that was sent out to PHAs located in the most-impacted and distressed areas of Florida. The survey requested information on unmet needs and program ideas that could be developed to address those needs. The PHAs were also given an opportunity to provide comments or additional information. The PHAs were also invited to the stakeholder session for public comment on the proposed Action Plan where participation helped inform program designs. Accordingly, it is possible that CDBG-DR funds may be used for the rehabilitation, mitigation, or new construction of HUD-assisted housing once other funding streams are fully exhausted and if additional funding becomes available. HUD-assisted housing includes public housing, housing

occupied by HCV tenants and multifamily housing. Additionally, DEO has chosen to fund the creation of new affordable housing through the Florida Housing Finance Corporation.

The unmet needs assessment, along with feedback from communities, demonstrates that there is a clear need for new workforce affordable rental housing. This is especially true in areas that have received an influx of population from Puerto Rico due to Hurricane Maria as well as in the Florida Keys, where affordable housing challenges were significantly exacerbated by Hurricane Irma. DEO met in-person with all most-impacted and distressed communities identified by HUD under the original allocation and discussed remaining unmet needs and program designs that would best help their recovery process. The information collected at these meetings was compiled and is reflected in the Community Stakeholder Surveys (page 101-102). DEO also distributed a survey broadly to all counties that received a Federal Individual Assistance (IA) disaster declaration. Many communities expressed the need for new workforce affordable rental housing as well as funding to support the acquisition of land to build affordable housing. In communities like the Florida Keys, the ability to provide workforce rental housing is crucial to ensuring long-term recovery of their economy. With few places for workers to live, it is challenging for businesses to retain their workforce. Much of the rental housing stock that was significantly damaged or destroyed during Hurricane Irma was either mobile homes or single-family homes built prior to the implementation of stronger building codes. The cost of rebuilding these homes in some cases may make it difficult to rent at an affordable rate. Therefore, the provision of new affordable rental housing to support the workforce and lifeblood of these local economies will be important to ensuring long-term recovery.

Various target populations are eligible to be served, including homeless and special needs populations. Funds received by the state will be used in the recovery efforts from Hurricane Irma for specific disaster-related purposes. DEO will set aside some funding in this allocation to address new construction of transitional housing for homeless populations. DEO will reevaluate the need to set aside additional funds for these target populations with subsequent Hurricane Irma CDBG-DR fund allocations.

DEO will ensure close and ongoing coordination with service providers that work with vulnerable populations to ensure that any remaining or ongoing storm-related impact is brought to DEO's attention for a coordinated approach. In addition, any vulnerable populations brought to DEO's attention who are not served under current DEO programs may be referred to specialized service providers for assistance.

DEO and grant sub recipients will develop policies and procedures for compliance with Affirmatively Furthering Fair Housing (AFFH) requirements during the implementation of this action plan. Such policies and procedures will involve a review that will include an assessment of the proposed housing project area's demography, socio-economic characteristics, environmental hazards or concerns, and other factors material to the AFFH determination. Applications should show that housing projects are likely to lessen area racial, ethnic, and low-income concentrations and/or promote affordable housing in low-poverty, non-minority areas in response to natural hazard-related impacts. The findings of this review will be used to inform the selection of projects for funding, in accordance with the Federal Register Notice requirements and the grantee's certification to AFFH. The state will remain highly agile throughout the planning and implementation and phases of each program to ensure the process and program design is consistent with HUD's direction to Affirmatively Further Fair Housing. Applications should show that housing projects are likely to lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing in low-poverty, non-minority areas in response to natural hazard-related impacts. The state will remain highly agile throughout the planning and implementation and phases of each program to ensure the process and program design is consistent with HUD's direction to Affirmatively Further Fair Housing.

Application and outreach materials will be made available in other languages. DEO acknowledges that persons with disabilities may have special needs and will make every effort to accommodate those needs as they arise.

3. Minimize or Address Displacement

The state and its subrecipients plan to minimize displacement of persons or entities and assist persons or entities displaced as a result of implementing a project with CDBG-DR funds. Should any projects cause displacement, DEO will follow the Uniform Relocation Assistance (URA) and the Real Property Acquisition Policies Act to ensure tenants are relocated to safe and sanitary locations. The state's policies and procedures plan, which will be updated to reflect Hurricane Irma activities, will ensure subrecipients minimize displacement. In the event of a voluntary buyout, when homeowners or tenants are located in a flood plain to prevent future loss, DEO will require subrecipients to develop policies and procedures to make sure this population is relocated into areas outside of floodplain and will receive full benefits as stated in the URA. The URA provides certain displaced persons with the right to benefits for moving expenses, housing counseling services, rental assistance payments and/or housing replacement costs depending upon the nature of the circumstances requiring relocation.

The relocation assistance requirements at section 104(d)(2)(A) of the Housing and Community Development Act and 24 CFR 42.350 are waived to the extent that they differ from the requirements of the URA and implementing regulations at 49 CFR part 24, as modified by the notice, for activities related to disaster recovery. Without this waiver, disparities exist in relocation assistance associated with activities typically funded by HUD and FEMA (e.g., buyouts and relocation). Both FEMA and CDBG funds are subject to the requirements of the URA; however, CDBG funds are subject to Section 104(d), while FEMA funds are not. The URA provides that a displaced person is eligible to receive a rental assistance payment that covers a period of 42 months. By contrast, Section 104(d) allows a lower-income displaced person to choose between the URA rental assistance payment and a rental assistance payment calculated over a period of 60 months. This waiver of the Section 104(d) requirements assures uniform and equitable treatment by setting the URA and its implementing regulations as the sole standard for relocation assistance under the Federal Register Notice. If CDBG-DR is matched with any other HUD funding sources, it will be subject to standard URA or Section 104(d) of the Housing and Community Development Act requirements.

Consistent with the goals and objectives of activities assisted under the Housing and Community Development Act of 1974, DEO will take the following steps to minimize the direct and indirect displacement of persons from their homes: (DEO will determine the full list of actions it will take based on local needs and priorities and will develop the Residential Anti-displacement and Relocation Assistance Plan (RARAP) at a later date in accordance with the [HUD Handbook 1378: Tenant Assistance, Relocation and Real Property Acquisition](#).)

- Arrange for facilities to house persons who must be relocated temporarily during rehabilitation.
- The affordability periods for single-family rental units will be a minimum of 5 years.
- Ensuring that rehabilitated or reconstructed multifamily rental housing with eight or more units remains affordable for a minimum of 15 years.
- Ensuring that newly constructed multifamily rental housing consisting of five or more units remains affordable for a minimum of 20 years.
- Where feasible, rehabilitate housing, as opposed to demolition, to avoid displacement.

4. Maximum Assistance and Cost Reasonableness Assessment

DEO follows a cost analysis process as part of standard contracting procedures, which includes a review of each cost element to determine allowability, reasonableness, and necessity. Maximum assistance available to housing

beneficiaries, as well as cost-effectiveness relative to other means of assistance, will be outlined in the DEO Disaster Recovery Program Housing Guidelines. Maximum assistance per beneficiary for infrastructure will be set by the applicant jurisdictions as part of the project submittal to DEO and will be considered by DEO upon review.

Additionally, the Florida State Housing Initiatives Partnership program (SHIP), provides funds to local governments as an incentive to create partnerships that produce and preserve affordable homeownership and multifamily housing. Many local governments have participated in the program and have established local housing assistance plans, which include items such as housing incentive strategies, local policies to implement the incentive strategies, and partnerships to reduce housing costs⁴¹. In order to ensure that housing assistance amounts are cost reasonable, the maximum amount of CDBG-DR assistance available for any single housing unit under Hurricane Irma recovery programs is \$150,000. In cases of demonstrable hardship or where local housing markets warrant an increase of the cap, beneficiaries may propose an alternative cap to DEO for review and approval. An increased cap may also be used to provide funding for difficult or unexpected repairs above and beyond the housing caps. DEO will establish methods of cost reasonableness by conducting research on the services sought and procured. DEO will consult industry accepted trade organizations, past programs, and other regional grantees for input on costs for services being procured.

DEO will define “demonstrable hardship” as exceptions to program policies for applicants who demonstrate undue hardship. Applicants in this situation will be reviewed on a case by case basis to determine whether assistance is required to alleviate such hardship. Demonstrable hardship may include, but is not limited to, excessive amounts of debt due to a natural disaster, disability, etc. With documentation, DEO may allow for persons with disabilities to exceed the \$150,000 cap on a case by case basis and if cost reasonable.

5. Elevation Standards

DEO will develop and implement resilient home construction standards, including design standards for all structures 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). DEO will require elevation of these structures such that the lowest floor, including the basement, is at least two feet above the base flood elevation which is the minimum height requirements set forth in the February 9, 2018, Federal Register Notice. DEO will comply with local building codes where higher elevation standards are required. DEO may elevate up to 3 feet above the base flood elevation for the subject property so that it qualifies for NFIP flood insurance premium discounts when it is cost reasonable for the state to do so and when it does not create other conflicts.

Mixed use structures with no dwelling units and no residents below two feet above the 1 percent annual floodplain must be elevated or flood proofed 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 the 1 percent annual floodplain.

Property owners assisted through the recovery program will be required to acquire and maintain flood insurance if their properties are located in a FEMA designated floodplain. This requirement is mandated to protect safety of residents and their property and the investment of federal dollars. Florida will ensure adherence to Section 582 of the National Flood Insurance Reform Act regarding the responsibility to inform property owners receiving disaster assistance that triggers the flood insurance purchase requirement that they have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance, and that the transferring owner may be

liable if he or she fails to do so. Additional Florida State Building Code requirements may apply, in addition to local codes as applicable.

Nationally, the average cost to elevate a home is between \$30,000 and \$100,000. The average cost to elevate a home is dependent upon several factors including, but not limited to: the size of the home, the number of feet it must be elevated and the location of the home. Based on preliminary research, the average cost to elevate a home in Florida is anywhere between \$35,000 and \$115,000. However, the cost to elevate can be greater or less depending on the value of the home and the factors mentioned above. The cost to elevate a home should not exceed 49 percent of the home's pre-storm value. Any building that has a total cost of repairs greater than 50 percent is considered substantially damaged as determined by the local jurisdiction and is subject to code compliance requirements.

6. Planning and Coordination

DEO has consulted with and will continue to coordinate with the planning, preparation, and response community throughout the affected areas of the state. For more information on how DEO solicited input from communities around the state, please see Section 27 on Consultation. In addition to working with communities, DEO coordinated closely with partnering agencies including the Florida Division of Emergency Management (FDEM) and the Florida Housing Finance Corporation (FHFC). DEO played an active role in the recovery process by embedding CDBG-DR lead staff in the FEMA/FDEM Joint Disaster Field Office in Orlando. This allowed the team to participate in the National Disaster Recovery Framework, particularly the recovery support functions focused on economic recovery, community planning and capacity building, as well as housing. Working closely with other state and federal counterparts in this environment gave the DEO team a better understanding of the challenges faced by communities and allowed the team to develop partnerships early on to help encourage leveraging of resources. In addition, it allowed the team to help support the development of recovery strategies to guide short and long-term recovery around the state. DEO continues to work closely with FDEM as these recovery support strategies are implemented and participates in coordination calls as well as face-to-face meetings to help address the unmet needs of communities.

DEO continues to participate in the State Hazard Mitigation Plan Advisory Team and coordinates with FDEM mitigation staff on planning efforts that consider natural hazard risk. The State of Florida has a robust mitigation and resiliency planning field due to the natural hazard risk and unique challenges of the state's geography. DEO has also partnered with FDEM in the creation of guidance for the Statewide Post-Disaster Redevelopment Plan Planning Initiative, funded by the National Oceanic and Atmospheric Administration (NOAA). The initiative helps a community plan for the long-term disaster recovery period to ensure that they can recover faster and more efficiently, maintain local control over recovery and take advantage of opportunities to build back better.

DEO also coordinated with the Florida Housing Finance Corporation throughout the recovery process. DEO is an ex-officio member on the FHFC board which ensures close coordination on decision making. This was especially helpful in ensuring coordination on short and long-term housing needs following a disaster. In addition to providing input on board action that will result in funding for affordable housing in disaster impacted areas, DEO and FHFC staff traveled to the Florida Keys to specifically discuss the post-disaster workforce housing challenges faced by these island communities. This gave both teams an opportunity to evaluate how other federal funding sources, such as HOME and low-income housing tax credits, can be used in conjunction with CDBG-DR to meet remaining unmet needs. If a project involves CDBG and CDBG-DR funds, both program requirements must be met. In the event one

of the layered programs has less restrictive requirements, DEO will ensure the more stringent program requirements are applied.

DEO plays a vital role in coordinating economic recovery following a disaster by serving as the primary agency for Emergency Support Function 18: Business, Industry and Economic Stabilization. In addition, the agency coordinates closely with the U.S. Department of Commerce, Economic Development Administration (EDA) and Florida Small Business Development Centers (SBDC) Network to provide loans and other types of assistance, ensuring that businesses can open as quickly as possible and have the resources needed to recover. Following Hurricane Irma, DEO, in partnership with the EDA, hosted workshops on economic recovery resources around the state geared towards community and business leaders. This gave the team a unique perspective on some of the unmet needs and challenges related to economic recovery and allowed an opportunity for the agency to discuss how CDBG-DR funding might be used to support these recovery efforts.

Through the state's response and recovery structure, coordination at the Joint Field Office, existing partnerships and participation in the National Disaster Recovery Framework, the State of Florida is cooperatively implementing robust recovery efforts. DEO does not anticipate pursuing additional disaster recovery and response planning activities at this time.

7. Infrastructure Activities

DEO will encourage its subrecipients to incorporate mitigation measures into rebuilding activities by providing opportunities to leverage Hazard Mitigation Grant Program (HMGP) and Public Assistance (PA) mitigation funding on projects that are CDBG-DR eligible. By providing opportunities to leverage mitigation resources and prioritizing eligible projects that are included in countywide local mitigation strategies, capital improvement plans and other regional plans, DEO will encourage the advancement of long-term resilience to natural hazards and ensure that grantees are aligning investments with other local capital improvement projects as well as local and regional post-disaster recovery and mitigation plans.

DEO will encourage subrecipients to consider the costs and benefits of the project when selecting CDBG-DR eligible projects. This will be completed by encouraging subrecipients to perform a self-assessment of each proposed project and selecting the project(s) that provide(s) the greatest impact within the confines of the budgeted grant amount.

All projects proposed to DEO will undergo Affirmatively Furthering Fair Housing (AFFH) review before approval. Such review will include an assessment of the proposed project area's demography, socio-economic characteristics, environmental hazards or concerns, and other factors material to the AFFH determination. Applications should show that projects are likely to lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing in low- poverty, non-minority areas in response to natural hazard-related impacts. DEO will monitor each program during implementation phase, and will perform additional analysis through program implementation to ensure all protected classes are adequately served. All subrecipients will certify that they will affirmatively further fair housing in their grant agreements.

DEO will rely on professional engineers, procured by the subrecipients, to employ adaptable and reliable technologies to guard against premature obsolescence of infrastructure and ensure that the construction or rehabilitation of storm water management systems in flood areas will mitigate future flood risk.

8. Leveraging Funds

DEO will encourage subrecipients to leverage CDBG-DR funds with funding provided by other federal, state, local, private, and nonprofit sources to utilize the limited CDBG-DR funds. This will be specifically encouraged for the homeowner buyout programs as well as infrastructure programs. By encouraging local governments to use CDBG-DR as match for the FEMA Hazard Mitigation Grant Program and Public Assistance Mitigation program, communities will be able to better utilize both of these funding sources as often local governments cannot afford match for HMGP and PA mitigation programs and CDBG-DR funding can go further if not funding a project fully. DEO will report on leveraged funds in the DRGR system. When leveraging funds, in accordance with the Robert T. Stafford Act, as amended, the state will implement policies and procedures to ensure no individual receives duplication of benefits for the same purpose and/or effect to recover from Hurricane Irma.

9. Protection of People and Property; Construction Methods

The housing assistance provided under DEO's disaster recovery program will be built with emphasis on high quality, durable, sustainable, and energy efficient construction methods and materials.

These include the following minimum standards:

- Construction standards will be based on the Florida Building Code and must meet or exceed applicable requirements.
- Construction will comply with the Green Building Standard for all new construction of residential buildings and for all replacement of substantially damaged residential buildings (i.e., where repair costs exceed 50 percent of replacement cost) under the Florida Green Building Coalition.
- 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.

DEO will establish 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 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 implementing regulations at 24 CFR part 153. Contractors selected under DEO will ensure that low and very low-income persons- particularly directing opportunities to local residents and businesses that meet the qualifications of the project. Contractors will make every effort to recruit, target, and direct opportunities to Section 3 residents and businesses as well as notifying Section 3 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.

Contractors, subcontractors, material suppliers, laborers and professionals have a right to enforce claims for payment of unpaid labor, materials, and/or services against the real property improved, according to Florida law (Chapter 713, Part I of the Florida Statutes). This claim is known as a construction lien and cannot be waived in

advance pursuant to Florida law. If a legally enforceable construction lien against an applicants' primary residence results from any construction project under DEO's disaster recovery programs, the Department will provide for release and satisfaction of the resulting legally enforceable construction lien through bonding and/or repayment of the lien on behalf of the property owner.

DEO will require a warranty period post-construction for housing with all work being performed by the contractor guaranteed for a period of one year.

As stated in the Federal Register, CDBG-DR funds are prohibited from being used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. DEO will ensure that if subrecipients use CDBG-DR funds for levees and dams, the subrecipients will (1) register and maintain entries regarding such structures with the U.S. Army Corps of Engineers National Levee Database or National Inventory of Dams, (2) ensure that the structure is admitted in the U.S. Army Corps of Engineers PL 84-99 Program (Levee Rehabilitation and Improvement Program), and (3) ensure the structure is accredited under the FEMA National Flood Insurance Program. DEO will upload into the DRGR system the exact location of the structure and the area served and protected by the structure and maintain file documentation demonstrating that the grantee has conducted a risk assessment prior to funding the flood control structure and that the investment includes risk reduction measures.

10. Program Income

The state anticipates it may generate program income as part of the activities allowed under this allocation. Should any funds be generated, recovery of funds including program income, refunds, and rebates will be used before drawing down additional CDBG-DR funds. These amounts will be recorded and tracked in the state accounting systems and recorded in the DRGR system. The DRGR system requires grantees to use program income before drawing additional grant funds, and ensures that program income retained by one will not affect grant draw requests for other subrecipients. Subrecipients will be required to report program income quarterly and will be subject to applicable rules, regulations and HUD guidance. Retention of program income will be in compliance with the sub-grant agreements.

11. Monitoring Standards and Procedures

The state has adopted monitoring standards, including procedures to (i) ensure program requirements (including non-duplication of benefits) are met, and (ii) 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 who 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 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. Where applicable, accounting policies and procedures of DEO should 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 Disaster Recovery 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](tel: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.

12. Broadband Infrastructure

The rehabilitation of housing with four or more rental units in a building may be funded under this Action Plan. Should such activity become awarded under the state's program, DEO confirms that broadband infrastructure shall be installed, as required.

IV. PROJECTS AND ACTIVITIES

1. Method of Distribution

Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of housing, infrastructure, and economic revitalization resulting from Hurricane Irma as declared in DR-4337. To prioritize limited funding in areas with highest damage, DEO disaster recovery program assistance outlined in this Action Plan will be limited to counties (and municipalities within those counties) that received FEMA Individual Assistance (IA) declarations in addition to their Public Assistance (PA) declaration. Receiving an IA declaration in addition to a PA declaration indicates that the county had a significant amount of damage to housing in addition to public infrastructure. The following counties received both IA and PA assistance:

TABLE 37: FLORIDA IA AND PA DECLARED COUNTIES

Florida IA and PA Declared Counties			
Alachua	Flagler	Levy	Polk
Baker	Gilchrist	Manatee	Putnam
Bradford	Glades	Marion	Sarasota
Brevard	Hamilton	Martin	Seminole
Broward	Hardee	Miami-Dade	St. Johns
Charlotte	Hendry	Monroe	St. Lucie
Citrus	Hernando	Nassau	Sumter
Clay	Highlands	Okeechobee	Suwannee
Collier	Hillsborough	Orange	Union
Columbia	Indian River	Osceola	Volusia
DeSoto	Lafayette	Palm Beach	
Dixie	Lake	Pasco	
Duval	Lee	Pinellas	

As required by Federal Register, Vol. 83, No. 157, published on Tuesday, August 14, 2018, DEO will use 80 percent of the allocation to address unmet needs within the HUD-identified Most Impacted and Distressed (MID) areas. This 80 percent MID area identified are Monroe, Miami-Dade, Duval, Lee, Polk, Collier, Brevard, Broward, Orange, Clay, Hillsborough, Osceola, Palm Beach, St. Lucie and Volusia counties; 34266, 32136, 32091, 32145, 32084, 32771, 33935, 33440, 33523, 33825 and 33870 ZIP codes and the jurisdictions within the counties.

The Federal Register also requires that 70 percent of the entire CDBG-DR grant award be used for activities that benefit low- and moderate-income persons. DEO will ensure, as is required and identified in the Federal Register,

that at least 70 percent of the entire CDBG Disaster Recovery grant award will be used for activities that benefit low- and moderate-income persons.

2. Program Budget

DEO is the lead agency and responsible entity for administering \$812,235,745 in Community Development Block Grant Disaster Recovery (CDBG-DR) funds allocated to the state for recovery. In accordance with the Federal Register, DEO's aggregate total for indirect costs, administrative and technical assistance expenditures will not exceed 5 percent of the total grant (\$40,611,787.25) plus program income. DEO will limit spending to a maximum of 20 percent of its total grant amount on a combination of planning, indirect and program administration costs. DEO's total budget for administration costs is \$38,679,900 and \$1,912,300 for planning costs. Planning costs subject to the 15 percent cap are those defined in 42 U.S.C. 5305(a)(12). State and local administration costs are capped at 5 percent in aggregate by federal regulations. The state will provide additional guidance to subrecipients regarding the amount of administrative funds available to them. Eligible project delivery costs are presumed included as a portion of the overall CDBG-DR grant funding allocation provided to each subrecipient. Subrecipients will be responsible for properly tracking and monitoring these expenses that may not be included as part of the overall grant award to each individual project or individual applicant as applicable.

The program budget outlined is as follows:

Program Budget									
Program	Total Budget	MID Budget Breakdown		Min Set-Aside for Keys	Min Set-Aside for New MID's	Estimated LMI Benefit	Maximum Award	Average award per unit	Estimated # of Units**
		80%	20%						
HOUSING Budget									
Housing Repair Program	\$346,186,147	\$276,948,917.60	\$69,237,229.40	\$50,000,000	\$51,856,347	90%	\$150,000	\$45,000	7,150
Workforce Affordable Rental New Construction Program: Leveraging Other Sources of Financing	\$120,000,000	\$96,000,000	\$24,000,000	\$35,000,000	N/A	100%	\$8,000,000	\$60,000	1,670
Workforce Affordable Rental New Construction Program: Small Rental Developments	\$20,000,000	\$16,000,000	\$4,000,000	\$0	N/A	100%	\$5,000,000	\$125,000	160
Voluntary Home Buyout Program	\$44,117,239	\$35,293,791.20	\$8,823,447.80	\$10,000,000	N/A	50%	\$5,000,000	\$225,000	300

ECONOMIC REVITALIZATION Budget									
Recovery Workforce Training	\$14,450,656	\$11,560,524.80	\$2,890,131.20	N/A	N/A	100%	N/A	N/A	N/A
INFRASTRUCTURE Budget									
Infrastructure Repair Program Competitive Application Cycle	\$226,889,503	\$181,511,602.40	\$45,377,900.60	N/A	*these are included in the 80%	25 %	Round 1: N/A Round 2: \$140,839,905	N/A	N/A
STATE AND LOCAL ADMINISTRATION									
Administration (5%)	\$38,679,900	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Planning	\$1,912,300	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL	\$812,235,745	\$617,314,836	\$154,328,709	\$95,000,000	\$51,856,347				

Eighty percent of each program allocation listed above will be spent within HUD-identified most-impacted and distressed communities. Funding included as a minimum set-aside for Monroe County is a subset of the 80 percent that will be spent in most-impacted and distressed communities. The remaining 20 percent will be spent in state-identified most-impacted and distressed communities, which are listed in the table above.

*The estimated number of units is calculated based upon the assumption that the award amount per unit will vary from the average estimated award to a maximum estimated award of \$150,000. The estimated number of units have been rounded in this project budget to allow for flexibility and any imprecision in our estimates. Once DEO receives more accurate data, the program budget will be updated to accurately reflect the true cost and units. These adjustments will be included in future action plan amendments. The unmet needs assessment demonstrated that the majority of unmet needs were housing related. Therefore, the largest allocation of funding will address the remaining unmet housing needs.

The program descriptions below will provide further detail on how each program will distribute funding and meet HUD National Objectives. DEO will implement program management, monitoring, and oversight standards necessary to ensure compliance with state and federal requirements.

Program Activity	November 4, 2019 Program Budget	March 6, 2020 Amended Program Budget	June 5, 2020 Amended Program Budget	October 23, 2020 Amended Program Budget	Amount Adjusted
Housing Repair and Replacement Program	\$ 346,186,147	\$ 346,186,147	\$ 346,186,147	\$ 346,186,147	-
Workforce Affordable Rental New Construction Program: Leveraging Other Sources of Financing	\$ 100,000,000	\$ 100,000,000	\$ 120,000,000	\$ 120,000,000	-
Workforce Affordable Rental New Construction Program: Small Rental Developments	\$ 20,000,000	\$ 20,000,000	\$ 20,000,000	\$ 20,000,000	-
Land Acquisition for Affordable Workforce Housing	\$ 20,000,000	\$ 20,000,000	-	-	
Voluntary Home Buyout Program	\$ 75,000,000	\$ 44,117,239	\$ 44,117,239	\$ 44,117,239	-
Workforce Recovery Training	\$ 20,000,000	\$ 14,450,656	\$ 14,450,656	\$ 14,450,656	-
Business Recovery Grant	\$ 66,000,000	\$ 39,137,963	\$ 40,839,905	-	-\$40,839,905
Infrastructure Repair Program	\$ 85,819,653	\$ 149,113,795	\$ 186,049,598 ³³	\$226,889,503	+\$40,839,905
Administration (5%)	\$ 38,679,900	\$ 38,679,900	\$ 38,679,900	\$ 38,679,900	-
Planning (5%)	\$ 1,912,300	\$ 1,912,300	\$ 1,912,300	\$ 1,912,300	-
Total	\$ 773,598,000	\$ 773,598,000	\$ 812,235,745	\$ 812,235,745	-

Non-Substantial Amendment, Revision Number 8 to the State of Florida Action Plan for Disaster Recovery – Hurricane Irma, submitted to HUD on March 6, 2020, re-allocated \$61,592,200 from the Voluntary Home Buyout (VHB), Workforce Recovery Training Program (WRTP), and the Business Recovery Grant Program (BRGP) to the Infrastructure Repair Program in order to address unmet infrastructure needs following Hurricane Irma.

The Infrastructure Repair Program was launched with \$85,819,653 to fund infrastructure restoration and improvement projects in communities impacted by Hurricane Irma. Counties, municipalities, water management districts and water authorities located in the most impacted and distressed (MID) areas that experienced Hurricane Irma storm damage are eligible to apply for funding.

³³ On January 27, 2020, HUD released federal guidance for an additional \$38,637,745 to Florida through CDBG-DR funds to support long-term recovery from Hurricane Irma. Substantial Amendment 9, submitted to reflect the additional allocation to address unmet infrastructure needs, was approved by HUD on June 1, 2020.

During the 90-day initial application period, the Infrastructure Repair Program received 42 applications totaling approximately \$175 million in CDBG-DR dollars requested. On January 30, 2020, the Infrastructure Repair Program awarded \$84.3 million to 21 communities. The Infrastructure Repair Program received applications for storm water projects, sewage projects, and water projects that directly impact housing and residents from the Hurricane Irma impacted communities. One entity that was unable to receive funding has drainage pipes that were clogged by excessive debris from Hurricane Irma as well as damage to sidewalks and fields located within 1.5 miles of 838 HUD-assisted multifamily apartment units.

Due to limited funding, the Infrastructure Repair Program's competitive application cycle restricted each Unit of General Local Government (UGLG) to one application per entity. Consequently, DEO was not able to fund the replacement of one community's walk bridge that elementary school students need to travel across a canal to get to school because the County government submitted an application for another project. With additional CDBG-DR funding, the Infrastructure Repair Program will be able to fund additional projects to support housing, repair damages and create resiliency throughout the Hurricane Irma impacted areas.

The application cycles for the Voluntary Home Buyout (VHB) and Workforce Recovery Training Program (W RTP) were both undersubscribed. The VHB funded all 11 projects submitted for consideration at a total of \$44,117,238.92. The remaining \$30, 882,761 will be re-allocated to the Infrastructure Repair Program to address unmet infrastructure needs following Hurricane Irma. The W RTP will be funding projects totaling \$14,450,656 of the \$20,000,000 previously allocated to the W RTP. The available \$5,549,344 will be re-allocated to the Infrastructure Repair Program.

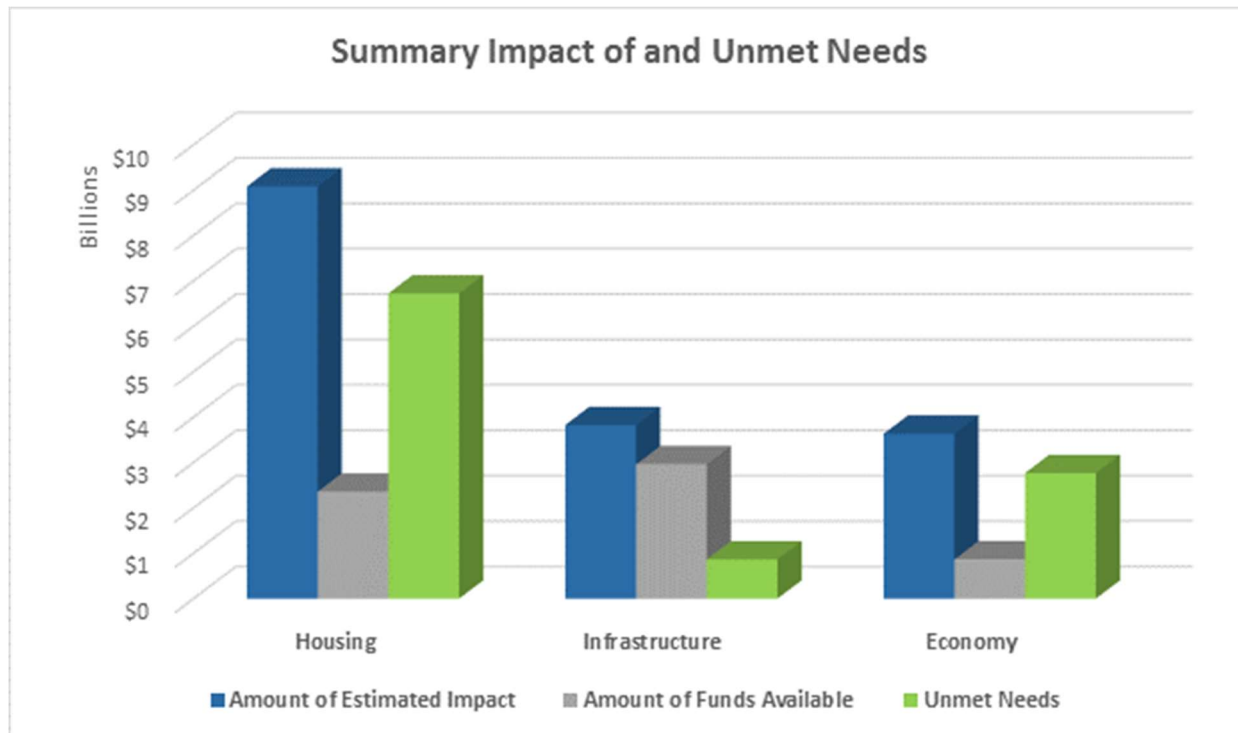
After receiving feedback from multiple communities expressing a greater need for Infrastructure Repair and Mitigation assistance, the State of Florida wishes to re-allocate a total of \$25,160,095 from the Business Recovery Grant Program to the Infrastructure Repair Program.

Non-Substantial Amendment, Revision Number 11 to the State of Florida Action Plan for Disaster Recovery – Hurricane Irma, submitted to HUD on June 5, 2020, re-allocated \$20,000,000 from the Land Acquisition for Affordable Workforce Housing Program to the Workforce Affordable Rental New Construction Program: Leveraging Other Sources of Financing. Per HUD guidance following a review of the Hurricane Irma Disaster Recovery Grant Reporting (DRGR) Action Plan, Land Acquisition for Affordable Workforce Housing Program is being removed as a separate program from the Program Budget table. The current land acquisition process occurs as a part of the Workforce Affordable New Construction Program: Leveraging Other Sources of Financing and is not required to be a separate budgeted program.

After reviewing current business data, the State of Florida submitted Substantial Amendment, Revision Number 14 to HUD on October 23, 2020 to remove the Business Recovery Grant Program and re-allocate a total of \$40,839,905 to the Infrastructure Repair Program. The Infrastructure Repair Program's Round 2 application cycle was launched with \$100,229,945. The Program received 71 applications requesting a total of \$304,168,950 in funding (oversubscription of \$204,168,950) to repair wastewater treatment and potable drinking water facilities, debris removal from canals, and other projects that directly impact housing and residents from the Hurricane Irma impacted communities. The additional \$40.8 million in CDBG-DR funding will allow the Infrastructure Repair Program to fund additional projects to support housing, repair damages and create resiliency throughout the - Hurricane Irma impacted areas.

3. Basis for Allocations

In consideration of the unmet needs assessment and HUD requirements and in order to prioritize limited funding in areas with highest damage, DEO disaster recovery program assistance outlined in this Action Plan will be limited to homeowners, small rental property owners, Public Housing Authorities and local governments within counties (and cities within those counties) that received FEMA Individual Assistance (IA) declarations in addition to their Public Assistance (PA) declaration. Program thresholds outlined in Section 16 state that projects or programs must primarily support LMI housing.



Estimated Impact, Support and Unmet Needs				
Summary of Impact/Support	Housing	Infrastructure	Economy	Total
Amount of Estimated Impact	\$9,078,545,706	\$3,822,535,087	\$3,631,322,666	\$16,532,403,459
Amount of Funds Available	\$2,357,387,008	\$2,960,178,503	\$866,054,771	\$6,183,620,282
Unmet Needs	\$6,721,158,698	\$862,356,583	\$2,765,267,895	\$10,348,783,176
Percent of Total Unmet Needs	64.91%	8.34%	26.72%	100%

4. Program Details

Housing Activities

The unmet housing needs in Florida due to Hurricane Irma are greater than housing assistance dollars available. The federal notice (FR-6109-N-01) requires states to primarily consider and address unmet housing needs. To address these needs, DEO proposes the following programs which are described in more detail below:

- Housing Repair and Replacement Program
- Workforce Affordable Rental New Construction Program

- Voluntary Home Buyout Program

HUD requires DEO to define what would constitute a housing unit “not suitable for rehabilitation.” DEO defines “not suitable for rehabilitation” as one of the two following definitions:

1. Residential properties that have experienced repetitive losses under FEMA’s National Flood Insurance Program (NFIP).
2. Dwellings that are considered substandard and do not meet the recovery program’s housing rehabilitation standards and/or federal, state, local code requirements shall not be deemed suitable for rehabilitation, as determined by the program and consistent with program guidelines. A structure is not suitable for rehabilitation if the cost of repair is unreasonable based on program standards as specified in the Housing Repair and Replacement Program Guidelines for Single Family Housing and Rental Properties.

As DEO identifies project sites with counties and communities, DEO will coordinate with VOADs (Voluntary Organizations Active in Disaster) and other Housing Counseling Agencies to provide additional support and services as needed by homeowners and renters. DEO will ensure outreach with HCAs to ensure that anyone that needs assistance will receive it.

Cost Verification

As a recipient of Federal funds, DEO is charged with ensuring that the costs of its activities are reasonable and necessary. Properties with repair and/or elevation cost estimates that meet or exceed 75% of a comparable reconstruction or replacement house as determined by standard operating procedures and policies will provide homeowners the option to select a reconstructed or replacement house. Properties with repair and/or elevation cost estimates that meet or exceed a comparable reconstruction or replacement house will be limited to reconstruction or replacement as a more cost reasonable option. Situations where replacement, reconstruction and/or elevation will be required include:

- Homes that have already been demolished may be replaced or reconstructed.
- Homes that are condemned (red tagged) by the local jurisdiction may be replaced or reconstructed.
- Homes that are structurally unsafe or that have other conditions that make interior inspection by program staff unsafe or impossible may be replaced or reconstructed.
- As stated in the Action Plan, repair of a Mobile/Manufactured Housing Unit (MHU) greater than 5 years old and/or with more than \$15,000 worth of Hurricane Irma repairs is not feasible and replacement is warranted.
- If a local jurisdiction has issued a substantial damage determination for a home located inside the 100-year floodplain, the home will be reconstructed and elevated.
- If the local jurisdiction has issued a substantial improvement determination for a home located inside the 100-year floodplain, the home must be elevated.
- Slab-on-grade homes that require elevation will be reconstructed and elevated. Repair will not be an option.
- Mobile home units that will require elevation in addition to the standard installation height will be replaced with a modular housing unit elevated to program standards.

Rental properties with five or more units are considered multifamily projects. DEO will assess the entire project for cost-reasonableness to determine whether rehabilitation or reconstruction of the property is necessary. The property owner may be required to provide additional documentation such as disclosure of planned future development, along with cost projections, engineering reports or other documentation necessary to make this determination.

Cost-effectiveness will be considered for all residential rehabilitation, reconstruction and/or new construction housing projects of 8 units or more. DEO and its recipients will establish policies and procedures to assess the cost-effectiveness of each proposed project undertaken to assist a household under any residential rehabilitation, reconstruction or new construction program. The policies and procedures will address criteria for determining when the cost of rehabilitation, reconstruction or new construction of the unit will not be cost-effective relative to other means of assisting the property. These policies and procedures will follow the Federal Register Vol. 83, No 157 regarding Rehabilitation and Reconstruction Cost-Effectiveness.

Housing Repair Program

Housing Repair and Replacement

The Housing Repair Program is a centralized housing rehabilitation or replacement program for low- and moderate-income families impacted by Hurricane Irma. DEO will manage and complete the construction process for the rehab or reconstruction of damaged homes on behalf of eligible applicants. With the assistance of staff and vendors, the state will work with a pool of qualified contractors assigned to repair, reconstruct or replace damaged properties. The program will pay contractors directly and no funds will be paid to homeowners. Applicants will not select their own contractors. Applicants will be required to enter into agreements with the state setting forth the terms and conditions of the program. This program is open to homeowners and owners of rental properties with the condition that it is agreed upon to meet affordability requirements. Rental units must be affordable as prescribed in the Federal Register notice. If currently occupied, the tenants will have the opportunity to move back into the unit or units created with other CDBG-DR activities.

DEO proposes the following housing assistance activities under this program:

- Repairs to, reconstruction or replacement of housing units damaged by Hurricane Irma, which may include bringing the home into code compliance and mitigation against future storm impacts, including elevation.
- The completion of work to homes that have been partially repaired.
- Repairs to, or replacement of, manufactured, modular and mobile homes impacted by Hurricane Irma.
- Temporary Housing Assistance based on individual homeowners needs and their participation in the Housing Repair Program.
- Temporary Housing Assistance based on individual tenant needs and their participation in the Housing Repair Program.*
- Acquisition of substantially-damaged housing units for housing redevelopment or buyouts of substantially-damaged properties may also be considered.

* The state and its subrecipients plan to minimize displacement of persons or entities and assist those displaced as a result of implementing a project with CDBG-DR funds. Should any projects cause displacement, DEO will follow the URA and the Real Property Acquisition Policies Act to ensure tenants are relocated to safe and sanitary locations. The state's policies and procedures plan, which will be updated to reflect Hurricane Irma activities, will ensure that subrecipients will minimize displacement. In the event of a voluntary buyout, when homeowners or tenants are located in a flood plain to prevent future loss, DEO will require subrecipients to develop policies and procedures to make sure this population is relocated into areas outside of floodplain and will receive full benefits as stated in the URA. The URA provides at 49 CFR 24.402(b) that a displaced person is eligible to receive a rental assistance payment that covers a period of 42 months.

In the event that a homeowner requests housing counseling services or displaced tenants wish to become homeowners, housing counseling services will be made available by a HUD-certified housing counseling agency. DEO will contact housing counseling agencies to coordinate on this portion of the Action Plan.

The Housing Repair Program is a grant program and requires applicants to be primary resident homeowners or property owners of rental property at the time of the Irma storm event (September 10, 2017). HUD's regulations regarding the use of grant funding for Hurricane Irma recovery state that an alternative requirement for housing rehabilitation is assistance for second homes. HUD is instituting an alternative requirement to the rehabilitation provisions at 42 U.S.C. 5305(a)(4) as follows: Properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation assistance or housing incentives. A second home is defined under this notice as a home that is not the primary residence of the owner, a tenant, or any occupant at the time of the storm or at the time of application for assistance. DEO may adopt policies and procedures that provide for limited exceptions to providing assistance to a second home in order to meet specific disaster recovery needs (e.g., adding affordable housing capacity); provided however that such exceptions are developed in consultation with and approved by HUD prior to implementation. DEO can verify a primary residence using a variety of documentation including, but not limited to, voter registration cards, tax returns, homestead exemptions, driver's licenses and rental agreements. Additionally, seasonal, short-term and vacation rental properties are not eligible for assistance.

DEO will implement construction methods that emphasize quality, durability, energy efficiency, sustainability, and mold resistance. All rehabilitation, reconstruction, and new construction will be designed to incorporate principles of sustainability, including water and energy efficiency, resilience, and mitigation against the impact of future disasters. DEO will implement and monitor construction results to ensure the safety of residents and the quality of homes assisted through the program. All housing units repaired or replaced must comply with the current HUD Housing Quality Standards (HQS). The housing assistance provided under the Housing Repair Program will be built with emphasis on high quality, durable, sustainable, and energy efficient construction methods and materials.

These include the following minimum standards:

- Construction standards will be based on the Florida Building Code and must meet or exceed applicable requirements.
- Construction will comply with the Green Building Standard for all new construction of residential buildings and for all replacement of substantially damaged residential buildings (i.e., where repair costs exceed 50 percent of replacement cost) under the Florida Green Building Coalition.
- 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.

Properties with rehabilitation and/or elevation cost estimates that meet or exceed 75 percent of a comparable reconstruction or replacement house as determined by standard operating procedures and policies will provide homeowners the option to select a reconstructed or replacement house. Properties with rehabilitation and/or elevation cost estimates that meet or exceed a comparable reconstruction or replacement house will be limited to reconstruction or replacement as a more cost reasonable option. Housing Repair Program homeowner-occupant participants household incomes cannot exceed 120 percent Area Median Income (AMI).

Coordinated Outreach

The State's housing recovery program will have a common outreach strategy, executed by DEO in coordination with storm impacted area stakeholders including but not limited to:

- Florida Division of Emergency Management;
- Florida Housing Finance Corporation;
- Local Government Emergency Management, Housing and Community Development Departments;
- Volunteer Organizations Active in Disasters; and

- Other stakeholder groups identified by DEO.

Additionally, the housing program will have a single communications and branding strategy that will be leveraged in all its communication and public outreach activities. This information will be included in the housing program guidance developed after the approval of this plan. To convey the status of applications for the Housing Repair and Replacement Program, within 72 hours of receiving the application, DEO will notify the applicant that the application has been received. Within 72 hours of a decision, letters of approval or denial will be sent to the applicant through the provided email and mailing address. DEO has established protocols for protecting personal information.

Leveraged Programs

Properties that have received rehab or repairs through the Housing Repair Program will not be eligible for assistance under the Voluntary Home Buyout Program. However, on a case-by-case basis, housing units that have been demolished through the Voluntary Home Buyout Program may be eligible for new construction/replacement through the Home Repair Program at DEO's discretion. New development would be on an alternative site that is less at risk of flooding and would be built to building code, elevation standards, and meet requirements of CDBG-DR. Properties already enrolled in other FEMA HMGP home repair and mitigation programs and eligible for Irma CDBG-DR assistance may only be eligible for the required matching funds subject to case-by-case reviews of the HMGP project scope.

Duplication of Benefits

To prevent duplication of benefits, DEO will require that all sources (federal, State, local, private) and amounts of disaster housing assistance received or reasonably anticipated to be received are documented with submission of an application for CDBG-DR funding. Duplication of benefits for housing assistance will only consider other sources of funding pertaining to structural damage caused by the hurricane. Assistance for contents and personal items will not be considered duplication. Prior to program-related construction, applicant awardees must submit any additional funds received for housing damage caused by the presidentially-declared hurricane disaster to the State to avoid duplication of benefits. There will be no duplication of benefits as its statutory not allowed. Policies and procedures will dictate the process to prevent duplication. CDBG-DR funding must be the funding of last resort. Any additional funds paid to applicant awardees for the same purpose as the housing assistance award after the State has completed the repair, rehabilitation, or replacement of the applicant's housing units must be returned to DEO.

Subrogation

All duplicative funding obtained by a property owner must be remitted to or accounted for by DEO, regardless of when the property owner received such assistance. If property owners receive additional funding for the same purpose as the HRRP award (permanent repair to storm damaged home) even after the HRRP award is executed or construction is completed, the property owner is required to report the additional funding to the program. The program is obligated to evaluate whether the assistance is duplicative of the HRRP award. Upon receipt of a report that additional benefits have been received, the program will recalculate the property owner's award and provide instructions whether the award will be reduced by such amount, whether the property owner must remit such amounts to the program as reimbursement (when additional assistance received after program disbursements) or assignment of payment. Each property owner will execute and be bound by a subrogation agreement that outlines these responsibilities.

Program Priorities

Recognizing that the \$346 million allocated for owner-occupied housing and rental properties will likely not address all need, at-risk and vulnerable populations with the greatest needs will be prioritized. At a minimum, 70 percent of program funds meet a low- and moderate-income national objective. Additionally, households with one or more of the below characteristics will be prioritized and processed in the order that they complete an application. The

State amends its Homeowner Housing Repair and Replacement program to prioritize, families with members over the age of 62, families with members with disabilities and families with children under the age of 18. The State believes that this adjustment creates a more equitable prioritization system and better serves the spirit and fact of AFFH. Furthermore, the State clarifies that prioritization does not “stack”. In other words, families with members both elderly and disabled do not receive higher priority than those with only elderly or disability members.

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

Special consideration may be given to the Florida Keys on a case-by-case basis. Households with income higher than 120 percent of AMI will not be eligible for this program. Additionally, DEO is ensuring access and transportation mobility services are accessible through a comprehensive outreach campaign and a mobile intake center to ensure any and all households have equal opportunity and support to complete an application.

DEO will track and project total obligation of grant funds for each proposed activity. As the projected grant award agreement total value for any activity approaches full obligation, DEO will analyze the remaining potential eligible applicant pipeline to determine the amount of remaining unmet need for prioritized applicants and the remaining balance of funds available to serve those applicants. DEO may choose to place remaining applicants on hold until priority household applicants are fully processed and needs most realized. As program applications are monitored, DEO may choose to adjust the percentage of funding or re-allocate additional funding from other programs with less production to maximize assistance for priority applicants eligible and seeking assistance.

Housing Repair Pilot Initiative

DEO will undertake a pilot initiative to examine the potential time savings and additional expenses that may result from a concurrent processing model, rather than a linear processing model.

The Pilot Initiative is a method of identifying a cohort of initial registrants in each impacted area that can be deliberately observed through the full HRRP process to identify and resolve issues prior to the bulk of the applicants getting into the full process. The close observance of the pilot cohort is intended to test initial process design and yield informed decisions to improve efficiencies as the rest of the applicant population comes into the workflow.

The pilot cohort will be processed concurrently for application, eligibility, damage assessment and environmental review prior to the feasibility, duplication of benefits and award steps. The simultaneous processing of these tasks will be allowed as activity delivery costs for the pilot group.

This dual-tracked process that results in the flagging of applications as either part of the Pilot Initiative or non-pilot will contribute to DEO’s ability to perform a real-time test of the program. The identified pilot cohort will have no impact on other applicants’ progress through the process. Any issues that DEO finds can be addressed and resolved to ensure smooth processing of the bulk, average and more complicated applications.

Initial registrants that are outside of the pilot group will also be processed at the same time the Pilot Initiative files are moving through the system. However, the applicants that are outside of the pilot group will follow the linear process path which requires completion of application prior to initial eligibility review, clearance of eligibility review prior to damage assessment, clearance of damage assessment prior to environmental review, clearance of environmental review prior to feasibility, duplication of benefits and award.

The pilot initiative is intended to gauge the benefits and identify issues associated with a concurrent processing method. It will support an analysis of whether the more conservative linear model, the concurrent model, or some combination of the two processes will provide the best results for the Department of Economic Opportunity (DEO) and our Irma-affected citizens.

Pilot Selection Process

At the initial stage of applicant registration, a group of applicants will be randomly selected within the Priority 1 invitation group based on property characteristics. DEO will process these applicants by conducting the application completion, initial eligibility, damage assessment and environmental review steps at the same time. The rest of the Priority 1 population will continue normal processing under the linear model, which will require each step to be completed prior to the next step starting. This will allow DEO to maintain compliance with the stated prioritization schedule, as described in this Action Plan, while testing alternatives that could result in a reduced overall processing time.

Established conditions and assumptions underlying the test of the initial cohort:

- Only Priority I registrants were randomly selected for the Pilot Cohort
- Motivated registrants will complete their applications early
- Identified local VOADs will assist applicants to speed up their completion

Cohort screening criteria:

- From the original 10 counties or 4 ZIPs (Tier 1 ERR complete)
- Insurance \$0, FEMA \$1-15000, SBA \$0, NFIP \$0 benefits
- Not in flood plain
- House built after 1978
- No Letter of Substantial Damage /No condemnation letter (Add into damaged section of application)
- Repair program

The only screening criteria used for the pilot cohort are those listed above. No other attribute of the property or applicant were used to screen for pilot selection. Both owner-occupied as well as rental applicants were included in the screening. Registrant/applicant IDs were selected at random as long as the criteria listed were met, which maintained the integrity of the prioritization requirements outlined in this Action Plan.

The Application Pilot project timeframe is defined by the substantial completion of the pilot application group's environmental review and submission of that documentation to the Department of Economic Opportunity.

Basis for Calculating Housing Assistance Awards

If eligible and awarded, housing assistance award calculations may be based on the following factors:

1. In order to ensure that housing assistance amounts are cost reasonable, the maximum amount of CDBG-DR assistance available to a single housing unit under the Housing Repair Program is \$150,000. In cases of demonstrable hardship or where local housing markets warrant an increase of the cap, DEO may allow projects to proceed that exceed the program cap. This will be determined on a case-by-case basis. The program cap may also be exceeded to provide funding for difficult or unexpected repairs above and beyond the housing cap, when the costs are deemed necessary and reasonable by DEO.
2. A review of all funding received by the applicant from any source to calculate the total previous assistance received by the applicant and to ensure no Duplication of Benefits (DOB);

3. Damage/scope of project work needed; and,
4. Reconstruction or Replacement Value

Housing assistance awards will be determined by first factoring in the inputs listed above and then deducting any duplication of benefits or qualified offsets for eligible repairs already performed. The pre-determined program assistance amount will then be applied. Funds qualified as DOB may be required in support of the overall construction assistance provided. Awards may include expenses for additional related costs such as green building and mitigations requirements, elevation, insurance, ADA modifications, repair or replacement of water, sewer and utility connection needs.

Cost effective energy measures and improvements that meet local zoning and code, Decent Safe and Sanitary (DSS) or required Housing Quality Standards (HQS), especially those improvements which add enhanced resilience, such as elevation of major electrical components, roof strapping and other items are also eligible. Environmental review and determined required remediation for items such as lead-based paint abatement, asbestos abatement, or other remediation components shall also be eligible.

Elevations will be included for applicants that meet requirements determined by the program, including substantially damaged properties as per locally approved floodplain requirements. Elevation will be evaluated on a case by case basis. Elevations will not be conducted on properties outside of the floodplain, with the possible exception where elevation is required by local ordinance. DEO will follow HUD guidance to ensure all structures, defined at 44 CFR 59.1, designed principally for residential use and located in the 1 percent annual (or 100-year) floodplain, that receive assistance for new construction, repair of substantial damage, or substantial improvement, as defined at 24 CFR 55.2(b)(10), will be elevated with the lowest floor at least two feet above the 1 percent annual floodplain elevation.

If located in a 100-year floodplain, the applicant will be required to maintain flood insurance and notify future owners of flood insurance requirements. Federal law requires people who live in a floodplain to carry flood insurance in perpetuity on that property. The Robert T. Stafford Disaster Relief and Emergency Assistance Act prohibits the receipt of disaster assistance because of lack of required flood insurance; accordingly, whether a property is subject to this requirement will be reviewed during the eligibility phase of the program. If an applicant is eligible for program assistance, a grant agreement, covenant, deed restriction or similar instrument will be required to be placed on the property requiring that flood insurance be maintained on that property in perpetuity. An award may also include assistance to pay for up to the first two years of flood insurance premiums for eligible program applicants. Such parameters to determine eligibility for assistance with flood insurance premiums shall be further defined in the state's policies and procedures.

Based on the current registration pool, DEO anticipates meeting all remaining unmet housing needs through the Housing Repair and Replacement Program.

Allocation for Activity: \$346,186,147

Keys Set-aside: \$50,000,000

Newly added Most-impacted and distressed communities set-aside: \$51,856,347

Eligible Applicants: Homeowners and owners of rental properties, including PHAs, whose primary residence sustained damage from Hurricane Irma and property owners of rental housing.

Eligibility Criteria: The state will prioritize homeowner applicants earning less than or equal to 80 percent AMI and rental property owners whose rental property serves LMI individuals. If this need is fulfilled, DEO may address applicants earning greater than 80 percent AMI. Special consideration may be given to the Florida Keys on a case-by-case basis.

CDBG-DR assistance is prohibited under Federal Register (FR-6109-N-01) if:

- (a) the combined household income is greater than 120 percent AMI or the national median;
- (b) the property was located in a flood plain at the time of the disaster; and
- (c) the property owner did not maintain flood insurance on the damaged property, even when the property owner was not required to obtain and maintain such insurance.

Maximum Award (per unit): \$150,000*

Responsible Entity for Administering: Florida Department of Economic Opportunity

Eligibility: 105(a)(4)

National Objective: Low- and moderate-income benefit or Urgent Need

**DEO may increase the \$150,000 cap if construction and elevation cost prove to be higher than originally estimated due to Hurricane Michael's impact on the market.*

Temporary Housing Assistance Benefit (THAB)

Overview

As a general rule, Rebuild Florida's Housing Repair and Replacement Program (HRRP) will not provide temporary relocation costs to applicants who will be required to vacate their property during construction activities. Since this is a voluntary program and applicants are made aware of program policies at the time of application. The temporary relocation requirement will be the applicant's responsibility.

DEO's Rebuild Florida program recognizes that some HRRP beneficiaries, particularly those of modest means and with vulnerable household members, may face financial cash flow challenges caused by the additional interim housing costs that may be necessary during the repair or reconstruction process. Rebuild Florida will provide temporary rental assistance to homeowner applicants experiencing hardship, on a case-by-case basis following excessive time of displacement or other substantiated extenuating circumstances and approval from the DEO Housing Exceptions Panel. This procedure identifies how this process will be implemented to identify appropriate cases to be temporary housing costs.

Demonstrable hardships may include job loss, failure of a business, divorce, severe medical illness, injury, death of a family member or spouse, unexpected and extraordinary medical bills, disability, substantial income reduction, unusual and excessive amount of debt due to a natural disaster, etc. None of the listed examples above, individually or taken together, automatically establish a demonstrable hardship, nor is the listing above exhaustive as there may be other factors relevant to the issue of demonstrable hardship in a particular case. If an applicant believes that they are in the state of demonstrable hardship and that the demonstrable hardship causes them to not comply with program policies, then they may present their evidence of a demonstrable hardship to their Intake Specialist and request temporary housing assistance. The Program will evaluate temporary housing requests on a case-by-case basis after review of all of the circumstances.

To avoid displacement and homelessness, DEO has developed the **Temporary Housing Assistance Benefit (THAB)** to provide additional assistance for homeowners who are experiencing a financial hardship that are participating in the HRRP, where the homeowner has been approved for rehabilitation or reconstruction assistance and the

Homeowner Grant Agreement has been signed by the homeowner, until repairs to their damaged homes are completed. The THAB provides assistance under Rebuild Florida's HRRP for unmet needs related to eligible short-term lodging or rental expenses, for up to 6 months, provided the household is at or below 80% AMI and is a beneficiary also receiving assistance for the rehabilitation, reconstruction or replacement of their Irma damaged property.

The THAB is a housing assistance benefit not directly resulting in the rehabilitation, replacement or reconstruction of a home. Therefore, THAB does not count against the program cap for rehabilitation, replacement or reconstruction of the home. The program construction cap identified in the Action Plan applies to hard and soft construction costs associated with the Irma repairs. THAB will be capped at a maximum of \$20,000.00 in Program sponsored payments. Construction delays for which the DEO assigned construction contractor is responsible may result in contractor responsibility for provisions of additional rental assistance and this additional assistance is not limited by the THAB cap.

Homeowners who choose to stay with friends or family in lieu of staying in a hotel or a short-term leased apartment are not eligible for THAB payments. Further, any homeowner who initially utilizes THAB assistance for hotel rental or short-term lease and subsequently abandons the temporary housing situation to stay with friends or family will have all future THAB payments terminated.

Temporary Housing Assistance Benefit (THAB)

The Temporary Housing Assistance Benefit (THAB) allows short-term lodging in the form of temporary hotel assistance for up to an estimated 90 days. Reevaluation for continued assistance is available on a case-by-case basis following extenuating circumstances. This may be available for eligible HRRP homeowners who:

1. have household incomes at or below 80% AMI,
2. have executed a Rebuild Florida HRRP grant agreement but construction has not been completed,
3. require temporary housing due to other circumstances of hardship, as approved by the Florida Department of Economic Opportunity (DEO), including temporary displacement that requires that the damaged home be vacated for safety and other reasonable measures during construction, and
4. will stay in a hotel, motel, or extended stay hotel unless alternative arrangements (e.g., short-term leased apartment) are needed due to excessive length of displacement

THAB Eligibility

In addition to the criteria listed above, the following eligibility criteria also applies:

1. Must be an active applicant in the HRRP. "Active" participants are defined as HRRP homeowners who are post-closing, meaning have executed their Homeowner Grant Agreement (HGA) grant. This means that the THAB will only be provided for applicants in the active construction phase.
2. Homeowner cannot receive concurrent temporary lodging or rental assistance from other governmental or charitable organization that would cause a duplicative benefit.
3. If the homeowner received any rental assistance from FEMA, Tenant-Based Rental Assistance (TBRA), Project-Based Rental Assistance (PBRA), or Section 8 Housing, the funding must have been exhausted prior to provision of CDBG-DR THAB funds.

4. Funds must be used for lodging and cannot be used for any other purpose.

The THAB is not a duplication of benefits to housing rehabilitation, repair or reconstruction funds, as it constitutes a separate and distinct eligible activity.

THAB Assistance Types

The Temporary Housing Assistance Benefit is dependent on the homeowner's needs, which will be identified and confirmed by Rebuild Florida HRRP intake specialists to determine the best and most reasonable options available to homeowners. The THAB may be provided in the form of temporary lodging in units such as hotels, motels or extended stay hotels, intended not to exceed 90 days. The benefit will be calculated based on the Government Services Agency (GSA) lodging rates for the homeowner's area. GSA rates can be found at <https://www.gsa.gov/travel/plan-book/per-diem-rates>.

1. Temporary Hotel Assistance: In order to avoid homelessness and undue financial burden, some homeowners need temporary hotel assistance (estimated not to exceed 90 days) to complete construction on their homes. This program will provide funding for temporary hotel lodging for these families for up to an estimated 90 days until construction is complete.
2. Extended Temporary Hotel Assistance: In the event that the construction contractor notifies DEO that the project will exceed the original schedule and a homeowner will not be able to reoccupy his or her home due to construction timelines that exceed the initial assistance, an extension of benefits may be issued to prevent homelessness or additional undue financial burden. The extension will be granted based on a new estimated timeline from the construction contractor.
3. Alternative Lodging Assistance: In cases where the duration of estimated displacement exceeds 90 days or other extenuation factors, alternative lodging (i.e., lodging alternative to hotel, motel, extended stay hotel) may be approved on a case-by-case basis.

THAB Maximum Benefit

The THAB covers 100% of the hotel, motel, or extended stay daily or monthly rate, as noted below, without a percentage cost share required from the homeowner. The benefit is capped at a maximum of \$20,000.00. This maximum may be waived in areas with spiking rates, as defined by the General Services Administration (GSA) publication, with approval on a case-by-case basis.

Payment of Benefit

The short-term lodging assistance received through THAB is paid directly to the hotel, motel, or extended stay hotel and charged by the hotel automatically, based on hotel policy. The total benefit payment amount is calculated based on the hotel nightly rate, including taxes (and other approved fees as required) and the contractor's projected timeline to completion once the applicant has vacated the property.

Associated Expenses

Occasionally, an applicant may have difficulty in transporting their personal property out of the damaged property during construction. In this event, the applicant may request assistance in paying "associated expenses," not to exceed \$5,000. This is reserved only for cases of extreme hardship and may be used to assist applicants in moving personal property from and to the damaged location.

Extension of Benefit

If the reconstruction or rehabilitation may extend beyond the initial estimate, applicants can apply for an extension of temporary housing. Intake specialists who receive questions about extensions should direct those to temporaryhousing@rebuildflorida.gov.

Termination or Discontinuation of Assistance

THAB is only provided to homeowners who have been evaluated and found to be eligible for the Rebuild Florida Housing Repair and Replacement Program. DEO does recognize that there may be unforeseen circumstances that cause a homeowner to withdraw, become inactive or later be disqualified, after the eligibility determination and after the homeowner has agreed to proceed in the program. Though rare, these situations may occur.

- Should an eligible homeowner who has received or is receiving THAB assistance withdraw, become inactive or disqualified, THAB assistance must cease immediately upon such determination by program staff. Additionally, any amount of money paid to the homeowner for THAB assistance must be returned by the homeowner to the Florida Department of Economic Opportunity.
- Acknowledging that there may be extenuating circumstances that result in a homeowner's withdrawal or inactivity subsequent to his or her eligibility determination and agreement to participate in the program, DEO may allow an exception to the repayment policy with documented proof of and acceptance by DEO of the hardship. Policies and procedures for THAB will be updated, as needed, as the program evolves, and unforeseen situations arise.
- The program will discontinue temporary housing assistance if a homeowner is post-closing (has executed their grant agreement) and fails to move out of the property in a timely manner to allow construction activities to begin.
- If a homeowner fails to check-in to their reservation, the HRRP will attempt to contact the homeowner. If, after 24 hours following contact attempt, the homeowner has not provided a reasonable cause for missing their check-in date/time, the HRRP may terminate assistance. This will be evaluated on a case-by-case basis to mitigate wasteful spending.
- If a homeowner is negligent or causes damage to the temporary lodging, the HRRP will immediately notify the homeowner and terminate assistance. The homeowner will be responsible for the cost of all damages.
- When the project contractors have notified the applicant that it is safe to move back into the home, the applicant should begin moving their belongings from the Portable On Demand (POD) Storage Container into their home. Once the move is finished, the applicant must check out of their temporary housing accommodation. This process should be completed no more than five business days following the final Program inspection. After check-out, a final folio will be requested by the Temporary Housing team, and no further charges will be permitted.
- If the homeowner chooses to stay with friends or family in lieu of staying in a hotel, the homeowner is not eligible for THAB payments. Terminating occupancy of a hotel to stay with family or friends will result in termination of payments.

Upon notice of any of the above conditions, THAB recipients should be immediately provided with a Termination of Temporary Housing Notice along with instructions for appeal.

Accessibility/Disability Accommodations

Reasonable steps will be taken to accommodate accessibility and other special needs to ensure the placement is appropriate to the homeowner and the household members.

Mobile Homes and Manufactured Homes

Mobile homes or manufactured homes may be eligible for rehabilitation under this program. However, to be cost effective, the mobile home to be rehabilitated must be no more than five years old at the time of the damage assessment the repair costs necessary to rehabilitate the mobile/manufactured home must not exceed \$15,000 (hard and soft construction costs). Any mobile/manufactured home that is older than five years old at the time of the damage assessment or has an estimated repair cost greater than \$15,000 shall require the mobile/manufactured home to be replaced with another mobile/manufactured home. The home must meet HQS upon completion. If local zoning disallows replacement of a mobile home, then DEO will allow code compliant site built or modular units. Off site replacements to more safe and secure environments will be considered on a case-by-case basis. Replacement is the demolition, removal and replacement of a damaged MHU with a new MHU in substantially the same footprint or at a new location, if the original damaged unit was on leased land and the MHU owner must relocate to a new property. Relocation of a new MHU will require additional environmental review.

Replacement Mobile Home Unit (MHU) relocations are limited to applicants whose damaged MHU is located on leased property. Relocation of a replacement MHU is restricted to the installation of a new unit which is outside of the floodway or Special Flood Hazard Area (SFHA, or "floodplain") at an established mobile home park or other leased land with an existing pad and utility infrastructure. The program will require documentation that the established mobile home park or leased land has the requisite existing pad and utility requirements. An occupational license, sewage and utility hookups, or other permitting issued by the local jurisdiction may serve as verification documentation. An Environmental Review Record (ERR) must be completed on the original damaged site and the new site on which the new unit will be installed for applicants of MHUs who will be locating the new unit on a lot different from the location of the damaged unit.

Summary Eligibility Requirements

DEO housing repair program will serve primary resident homeowners and owners of rental property in HUD and state-identified most impacted and distressed counties. Property owners must prove Irma storm damage to qualify for repair, reconstruction or replacement assistance. The following additional eligibility criteria apply:

- A. Home was impacted by Irma (DR-4337). The property must have documented damage because of the declared disaster. Home repair needs will be documented by FEMA, SBA, and/or a privately contracted inspection.
- B. The state will prioritize homeowner applicants earning less than or equal to 80 percent AMI and rental property owners whose rental property serves LMI individuals. If this need is fulfilled, DEO may address applicants earning greater than 80 percent AMI.
- C. All applicants must own a single-family home, mobile/manufactured home, or rental property located within Brevard, Broward, Clay, Collier, Duval, Hillsborough, Lee, Miami-Dade, Monroe, Orange, Osceola, Palm Beach, Polk, St. Lucie and Volusia counties; and 11 separate ZIP codes outside of these areas (32084 and 32145 in St. Johns County, 32091 in Bradford County, 32136 in Flagler County, 32771 in Seminole County, 33935 and 33440 in Hendry County, 33523 in Pasco County, 33825 and 33870 in Highlands County and 34266 in DeSoto County) prior to the Irma storm event. Note that 80% of funding must be spent in the HUD-designated MID counties and ZIP codes. The remaining 20% of the funds may be spent outside of the MID-designated areas that also received a Presidential Disaster Declaration.

- D. Households that make above 120 percent of the area median income and are in the flood zone that failed to maintain flood insurance at the time of the hurricane will not be eligible to receive funding to rehabilitate or rebuild their home.

Workforce Affordable Rental New Construction Program

DEO will work in partnership with the Florida Housing Finance Corporation (FHFC) to manage a program that will result in the construction of new affordable rental housing in areas impacted by Hurricane Irma and in areas that experienced a population influx because of migration from Puerto Rico and the U. S. Virgin Islands due to Hurricane Maria. FHFC will serve as a sub-recipient to DEO, administering one or more competitive solicitations seeking applications from for-profit and not-for-profit developers and public housing authorities to build affordable housing in targeted areas of the state. The Workforce Affordable Rental New Construction Program will provide two different funding mechanisms to facilitate the creation of quality, affordable housing units to help Florida build resiliency and alleviate the rental stock shortage caused by the storms in the most impacted areas of the state. The term “workforce” under this program is defined to represent LMI individuals. This affordable housing is also intended to serve vulnerable population and reduce the risk of homelessness by requiring certain funded developments to set aside at least 10 percent of units to serve extremely low income (ELI) households at area median incomes set by the Corporation, and to set aside at least 5 percent of those ELI units to serve Homeless and Persons with Special Needs as defined in Florida Statutes. CDBG-DR funds will be provided as zero-interest, non-amortizing loans (including forgivable loans) to qualified developers to leverage other sources of funds and as stand-alone financing to support development. Any new rental housing will have an affordability period of 20 years. CDBG-DR funds will be awarded to eligible applicants through a competitive application process.

DEO proposes the following Workforce Affordable Rental New Construction Program activities under this program:

- DEO will work in partnership with FHFC to leverage CDBG-DR funds with other sources of funding including, but not limited to, Low-Income Housing Tax Credits and Tax-Exempt Bond Financing.
- DEO will work in partnership with FHFC to utilize stand-alone CDBG-DR funds to provide zero-interest loans to create smaller, new multi-family developments.

FHFC refers to their applications as Requests for Applications (RFA). If funds remain after the funding selection process is complete in an RFA and there are no additional eligible applicants to select for funding in that identified RFA, then the remaining funds will be distributed to another RFA’s total funding budget. For example, if all eligible applications are funded in the Workforce Affordable Rental New Construction: Small Rental Development RFA, but \$7 Million remains in that budget unused, FHFC will re-distribute the remaining \$7 Million to fund an unfunded application in the Workforce Affordable Rental New Construction: Leveraging CDBG-DR funds with other Sources.

FHFC will include the criteria for prioritizing proposed projects under these programs within the Workforce Affordable Housing- New Construction Request for Applications (RFAs). These guidelines will be available on FHFC’s webpage and will demonstrate how the programs will promote affordable housing in HUD and State designated Most-Impacted and Distressed Areas.

Affordable Rents

We will use FHFC’s definition of affordable rents which are provided at this [website](#).

Workforce Affordable Rental New Construction: Leveraging CDBG-DR Funds with Other Sources of Financing

Where appropriate in the HUD-identified most-impacted and distressed communities, CDBG-DR funds can be effectively leveraged with 4 percent Low Income Housing Tax Credits, local or state Tax-Exempt Bond Financing, 9 percent Low Income Housing Tax Credits in limited high-cost areas or other local financing to produce new affordable housing rental units. High-cost areas are locations where development costs are so high that a bond/non-competitive 4 percent LIHTC/CDBG-DR approach (or CDBG-DR alone) will not be enough. The primary leveraging of funds will be tax credits. The CDBG-DR funds will be provided as zero-interest forgivable loans to eligible private for-profit and nonprofit housing developers, and public housing authorities.

For units developed using funding under the minimum set aside in the Florida Keys, leveraging of CDBG-DR funds with other sources of financing to build larger developments is not always the best approach due to the unique land use issues in Monroe County. Therefore, in addition to traditional rental developments, other varied rental development types will be allowed and prioritized. These can include single family rental, scattered site rental developments and rental developments that are part of a Community Land Trust (CLT). For these developments, CDBG-DR funds may be used to provide stand-alone financing or may be the primary source of funds needed to finance the development.

Maximum subsidy limits will follow the applicable HOME Investment Partnership Program per-unit limits and will target low and moderate-income households. The units created under this program, at a minimum, will follow the established HOME Program Rent schedule or any other funding source used to finance the development with a more restrictive rent schedule and will be set-aside for the required CDBG-DR affordability period plus the longer affordability periods required by the additional financing source (such as FHFC or local Tax-Exempt Bonds and/or Low-Income Housing Tax Credits for example). In the event one program has less restrictive requirements, the more stringent program requirements will apply to ensure all requirements are met. To be considered for funding, eligible applicants will be required to show ability to proceed with construction, demonstrate experience in developing and managing affordable housing in size and scope of the proposed development and have a financing structure that leverages CDBG-DR funding. To ensure feasibility, the proposed development will be underwritten in accordance with underwriting standards in place at FHFC.

Any new housing construction will meet elevation requirements per the February 9, 2018 Federal Register Notice and the NFIP purchase requirements prior to the commencement of construction activities in compliance with page 61 and page 65 of the Federal Register Notice. Detailed policies and procedures will be developed later by FHFC.

Allocation for Activity: \$120,000,000

Eligible Applicants: Eligible Applicants will include for-profit and nonprofit housing developers, and public housing authorities with experience developing and managing rental properties in size and scope of the proposed development. Local governments may partner with these entities in applying for these funds.

Eligibility Criteria: The proposed developments must help address the unmet need in the HUD-identified most-impacted and distressed areas, or other areas impacted by the storms and deemed as a priority by the State

All developments funded will be required to meet the following criteria:

- Green Building Standards
- Energy Efficiency Standards
- Accessibility and Visitability Standards
- Resiliency Standards

Maximum Award: \$8,000,000

Responsible Entity for Administering: Florida Housing Finance Corporation

Eligibility: 105(a)(2)

National Objective: Low- and moderate-income benefit

***Note:** Florida Housing Finance Corporation may consider increasing the per unit limit amount. To do so, potential applicants must submit sufficient and specific information that justifies the need through public comment. Public comment can be submitted here: <https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2018/community-development-block-grant-disaster-recovery-programs/public-comments>.

Workforce Affordable Rental New Construction: Funding for Small Rental Developments

It is not feasible to finance new rental development with Tax-Exempt Bond Financing in some areas of the State impacted by the storm; this is particularly true for smaller, less populated counties identified by HUD as the most-impacted and distressed areas. This is primarily due to the need for smaller properties where Tax-Exempt Bond financing is not cost effective. In these areas, CDBG-DR will be used to provide stand-alone or the primary source of funds needed to finance the development. CDBG-DR funds will be provided as zero-interest, forgivable loans.

Developments in this strategy will be 50 units or less to ensure project viability. Maximum subsidy limits will follow the applicable HOME Investment Partnership Program per-unit limits and will target low and moderate-income households. The units created under this program, at a minimum, will follow the established HOME Program Rent schedule or any other funding source used to finance the development with a more restrictive rent schedule and will be set-aside for the required CDBG-DR affordability period plus an additional extended use period required by FHFC. In the event one program has less restrictive requirements, the more stringent program requirements will apply to ensure all requirements are met. To be considered for funding, eligible applicants will be required to show ability to proceed with construction and demonstrate experience in developing affordable housing in size and scope of the proposed development. To ensure feasibility, the proposed development will be underwritten in accordance with underwriting standards in place at FHFC.

Allocation for Activity: \$20,000,000

Eligible Applicants: Eligible Applicants will include private for-profit and nonprofit housing developers, and public housing authorities with experience developing and managing rental properties in size and scope of the proposed development. Local governments may partner with these entities for funds.

Eligibility Criteria: The proposed developments must help address the unmet need in the HUD-identified most-impacted and distressed areas, or other areas impacted by the storms and deemed as a priority by the State

All developments funded will be required to meet the following criteria:

- Green Building Standards
- Energy Efficiency Standards
- Accessibility and Visitability Standards
- Resiliency Standards

Maximum Award: \$5,000,000

Responsible Entity for Administering: Florida Housing Finance Corporation

Eligibility: 105(a)(2)

National Objective: Low- and moderate-income benefit

***Note:** Florida Housing Finance Corporation may consider increasing the per unit limit amount. To do so, potential applicants must submit sufficient and specific information that justifies the need through public comment. Public comment can be submitted here: <https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2018/community-development-block-grant-disaster-recovery-programs/public-comments>.

Voluntary Home Buyout Program

Reducing the risk of flooding in residential areas is a priority for the State of Florida. The Florida Division of Emergency Management (FDEM) has recommended that all counties focus on acquisition of properties without flood insurance in Special Flood Hazard Areas. Recognizing this great need, DEO will create a voluntary home buyout program to encourage risk reduction through the acquisition of residential property in high flood risk areas. It is the responsibility of subrecipients interested in pursuing the buyout projects to support and provide:

- Appraisals
- Title and legal services
- Homeowner counseling services
- Environmental review, and
- Related buyout processes.

Counties that are interested in participating will have two potential funding options for pursuing home buyout. The first option is to leverage CDBG-DR funding as match for projects that are also eligible for the Hazard Mitigation Assistance (HMA) grant programs. The second option is to work directly with DEO on projects located in low- and moderate-income areas to buyout residential areas in support of permanent open space supporting green infrastructure or other floodplain management systems.

DEO will prioritize home buyout projects that focus on the acquisition of concentrations of residential areas that meet low- and moderate-income area requirements. The CDBG-DR driven buyout program will be required to meet a low-moderate area (LMA) benefit for funding so that DEO meets or exceeds its overall low- and moderate-income support requirements.

Cities and counties that are interested in this program will work with the DEO contracted team to determine feasibility of the project. Once a project is determined feasible, it will be eligible for funding in this program. Local governments are encouraged to leverage matching funds under this program and will also be eligible to include homeowner incentives to encourage relocation.

Additional criteria for the both homeowner buyout program options, including a process map for coordination with the Florida Division of Emergency Management will be detailed in Home Buyout Program guidance to be released after the approval of this action plan. DEO will manage subrecipient agreements directly with eligible local governments and coordinate with our partners at FDEM on project application evaluation, required environmental and cultural resource reviews and program implementation, where applicable.

For all properties acquired by subrecipients through the Voluntary Home Buyout Program, a restrictive covenant, in perpetuity (i.e. running with the land), prohibiting all future redevelopment of the site must be recorded upon closing of the transaction. New development would be on an alternative site that is less at risk of flooding and would be built to building code, elevation standards, and meet requirements of CDBG-DR. Properties that have received rehab or repairs through the Housing Repair Program will not be eligible for assistance under the Voluntary Home Buyout Program. However, on a case-by-case basis, housing units that have been demolished through the Voluntary Home Buyout Program may be eligible for new construction/replacement, in an area other than the buyout zone, through the Home Repair Program at DEO's discretion. No specific site or property needs to be acquired, although DEO may limit its search for alternative sites to a general geographic area. Where DEO wishes to purchase more than one site within a general geographic area on this basis, all owners are to be treated similarly. The property to be acquired is not part of an intended, planned, or designated project area where all or substantially all of the property within the area is to be acquired within specific time limits. DEO will not acquire the property if negotiations fail to result in an amicable agreement, and the owner is so informed in writing. DEO will inform the owner in writing of what it believes to be the market value of the property. Florida Licensed Real Estate Appraisers will be used to value property in the buyout program. DEO will offer the homeowner the value of the home as appraised prior to the storm. Additionally, DEO will establish policies on resettlement incentives. DEO's policies will ensure that its resettlement incentives comply with applicable Civil Rights and Affirmatively Furthering Fair Housing requirements and that there is no discrimination against a protected class.

Allocation for Activity: \$44,117,239

Eligible Applicants: Counties and municipalities within those counties that received a declaration of both FEMA IA and PA after Hurricane Irma.

Eligibility Criteria: Buyout areas that result in a feasible project that will meet a LMA benefit.

Maximum Award: \$5,000,000

Responsible Entity for Administering: Units of General Local Government (UGLG)

Eligibility: 105(a)(1), 83 FR 5844-35 Housing incentives in disaster-affected communities

National Objective: Low- and moderate-income benefit

Proposed buyout areas will undergo a review of eligibility to ensure that the end use of the properties results in a project service area where at least 51 percent of the residents are LMI.

Creative compatible reuse of the property

DEO will create guidance and best practices for communities to consider on how property that is acquired through this program can be utilized for public benefit, that meet HUD requirements for permanent green space. This may include creative stormwater design, park space and other examples. Communities that participate in this program will be encouraged to have a plan for how this property will be used in the future to further reduce flood risk and/or serve as a recreational space for the public.

Affordability Periods

Properties seeking assistance through Rebuild Florida's Housing programs listed in the state of Florida's action plan may be required to adhere to affordability period requirements. The affordability requirements are:

1. Rehabilitation or reconstruction multifamily rental projects with five or more will require the assisted rental property to remain affordable for LMI tenants for a minimum of 15 years. The assistance to public Housing Authorities may fall under this category.
2. New construction multi-family rental projects with five or more units will require the assisted rental property to remain affordable for LMI tenants for a minimum of 20 years.
3. The affordability periods for single family rental units will be a minimum of 5 years. Public Housing Authorities seeking rehabilitation or reconstruction of multifamily housing units must ensure that the assisted rental property remains affordable for LMI tenants for a minimum of 15 years (if eight or more units).
4. Special consideration may be given to rental property owners in the Florida Keys on a case-by-case basis.

Affordable Rent

Properties seeking assistance through Rebuild Florida's Housing programs listed in the state of Florida's action plan may be required to adhere to affordability period requirements. The affordability requirements are:

- The fair market rent for existing housing for comparable units in the area as established by HUD under 24 CFR 888.111; or
- A rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65 percent of the AMI, as determined by HUD, with adjustments for number of bedrooms in the unit. The HUD HOME rent limits will include average occupancy per unit and adjusted income assumptions.

Recapture

If the applicant fails to comply with the program affordability requirements, the program will exercise its rights to recapture the full amount of the assistance provided. The program's policies will set forth the process the program will utilize to enforce this provision.

Economic Revitalization Activities

Rebuild Florida's housing programs, detailed above, will address the significant unmet need for housing recovery across the state. However, recovery for individuals and communities must include consideration of the businesses and jobs that provide services and employment. As recognized in the unmet needs assessment, businesses and local economies were significantly impacted by Hurricane Irma. Individuals whose jobs or businesses were impacted by the storm may have difficulty obtaining or retaining housing due to lost income. Further, it is anticipated that recovery and redevelopment needs will likely stress the current construction workforce, leading to the need for programs to support the growth of the skilled labor workforce required to sustain housing recovery activities. To ensure the complete recovery of communities, it is essential that the State of Florida support businesses and the workforce through activities designed to address unmet economic recovery needs.

Florida will prioritize economic revitalization and public assistance activities that retain or create jobs, as well as activities that provide training and support services helping Floridians gain employment and remain employed. The two economic recovery programs described below are designed with the goal of long-term recovery for businesses, the workforce and the entire community.

To address these essential recovery needs, DEO will implement the following economic revitalization and public assistance programs:

- Workforce Recovery Training Program

Workforce Recovery Training Program

Hurricane Irma had a significant impact on the housing supply, creating an increased demand for new construction and home repair activities, with additional impact on commercial construction and repair activities. The increased demand for construction activities following Hurricane Irma has created or increased the supply gap in many construction occupations. The unmet needs assessment shows a long-term supply gap for skilled workers across several construction trades. By addressing the unmet needs in the construction trades, Florida can provide a new labor force to support the increased demands for post-disaster construction, as well as support Floridians looking for new employment in the post-disaster economy.

To ensure that there are resources to support the remaining recovery needs, DEO will implement a workforce recovery training program that may include, but may not be limited to, the areas of:

- Roofing;
- Masonry;
- Carpentry;
- Concrete finishing;
- Plumbing;
- HVAC (heating, ventilation, and air conditioning);
- Electricity;
- Heavy equipment operations;
- Carpet laying;
- Glass / window installation;
- Plastering;
- Welding;
- Customized training; and
- On-the-Job Training (OJT).

DEO will select entities to deliver workforce training services through a competitive application cycle. DEO will seek proposals from eligible Local Workforce Development Boards, educational institutions, and technical centers, who will describe the services they can provide in the impacted communities. **This program is not a direct grant program. No funds will be paid directly to individuals seeking job training.**

The Section 3 program requires that recipients of CDBG-DR funding provide, to the greatest extent possible, training, employment, contracting and other economic opportunities to low- and very low-income persons and to business concerns that provide economic opportunities to low- and very low-income persons. Subrecipients will be required to demonstrate efforts to recruit and target residents receiving public housing assistance and other low- and very-low- income persons.

Allocation for Activity: \$14,450,656

Eligible Subrecipients: Local Workforce Development Boards, educational institutions, and technical centers

Maximum Award: N/A

Responsible Entity for Administering: DEO, subrecipients

Eligibility: 105(a)(8)

National Objective: Low- and moderate-income benefit

Infrastructure Repair and Mitigation Activities

The State of Florida has made significant investments in mitigation over the past 25 years to ensure that infrastructure is able to withstand the impacts of wind and flood events. Hurricane Irma was a success story for the state in that infrastructure damage assessments were not as high as initially projected due to this major statewide investment. DEO will continue to strengthen the state's infrastructure by creating an Infrastructure Repair Program that allows communities to use CDBG-DR to leverage other funding sources such as the Hazard Mitigation Grant Program (HMGP), 406 Public Assistance (406 PA) Mitigation Program. Some communities are not able to fully utilize these other resources following a disaster because reserve cash funds are exhausted by disaster recovery efforts and they cannot meet local match requirements. Allowing local governments to leverage CDBG-DR funding as match will enable communities, especially smaller and rural local governments, to better utilize all resources available to them.

In the development of policies and procedures, cost benefit will be addressed. DEO acknowledges infrastructure activities may have unintended risks that could potentially effect communities. With this understanding, DEO will follow guidance provided in the Federal Register to avoid disproportionate impacts on vulnerable populations and environmental injustice. Additionally, DEO recognizes the importance of resiliency against future storms and will employ adaptable and reliable technologies to guard against premature obsolescence of infrastructure. DEO will describe the implementation of utilizing these technologies, when applicable, in its program policies and procedures manual.

Infrastructure Repair Program

The Florida Department of Economic Opportunity's (DEO) Rebuild Florida Infrastructure Repair Program was launched with \$85,819,653 to fund infrastructure restoration and improvement projects in communities impacted by Hurricane Irma. On January 27, 2020, HUD released federal guidance for an additional \$38,637,745 to Florida through CDBG-DR funds to support long-term recovery from Hurricane Irma. Approximately \$186 million will be distributed in the Infrastructure Repair Program. Hurricane Irma affected many community's infrastructure systems such as damaging roadways, bridges and state beaches. Funding will be dispersed to communities impacted by Hurricane Irma through a competitive application cycle with priority given to projects that can demonstrate urgent need, readiness to proceed, and that benefit LMI. Where possible, DEO will leverage other sources such as FEMA Public Assistance funding to first address remaining urgent and unmet needs in communities.

Eligible activities within this program may include, but are not limited to the following:

- Restoration of infrastructure damaged by Hurricane Irma (such as water and sewer facilities, streets, removal of debris, drainage, bridges, etc.).
- Demolition and rehabilitation of publicly or privately owned commercial or industrial buildings.
- Renourishment of protective coastal dunes systems and state beaches.
- Repairs to damaged buildings that are essential to the health, safety and welfare of a community when repairs to these buildings constitutes an urgent need (this can include police stations, fire stations, parks and recreational centers, community and senior centers, hospitals, clinics, schools and educational facilities, other public properties).
- Repairs to water lines and systems, sewer lines and systems, drainage and flood mitigation systems.

Prior to opening the competitive application cycle for the Infrastructure Repair and Mitigation Program, DEO will send an announcement through its mailing list describing the details of this program as well as an announcement on DEO's webpage which can be found [here](#). DEO will hold a pre-application training to those interested in the program. The pre-application training will go over the full details of the program. This training will also be advertised on the webpage. Then, following a tentative award, DEO will hold another pre-implementation training. This training will cover all materials and expectations for subrecipients. Following an award, DEO will hold trainings, as needed.

Competitive Application Cycle

Applicants will select projects or programs to propose to DEO for funding in accordance with DEO thresholds and objectives. These thresholds are:

- Projects must demonstrate tie-back to Hurricane Irma
- Projects must not duplicate benefits.

DEO will also consider to what extent proposed projects or programs support the following objectives:

- Projects must support LMI housing needs in some way,
- Projects must primarily serve LMI populations, or
- Demonstrate an urgent need in the community

DEO will first consider LMI as the national objective for infrastructure projects. The urgent need national objective will only be used if the project is not LMI, but is needed to alleviate emergency conditions. When using urgent need as a national objective, DEO will obtain justification from the local government or municipality to certify the urgency of the condition.

Applicants may pursue a range of eligible activities as allowed under CDBG-DR regulations for this appropriation, so long as they are in accordance with DEO threshold requirements and the requirements for the applicable activity as outlined in the Action Plan and Federal Register. Applicants will be required to meet HUD regulations, such as environmental, supplantation of benefits, fair housing and others.

Allocation for Activity: \$226,889,503 Competitive Cycle

Maximum Award: Round 1: N/A, Round 2: \$140,839,905

Responsible Entity for Administering: DEO

Eligibility: 105(a)(2)

National Objective: Low- and moderate-income benefit or Urgent Need

Use of CDBG-DR as Match

Additionally, funds may be used to meet a matching, share, or contribution requirement for any other federal program when used to carry out an eligible CDBG-DR activity. This includes programs or activities administered by the Federal Emergency Management Agency (FEMA) or the U.S. Army Corps of Engineers (USACE). By law, the amount of CDBG-DR funds that may be contributed to a USACE project is \$250,000 or less. Note that the

Appropriations Act prohibits supplanting the use of CDBG–DR funds for any activity reimbursable, or for which funds are also made available, by FEMA or USACE.

Ineligible Activities

Ineligible activities identified in the Federal Register, Vol. 83, No. 28, Friday, February 9, 2018, include the use of CDBG-DR for forced mortgage payoff, construction of a dam/levee beyond original footprint, incentive payments to households that move to disaster-impacted floodplains, assistance to privately owned utilities, not prioritizing assistance to businesses that meet the definition of a small business, or assistance for second homes and activities identified in 24 CFR 570.207. All activities and uses authorized under Title I of the Housing and Community Development Act of 1974 and allowed by waiver.

Method of Distribution

DEO has designed this CDBG-DR program in compliance with the National Program objectives, and will ensure that assistance is prioritized toward the most disadvantaged populations to address unmet housing needs. Florida intends to spend a minimum of 70 percent of program funds on activities that benefit the Low-and-Moderate Income (LMI) population. LMI status is determined by evaluating income as a percentage of the Area Median Income (AMI) in the region in which the applicant lives.

As stewards of federal CDBG funds, DEO complies with the HUD mission to develop viable communities by the provision of decent housing, a suitable living environment and expanding economic opportunities, principally for LMI persons. To this end, all funded activities administered by the State of Florida will meet one of three named HUD national objectives:

1. Benefitting LMI Persons;
2. Preventing or Eliminating Slum or Blight; or
3. Meeting Urgent Needs.

In addition, a minimum of 80 percent of funding will be spent in HUD-identified most-impacted and distressed areas, with the 20 percent of funding spent in state-identified most-impacted and distressed areas, as detailed on page 16. Given the extent of catastrophic damage seen in Monroe County, the Florida Keys will get a minimum program set-aside for many of the programs established in this plan. Further distribution criteria is outlined in the above descriptions, specific to each program.

V. LOCATION, MITIGATION MEASURES AND URGENT NEED

1. Presidentially-Declared County

All activities must be in a Presidentially-declared county that is eligible for assistance under FEMA declaration 4337 for Hurricane Irma, as outlined in this Action Plan.

2. Mitigation Measures

DEO will encourage subrecipients to incorporate preparedness and mitigation measures into rebuilding activities. This helps to ensure that communities build back safer and stronger than prior to the disaster. Incorporation of these measures also reduces costs in recovering from future disasters. Mitigation measures that are not incorporated into those rebuilding activities must be a necessary expense related to disaster relief, long-term recovery, and restoration of infrastructure.

3. Use of Urgent Need

The Unmet Needs Assessment documents unmet need in housing, infrastructure, and economy throughout the impacted areas. The state will seek to meet the requirement that 70 percent of funds are utilized for Low-and-Moderate (LMI) income families. Program activities are presumed to meet the use of Urgent Need as a national objective if they occur in the sectors and regions, particularly for housing and infrastructure activities, that were impacted as documented in the Unmet Needs Assessment. However, the state will first seek to determine if the activity meets the LMI national objective before utilizing the Urgent Need national objective.

Pursuant to the Federal Register, Volume 83, No. 28, February 9, 2018 the CDBG certification requirements for documentation of urgent need, located at 24 CFR 570.483(d), are waived and replaced with an alternative requirement. Formal certification statements to qualify an activity as meeting the urgent need national objective is no longer needed. Instead DEO and subrecipients will document how each program and/or activity funded under the urgent need national objective responds to a disaster-related impact.

VI. Citizen Participation

The citizen participation plan for the Hurricane Irma allocation will provide a reasonable opportunity of at least 14 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 www.floridajobs.org/cdbg-dr, DEO's main 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 14 days and have a method for receiving comments.

DEO will take comments via USPS mail or email at:

Attention: Chief, Community Disaster Recovery
Florida Department of Economic Opportunity
Division of Community Development
107 East Madison Street
The Caldwell Building, MSC 400
Tallahassee, Florida 32399-2100
cdbg-dr@deo.myflorida.com

Publication

Before its adoption, the proposed Action Plan was published on the DEO website, www.floridajobs.org/CDBG-DR, for a 14-day citizen comment period. DEO published a notice of the posting in the Florida Administrative Register (FAR) on April 20, 2018. DEO incorporated and addressed citizen comments received during that period into the final Action Plan.

1. Public Website

DEO has a public website providing access to information and programs administered by the state. DEO has a separate and distinct webpage on its website entitled "Disaster Recovery Programs" at www.floridajobs.org/cdbg-dr that includes information on disaster recovery activities assisted with CDBG-DR funds due to 2017 Hurricane Irma. The creation and maintenance of the public website is one component of HUD's certification that DEO has proficient financial controls and procurement processes as required in the Register.

The Disaster Recovery Programs' webpage will include links to action plans, action plan amendments, citizen participation requirements, and activity/program information for activities described in the action plan, including

details of all contracts and ongoing procurement policies. It will also store every HUD Quarterly Performance Report (QPR), with information accounting for how funds are being used and managed.

2. Consultation

Seeking input from stakeholders and communities around the state is a very important part of the planning process. DEO used a variety of methods to understand unmet needs and to get feedback on how to craft programs that will meet the needs of communities as quick as possible. In addition to gaining feedback, this helped local stakeholders understand what to expect from CDBG-DR funding and allowed them to play a key role in shaping the outcomes of this plan. The outreach methods, along with the feedback obtained, it included below.

Webinars

Over the course of the planning period, DEO conducted three webinars to keep stakeholders informed of the process and solicit feedback. The first webinar was held on February 22, 2018. The purpose of this webinar was to provide an orientation to the disaster recovery planning and implementation process for CDBG-DR and set the stage for upcoming visits to communities. The second webinar was held on April 12, 2018, to provide an overview of the unmet needs assessment data and ensure that the data was telling the story of impacted communities around the state. The third webinar was held on April 25, 2018, in coordination with the public comment period. During this webinar, DEO described the feedback that was received statewide regarding unmet needs and provided an overview of proposed programs to address these remaining needs.

To obtain feedback on the substantial amendment responding to the new allocation, DEO conducted a webinar on September 14 to provide an overview of the latest federal register, the current action plan and a request for feedback through a survey sent to local governments.

Local Government Stakeholder Meetings

DEO, FDEM and HUD CDBG-DR staff traveled around the state and visited each of the 14 HUD-identified most-impacted and distressed areas. At these meetings, participants were given a brief overview of the program with an opportunity to ask any questions that they may have of staff. Most of the meeting was open dialogue with local government staff asking questions and DEO and HUD staff providing responses. Unmet needs were captured on flipcharts and DEO staff suggested various program options that may be available to meet those needs. Community members also offered suggestions under the categories of housing, economic revitalization and infrastructure. At the end of each meeting, participants were given three different colored dots for each category, indicating a first, second and third priority. The dots were then placed by the individuals top three program ideas to get a sense of what types of programs would be most beneficial to communities. The table below contains the dates for each of these meetings.

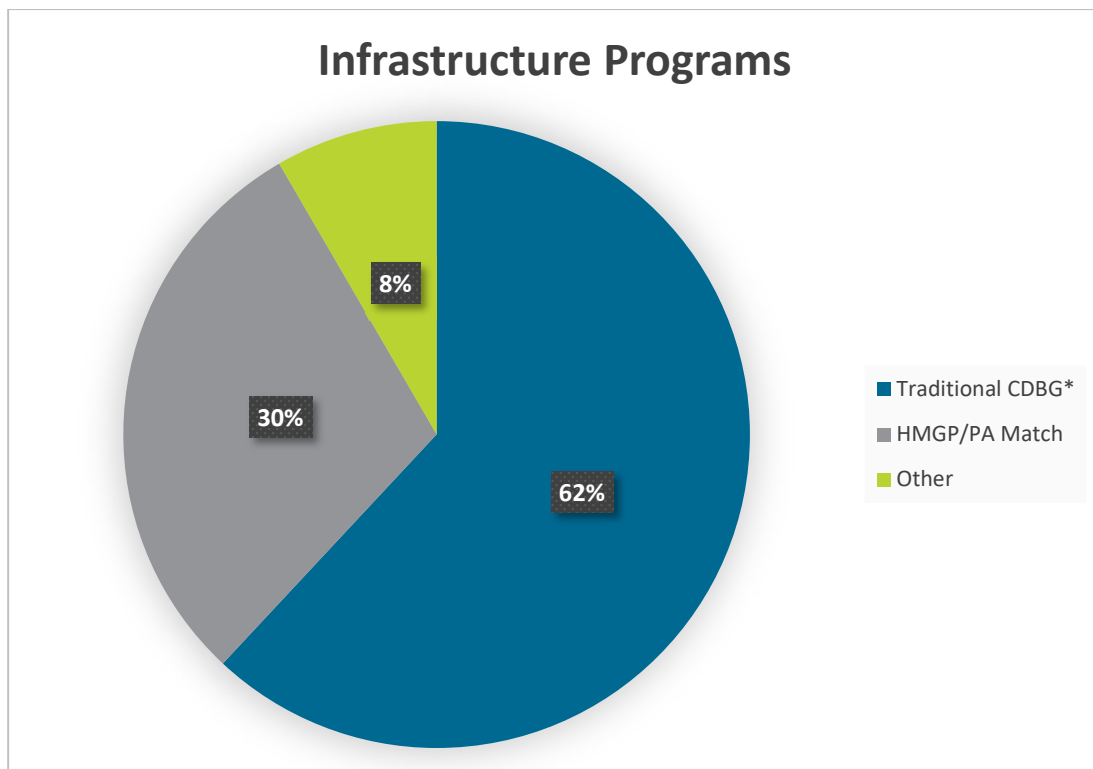
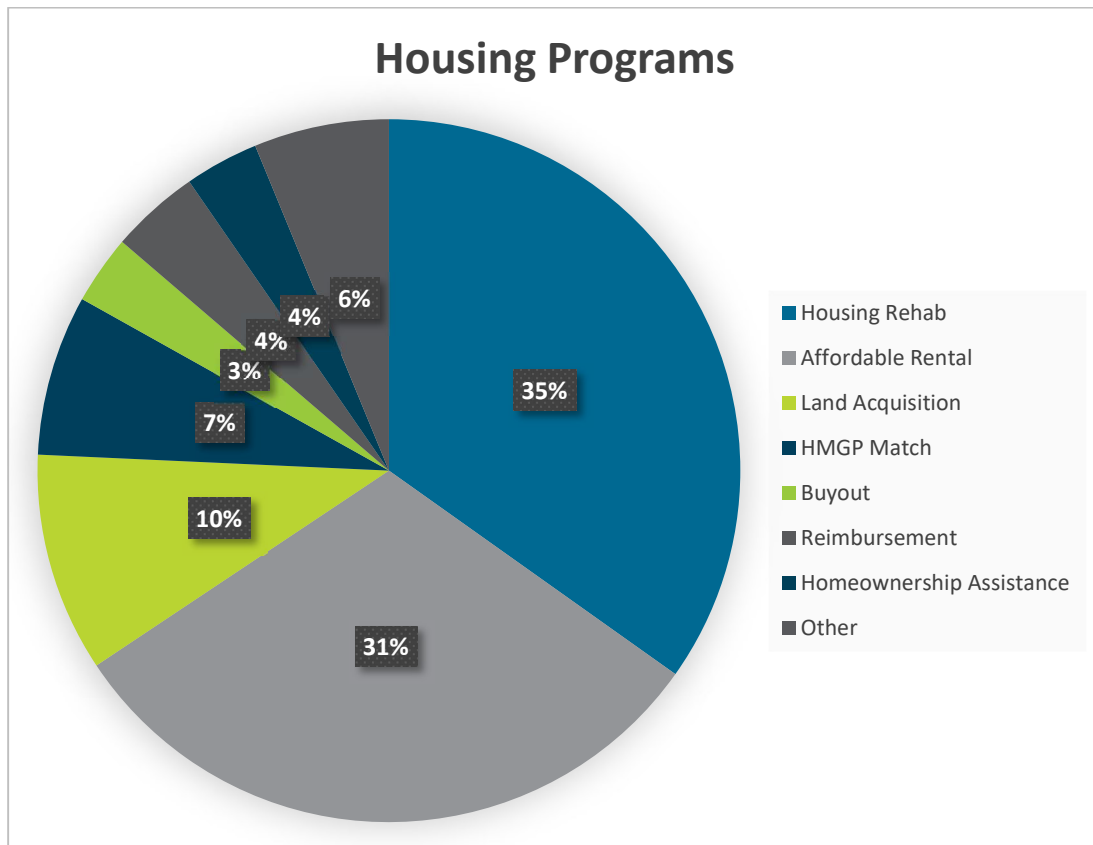
Stakeholder Meetings with HUD-Identified Most Impacted and Distressed Areas	
Location	Date
Monroe County	Thursday, March 1, 2018
Miami-Dade County	Friday, March 2, 2018
Broward County	Friday, March 2, 2018
Volusia County	Monday, March 5, 2018
Brevard County	Monday, March 5, 2018
Orange County	Monday, March 5, 2018

Stakeholder Meetings with HUD-Identified Most Impacted and Distressed Areas	
Location	Date
Duval County	Tuesday, March 6, 2018
Flagler County (32136)	Tuesday, March 6, 2018
Clay County (32068)	Wednesday, March 7, 2018
Bradford County (32091)	Wednesday, March 7, 2018
DeSoto County (34266)	Monday, March 19, 2018
Polk County	Monday, March 19, 2018
Lee County	Tuesday, March 20, 2018
Collier County	Tuesday, March 20, 2018
Brevard County	Tuesday, March 5, 2018

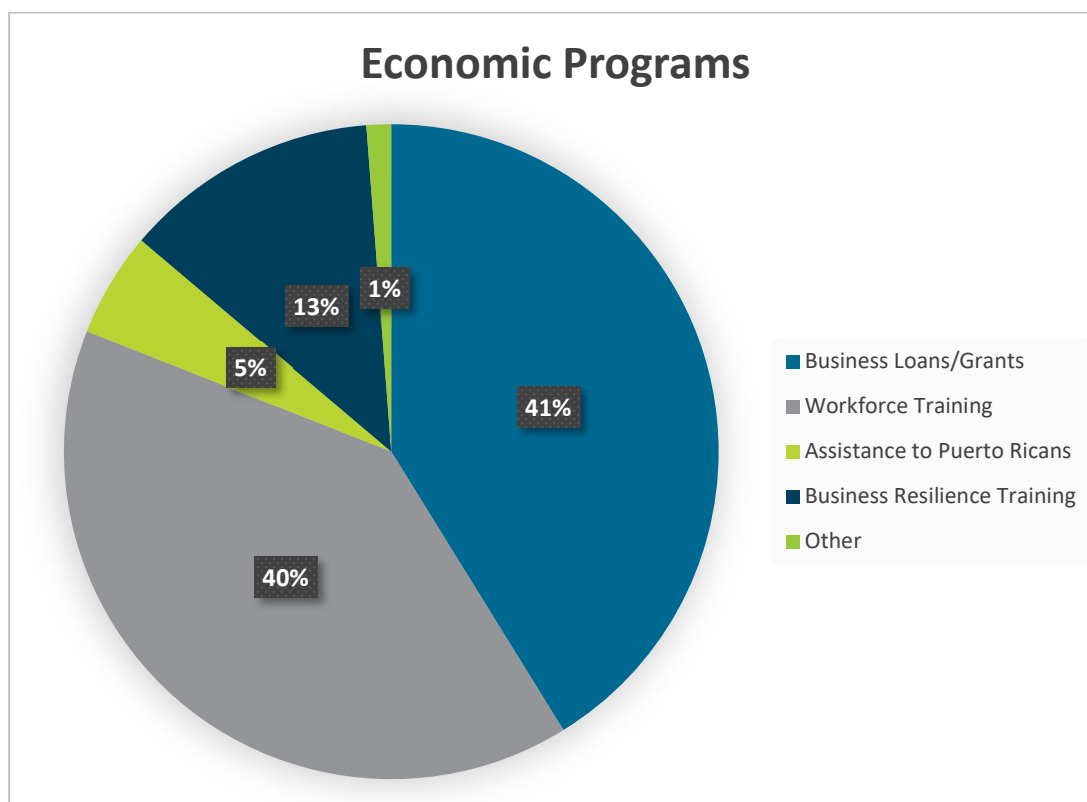
Community Stakeholder Survey

DEO developed a survey to capture feedback from communities that were outside of the HUD-identified most-impacted and distressed areas and to allow for additional input from communities that were not able to attend stakeholder meetings. The survey mirrored the feedback from the stakeholder meetings by asking for an anecdotal account of remaining housing, economic revitalization and infrastructure unmet needs. In addition, survey respondents were asked to rank the various program ideas that came out of stakeholder workshops. They were also given an opportunity to suggest additional program ideas.

The cumulative results from the in-person community outreach meetings and surveys are displayed in the three graphs below.



**Including components to roads, bridges, storm water, etc.*



DEO conducted another survey throughout the month of September to capture feedback on updates needed to the action plan. This survey requested input on the funding levels currently provided to each program, in relationship to remaining unmet need. Stakeholders generally felt that additional funding was most needed in housing and infrastructure. Local governments detailed infrastructure project needs in their community, recognizing that in some cases funding would be obtained from other sources but it likely wouldn't be enough to cover the entire project.

Economic Recovery Workshops

DEO, in partnership with the EDA, conducted economic recovery workshops across the state to provide resources for long-term recovery to local governments, businesses and economic development organizations. In addition to many other resources, CDBG-DR was presented to community members with an opportunity to ask questions about the program. In addition to providing outreach to communities, these meetings provided DEO with an opportunity to focus in on economic revitalization and hear about some of the challenges that exist post-Hurricane Irma. The table below contains location and dates for each of these meetings.

Economic Recovery Workshops	
Location	Date
Lee County	February 12, 2018
Hendry County	February 14, 2018
Collier County	February 13, 2018
Polk County	February 15, 2018
Highlands County	February 15, 2018
Citrus County	February 16, 2018
Monroe County	February 27, 2018

Florida Keys Workforce Affordable Housing Outreach

DEO has a very close relationship with Monroe County, as it is considered one of four Areas of Critical State Concern. Due to this designation, the agency has a unique oversight role in development decisions. In the Florida Keys, limited land and strict local building codes, combined with the need to ensure safe evacuation of residents and the protection of important environmental resources drives up the cost of residential development. With the lowest unemployment rate in the state, most business owners in the community say that their biggest challenge is retaining employees due to limited supply of housing that they can afford. This issue has been exacerbated greatly by Hurricane Irma, as mobile homes and older single-family houses that served as housing for their workforce were significantly damaged and will be required to be built back to new codes and standards. The cost of redevelopment will result in higher rents or pressure to sell to someone who will rebuild a second home or vacation rental property, leading to less housing stock that is affordable for the workforce. Understand that the Keys would be facing long-term affordable workforce housing challenges that could be detrimental to the local economy, DEO visited Monroe County several times during the recovery process as well as participated in weekly local housing recovery taskforce conference calls.

- The first technical visit occurred November 1 – 3, 2017 in conjunction with the Florida Housing Finance Corporation and the Florida Department of Environmental Protection. During this visit, staff met with local government and housing authority officials to brainstorm solutions on how to align available land with financing options and building permit allowances to create more affordable housing in the Keys. In addition, staff answered questions from citizens at a local delegation meeting on long-term housing recovery resources.
- The following week on November 8, 2017 staff met with the Monroe County Housing Taskforce along with FEMA and FDEM. This meeting focused on potential resources that might be available and helped the communities brainstorm potential project ideas that could be included in their long-term recovery strategy.
- On January 11, 2018, DEO staff presented to elected officials and citizens at a Key West Housing Recovery Workshop. This presentation was focused on the availability of CDBG-DR, along with streamlining review processes at DEO to ensure an expedited recovery.
- On February 1, 2018, DEO staff met with local officials and congressional staff to discuss long-term housing recovery needs and upcoming CDBG-DR funding.
- Finally, on March 1, DEO staff visited Monroe County to discuss the federal register and brainstorm program ideas for the CDBG-DR action plan.

Website

DEO posted important information on the CDBG-DR program on its website at www.floridajobs.org/CDBG-DR. This includes links to the federal register, short summaries and overviews and webinar recordings for individuals who could not participate or may want a refresher on the program.

Additional Outreach

In addition to the outreach above, DEO had many one-on-one discussions with community members over the phone, sent out emails with summaries of the federal register and other information and participated in the following discussions:

- Housing Partners Conference Calls
- Florida Housing Coalition Hurricane Recovery Webinars
- Community Place-based Recovery Support Team calls in Lee, Collier, Hendry and Monroe Counties.
- Community Planning and Capacity Building Recovery Support Function Calls

- Housing Recovery Support Function Calls
- Economic Recovery Support Function Calls

DEO will continue to conduct outreach with communities throughout the implementation of this action plan to ensure that all stakeholders are aware of the opportunities that exist and can provide feedback along the way.

During intake and eligibility operations of the Housing Repair Program, DEO plans to provide options for mobile application intake to accommodate any resident who is transportation disadvantaged or has special needs.

3. Accessibility

The Action Plan was made available in English and Spanish, and was posted on the DEO website, which has embedded technology to provide accessibility to the visually impaired. DEO's website includes an Interpretive Translation Notice informing citizens in 15 different languages that translation services are available upon request. DEO will provide a Creole translation of the final action plan.

4. Receipt of Comments

DEO provided a 14-day timeframe for receiving public comments to the Action Plan and obtained comments via an email address published on the disaster recovery website. DEO provided a 30-day timeframe for receiving public comments to the Action Plan and obtained comments via an email address published on the disaster recovery website.

5. Substantial Amendment

DEO will engage citizens throughout the disaster recovery program 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; or
- the allocation or reallocation of more than 10 percent of the original appropriation.

Citizens will be provided with no less than 30 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.

DEO will notify HUD, but is not required to undertake public comment, when it makes any plan amendment that is not substantial. HUD will be notified at least five business days before the amendment becomes effective.

Every amendment to the action plan (substantial and non-substantial) will be numbered and posted on the DEO website.

6. Summary of Public Comments

A summary of public comments submitted on the draft Action Plan, as well as DEO's response to each comment, are included in the Appendices titled "30-day public comment period"

7. Citizen Complaints

DEO will handle citizen complaints received by the state, its subrecipients, vendors and/or other program sources by:

1. Conducting investigations, as necessary;
2. Finding a resolution; or
3. Conducting follow-up actions.

The goal of the state is to provide an opportunity to resolve complaints in a timely manner, usually within 15 business days as expected by HUD, if practicable, and to provide the right to participate in the process and appeal a decision when there is reason for an applicant to believe its application was not handled according to program policies. All applications, guidelines, and websites will include details on the right to file a complaint or appeal, and the process for filing a complaint or beginning an appeal.

Applicants can appeal program decisions related to one of the following activities:

1. A program eligibility determination;
2. A program assistance award calculation; and
3. A program decision concerning housing unit damage and the resulting program outcome.

Citizens may file a written complaint or appeal through the Disaster Recovery email at CDBG-DR@deo.myflorida.com or submit by postal mail to the following address:

Attention: Chief, Community Disaster Recovery
Florida Department of Economic Opportunity
Division of Community Development
107 East Madison Street
The Caldwell Building, MSC 400
Tallahassee, Florida 32399
cdbg-dr@deo.myflorida.com

If the complainant is not satisfied by the subrecipient determination or DEO response, the complainant may file a written appeal by following the instructions issued in the letter of response. If after the appeals process the complainant has not been satisfied with the response, a formal complaint may then be addressed directly to the regional Department of Housing and Urban Development (HUD) at:

Department of Housing & Urban Development
Charles E. Bennett Federal Building
400 West Bay Street, Suite 1015
Jacksonville, FL 32202

The Florida Disaster Recovery Program operates in Accordance with the Federal Fair Housing Law (The Fair Housing Amendments Act of 1988). Anyone who feels he or she has been discriminated against may file a complaint of housing discrimination: 1-800-669-9777 (Toll Free) or www.hud.gov/fairhousing.

VII. Certification and Risk Analysis Documentation

The State of Florida DEO submitted the Certification and Risk Analysis Documentation to HUD on April 13, 2018 as required.

1. CDBG-DR Certifications

24 CFR 91.225 and 91.325 are waived. Each grantee receiving a direct allocation under this notice must make the following certifications with its action plan:

- a. The grantee certifies that it has in effect and is following a residential antidisplacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.
- 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 for disaster recovery 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-DR 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 funds under this notice 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 in this notice.
- 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).
- 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.
- h. The grantee certifies that it is complying with each of the following criteria: (1) Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2016 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.). (2) With respect to activities expected to be assisted with CDBG-DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit

low- and moderate-income families. (3) The aggregate use of CDBG–DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver published in an applicable Federal Register notice) of the grant amount is expended for activities that benefit such persons. (4) The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG–DR grant 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) Disaster recovery grant 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: (1) 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 (2) 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 disaster recovery activities in a timely manner and that the grantee has reviewed the requirements of this notice. The grantee certifies to the accuracy of its Public Law 115–56 Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced at A.1.a. under section VI and its Implementation Plan and Capacity Assessment and related submissions to HUD referenced at A.1.b. under section VI.
- l. The grantee certifies that it will not use CDBG–DR 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.
- m. 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.
- n. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.
- o. 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.

Signed version submitted to HUD

2. SF-424

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

VIII. CONCLUSION

1. Complete and Compliant

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

2. Pre-Award, Pre-Agreement and Reimbursement

The provisions of 24 CFR 570.489(b) and 570.200 (h) permits a state to reimburse itself for otherwise allowable costs incurred by itself or its recipients sub grantees or sub recipients 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 115-56.

Florida's Department of Economic Opportunity (DEO) incurred pre-award costs and is seeking reimbursement for these 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 cost for each employee based on their individual percentage of time spent on the planning of the CDBG-DR program during a pay period. Any cost associated with the disaster recovery efforts will be allocated based on the total time spent on CDBG-DR activities versus other duties for a particular month. The total cost of the contractors to assist with disaster recovery research and analysis to help DEO prepare the unmet needs assessment and action plan and other costs associated with meetings, community outreach, and any other direct costs associated with the Action Plan will be reimbursed by this CDBG-DR grant. Additionally, once contracted, DEO may allow the drawdown of pre-agreement costs associated with eligible disaster recovery activities dating back to the date of the disaster(s) for subrecipients and DEO with appropriate documentation.

3. Uniform Relocation Act

DEO plans to minimize displacement of persons or entities and assist persons or entities displaced as a result of implementing a project with CDBG-DR funds. This is not intended to limit the ability of DEO to conduct buyouts or acquisitions for destroyed and extensively damaged units or units in a floodplain. DEO will ensure that the assistance and protections afforded to persons or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), and Section 104(d) of the Housing and Community Development Act of 1974 are available. DEO plans to exercise the waivers set forth in Federal Register/Vol. 83, No. 28/Friday, February 9, 2018 pertaining to URA and HCD Acts given its priority to engage in voluntary acquisition and optional relocation activities to avert repeated flood damage and to improve floodplain management.

In addition, HUD requires DEO to define "demonstrable hardship" and how it applies to applicants. DEO will define "demonstrable hardship" as exceptions to program policies for applicants who demonstrate undue hardship. Applicants in this situation will be reviewed on a case by case basis to determine whether assistance is required to alleviate such hardship. Demonstrable hardship may include, but is not limited to, excessive amounts of debt due to a natural disaster, disability, etc.

4. Disaster Recovery Program Implementation

A copy of the Florida Disaster Recovery Program Implementation Timeline will be posted to DEO's website at the following location: www.floridajobs.org/CDBG-DR once the action plan has been approved.

5. Citizen Participation and Applications for Assistance

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

IX. APPENDICES AND SUPPORTING DOCUMENTATION

Appendix 1: 2017 Family Income Limits for IA Declared Counties³⁴

2017 Family Income Limits for IA Declared Counties								
Household Composition								
Limit	Fam1	Fam2	Fam3	Fam4	Fam5	Fam6	Fam7	Fam8
Alachua								
30% LIMITS	\$13,650	\$15,600	\$17,550	\$19,450	\$21,050	\$22,600	\$24,150	\$25,700
VERY LOW INCOME	\$22,750	\$26,000	\$29,250	\$32,450	\$35,050	\$37,650	\$40,250	\$42,850
60% LIMITS	\$27,300	\$31,200	\$35,100	\$38,940	\$42,060	\$45,180	\$48,300	\$51,420
LOW INCOME	\$36,350	\$41,550	\$46,750	\$51,900	\$56,100	\$60,250	\$64,400	\$68,550
Baker								
30% LIMITS	\$12,450	\$14,200	\$16,000	\$17,750	\$19,200	\$20,600	\$22,050	\$23,450
VERY LOW INCOME	\$20,700	\$23,650	\$26,600	\$29,550	\$31,950	\$34,300	\$36,650	\$39,050
60% LIMITS	\$24,840	\$28,380	\$31,920	\$35,460	\$38,340	\$41,160	\$43,980	\$46,860
LOW INCOME	\$33,150	\$37,850	\$42,600	\$47,300	\$51,100	\$54,900	\$58,700	\$62,450
Bay								
30% LIMITS	\$11,900	\$13,600	\$15,300	\$17,000	\$18,400	\$19,750	\$21,100	\$22,450
VERY LOW INCOME	\$19,850	\$22,700	\$25,550	\$28,350	\$30,650	\$32,900	\$35,200	\$37,450
60% LIMITS	\$23,820	\$27,240	\$30,660	\$34,020	\$36,780	\$39,480	\$42,240	\$44,940
LOW INCOME	\$31,750	\$36,300	\$40,850	\$45,350	\$49,000	\$52,650	\$56,250	\$59,900
Bradford								
30% LIMITS	\$11,300	\$12,900	\$14,500	\$16,100	\$17,400	\$18,700	\$20,000	\$21,300
VERY LOW INCOME	\$18,800	\$21,450	\$24,150	\$26,800	\$28,960	\$31,100	\$33,250	\$35,400
60% LIMITS	\$22,560	\$25,740	\$28,980	\$32,160	\$34,740	\$37,320	\$39,900	\$42,480
LOW INCOME	\$30,050	\$34,350	\$38,650	\$42,900	\$46,350	\$49,800	\$53,200	\$56,650
Brevard								
30% LIMITS	\$12,950	\$14,800	\$16,650	\$18,500	\$20,000	\$21,500	\$22,950	\$24,450
VERY LOW INCOME	\$21,600	\$24,700	\$27,800	\$30,850	\$33,350	\$35,800	\$38,300	\$40,750
60% LIMITS	\$25,920	\$29,640	\$33,360	\$37,020	\$40,020	\$42,960	\$45,960	\$48,900
LOW INCOME	\$34,550	\$39,500	\$44,450	\$49,350	\$53,300	\$57,250	\$61,200	\$65,150
Broward								
30% LIMITS	\$16,000	\$18,300	\$20,600	\$22,850	\$24,700	\$26,550	\$28,350	\$30,200
VERY LOW INCOME	\$26,700	\$30,500	\$34,300	\$38,100	\$41,150	\$44,200	\$47,250	\$50,300
60% LIMITS	\$32,040	\$36,600	\$41,160	\$45,720	\$49,380	\$53,040	\$56,700	\$60,360
LOW INCOME	\$42,700	\$48,800	\$54,900	\$60,950	\$65,850	\$70,750	\$75,600	\$80,500
Calhoun								
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,950
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Charlotte								

³⁴ <https://www.huduser.gov/portal/datasets/il/il16/FY16-IL-fl.pdf>

2017 Family Income Limits for IA Declared Counties								
Household Composition								
Limit	Fam1	Fam2	Fam3	Fam4	Fam5	Fam6	Fam7	Fam8
30% LIMITS	\$11,450	\$13,100	\$14,750	\$16,350	\$17,700	\$19,000	\$20,300	\$21,600
VERY LOW INCOME	\$19,100	\$21,800	\$24,550	\$27,250	\$29,450	\$31,650	\$33,800	\$36,000
60% LIMITS	\$22,920	\$26,160	\$29,460	\$32,700	\$35,340	\$37,980	\$40,560	\$43,200
LOW INCOME	\$30,550	\$34,900	\$39,250	\$43,600	\$47,100	\$50,600	\$54,100	\$57,600
Citrus								
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,950
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Clay								
30% LIMITS	\$13,550	\$15,450	\$17,400	\$19,300	\$20,850	\$22,400	\$23,950	\$25,500
VERY LOW INCOME	\$22,550	\$25,800	\$29,000	\$32,200	\$34,800	\$37,400	\$39,950	\$42,550
60% LIMITS	\$27,060	\$30,960	\$24,800	\$38,640	\$41,760	\$44,880	\$47,940	\$51,060
LOW INCOME	\$36,050	\$41,200	\$46,350	\$51,500	\$55,650	\$59,750	\$63,900	\$68,000
Collier								
30% LIMITS	\$14,650	\$16,750	\$18,850	\$20,900	\$22,600	\$24,250	\$25,950	\$27,600
VERY LOW INCOME	\$24,400	\$27,900	\$31,400	\$34,850	\$37,650	\$40,450	\$43,250	\$46,050
60% LIMITS	\$29,280	\$33,480	\$37,680	\$41,820	\$45,180	\$48,540	\$51,900	\$55,260
LOW INCOME	\$39,050	\$44,600	\$50,200	\$55,750	\$60,250	\$64,700	\$69,150	\$73,600
Columbia								
30% LIMIT	\$11,250	\$12,850	\$14,450	\$16,050	\$17,350	\$18,650	\$19,950	\$21,200
VERY LOW INCOME	\$18,750	\$21,400	\$24,100	\$26,750	\$28,900	\$31,050	\$33,200	\$35,350
60% LIMITS	\$22,500	\$25,680	\$28,920	\$32,100	\$34,680	\$38,260	\$39,840	\$42,420
LOW INCOME	\$30,000	\$34,250	\$38,550	\$42,800	\$46,250	\$49,650	\$53,100	\$56,500
DeSoto								
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,950
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Dixie								
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,950
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Duval								
30% LIMITS	\$13,550	\$15,450	\$17,400	\$19,300	\$20,850	\$22,400	\$23,950	\$25,500
VERY LOW INCOME	\$22,550	\$25,800	\$29,000	\$32,200	\$34,800	\$37,400	\$39,950	\$42,550
60% LIMITS	\$27,060	\$30,960	\$24,800	\$38,640	\$41,760	\$44,880	\$47,940	\$51,060
LOW INCOME	\$36,050	\$41,200	\$46,350	\$51,500	\$55,650	\$59,750	\$63,900	\$68,000
Escambia								
30% LIMITS	\$13,050	\$14,900	\$16,750	\$18,600	\$20,100	\$21,600	\$23,100	\$24,600
VERY LOW INCOME	\$21,700	\$24,800	\$27,900	\$31,000	\$33,500	\$36,000	\$38,450	\$40,950
60% LIMITS	\$26,040	\$29,760	\$33,480	\$37,200	\$40,200	\$43,200	\$46,140	\$49,140
LOW INCOME	\$34,750	\$39,700	\$44,650	\$49,600	\$53,600	\$57,550	\$64,550	\$65,500
Flagler								

2017 Family Income Limits for IA Declared Counties								
Household Composition								
Limit	Fam1	Fam2	Fam3	Fam4	Fam5	Fam6	Fam7	Fam8
30% LIMITS	\$12,150	\$13,850	\$15,600	\$17,300	\$18,700	\$20,100	\$21,500	\$22,850
VERY LOW INCOME	\$20,200	\$23,100	\$26,000	\$28,850	\$31,200	\$33,500	\$35,800	\$38,100
60% LIMITS	\$24,240	\$27,720	\$31,200	\$34,620	\$37,440	\$40,200	\$42,960	\$45,720
LOW INCOME	\$32,350	\$36,950	\$41,550	\$46,150	\$49,850	\$53,550	\$57,250	\$60,950
Franklin								
30% LIMITS	\$10,400	\$11,850	\$13,350	\$14,800	\$16,000	\$17,200	\$18,400	\$19,550
VERY LOW INCOME	\$17,300	\$19,800	\$22,250	\$24,700	\$26,700	\$28,700	\$30,650	\$32,650
60% LIMITS	\$20,760	\$23,760	\$26,700	\$29,640	\$32,040	\$34,440	\$36,780	\$39,180
LOW INCOME	\$27,650	\$31,600	\$35,550	\$39,500	\$42,700	\$45,850	\$49,000	\$52,150
Gadsden								
30% LIMITS	\$14,350	\$16,400	\$18,450	\$20,500	\$22,150	\$23,800	\$25,450	\$27,100
VERY LOW INCOME	\$23,950	\$27,400	\$30,800	\$34,200	\$36,950	\$39,700	\$42,450	\$45,150
60% LIMITS	\$28,740	\$32,880	\$36,960	\$41,040	\$44,340	\$47,640	\$50,940	\$54,180
LOW INCOME	\$38,300	\$43,800	\$49,250	\$54,700	\$59,100	\$63,500	\$67,850	\$72,250
Gilchrist								
30% LIMITS	\$13,650	\$15,600	\$17,550	\$19,450	\$21,050	\$22,600	\$24,150	\$25,700
VERY LOW INCOME	\$22,750	\$26,000	\$29,250	\$32,450	\$35,050	\$37,650	\$40,250	\$42,850
60% LIMITS	\$27,300	\$31,200	\$35,100	\$38,940	\$42,060	\$45,180	\$48,300	\$51,420
LOW INCOME	\$36,350	\$41,550	\$46,750	\$51,900	\$56,100	\$60,250	\$64,400	\$68,550
Glades								
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,950
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Gulf								
30% LIMITS	\$10,300	\$11,750	\$13,200	\$14,650	\$15,850	\$17,000	\$18,200	\$19,350
VERY LOW INCOME	\$17,150	\$19,600	\$22,050	\$24,450	\$26,450	\$28,400	\$30,350	\$32,300
60% LIMITS	\$20,580	\$23,520	\$26,460	\$29,340	\$31,740	\$34,080	\$36,420	\$38,760
LOW INCOME	\$27,400	\$31,300	\$35,200	\$39,100	\$42,250	\$45,400	\$48,500	\$51,650
Hamilton								
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,950
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$28,100	\$31,000	\$24,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Hardee								
30% LIMITS	\$10,050	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,950
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Hendry								
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,950
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Hernando								

2017 Family Income Limits for IA Declared Counties								
Household Composition								
Limit	Fam1	Fam2	Fam3	Fam4	Fam5	Fam6	Fam7	Fam8
30% LIMITS	\$12,600	\$14,400	\$16,200	\$17,950	\$19,400	\$20,850	\$22,300	\$23,700
VERY LOW INCOME	\$20,950	\$23,950	\$26,950	\$29,900	\$32,300	\$24,700	\$37,100	\$39,500
60% LIMITS	\$25,140	\$28,740	\$32,340	\$35,880	\$38,760	\$14,640	\$44,520	\$47,400
LOW INCOME	\$33,500	\$38,300	\$43,100	\$47,850	\$51,700	\$55,550	\$59,350	\$63,200
Highlands								
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,850
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Hillsborough								
30% LIMITS	\$12,600	\$14,400	\$16,200	\$17,950	\$19,400	\$20,850	\$22,300	\$23,700
VERY LOW INCOME	\$20,950	\$23,950	\$26,950	\$29,900	\$32,300	\$24,700	\$37,100	\$39,500
60% LIMITS	\$25,140	\$28,740	\$32,340	\$35,880	\$38,760	\$14,640	\$44,520	\$47,400
LOW INCOME	\$33,500	\$38,300	\$43,100	\$47,850	\$51,700	\$55,550	\$59,350	\$63,200
Holmes								
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,950
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Indian River								
30% LIMITS	\$12,400	\$14,150	\$15,900	\$17,650	\$19,100	\$20,500	\$21,900	\$23,300
VERY LOW INCOME	\$20,650	\$23,600	\$26,550	\$29,450	\$31,850	\$34,200	\$36,550	\$28,900
60% LIMITS	\$24,780	\$28,320	\$31,860	\$35,340	\$38,220	\$41,040	\$43,860	\$46,680
LOW INCOME	\$33,000	\$37,700	\$42,400	\$47,100	\$50,900	\$54,650	\$58,450	\$62,200
Jackson								
30% LIMITS	\$10,400	\$11,850	\$13,350	\$14,800	\$16,000	\$17,200	\$18,400	\$19,550
VERY LOW INCOME	\$17,300	\$19,800	\$22,250	\$24,700	\$26,700	\$28,700	\$30,650	\$32,650
60% LIMITS	\$20,760	\$23,760	\$26,700	\$29,640	\$32,040	\$34,440	\$36,780	\$39,180
LOW INCOME	\$27,700	\$31,650	\$35,600	\$39,550	\$42,750	\$45,900	\$49,050	\$52,250
Jefferson								
30% LIMITS	\$14,350	\$16,400	\$18,450	\$20,500	\$22,150	\$23,800	\$25,450	\$27,100
VERY LOW INCOME	\$23,950	\$27,400	\$30,800	\$34,200	\$36,950	\$39,700	\$42,450	\$45,150
60% LIMITS	\$28,740	\$32,880	\$36,960	\$41,040	\$44,340	\$47,640	\$50,940	\$54,180
LOW INCOME	\$38,300	\$43,800	\$49,250	\$54,700	\$59,100	\$63,500	\$67,850	\$72,250
Lafayette								
30% LIMITS	\$10,800	\$12,350	\$13,900	\$15,400	\$16,650	\$17,900	\$19,100	\$20,350
VERY LOW INCOME	\$18,000	\$20,550	\$23,100	\$25,650	\$27,750	\$29,800	\$31,850	\$33,900
60% LIMITS	\$21,600	\$24,660	\$27,720	\$30,780	\$33,300	\$35,760	\$38,220	\$40,680
LOW INCOME	\$28,750	\$32,850	\$36,950	\$41,050	\$44,350	\$47,650	\$50,950	\$54,200
Lake								
30% LIMITS	\$12,250	\$14,000	\$15,750	\$17,500	\$18,900	\$20,300	\$21,700	\$23,100
VERY LOW INCOME	\$20,450	\$23,400	\$26,300	\$29,200	\$31,550	\$33,900	\$36,250	\$38,550
60% LIMITS	\$24,540	\$28,080	\$31,560	\$35,040	\$37,860	\$40,680	\$43,500	\$46,260
LOW INCOME	\$32,700	\$37,400	\$42,050	\$46,700	\$50,450	\$54,200	\$57,950	\$61,650
Lee								

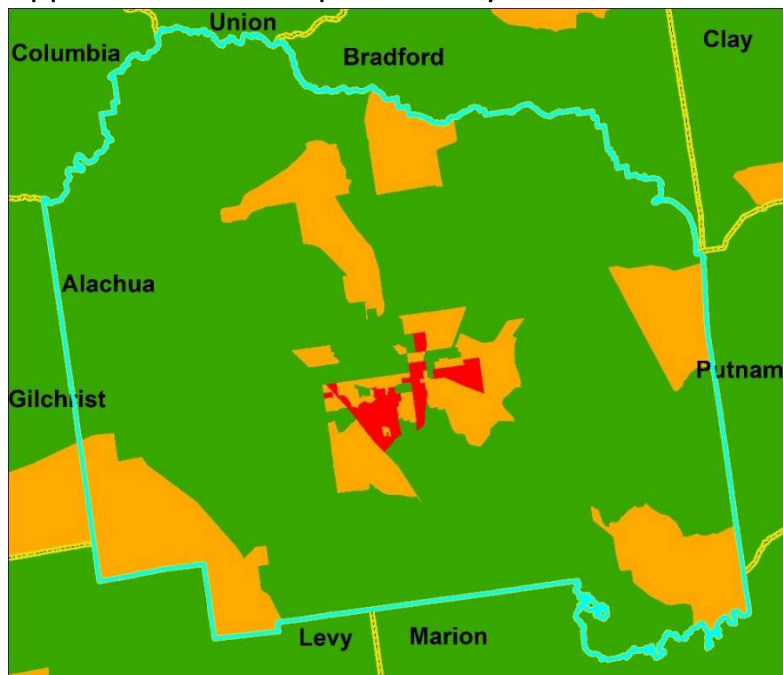
2017 Family Income Limits for IA Declared Counties								
Household Composition								
Limit	Fam1	Fam2	Fam3	Fam4	Fam5	Fam6	Fam7	Fam8
30% LIMITS	\$12,150	\$13,900	\$15,650	\$17,350	\$18,750	\$20,150	\$21,550	\$22,950
VERY LOW INCOME	\$20,300	\$23,200	\$26,100	\$28,950	\$31,300	\$33,600	\$35,900	\$38,250
60% LIMITS	\$24,360	\$27,840	\$31,320	\$34,740	\$37,560	\$40,320	\$43,080	\$45,900
LOW INCOME	\$32,450	\$37,050	\$41,700	\$46,300	\$50,050	\$53,750	\$57,450	\$61,150
Leon								
30% LIMITS	\$14,350	\$16,400	\$18,450	\$20,500	\$22,150	\$23,800	\$25,450	\$27,100
VERY LOW INCOME	\$23,950	\$27,400	\$30,800	\$34,200	\$36,950	\$39,700	\$42,450	\$45,150
60% LIMITS	\$28,740	\$32,880	\$36,960	\$41,040	\$44,340	\$47,640	\$50,940	\$54,180
LOW INCOME	\$38,300	\$43,800	\$49,250	\$54,700	\$59,100	\$63,500	\$67,850	\$72,250
Levy								
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,950
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Liberty								
30% LIMITS	\$11,100	\$12,650	\$14,250	\$15,800	\$17,100	\$18,350	\$19,600	\$20,900
VERY LOW INCOME	\$18,450	\$21,100	\$23,750	\$26,350	\$28,500	\$30,600	\$32,700	\$34,800
60% LIMITS	\$22,140	\$25,320	\$28,500	\$31,620	\$34,200	\$36,720	\$39,240	\$41,760
LOW INCOME	\$29,550	\$33,750	\$37,950	\$42,150	\$45,550	\$48,900	\$52,300	\$55,650
Madison								
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,950
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Manatee								
30% LIMITS	\$13,800	\$15,750	\$17,700	\$19,650	\$21,250	\$22,800	\$24,400	\$25,950
VERY LOW INCOME	\$22,950	\$26,200	\$29,500	\$32,750	\$35,400	\$38,000	\$40,650	\$43,250
60% LIMITS	\$27,540	\$31,440	\$35,400	\$39,300	\$42,480	\$45,600	\$48,780	\$51,900
LOW INCOME	\$36,700	\$41,950	\$47,200	\$52,400	\$56,600	\$60,800	\$65,000	\$69,200
Marion								
30% LIMITS	\$10,700	\$12,200	\$13,750	\$15,250	\$16,500	\$17,700	\$18,950	\$20,150
VERY LOW INCOME	\$17,800	\$20,350	\$22,900	\$25,400	\$27,450	\$29,500	\$31,500	\$33,550
60% LIMITS	\$21,360	\$24,420	\$27,480	\$30,480	\$32,940	\$35,400	\$37,800	\$40,260
LOW INCOME	\$28,500	\$32,550	\$36,600	\$40,650	\$43,950	\$47,200	\$50,450	\$53,700
Martin								
30% LIMITS	\$12,650	\$14,450	\$16,250	\$18,050	\$19,500	\$20,950	\$22,400	\$23,850
VERY LOW INCOME	\$21,100	\$24,100	\$27,100	\$30,100	\$32,550	\$34,950	\$37,350	\$39,750
60% LIMITS	\$25,320	\$28,920	\$32,520	\$36,120	\$39,060	\$41,940	\$44,820	\$47,700
LOW INCOME	\$33,750	\$38,550	\$43,350	\$48,150	\$52,050	\$55,900	\$59,750	\$63,600
Miami-Dade								
30% LIMITS	\$15,900	\$18,150	\$20,400	\$22,650	\$24,500	\$26,300	\$28,100	\$29,900
VERY LOW INCOME	\$26,450	\$30,200	\$34,000	\$37,750	\$40,800	\$43,800	\$46,850	\$49,850
60% LIMITS	\$31,740	\$36,240	\$40,800	\$45,300	\$48,960	\$52,560	\$56,220	\$59,820
LOW INCOME	\$42,300	\$48,350	\$54,400	\$60,400	\$65,250	\$70,100	\$74,900	\$79,750
Monroe								

2017 Family Income Limits for IA Declared Counties								
Household Composition								
Limit	Fam1	Fam2	Fam3	Fam4	Fam5	Fam6	Fam7	Fam8
30% LIMITS	\$19,300	\$22,050	\$24,800	\$27,550	\$29,800	\$32,000	\$34,200	\$36,400
VERY LOW INCOME	\$32,000	\$36,800	\$41,400	\$45,950	\$49,650	\$53,350	\$57,000	\$60,700
60% LIMITS	\$38,640	\$44,160	\$49,680	\$55,140	\$59,580	\$64,020	\$68,400	\$72,840
LOW INCOME	\$51,450	\$58,800	\$66,150	\$73,500	\$79,400	\$85,300	\$91,150	\$97,050
Nassau								
30% LIMITS	\$13,550	\$15,450	\$17,400	\$19,300	\$20,850	\$22,400	\$23,950	\$25,500
VERY LOW INCOME	\$22,550	\$25,800	\$29,000	\$32,200	\$34,800	\$37,400	\$39,950	\$42,550
60% LIMITS	\$27,060	\$30,960	\$24,800	\$38,640	\$41,760	\$44,880	\$47,940	\$51,060
LOW INCOME	\$36,050	\$41,200	\$46,350	\$51,500	\$55,650	\$59,750	\$63,900	\$68,000
Okaloosa								
30% LIMITS	\$14,350	\$16,400	\$18,450	\$20,450	\$22,100	\$23,750	\$25,400	\$27,000
VERY LOW INCOME	\$23,850	\$27,250	\$30,650	\$34,050	\$36,800	\$39,500	\$42,250	\$44,950
60% LIMITS	\$28,620	\$32,700	\$36,780	\$40,860	\$44,160	\$47,400	\$50,700	\$53,940
LOW INCOME	\$38,150	\$43,600	\$49,050	\$54,500	\$58,900	\$63,250	\$67,600	\$71,950
Okeechobee								
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,950
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Orange								
30% LIMITS	\$12,250	\$14,000	\$15,750	\$17,500	\$18,900	\$20,300	\$21,700	\$23,100
VERY LOW INCOME	\$20,450	\$23,400	\$26,300	\$29,200	\$31,550	\$33,900	\$36,250	\$38,550
60% LIMITS	\$24,540	\$28,080	\$31,560	\$35,040	\$37,860	\$40,680	\$43,500	\$46,260
LOW INCOME	\$32,700	\$37,400	\$42,050	\$46,700	\$50,450	\$54,200	\$57,950	\$61,650
Osceola								
30% LIMITS	\$12,250	\$14,000	\$15,750	\$17,500	\$18,900	\$20,300	\$21,700	\$23,100
VERY LOW INCOME	\$20,450	\$23,400	\$26,300	\$29,200	\$31,550	\$33,900	\$36,250	\$38,550
60% LIMITS	\$24,540	\$28,080	\$31,560	\$35,040	\$37,860	\$40,680	\$43,500	\$46,260
LOW INCOME	\$32,700	\$37,400	\$42,050	\$46,700	\$50,450	\$54,200	\$57,950	\$61,650
Palm Beach								
30% LIMITS	\$15,100	\$17,250	\$19,400	\$21,550	\$23,300	\$25,000	\$26,750	\$28,450
VERY LOW INCOME	\$25,200	\$28,800	\$32,400	\$35,950	\$38,850	\$41,750	\$44,600	\$47,500
60% LIMITS	\$30,240	\$34,560	\$38,880	\$43,140	\$46,620	\$50,100	\$53,520	\$57,000
LOW INCOME	\$40,250	\$46,000	\$51,750	\$57,500	\$621,000	\$66,700	\$71,300	\$75,900
Pasco								
30% LIMITS	\$12,600	\$14,400	\$16,200	\$17,950	\$19,400	\$20,850	\$22,300	\$23,700
VERY LOW INCOME	\$20,950	\$23,950	\$26,950	\$29,900	\$32,300	\$24,700	\$37,100	\$39,500
60% LIMITS	\$25,140	\$28,740	\$32,340	\$35,880	\$38,760	\$14,640	\$44,520	\$47,400
LOW INCOME	\$33,500	\$38,300	\$43,100	\$47,850	\$51,700	\$55,550	\$59,350	\$63,200
Pinellas								
30% LIMITS	\$12,600	\$14,400	\$16,200	\$17,950	\$19,400	\$20,850	\$22,300	\$23,700
VERY LOW INCOME	\$20,950	\$23,950	\$26,950	\$29,900	\$32,300	\$24,700	\$37,100	\$39,500
60% LIMITS	\$25,140	\$28,740	\$32,340	\$35,880	\$38,760	\$14,640	\$44,520	\$47,400
LOW INCOME	\$33,500	\$38,300	\$43,100	\$47,850	\$51,700	\$55,550	\$59,350	\$63,200
Polk								

2017 Family Income Limits for IA Declared Counties								
Household Composition								
Limit	Fam1	Fam2	Fam3	Fam4	Fam5	Fam6	Fam7	Fam8
30% LIMITS	\$11,050	\$12,600	\$14,200	\$15,750	\$17,050	\$18,300	\$19,550	\$20,800
VERY LOW INCOME	\$18,400	\$21,000	\$23,650	\$26,250	\$28,350	\$30,450	\$32,550	\$34,650
60% LIMITS	\$22,080	\$25,200	\$28,380	\$31,500	\$34,020	\$36,540	\$39,060	\$41,580
LOW INCOME	\$29,400	\$33,600	\$37,800	\$42,000	\$45,400	\$48,750	\$52,100	\$55,450
Putnam								
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,950
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Santa Rosa								
30% LIMITS	\$13,050	\$14,900	\$16,750	\$18,600	\$20,100	\$21,600	\$23,100	\$24,600
VERY LOW INCOME	\$21,700	\$24,800	\$27,900	\$31,000	\$33,500	\$36,000	\$38,450	\$40,950
60% LIMITS	\$26,040	\$29,760	\$33,480	\$37,200	\$40,200	\$43,200	\$46,140	\$49,140
LOW INCOME	\$34,750	\$39,700	\$44,650	\$49,600	\$53,600	\$57,550	\$64,550	\$65,500
Sarasota								
30% LIMITS	\$13,800	\$15,750	\$17,700	\$19,650	\$21,250	\$22,800	\$24,400	\$25,950
VERY LOW INCOME	\$22,950	\$26,200	\$29,500	\$32,750	\$35,400	\$38,000	\$40,650	\$43,250
60% LIMITS	\$27,540	\$31,440	\$35,400	\$39,300	\$42,480	\$45,600	\$48,780	\$51,900
LOW INCOME	\$36,700	\$41,950	\$47,200	\$52,400	\$56,600	\$60,800	\$65,000	\$69,200
Seminole								
30% LIMITS	\$12,250	\$14,000	\$15,750	\$17,500	\$18,900	\$20,300	\$21,700	\$23,100
VERY LOW INCOME	\$20,450	\$23,400	\$26,300	\$29,200	\$31,550	\$33,900	\$36,250	\$38,550
60% LIMITS	\$24,540	\$28,080	\$31,560	\$35,040	\$37,860	\$40,680	\$43,500	\$46,260
LOW INCOME	\$32,700	\$37,400	\$42,050	\$46,700	\$50,450	\$54,200	\$57,950	\$61,650
St. Johns								
30% LIMITS	\$13,550	\$15,450	\$17,400	\$19,300	\$20,850	\$22,400	\$23,950	\$25,500
VERY LOW INCOME	\$22,550	\$25,800	\$29,000	\$32,200	\$34,800	\$37,400	\$39,950	\$42,550
60% LIMITS	\$27,060	\$30,960	\$24,800	\$38,640	\$41,760	\$44,880	\$47,940	\$51,060
LOW INCOME	\$36,050	\$41,200	\$46,350	\$51,500	\$55,650	\$59,750	\$63,900	\$68,000
St. Lucie								
30% LIMITS	\$12,650	\$14,450	\$16,250	\$18,050	\$19,500	\$20,950	\$22,400	\$23,850
VERY LOW INCOME	\$21,100	\$24,100	\$27,100	\$30,100	\$32,550	\$34,950	\$37,350	\$39,750
60% LIMITS	\$25,320	\$28,920	\$32,520	\$36,120	\$39,060	\$41,940	\$44,820	\$47,700
LOW INCOME	\$33,750	\$38,550	\$43,350	\$48,150	\$52,050	\$55,900	\$59,750	\$63,600
Sumter								
30% LIMITS	\$12,600	\$14,400	\$16,200	\$18,000	\$19,450	\$20,900	\$22,350	\$23,800
VERY LOW INCOME	\$21,000	\$24,000	\$27,000	\$30,000	\$32,400	\$34,800	\$37,200	\$39,600
60% LIMITS	\$25,200	\$28,800	\$32,400	\$36,000	\$38,880	\$41,760	\$44,640	\$47,520
LOW INCOME	\$33,600	\$38,400	\$43,200	\$48,000	\$51,850	\$55,700	\$59,550	\$63,400
Suwanee								
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,950
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Taylor								

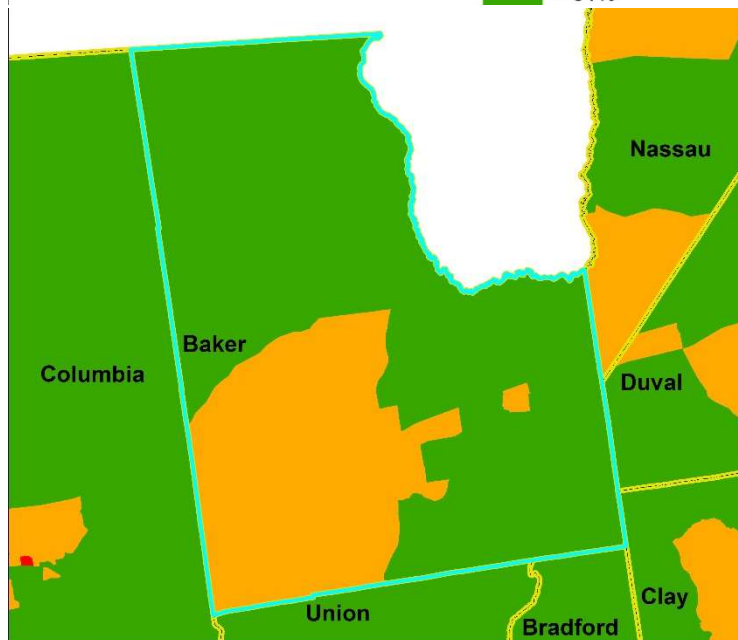
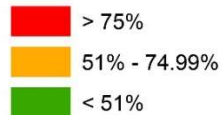
2017 Family Income Limits for IA Declared Counties								
Household Composition								
Limit	Fam1	Fam2	Fam3	Fam4	Fam5	Fam6	Fam7	Fam8
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,950
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Union								
30% LIMITS	\$10,500	\$12,050	\$13,550	\$15,050	\$16,300	\$17,500	\$18,700	\$19,900
VERY LOW INCOME	\$17,600	\$20,100	\$22,600	\$25,100	\$27,150	\$29,150	\$31,150	\$33,150
60% LIMITS	\$21,120	\$24,120	\$27,120	\$30,120	\$32,580	\$34,900	\$37,380	\$39,780
LOW INCOME	\$28,150	\$32,150	\$36,150	\$40,150	\$43,400	\$46,600	\$49,800	\$53,000
Volusia								
30% LIMITS	\$11,750	\$13,400	\$15,100	\$16,750	\$18,100	\$19,450	\$20,800	\$22,150
VERY LOW INCOME	\$19,550	\$22,350	\$25,150	\$27,900	\$30,150	\$32,400	\$34,600	\$36,850
60% LIMITS	\$23,460	\$26,820	\$30,180	\$33,480	\$36,180	\$38,880	\$41,520	\$44,220
LOW INCOME	\$31,300	\$35,750	\$40,200	\$44,650	\$48,250	\$51,800	\$55,400	\$58,950
Wakulla								
30% LIMITS	\$13,450	\$15,350	\$17,250	\$19,150	\$20,700	\$22,250	\$23,750	\$35,300
VERY LOW INCOME	\$22,400	\$25,600	\$28,800	\$31,950	\$34,550	\$37,100	\$36,950	\$42,220
60% LIMITS	\$26,880	\$30,720	\$34,560	\$38,340	\$42,460	\$44,520	\$47,580	\$50,640
LOW INCOME	\$35,800	\$40,900	\$46,000	\$51,100	\$55,200	\$59,300	\$63,400	\$67,500
Walton								
30% LIMITS	\$12,400	\$14,150	\$15,900	\$17,650	\$19,100	\$20,500	\$21,900	\$23,300
VERY LOW INCOME	\$20,600	\$23,550	\$26,500	\$29,400	\$31,800	\$34,150	\$36,500	\$38,850
60% LIMITS	\$24,720	\$28,260	\$31,800	\$35,280	\$38,160	\$40,980	\$43,800	\$46,620
LOW INCOME	\$32,950	\$37,650	\$42,350	\$47,050	\$50,850	\$54,600	\$58,350	\$62,150
Washington								
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$30,050	\$31,950
60% LIMITS	\$20,340	\$23,280	\$26,160	\$29,040	\$31,380	\$33,720	\$36,060	\$38,340
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100

Appendix 2: 2016 Populations by LMI for IA Declared Counties



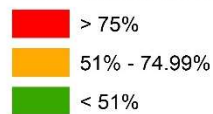
**Alachua County
% Low-Mod Income
Populations**

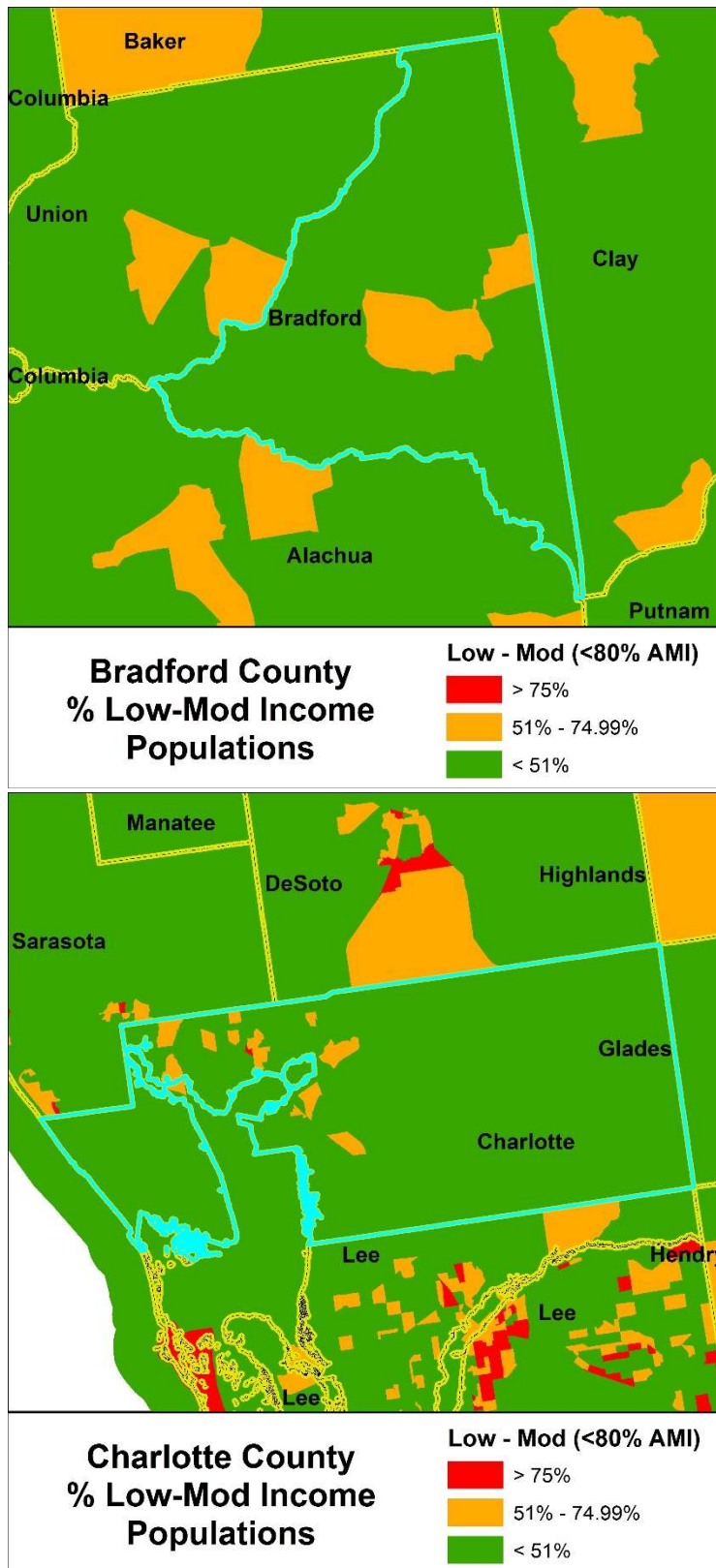
Low - Mod (<80% AMI)

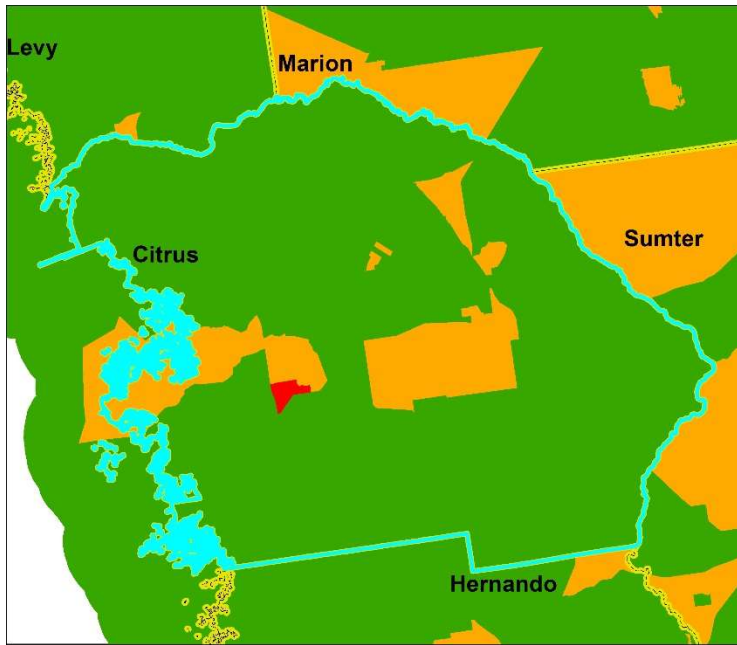


**Baker County
% Low-Mod Income
Populations**

Low - Mod (<80% AMI)

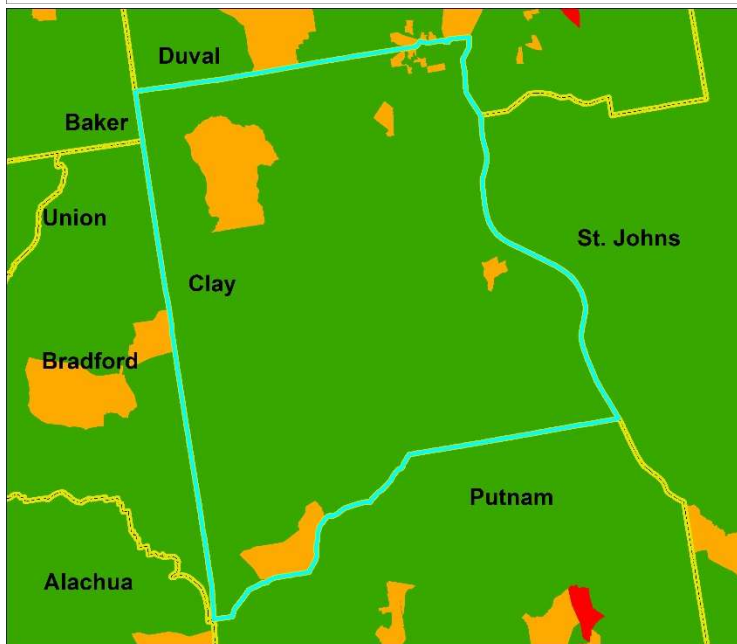






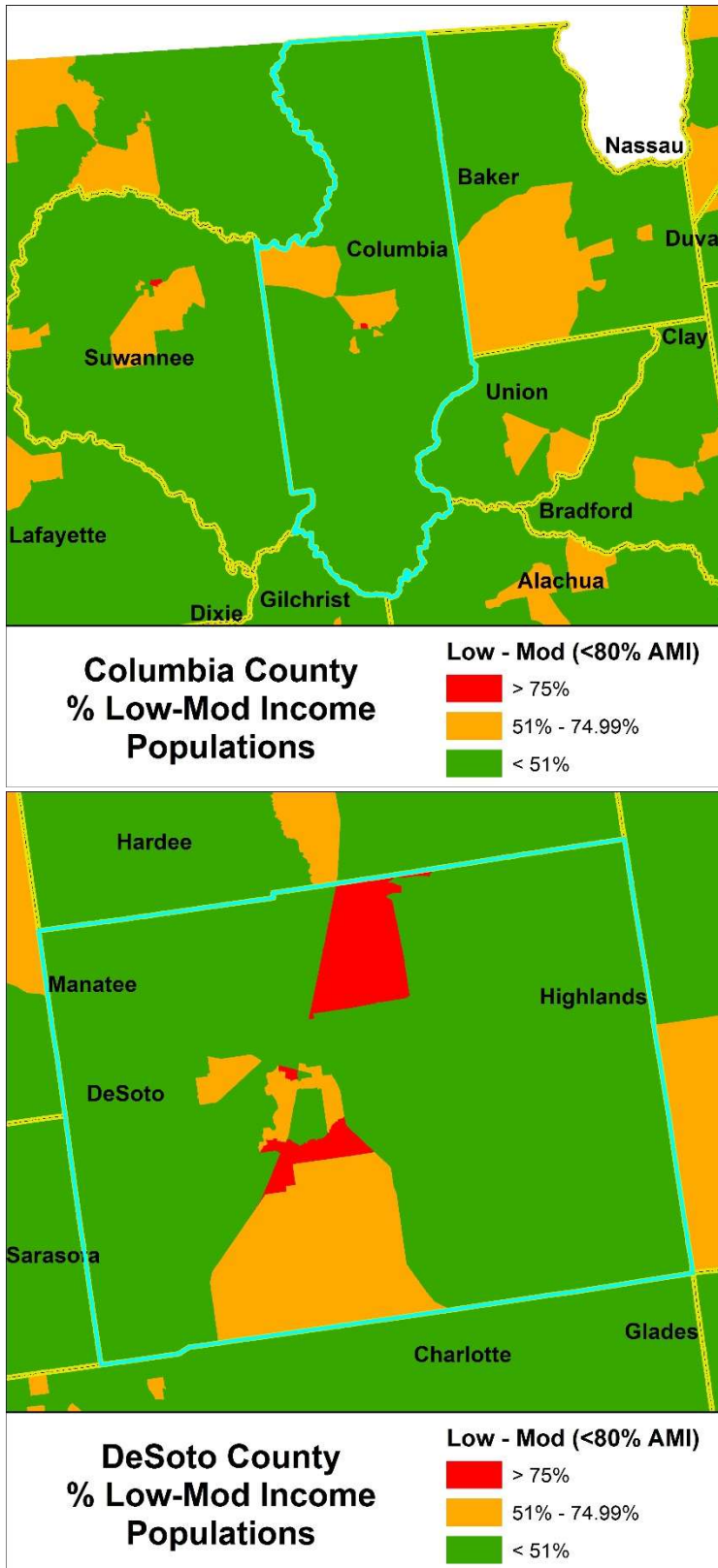
**Citrus County
% Low-Mod Income
Populations**

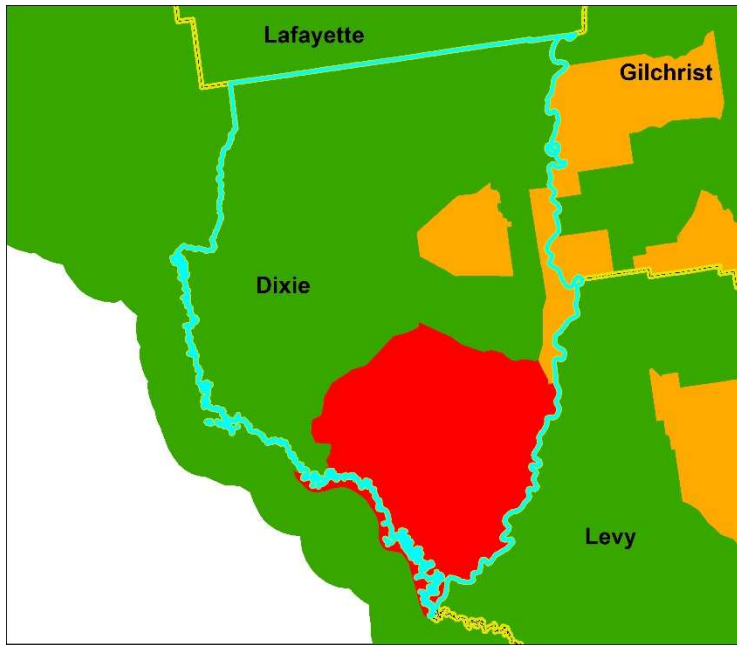
Low - Mod (<80% AMI)
■ > 75%
■ 51% - 74.99%
■ < 51%



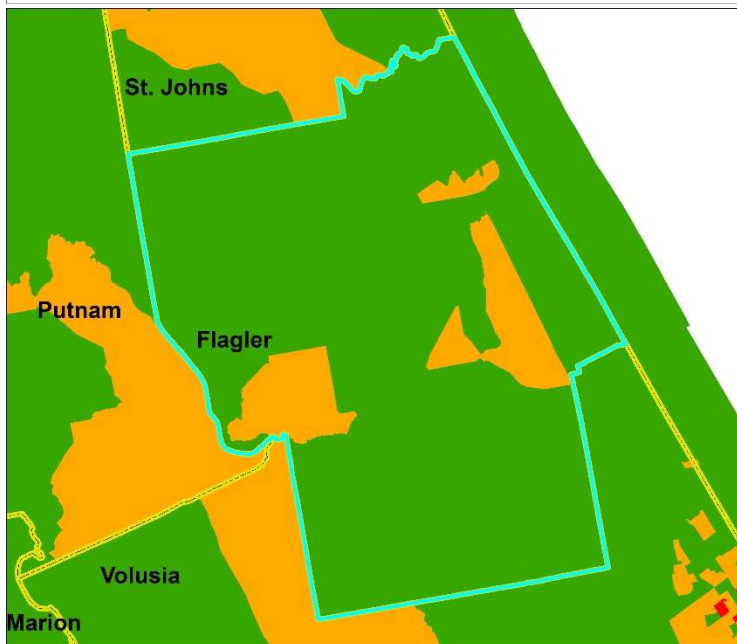
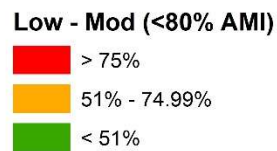
**Clay County
% Low-Mod Income
Populations**

Low - Mod (<80% AMI)
■ > 75%
■ 51% - 74.99%
■ < 51%

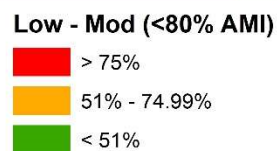


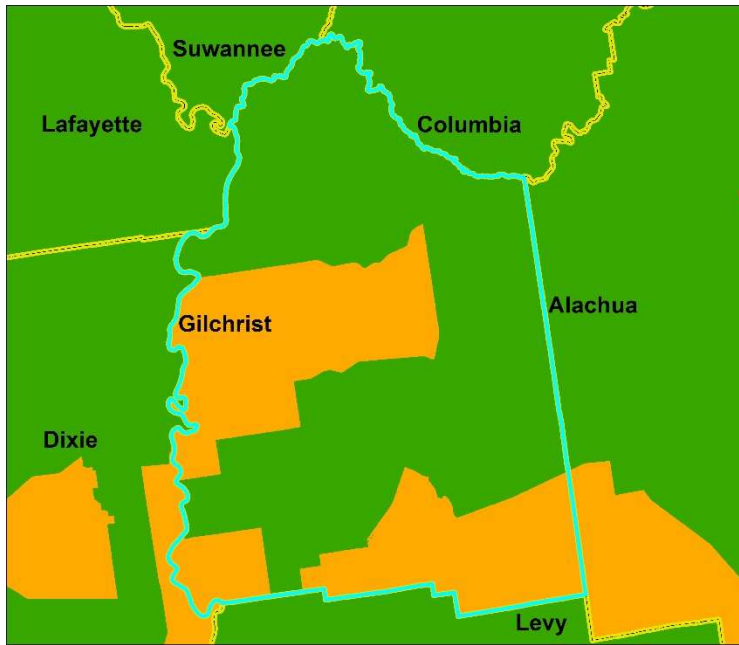


**Dixie County
% Low-Mod Income
Populations**



**Flagler County
% Low-Mod Income
Populations**





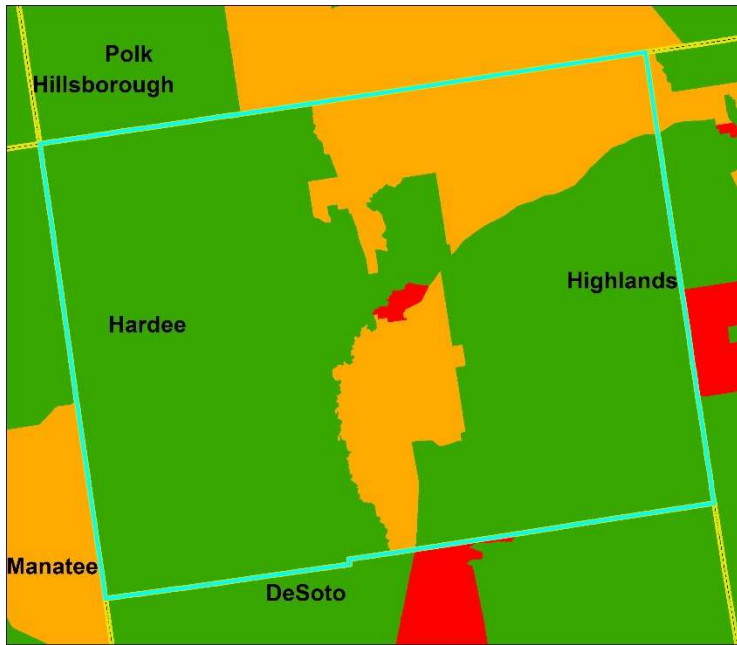
**Gilchrist County
% Low-Mod Income
Populations**

Low - Mod (<80% AMI)
■ > 75%
■ 51% - 74.99%
■ < 51%

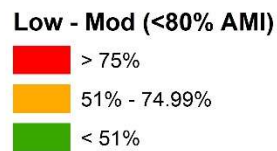


**Glades County
% Low-Mod Income
Populations**

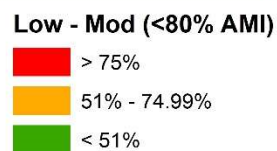
Low - Mod (<80% AMI)
■ > 75%
■ 51% - 74.99%
■ < 51%

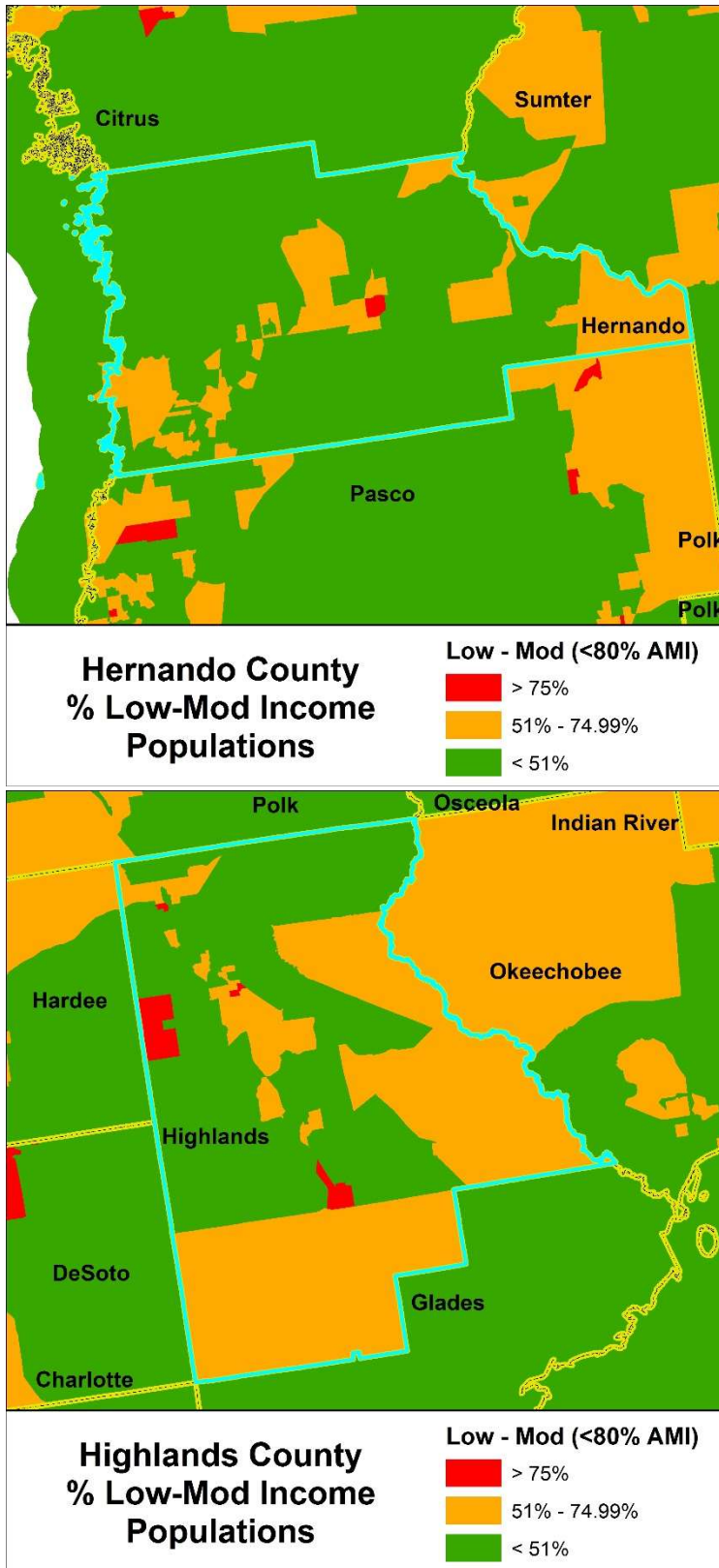


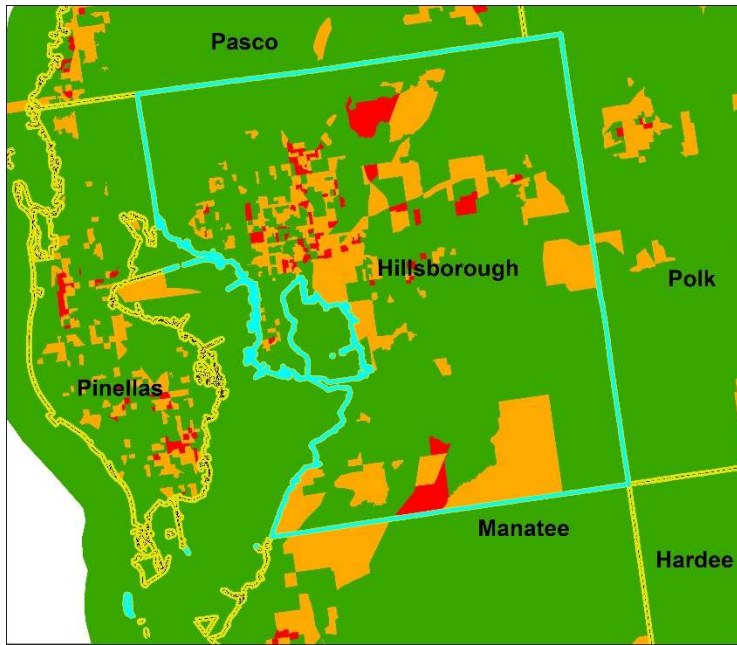
**Hardee County
% Low-Mod Income
Populations**



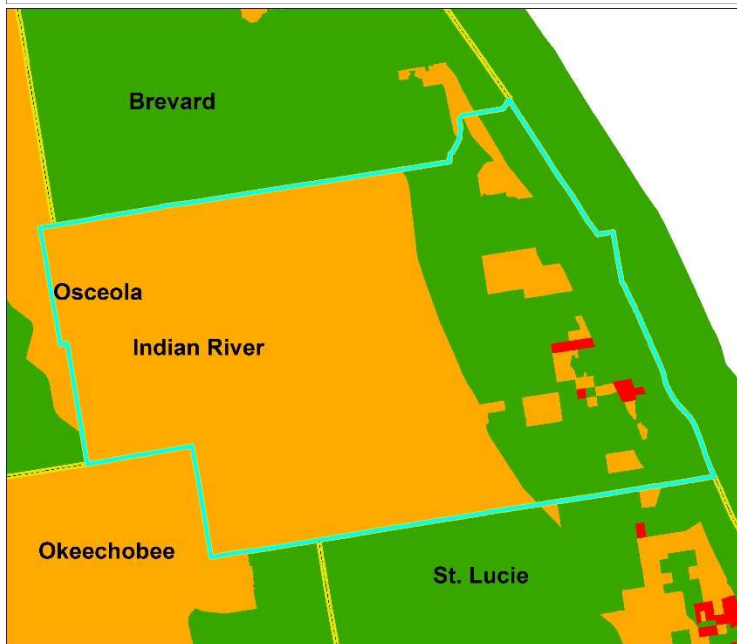
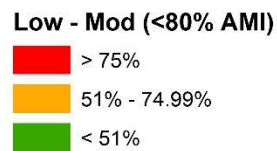
**Hendry County
% Low-Mod Income
Populations**



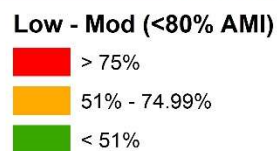


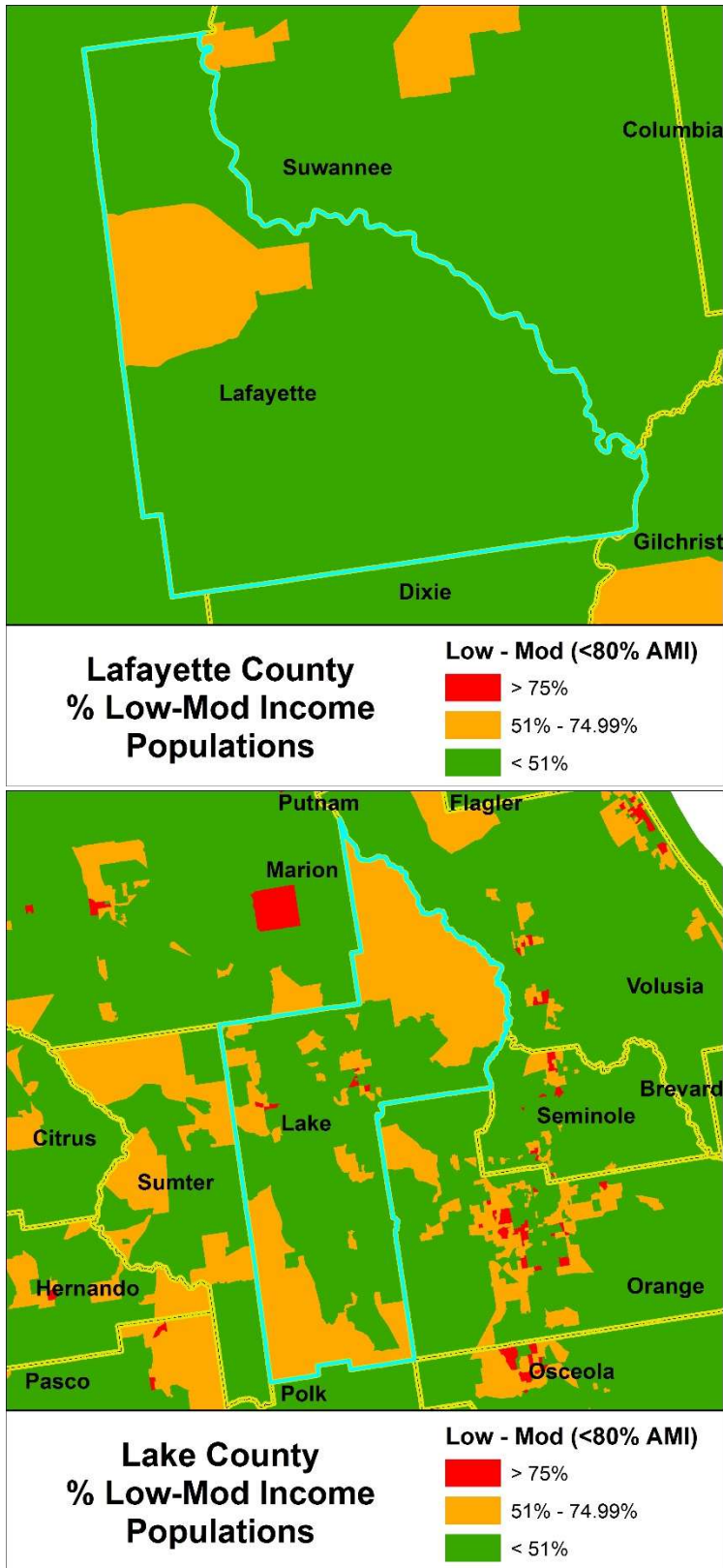


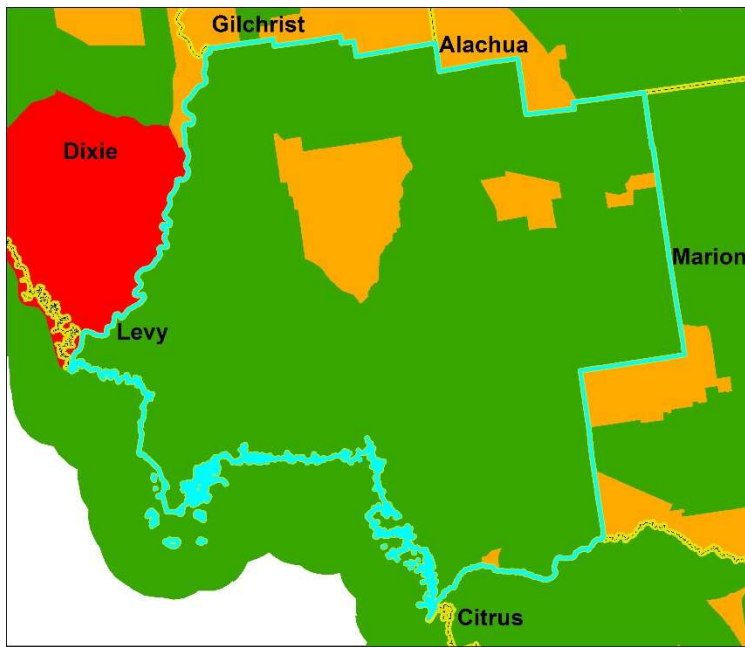
**Hillsborough County
% Low-Mod Income
Populations**



**Indian River County
% Low-Mod Income
Populations**

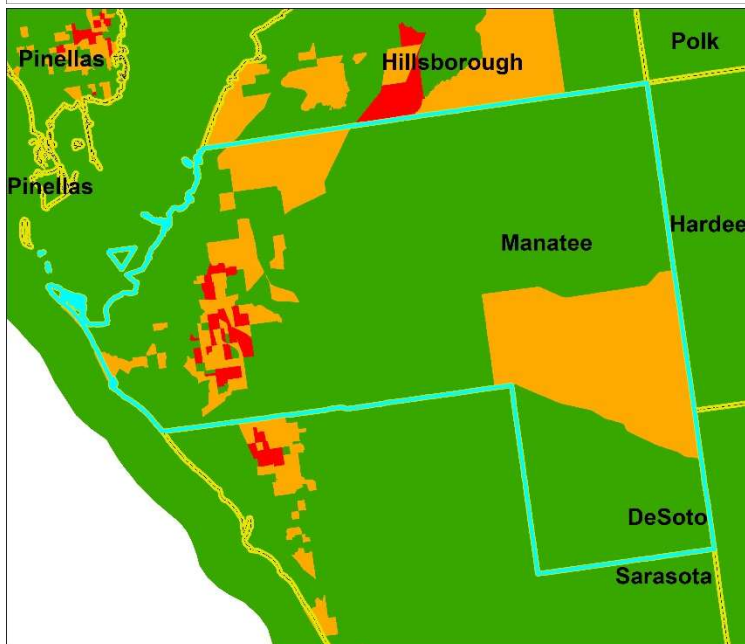






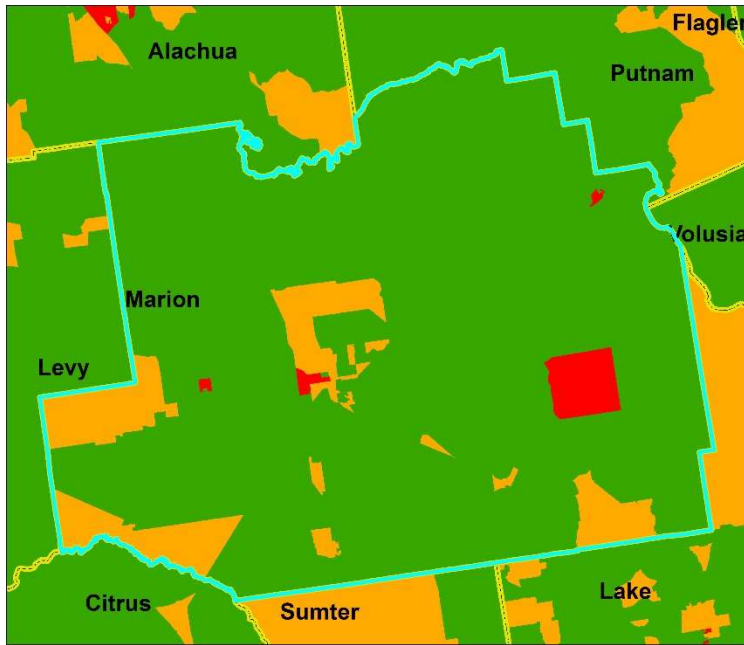
**Levy County
% Low-Mod Income
Populations**

Low - Mod (<80% AMI)
 > 75%
 51% - 74.99%
 < 51%



**Manatee County
% Low-Mod Income
Populations**

Low - Mod (<80% AMI)
 > 75%
 51% - 74.99%
 < 51%



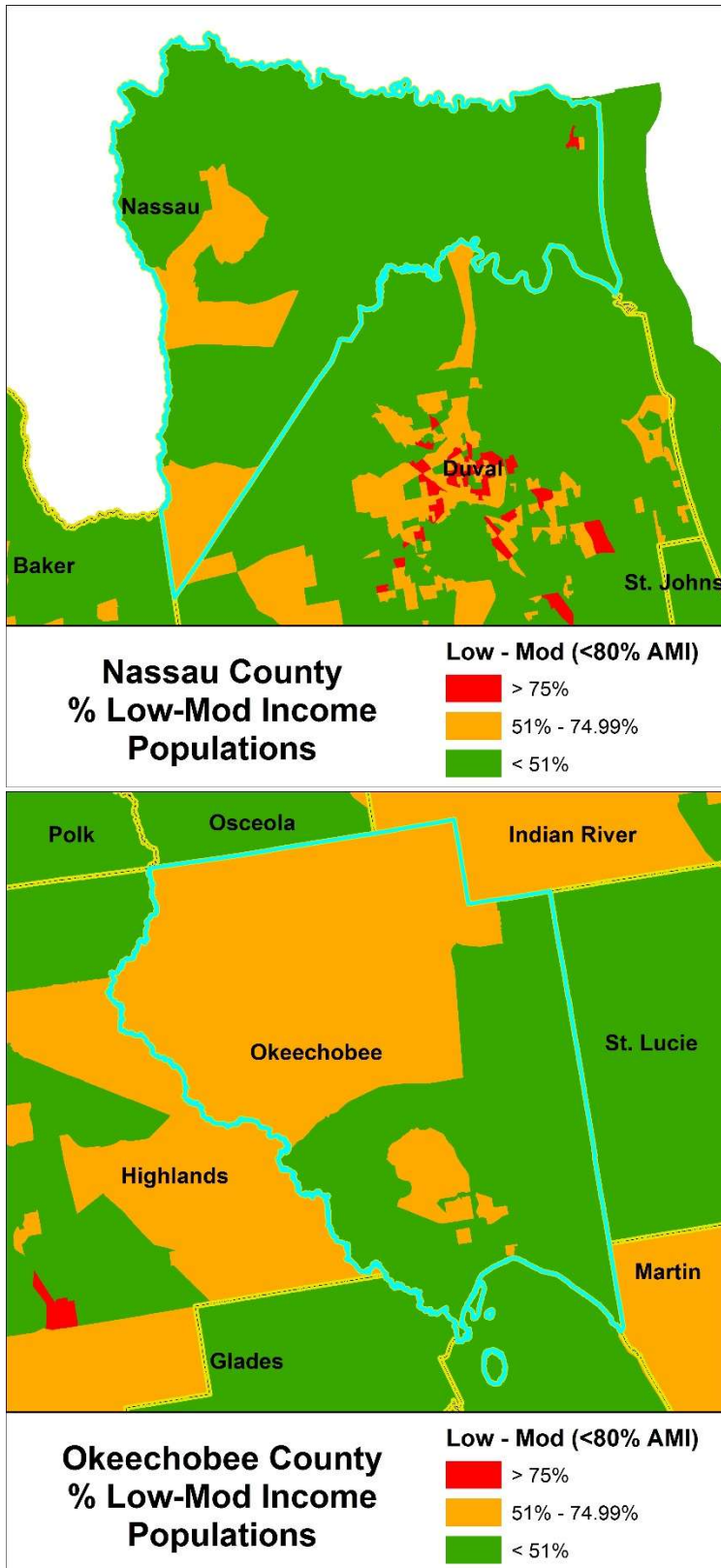
**Marion County
% Low-Mod Income
Populations**

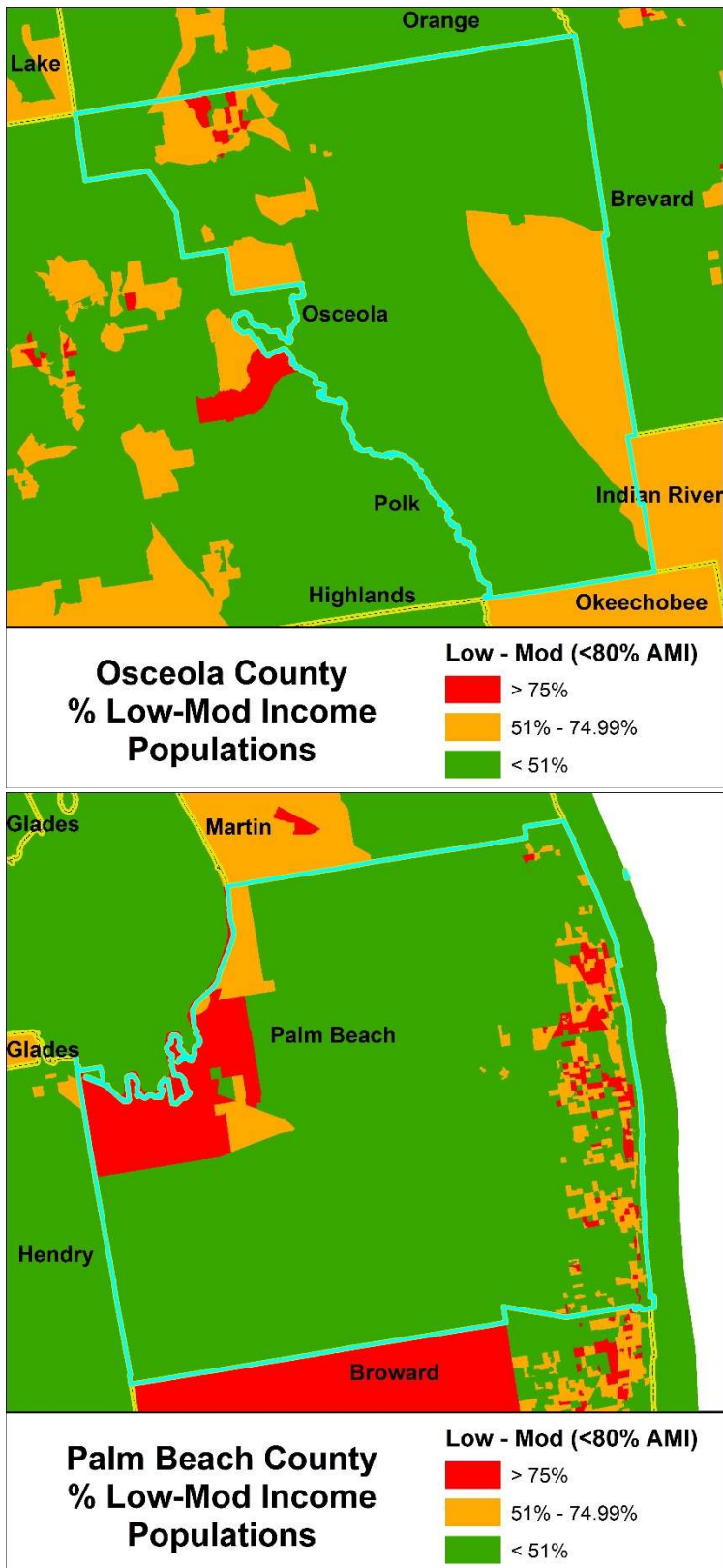
Low - Mod (<80% AMI)
■ > 75%
■ 51% - 74.99%
■ < 51%

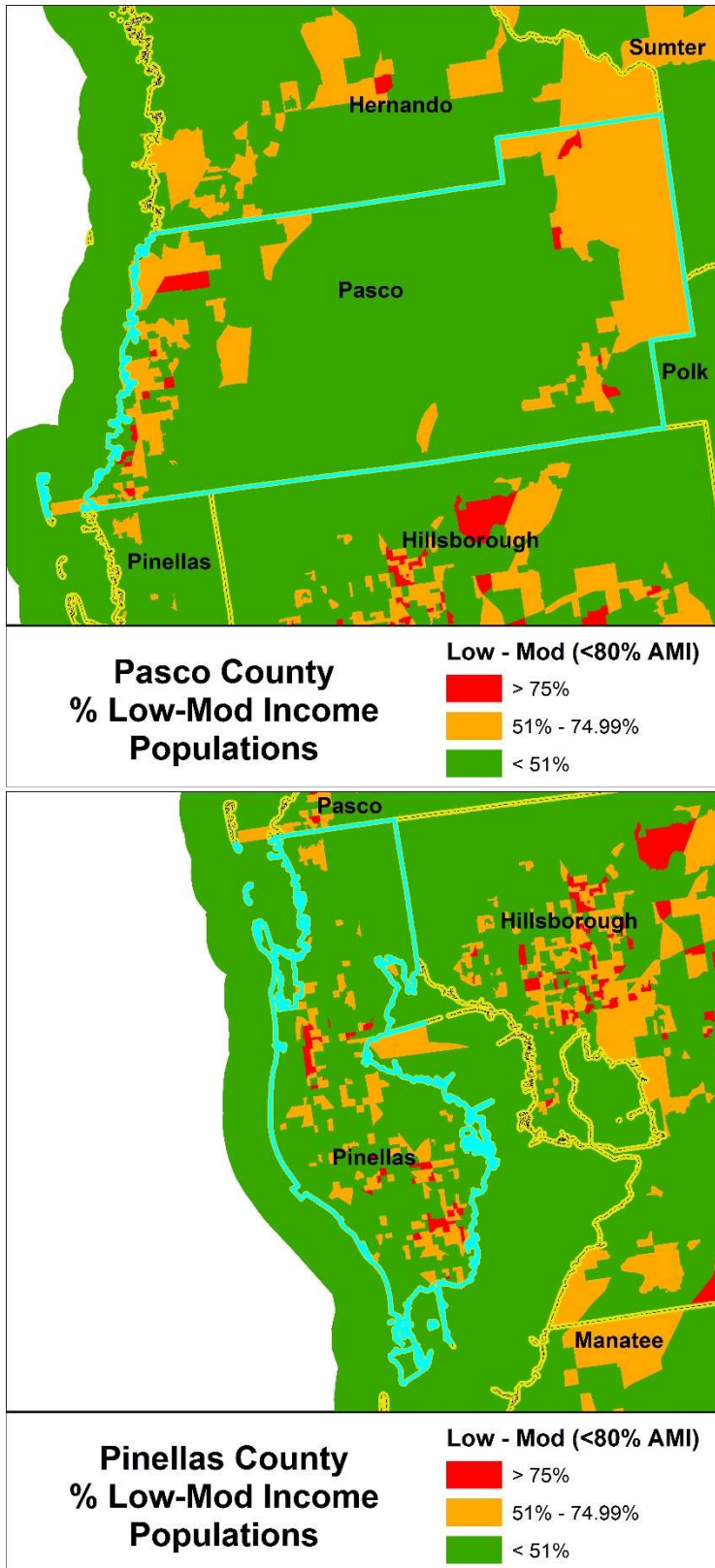


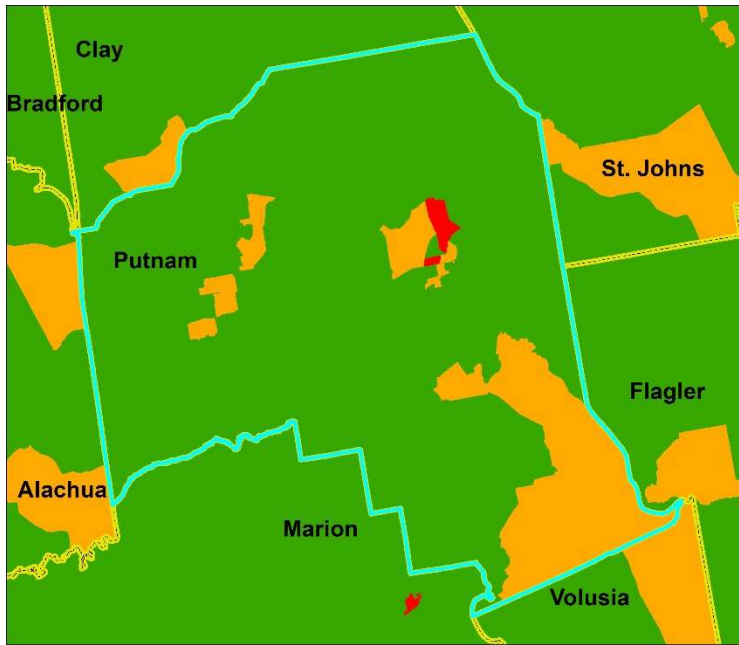
**Martin County
% Low-Mod Income
Populations**

Low - Mod (<80% AMI)
■ > 75%
■ 51% - 74.99%
■ < 51%



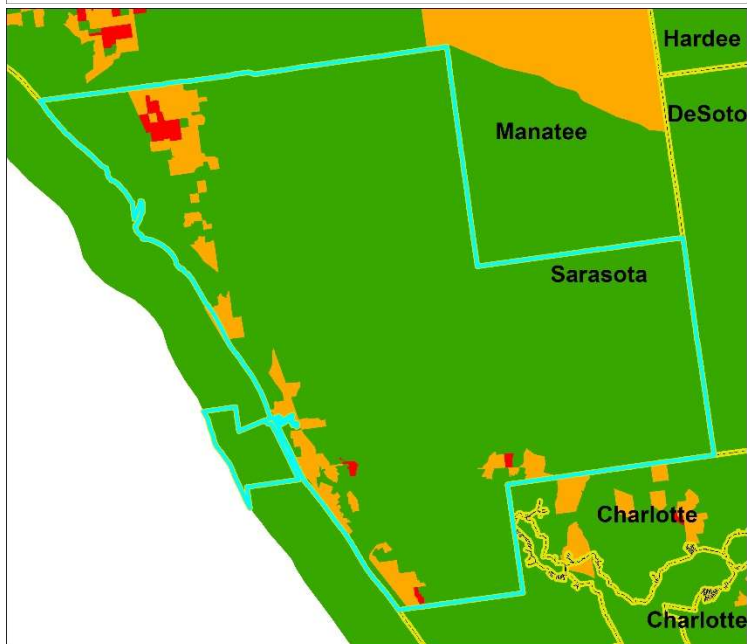






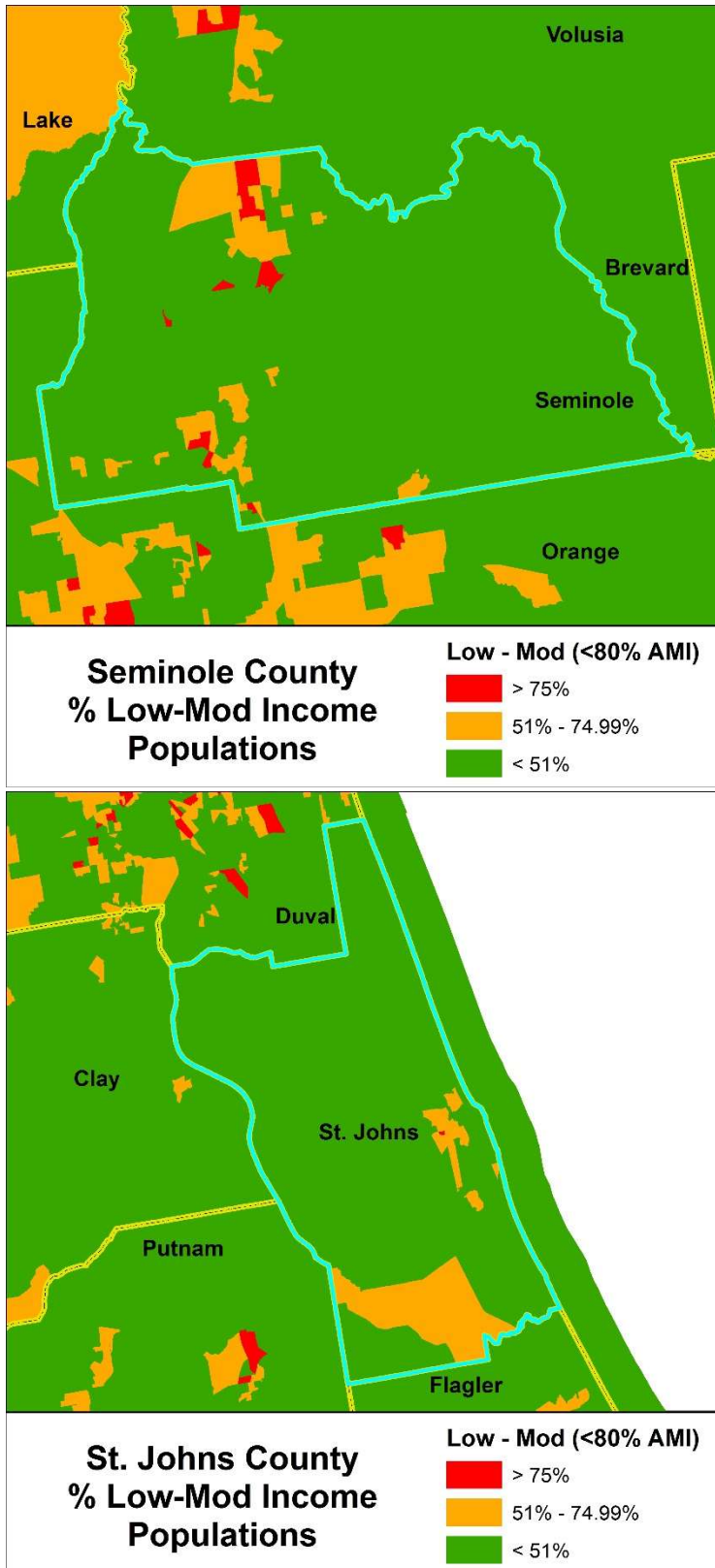
**Putnam County
% Low-Mod Income
Populations**

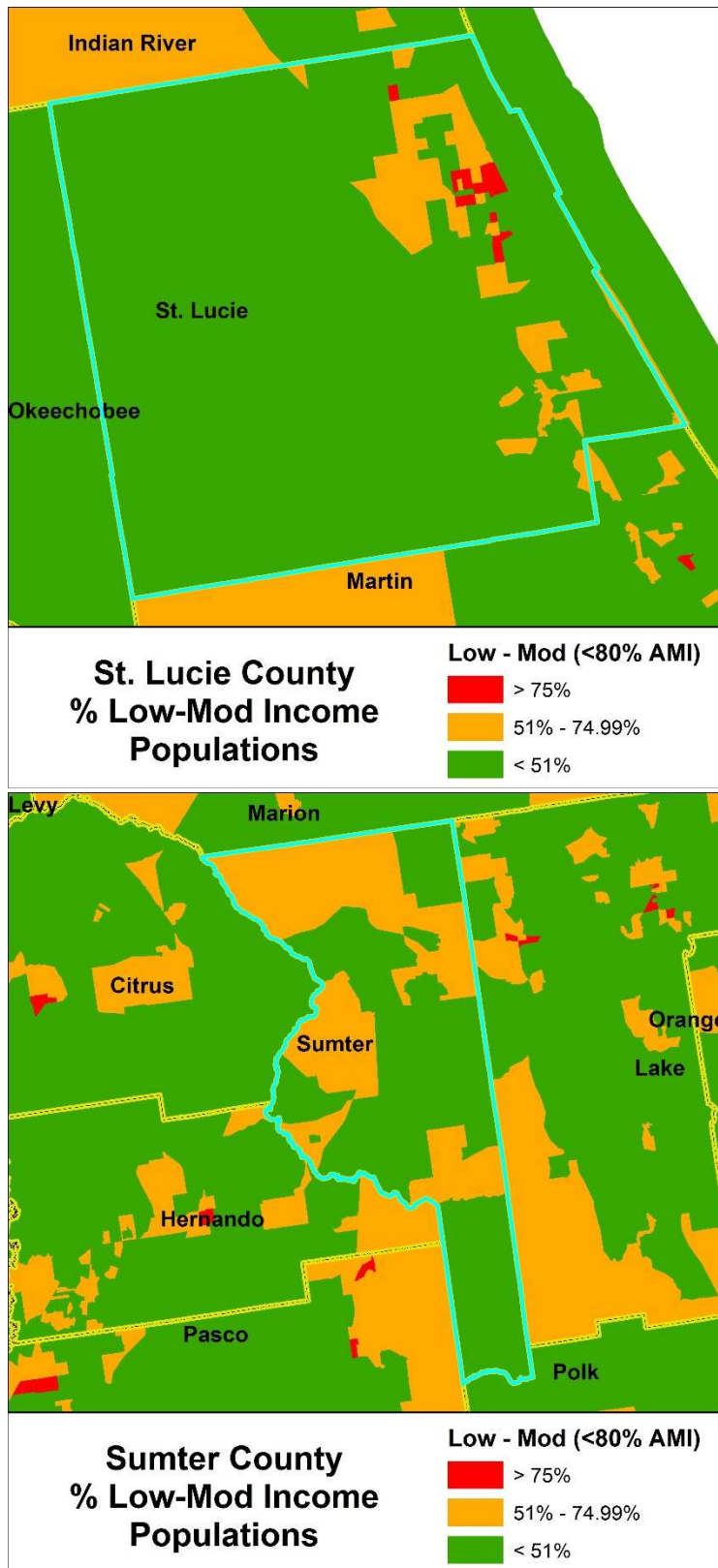
Low - Mod (<80% AMI)
■ > 75%
■ 51% - 74.99%
■ < 51%

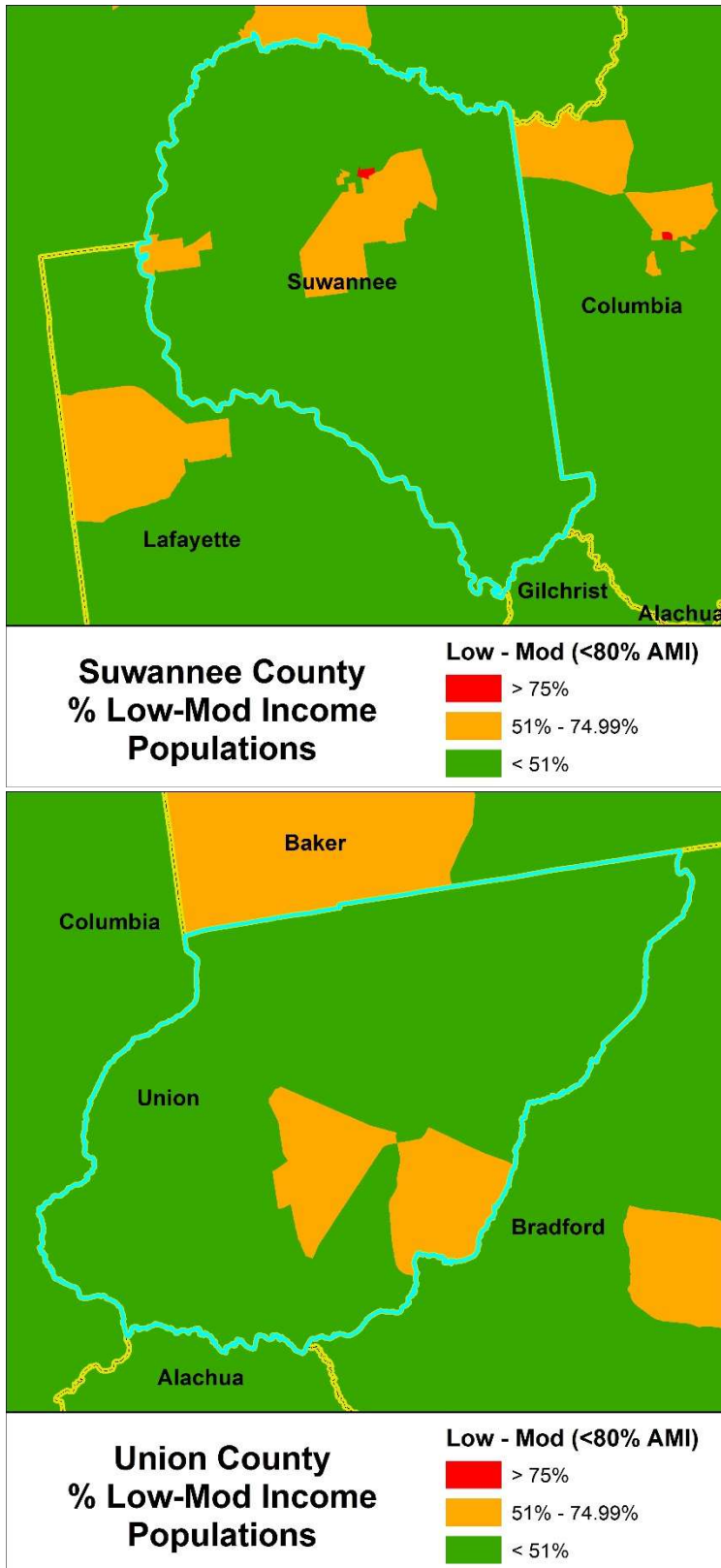


**Sarasota County
% Low-Mod Income
Populations**

Low - Mod (<80% AMI)
■ > 75%
■ 51% - 74.99%
■ < 51%







Appendix 3: Insurance claims by county for Hurricane Irma³⁵.

Insurance Claims by County for Hurricane Irma					
County	Number of Claims	Closed Claims (paid)	Closed Claims (not paid)	Number Claims Open	Percent Claims Closed
Alachua	4,087	2,087	1,670	330	91.9%
Baker	547	343	174	30	94.5%
Bay	192	105	59	28	85.4%
Bradford	805	444	298	63	92.2%
Brevard	41,028	24,876	10,529	5,623	86.3%
Broward	74,687	34,203	27,664	12,820	82.8%
Calhoun	24	17	4	3	87.5%
Charlotte	7,365	3,663	2,965	737	90.0%
Citrus	2,453	1,149	1,094	210	91.4%
Clay	9,046	5,507	2,842	697	92.3%
Collier	69,888	39,294	17,798	12,796	81.7%
Columbia	973	574	325	74	92.4%
DeSoto	2,042	1,270	530	242	88.1%
Dixie	221	139	67	15	93.2%
Duval	35,386	20,057	11,866	3,463	90.2%
Escambia	241	129	81	31	87.1%
Flagler	6,097	3,387	2,036	674	88.9%
Franklin	52	23	22	7	86.5%
Gadsden	188	98	80	10	94.7%
Gilchrist	190	126	56	8	95.8%
Glades	1,099	813	164	122	88.9%
Gulf	27	13	13	1	96.3%
Hamilton	227	155	55	17	92.5%
Hardee	1,923	1,183	444	296	84.6%
Hendry	3,566	2,493	642	431	87.9%
Hernando	2,813	1,303	1,337	173	93.8%
Highlands	16,570	10,672	4,122	1,776	89.3%
Hillsborough	19,417	9,471	8,070	1,876	90.3%
Holmes	23	12	10	1	95.7%
Indian river	5,434	3,131	1,627	676	87.6%
Jackson	125	68	44	13	89.6%
Jefferson	131	76	36	19	85.5%
Lafayette	102	74	26	2	98.0%
Lake	22,880	13,538	7,122	2,220	90.3%
Lee	68,995	37,186	22,625	9,184	86.7%
Leon	1,142	603	433	106	90.7%
Levy	563	360	170	33	94.1%
Liberty	12	7	4	1	91.7%
Madison	226	156	63	7	96.9%
Manatee	8,207	4,280	3,122	805	90.2%
Marion	9,588	5,088	3,795	705	92.6%
Martin	3,644	2,027	1,130	487	86.6%

³⁵ <https://www.flor.com/Office/HurricaneSeason/HurricaneIrmaClaimsData.aspx>

Insurance Claims by County for Hurricane Irma					
County	Number of Claims	Closed Claims (paid)	Closed Claims (not paid)	Number Claims Open	Percent Claims Closed
Dade	117,448	52,894	39,195	25,359	78.4%
Monroe	28,855	15,357	9,481	4,017	86.1%
Nassau	3,844	2,313	1,109	422	89.0%
Okaloosa	239	131	74	34	85.8%
Okeechobee	3,710	2,764	653	293	92.1%
Orange	70,718	39,673	22,704	8,341	88.2%
Osceola	27,417	16,210	7,638	3,569	87.0%
Palm beach	39,158	18,542	14,658	5,958	84.8%
Pasco	8,663	4,103	3,899	661	92.4%
Pinellas	24,097	11,994	9,722	2,381	90.1%
Polk	51,465	32,279	14,303	4,883	90.5%
Putnam	2,993	1,855	933	205	93.2%
Santa Rosa	393	231	130	32	91.9%
Sarasota	11,023	4,957	4,791	1,275	88.4%
Seminole	23,400	12,407	8,300	2,693	88.5%
St johns	9,955	5,395	3,404	1,156	88.4%
St. Lucie	11,999	6,587	3,939	1,473	87.7%
Sumter	4,941	2,651	2,053	237	95.2%
Suwannee	844	571	217	56	93.4%
Taylor	122	66	42	14	88.5%
Union	179	127	45	7	96.1%
Volusia	25,055	14,706	7,686	2,663	89.4%
Wakulla	103	50	34	19	81.6%
Walton	64	26	27	11	82.8%
Washington	31	20	11	0	100.0%
County unknown	11,286	3,528	2,967	4,791	57.5%
Statewide	900,228	479,637	293,229	127,362	89.41%

Appendix 4: LMI population counts by block group and county for Irma impacted counties³⁶.

LMI Population Counts by Block Group and County for Irma Impacted Counties						
County	Block Groups Counts and Populations by LMI Category					
	< 51% Count	< 51% Population	51% - 75% County	51% - 75% Population	> 75% Count	>% Population
Alachua	84	36,570	39	32,995	32	38,880
Baker	9	6,500	3	2,355		
Bradford	15	7,280	3	2,060		
Brevard	239	124,655	66	55,205	13	12,430
Broward	530	301,035	301	337,725	109	144,730
Charlotte	91	42,185	16	13,230	1	785
Citrus	78	39,680	9	8,495	1	740
Clay	71	43,605	10	10,540		
Collier	130	60,935	48	56,340	15	18,805
Columbia	33	18,330	6	3,875	1	795
DeSoto	16	6,360	7	6,010	3	2,170
Dixie	8	3,450	4	3,045	1	240
Duval	309	174,210	131	116,280	50	46,705
Flagler	41	22,080	11	14,000		
Gilchrist	7	3,150	6	4,815		
Glades	9	2,480	2	1,840		
Hardee	11	3,510	8	6,725	1	1,385
Hendry	14	5,755	11	10,850		
Hernando	74	43,545	31	24,500	2	1,050
Highlands	52	23,315	23	14,440	4	2,760
Hillsborough	590	220,115	223	162,995	68	62,740
Indian River	69	31,560	19	16,970	5	4,665
Lafayette	5	2,265	1	1,040		
Lake	88	65,640	54	46,305	6	5,310
Lee	366	133,379	105	71,890	43	33,320
Levy	23	12,800	6	4,050		
Manatee	126	62,360	54	41,050	28	36,835
Marion	142	83,610	27	23,225	6	5,640
Martin	72	29,855	20	15,120	2	2,525
Miami-Dade	833	382,809	473	481,015	288	352,200
Monroe	46	12,800	25	15,455	5	6,505
Nassau	34	19,940	5	3,775	1	470
Okeechobee	20	8,275	8	7,880		
Orange	240	221,340	108	200,260	27	41,685

³⁶ <https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-block-groups-places/>

LMI Population Counts by Block Group and County for Irma Impacted Counties						
County	Block Groups Counts and Populations by LMI Category					
	< 51% Count	< 51% Population	51% - 75% County	51% - 75% Population	> 75% Count	>% Population
Osceola	40	57,520	28	50,780	8	9,685
Palm Beach	504	229,305	248	218,540	134	152,300
Pasco	204	96,330	89	67,870	15	14,245
Pinellas	533	206,415	152	104,430	36	27,130
Polk	242	135,695	77	66,955	12	11,405
Putnam	42	17,685	17	12,460	2	2,120
Sarasota	180	97,210	61	46,010	11	10,325
Seminole	194	93,675	31	29,800	10	9,850
St. Johns	69	36,065	12	12,595	1	1,150
St. Lucie	95	75,350	32	24,805	14	12,735
Sumter	27	15,910	14	11,525		
Suwannee	20	10,780	5	3,575	1	935
Union	7	3,625	2	1,740		
Volusia	204	114,020	68	60,830	17	12,625

Appendix 5: National Flood Insurance claims and payments.

National Flood Insurance Claims and Payments by County					
County	Claims Submitted	Building Payments	Content Payments	ICC Payments	Total Paid
Alachua	81	\$1,962,934	\$445,525	\$0	\$2,408,459
Baker	19	\$547,460	\$99,022	\$0	\$646,482
Bradford	81	\$1,738,819	\$462,910	\$0	\$2,201,729
Brevard	724	\$9,328,384	\$2,465,711	\$0	\$11,794,094
Broward	1,488	\$6,513,330	\$1,099,064	\$0	\$7,612,394
Charlotte	207	\$1,527,652	\$365,041	\$0	\$1,892,693
Citrus	16	\$21,301	\$0	\$0	\$21,301
Clay	750	\$28,431,892	\$6,904,213	\$0	\$35,336,105
Collier	2,469	\$22,735,778	\$4,443,588	\$0	\$27,179,367
Columbia	35	\$593,784	\$121,328	\$0	\$715,112
DeSoto	53	\$983,096	\$68,783	\$0	\$1,051,879
Dixie	2	\$0	\$0	\$0	\$0
Duval	1,927	\$56,649,678	\$11,982,272	\$0	\$68,631,950
Escambia	2	\$0	\$0	\$16,490	\$16,490
Flagler	690	\$17,807,231	\$4,522,155	\$0	\$22,329,386
Gilchrist	9	\$33,327	\$503	\$0	\$33,830
Glades	3	\$6,149	\$0	\$0	\$6,149
Hardee	23	\$557,239	\$134,332	\$0	\$691,571
Hendry	18	\$77,600	\$601	\$0	\$78,201

National Flood Insurance Claims and Payments by County					
County	Claims Submitted	Building Payments	Content Payments	ICC Payments	Total Paid
Hernando	64	\$627,553	\$145,029	\$0	\$772,582
Highlands	61	\$198,727	\$25,817	\$0	\$224,544
Hillsborough	276	\$2,314,081	\$427,773	\$0	\$2,741,854
Indian River	107	\$2,045,042	\$333,382	\$0	\$2,378,424
Lake	91	\$777,229	\$85,463	\$0	\$862,692
Lee	1,808	\$18,140,998	\$3,084,949	\$0	\$21,225,947
Leon	1	\$0	\$0	\$0	\$0
Levy	1	\$3,909	\$0	\$0	\$3,909
Manatee	87	\$199,561	\$10,500	\$0	\$210,061
Marion	55	\$1,443,658	\$181,918	\$0	\$1,625,576
Martin	43	\$519,607	\$93,704	\$0	\$613,311
Miami-Dade	3,451	\$25,522,046	\$5,261,215	\$0	\$30,783,261
Monroe	7,726	\$76,535,687	\$11,827,460	\$13,940	\$88,377,087
Nassau	170	\$2,504,986	\$631,345	\$0	\$3,136,331
Okeechobee	14	\$111,527	\$0	\$0	\$111,527
Orange	187	\$1,731,558	\$119,579	\$0	\$1,851,138
Osceola	158	\$1,494,704	\$230,674	\$0	\$1,725,378
Palm Beach	387	\$907,137	\$147,607	\$0	\$1,054,744
Pasco	171	\$2,288,172	\$99,971	\$0	\$2,388,143
Pinellas	197	\$192,095	\$10,759	\$0	\$202,854
Polk	234	\$3,034,383	\$912,317	\$0	\$3,946,700
Putnam	165	\$2,181,859	\$264,492	\$0	\$2,446,350
Sarasota	117	\$310,012	\$63,902	\$0	\$373,914
Seminole	190	\$2,472,654	\$466,582	\$0	\$2,939,236
St. Johns	1,572	\$25,912,970	\$3,528,503	\$0	\$29,441,474
St. Lucie	199	\$4,810,610	\$1,170,411	\$0	\$5,981,021
Sumter	16	\$70,570	\$15,445	\$0	\$86,014
Suwannee	3	\$0	\$0	\$0	\$0
Union	5	\$42,897	\$17,113	\$0	\$60,010
Volusia	888	\$17,536,047	\$3,329,542	\$0	\$20,865,590
Total	27,041	\$343,445,932	\$65,600,503	\$30,430	\$409,076,863

Summary Appendices

Appendices 6 through 10 display FEMA IA applicants by categories useful for understanding possible program enrollment, including ownership versus rental, age and access and functional needs.

Appendix 6: FEMA Applicant Breakdown by < 30 Percent Low/Moderate Income, Age, and Access/Functional Needs.

FEMA Applicant Breakdown by < 30 Percent Low/Moderate Income, Age and Access/Functional Needs			
FEMA IA Applicants	LMI < 30%	Over 65	AFN
Home	452,542	72,274	2,200
Owners	232,451	56,097	1,601
Renters	219,254	16,061	596
Not Specified	837	116	3
Mobile Home	72,166	11,768	308
Owners	41,440	9,751	249
Renters	30,538	1,982	59
Not Specified	188	35	

Appendix 7: FEMA applicant breakdown by < 30 percent low/moderate income, county and housing assistance received.

FEMA Applicant Breakdown by < 30 Percent Low/Moderate Income, County and Housing Assistance Received				
County	< 30% LMI			
	Applicants	Recipients	Amount Received	Average Received
Alachua	9718	1105	\$1,749,737	\$1,583
Baker	868	162	\$246,745	\$1,523
Bradford	1119	211	\$540,461	\$2,561
Brevard	21387	2793	\$5,829,414	\$2,087
Broward	90081	6976	\$10,875,717	\$1,559
Charlotte	4013	583	\$970,615	\$1,665
Citrus	4186	732	\$911,519	\$1,245
Clay	4649	647	\$1,886,015	\$2,915
Collier	24897	3609	\$8,279,614	\$2,294
Columbia	2810	427	\$691,157	\$1,619
DeSoto	1413	259	\$611,844	\$2,362
Dixie	687	124	\$204,215	\$1,647
Duval	44059	5822	\$9,783,549	\$1,680
Flagler	2710	379	\$953,962	\$2,517
Gilchrist	596	89	\$152,849	\$1,717
Glades	478	92	\$217,585	\$2,365

FEMA Applicant Breakdown by < 30 Percent Low/Moderate Income, County and Housing Assistance Received				
County	< 30% LMI			
	Applicants	Recipients	Amount Received	Average Received
Hardee	1234	221	\$429,249	\$1,942
Hendry	2720	411	\$886,018	\$2,156
Hernando	5561	792	\$1,362,122	\$1,720
Highlands	6199	1069	\$1,696,738	\$1,587
Hillsborough	51567	5977	\$8,324,047	\$1,393
Indian River	4024	469	\$845,307	\$1,802
Lafayette	312	74	\$69,303	\$937
Lake	11813	1576	\$2,407,796	\$1,528
Lee	38343	5982	\$9,530,547	\$1,593
Levy	1338	239	\$286,526	\$1,199
Manatee	11102	1446	\$2,153,692	\$1,489
Marion	14830	2774	\$3,738,777	\$1,348
Martin	3045	323	\$656,934	\$2,034
Monroe	158753	3920	\$20,504,948	\$5,231
Nassau	16030	315	\$628,326	\$1,995
Okeechobee	1907	206	\$460,316	\$2,235
Orange	1528	7301	\$9,776,784	\$1,339
Osceola	58683	1152	\$2,153,596	\$1,869
Palm Beach	12433	9565	\$15,424,345	\$1,613
Pasco	69433	2266	\$3,763,181	\$1,661
Pinellas	16490	7267	\$8,519,437	\$1,172
Polk	47685	4520	\$7,538,543	\$1,668
Putnam	30762	875	\$1,380,728	\$1,578
Sarasota	4473	1484	\$2,124,425	\$1,432
Seminole	10723	2695	\$3,772,860	\$1,400
St. Johns	16686	611	\$1,515,326	\$2,480
St. Lucie	4643	1275	\$2,886,320	\$2,264
Sumter	11170	428	\$807,302	\$1,886
Suwannee	2561	328	\$282,520	\$861
Union	1703	64	\$69,635	\$1,088
Volusia	423	3116	\$4,889,064	\$1,569
Grand Total	831,845	92,751	\$162,789,707	\$1,755

Appendix 8: FEMA applicant breakdown by < 50 percent low/moderate income, age and access/functional needs.

FEMA Applicant Breakdown by <50 Percent Low/Moderate Income, Age and Access/Functional Needs			
FEMA IA Applicants	LMI < 50%	Over 65	AFN
Home	693,436	113,396	3,949
Owners	348,018	90,695	3,122
Renters	344,291	22,538	822
Not Specified	1,127	163	5
Mobile Home	116,258	22,465	569
Owners	68,713	19,305	479
Renters	47,264	3,101	90
Not Specified	281	59	

Appendix 9: FEMA applicant breakdown by < 50 percent low/moderate income, county and housing assistance received.

FEMA Applicant Breakdown by <50 Percent Low/Moderate Income, County and Housing Assistance Received				
< 50% LMI				
County	Applicants	Recipients	Amount Received	Average Received
Alachua	4106	647	\$802,082	\$1,240
Baker	539	117	\$140,399	\$1,200
Bradford	636	157	\$468,655	\$2,985
Brevard	11420	1904	\$3,654,149	\$1,919
Broward	60678	4072	\$6,137,159	\$1,507
Charlotte	2196	363	\$563,703	\$1,553
Citrus	2283	491	\$537,294	\$1,094
Clay	2340	418	\$1,170,536	\$2,800
Collier	11820	2138	\$4,985,510	\$2,332
Columbia	1526	277	\$357,140	\$1,289
DeSoto	793	169	\$369,855	\$2,188
Dixie	341	73	\$93,252	\$1,277
Duval	21568	3433	\$5,725,673	\$1,668
Flagler	1484	275	\$654,082	\$2,378

FEMA Applicant Breakdown by <50 Percent Low/Moderate Income, County and Housing Assistance Received				
< 50% LMI				
County	Applicants	Recipients	Amount Received	Average Received
Gilchrist	327	59	\$75,343	\$1,277
Glades	275	60	\$110,275	\$1,838
Hardee	701	167	\$464,512	\$2,782
Hendry	1454	274	\$690,042	\$2,518
Hernando	2590	451	\$785,054	\$1,741
Highlands	3767	692	\$1,110,618	\$1,605
Hillsborough	21535	3149	\$4,162,517	\$1,322
Indian River	2182	314	\$559,414	\$1,782
Lafayette	148	39	\$29,936	\$768
Lake	6527	1082	\$1,489,999	\$1,377
Lee	18927	3546	\$6,096,106	\$1,719
Levy	708	151	\$148,170	\$981
Manatee	5782	957	\$1,405,295	\$1,468
Marion	8377	1897	\$2,453,878	\$1,294
Martin	1327	172	\$320,048	\$1,861
Monroe	116781	1943	\$10,029,870	\$5,162
Nassau	7203	187	\$434,585	\$2,324
Okeechobee	987	138	\$314,201	\$2,277
Orange	947	4665	\$6,099,459	\$1,307
Osceola	30768	810	\$1,584,943	\$1,957
Palm Beach	7034	5628	\$8,717,809	\$1,549
Pasco	31310	1389	\$2,019,213	\$1,454
Pinellas	8119	4070	\$4,775,310	\$1,173
Polk	21793	3064	\$4,951,220	\$1,616
Putnam	17300	571	\$801,537	\$1,404
Sarasota	2460	796	\$1,150,325	\$1,445
Seminole	4792	1631	\$2,123,482	\$1,302
St. Johns	8240	341	\$716,697	\$2,102
St. Lucie	1827	766	\$1,502,052	\$1,961
Sumter	6100	284	\$405,259	\$1,427
Suwannee	1417	205	\$251,406	\$1,226
Union	863	32	\$37,182	\$1,162
Volusia	221	2140	\$3,242,720	\$1,515
Grand Total	464,519	56,204	\$94,717,962	\$1,685

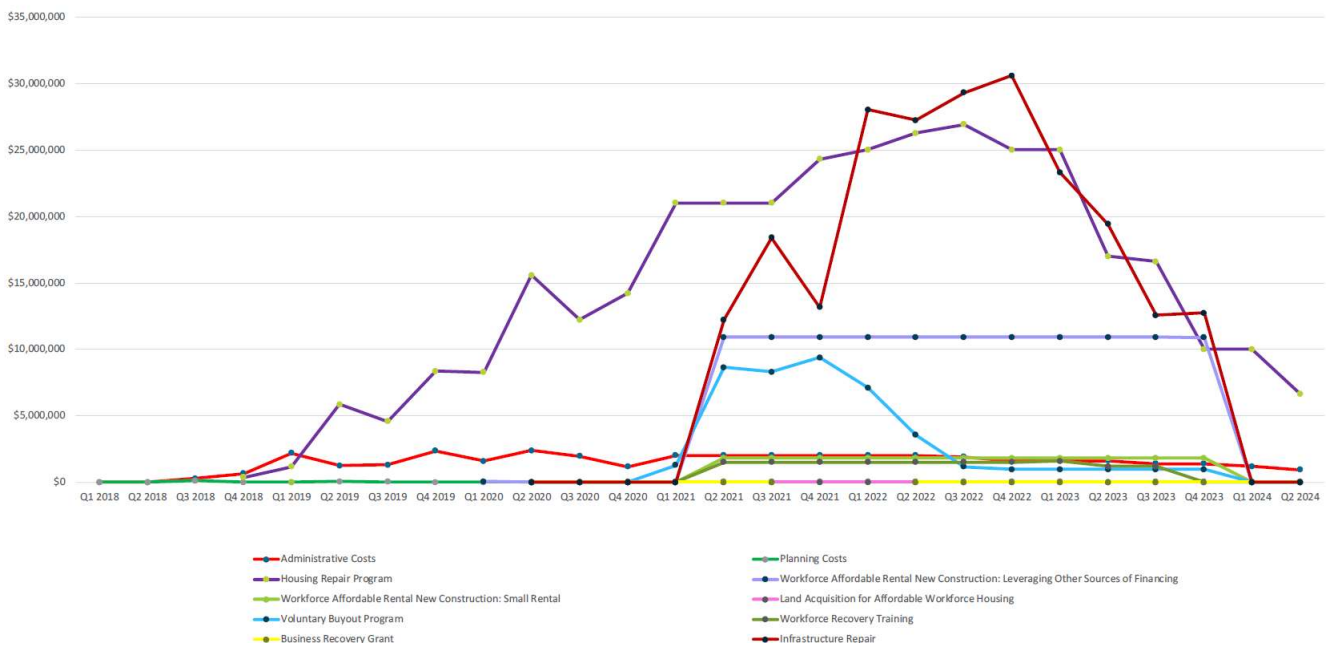
Appendix 10: FEMA applicant breakdown by < 80 percent low/moderate income, age and access/functional needs.

FEMA Applicant Breakdown by <80 Percent Low/Moderate Income, Age and Access/Functional Needs			
FEMA IA Applicants	LMI < 80%	Over 65	AFN
Homes	861,488	129,652	4,979
Owners	452,594	104,994	4,052
Renters	407,632	24,482	922
Not Specified	1,262	176	5
Mobile Home	140,291	26,804	705
Owners	85,403	23,276	601
Renters	54,547	3,453	104
Not Specified	341	75	

Appendix 11: Projected Expenditures

DEO has developed a performance and expenditure schedule that includes projected performance of both expenditures and outcome measures for programs, project delivery and administration activities shown in the graph below

Cost Category	3/31/2018	6/30/2018	9/30/2018	12/31/2018	3/31/2019	6/30/2019	9/30/2019	12/31/2019	3/31/2020	6/30/2020	9/30/2020
Q1 2018	Q2 2018	Q3 2018	Q4 2018	Q1 2019	Q2 2019	Q3 2019	Q4 2019	Q1 2020	Q2 2020	Q3 2020	Q4 2020
Administrative Costs	\$0	\$0	\$268,157	\$645,101	\$2,170,447	\$1,242,157	\$1,288,361	\$2,345,129	\$1,597,969	\$2,392,217	\$1,951,229
Planning Costs	\$0	\$0	\$109,772	\$0	\$0	\$45,266	\$12,557	\$3,251	\$5,916	\$4,435	\$4,902
Housing Repair Program				\$352,703	\$1,164,558	\$5,834,782	\$4,564,854	\$8,340,322	\$8,271,996	\$15,560,669	\$12,206,829
Workforce Affordable Rental New Construction: Leveraging Other Sources of Financing									\$35,571		
Workforce Affordable Rental New Construction: Small Rental Land Acquisition for Affordable Workforce Housing											
Voluntary Buyout Program											
Workforce Recovery Training											
Business Recovery Grant											
Infrastructure Repair											
Total	\$0	\$0	\$377,929	\$997,804	\$3,335,005	\$7,122,206	\$5,865,772	\$10,688,702	\$9,911,452	\$17,957,321	\$14,162,960
Cost Category	12/31/2020	03/31/2021	06/30/2021	09/30/2021	12/31/2021	03/31/2022	06/30/2022	09/30/2022	12/31/2022	03/31/2023	06/30/2023
Q4 2020	Q1 2021	Q2 2021	Q3 2021	Q4 2021	Q1 2022	Q2 2022	Q3 2022	Q4 2022	Q1 2023	Q2 2023	Q3 2023
Administrative Costs	\$1,159,857	\$2,000,000	\$2,000,000	\$2,000,000	\$2,000,000	\$2,000,000	\$2,000,000	\$1,888,914	\$1,600,000	\$1,600,000	\$1,600,000
Planning Costs	\$8,566	\$10,510	\$10,510	\$10,510	\$10,510	\$10,510	\$10,510	\$10,510	\$10,510	\$10,510	\$6,000
Housing Repair Program	\$14,211,376	\$21,000,000	\$21,000,000	\$21,000,000	\$24,288,624	\$25,000,000	\$26,250,000	\$26,906,250	\$25,000,000	\$25,000,000	\$17,000,000
Workforce Affordable Rental New Construction: Leveraging Other Sources of Financing		\$0	\$10,909,091	\$10,909,091	\$10,909,091	\$10,909,091	\$10,909,091	\$10,909,091	\$10,909,091	\$10,909,091	\$10,909,091
Workforce Affordable Rental New Construction: Small Rental Land Acquisition for Affordable Workforce Housing	\$0	\$0	\$1,818,182	\$1,818,182	\$1,818,182	\$1,818,182	\$1,818,182	\$1,818,182	\$1,818,182	\$1,818,182	\$1,818,182
Voluntary Buyout Program	\$0	\$1,259,325	\$8,641,931	\$8,299,048	\$9,371,082	\$7,087,912	\$3,537,192	\$1,160,168	\$952,116	\$952,116	\$952,116
Workforce Recovery Training	\$0	\$0	\$1,500,000	\$1,500,000	\$1,500,000	\$1,500,000	\$1,500,000	\$1,500,000	\$1,500,000	\$1,588,040	\$1,181,308
Business Recovery Grant											
Infrastructure Repair	\$0	\$0	\$12,204,045	\$18,373,132	\$13,168,180	\$28,023,617	\$27,232,775	\$29,303,370	\$30,574,130	\$23,312,377	\$19,408,575
Total	\$15,379,799	\$24,269,835	\$58,083,759	\$63,909,963	\$63,065,669	\$76,349,311	\$73,257,749	\$73,496,485	\$72,364,028	\$65,190,316	\$52,875,272
Cost Category	09/30/2023	12/31/2023	03/31/2024	06/30/2024	Total						
Q3 2023	Q4 2023	Q1 2024	Q2 2024								
Administrative Costs	\$1,400,000	\$1,400,000	\$1,200,000	\$930,362	\$38,679,900						
Planning Costs	\$10,000	\$10,000	\$10,000	\$19,566	\$344,819						
Housing Repair Program	\$16,586,707	\$10,000,000	\$10,000,000	\$6,646,476	\$346,186,147	*** Note: The balance of \$1,567,481 in the Planning Budget is under consideration to be redirected to the Housing Activity Delivery budget					
Workforce Affordable Rental New Construction: Leveraging Other Sources of Financing	\$10,909,091	\$10,873,520			\$120,000,000						
Workforce Affordable Rental New Construction: Small Rental Land Acquisition for Affordable Workforce Housing	\$1,818,182	\$1,818,182			\$20,000,000						
Voluntary Buyout Program	\$952,116	\$952,117			\$44,117,239						
Workforce Recovery Training	\$1,181,308				\$14,450,656						
Business Recovery Grant											
Infrastructure Repair	\$12,559,575	\$12,729,725			\$226,889,503	*** Note: \$40,839,905 Business Recovery Grant Funding was redirected to the Infrastructure Repair Program through Substantial Amendment 14***					
Total	\$45,416,979	\$37,783,544	\$11,210,000	\$7,596,404	\$810,668,264						



Appendix 12: 14 – day Public Comment Period for initial CDBG-DR Action Plan

Responses to Public Comments

This document describes the comments received from the public following the release of the initial CDBG-DR draft Action Plan. Each section addresses comments and questions that correspond to specific topics mentioned in the draft Action Plan.

- Release Date: April 20, 2018
- Comment Period: April 20, 2018-May 4, 2018
- Approved by HUD: June 28, 2018
- Number of Comments Received: 110

Comments were received via email. The duration of the public comment period as well as instructions for how public comment submissions were posted to the webpage and expressed in a webinar overview of the draft Action Plan. Recordings of all webinars can be found on the CDBG-DR official webpage at www.floridajobs.org/CDBG-DR.

Public Comments Related to Applications

1. Commenters asked for specific information regarding how to apply for the programs identified in the draft Action Plan. Commenters also requested clarification regarding the preparation of quality applications and the proper methods used to document a connection between damages and Hurricane Irma.

Staff response:

The draft Action Plan outlines programs the state plans to offer, using the initial allocation of CDBG-DR funds provided by HUD to Florida, to assist the state's long-term recovery from Hurricane Irma. HUD must approve the draft Action Plan before the state can access CDBG-DR funds and implement its proposed programs. The state continues to work on developing mechanisms to administer its proposed programs efficiently and effectively, which includes developing program applications, policies and procedures.

DEO recommends communities begin to gather existing data provided by local emergency management services, like FEMA, SBA and NFIP. Private insurance claims are also good examples of storm-related damage documentation. DEO will also consider other related reporting methods that demonstrate a connection to Hurricane Irma.

Once HUD approves the state's draft Action Plan and the mechanisms for administering proposed programs are in place, the state will use a variety of outreach methods to inform the public of the availability of funds and provide instructions on how to apply for the program. Please visit DEO's Disaster Recovery webpage, www.floridajobs.org/CDBG-DR, to be added to DEO's email distribution list.

2. A commenter requested that nonprofit organizations be listed as eligible applicants for funding to expedite dispersal of funds to communities they serve. The commenter referenced the work nonprofit organizations currently do to repair, reconstruct and/or replace the homes of Hurricane Irma victims. Commenters also suggested awarding extra points to applicants for collaborating with nonprofits. Many nonprofit

organizations that contacted DEO felt their direct involvement in the recovery process could help provide communities with a better understanding of the state's program goals.

Staff response:

DEO appreciates the work that nonprofits contribute to helping communities across the state recover. In addition, DEO will work with Volunteer Florida to continue its coordination with volunteer organizations that remain active throughout the long-term, recovery efforts. DEO will work with a vendor to manage the state-run housing program. Nonprofit organizations will be able to apply through a solicitation process for the rebuilding and reconstruction of homes. DEO will finalize applications and scoring criteria at a later date.

3. A commenter referenced the policies and procedures within DEO's implementation plan and requested clarification of applicant requirements.

Staff response:

DEO's implementation plan was submitted to HUD on April 13, 2018, for review. Once approved, DEO will provide guidance on next steps and requirements of applicants. DEO will create policies and procedures specifically for each program.

Public Comments Related to Community Outreach

4. DEO's draft Action Plan outlined various methods of community outreach. Commenters asked where DEO's webinars regarding Hurricane Irma are located online.

Staff response:

Staff presented a series of webinars between the periods of February 22, 2018, and April 25, 2018. These webinars introduced the CDBG-DR Program, explained Florida's unmet needs assessment and presented a high-level overview of the draft Action Plan. These webinar recordings are posted to the CDBG-DR webpage in the presentation section along with corresponding PowerPoint materials. The CDBG-DR webpage can be found here: www.floridajobs.org/CDBG-DR

Other helpful materials on the webpage include an explanation of the CDBG-DR Program and its goals, a summary of Hurricane Irma's impacts and DEO's next steps. The webpage also provides information on how to join the program's mailing list as well as a list of upcoming events.

5. Commenters stated that during community outreach, communities emphasized infrastructure needs and asked why the state's Action Plan did not prioritize infrastructure. Commenters requested a description of how the information gathered at outreach meetings was incorporated into the draft Action Plan.

Staff response:

DEO recognizes there are unmet needs related to infrastructure in communities around the state. As directed by federal guidance from HUD, DEO is addressing remaining unmet needs for housing. An additional allocation of \$791 million announced by HUD on April 10, 2018, will be used to support additional unmet needs, including infrastructure and mitigation efforts through the CDBG-DR Program. Funding for these programs will be addressed when federal guidance is released. DEO anticipated that a portion of this funding will go to the Infrastructure Repair and Mitigation Program. DEO created additional language to clarify how data from outreach meetings were incorporated into the Action Plan.

6. Commenters suggested the scope of the outreach efforts related to CDBG-DR should be broader. Commenters stated they could not find public notice of meetings and that it was concerning that the community outreach excluded residents and other organizations that work directly with vulnerable populations.

Staff response:

DEO worked with the most impacted and distressed counties and ZIP codes as identified by HUD in the Federal Register 5844, Volume 83, Number 23. DEO consulted with required stakeholders as directed in the federal guidance from HUD. DEO used local government outreach meetings, webinars and surveys along with the state's unmet needs assessment to help create program designs that would best serve the needs of the communities across Florida.

7. Commenters requested for the public comment period to be extended. Commenters also requested for DEO to continue community outreach and provide an opportunity for a public hearing. Lastly, commenters requested a timeline as well as procedures for appeals.

Staff response:

To ensure DEO submits the Action Plan to HUD by the deadline of May 15, 2018, DEO will not be extending the public comment period. DEO will continue to work with communities and provide outreach regarding the state's Action Plan and next steps and continue to receive input to best address unmet needs. If anyone wishes to be added to DEO's distribution list to learn more about upcoming events and announcements, please visit DEO's disaster recovery webpage at www.floridajobs.org/CDBG-DR.

Public Comment Related to Unmet Needs Assessment

8. Commenters requested clarification on CDBG-DR funding allocation, specifically for the most impacted and distressed communities.

Staff response:

Funding will be distributed across the 14 most impacted counties based on program demand, priorities and quality of eligible applications within each program. Understanding the significant need for recovery funding in the Florida Keys and the more complex local development process, DEO has set aside a minimum of \$90 million to address project needs of the Florida Keys.

Housing program intake centers managed by DEO will be strategically located across the impacted counties. Applications will be accepted online to ensure fair and equitable opportunities are available for all counties. The remaining 20 percent of \$110,865,960, will also be distributed across all other eligible counties through the same programs.

Please see the budget table on pages 81-82 of the draft Irma Action Plan for details.

Please see Section IV, Projects and Activities of the draft Irma Action Plan with specific attention to pages 79-82 regarding funding allocations.

Please also note as stated on page 82.

Florida will receive an additional \$791 million to support additional unmet needs, including infrastructure and mitigation efforts through the CDBG-DR program. Funding for these programs will be included in an amendment to this Action Plan when the federal guidance is released.

9. Many commenters asked for clarification on income limits, specifically if DEO planned to utilize the 2017 or 2018 income limits set by HUD.

Staff response:

DEO will utilize the most current income rates set by HUD each year.

10. Commenters voiced concern regarding the rising flood premium rates and their effects on property tax revenue for the community. Commenters felt that the state of Florida may need to recalculate the unmet need of flood hazard mitigation in high flood risk buildings.

Staff response:

DEO used the best available data in creating the unmet needs assessment for Florida. DEO recognizes the need for preparedness and mitigation as a priority in rebuilding areas that have been affected by Hurricane Irma. With the announcement of the additional \$791 million allocation, DEO will incorporate mitigation efforts to address the unmet needs of issues such as flood hazard mitigation in high flood risk areas. Additionally, DEO proposes a voluntary buyout program to encourage risk reduction through acquisition of residential property in high flood risk areas.

11. In the unmet needs assessment, there are two tables displaying data that show the impacts of Hurricane Irma. A commenter requested clarification on the difference between table 12 and table 15 within the Action Plan. Commenters also asked for clarification as to the source for this information and felt there were some discrepancies within the statistics.

Staff response:

Table 12 shows data on FEMA Real Property Verified Loss Determinations in the Florida Individual Assistance (IA) declared counties. These losses are damages to physical structures identified by FEMA upon inspection. Table 15 includes an estimate of Hurricane Maria households and includes all counties in Florida, not just the FEMA IA declared counties.

12. A commenter asked for clarification as to why Puerto Rican populations were classified as having unique needs.

Staff response:

During DEO's outreach efforts, communities expressed a need to help new Floridians from Puerto Rico through the provision of affordable housing and assistance with establishing their businesses in the state. These needs were also discovered during the state's unmet needs assessment. Recognizing this need, DEO proposed a program to help address the unique needs of Puerto Ricans as they relocate to Florida.

13. Commenters asked for additional clarification on table 21. Commenters felt that the FEMA IA allocation statistics were confusing and hard to understand.

Staff response:

DEO reviewed table 21 and made clarifications to the titles and overall layout of the table to make the data clearer.

Public Comments Related to Hurricane Maria Evacuees from Puerto Rico to Florida

14. DEO received comments that voiced confusion regarding a section of the unmet needs assessment that describes statistics for Hurricane Maria evacuees. Commenters requested clarification of age groups represented in the statistics. Commenters also requested to know if these evacuees are still located within the state of Florida. Commenters asked for clarification as to the source for this information and felt there were some discrepancies within the statistics and that these statistics were based on estimates rather than facts.

Staff response:

DEO used the best available data to determine the needs of the state as a result of Hurricane Maria evacuees from Puerto Rico to Florida. DEO used school enrollment data to determine the number of new students that have enrolled in schools across the state and used this data as a foundation to determine the overall number of families that evacuated as a result of Hurricane Maria.

Public Comments Related to Program Details

1. Many commenters requested clarification on whether DEO will be managing all activities or if activities will be managed locally. There were several requests to clarify how the funding will be provided to communities for programs and if there will be administrative aid to help with the execution of program activities. A commenter voiced objections to the program management being centralized at the state level. This commenter felt programming should be performed locally to better meet communities needs.

Staff response:

The Housing Repair Program will be centrally managed by DEO. For-profit and nonprofit developers or public housing authorities will be the primary applicants for the New Construction Rental program. Local governments may only apply for funding through these particular programs if they are partnering with experienced developers, however they will be able to apply for funding through all remaining housing programs.

2. A few commenters noted the draft Action Plan requires compliance with green building standards under the Florida Green Building Coalition. There were concern that the state of Florida was limiting itself to only utilizing one of the multiple HUD-accepted green building programs. Commenters voiced their desire for more options to be available.

Staff response:

DEO appreciates the comments regarding green building standards. It was recommended that DEO select one HUD-accepted green building program to reduce confusion and simplify the process for any potential federal audits.

3. The state received a request for clarification on utilizing CDBG-DR funds for rehabilitation, mitigation or new construction of Public Housing Authorities once other funding streams are fully exhausted, and if additional funding becomes available. The commenter voiced concerns on the potential limitations and caveats in this section.

Staff response:

Public Housing Authorities are able to apply for assistance through the Housing Repair Program for repair or replacement of rental properties.

4. A commenter voiced concern regarding the delays of processing applications when the draft Action Plan states that DEO will view “demonstrable hardship” on a case-by-case basis. A request was made for DEO to include clear criteria to ensure all individuals are treated equally. Clear criteria for all programs was also requested.

Staff response:

DEO appreciates the comment and will work to ensure that no delays in application processing occurs. Clear program criteria will be included in the forthcoming policies and procedures.

5. A commenter expressed the need for DEO to consider awarding additional points to programs that will include local and minority contractors, organizations that provide childcare and community services with outside funding, incorporate new technology and serve farm workers and their families.

Staff response:

DEO appreciates the comment regarding awarding additional points to certain programs based on the criteria mentioned above and will consider the request.

6. Commenters voiced concerns that the draft Action Plan did not sufficiently account for racial, ethnic or national origin. These concerns voiced the desires for DEO’s final Action Plan to combat existing inequality within the state of Florida.

Staff response:

DEO appreciates the concerns regarding accounting for racial, ethnic and national origin and has worked to ensure the final Action Plan for Disaster Recovery adequately addresses these issues.

7. A commenter requested to use pre-approved contractors and vendors to assist in the execution of the proposed draft Action Plan.

Staff response:

DEO will centrally manage the Housing Repair Program and will work with contractors and vendors directly to ensure the full execution of the program.

8. Commenters requested the state consider additional set-asides for other communities. These commenters explained the impacts within their specific communities and desire to receive enough funding.

Staff response:

Hurricane Irma made its first U.S. landfall as a Category 4 storm on Cudjoe Key, Florida. There are a large number of significantly-damaged structures in Monroe county and a high cost of rebuilding them to current resiliency standards. It is likely that without funding to support the rebuilding of homes and the construction of new affordable housing units, Monroe County's economy will experience major issues well into the future. DEO acknowledges the damage and impacts of the storm on other communities and has included 10 counties and four ZIP codes in the HUD-identified most impacted and distressed areas of the state. These 14 counties and communities will receive 80 percent of the total funding.

9. Several commenters voiced concern that the state's draft Action Plan did not provide enough assistance to those displaced by Hurricane Irma. Commenters requested DEO to provide low-income residents an option to return to their communities after being displaced.

Staff response:

DEO appreciates the concerns voiced regarding the displacement of low-income residents. DEO is working to minimize and address displacement by ensuring all projects and potential subrecipients follow the requirements set forth under the Uniform Relocation Assistance (URA) and Real Property Acquisition Policies Act.

10. Commenters requested clarity on duplication of benefits and how the state will ensure no duplication has occurred. Commenters expressed concerns that low-income families may be at a disadvantage in understanding the meaning of duplication of benefits. Commenters requested DEO elaborate on how they plan to inform the residents of this program requirement.

Staff response:

DEO will detail how we will conduct proper verification of benefits to ensure non-duplication in our forthcoming policies and procedures. DEO will work with a vendor to ensure residents and applicants understand all program and application requirements.

=

Public Comments Related to Housing Programs

11. Many commenters asked for clarification on DEO's proposed Housing Repair Program. There was confusion regarding which activities would be eligible within the program. Commenters also wanted to know much money would be allocated specifically to the HUD-identified "most impacted and distressed" communities in this program.

Staff response:

The proposed eligible activities under the Housing Repair Program include:

- Repairs to, reconstruction or replacement of housing units damaged by Hurricane Irma, which may include ensuring code compliance and mitigation against future storms.
- The completion of work to homes that have been partially repaired.
- Repairs to or replacement of manufactured homes impacted by Hurricane Irma.
- Temporary Housing Assistance based on individual household needs and their participation in the Housing Repair Program.
- Acquisition of substantially-damaged housing units for housing redevelopment, or buyouts of substantially-damaged properties may also be considered.

The counties and ZIP codes included in the HUD-identified “most impacted and distressed” will receive 80 percent of the total allocation.

12. Commenters also expressed confusion regarding the area median income parameters set within the Workforce Affordable Rental Program. Commenters requested clarification on whether these programs would be limited to only benefiting low- to moderate-income households.

Staff response:

Due to a national objective, a minimum of 70 percent of funds must benefit low- to moderate-income households.

13. A commenter requested clarification on the financing options for housing programs, specifically if the use of Low-Income Housing Tax Credit (LIHTC) would be required or if other methods, like a tax-exempt bond, could also be used. A few commenters also requested that DEO prohibit those receiving funds from refusing rent to tenants based off a tenant’s source of income.

Staff response:

For the Workforce Affordable Rental New Construction Program, other financing, including tax-exempt bond financing, will be allowed to leverage the CDBG-DR program. To serve tenants, DEO and subrecipients will comply with the requirements set forth in the Florida Fair Housing Act.

14. A commenter requested clarification of Florida Housing Finance Corporation (FHFC) ’s role in the Workforce Housing Program and if it would be administering funds directly to the communities.

Staff response:

FHFC will be administering funds directly to private for-profit and nonprofit developers and public housing authorities, as well as local governments partnering with these developers that apply for funding through the Workforce Affordable Rental New Construction Program.

15. Commenters requested clarification as to why there was not a program description for the proposed Land Acquisition Program in the draft Action Plan.

Staff response:

The Land Acquisition Program is being developed and will be included in the final Action Plan for Disaster Recovery.

16. A few commenters expressed concern with the state’s standards for elevating structures 2 feet above base flood elevation, compared to 3 feet above base flood elevation. Comments explained that the National Flood Insurance Program (NFIP) offers insurance premium discounts at a higher rate when structures are 3 feet above base flood elevation. There was also confusion on which counties and cities participated in the NFIP.

Staff response:

DEO will comply with the minimum height requirements set forth in the February 9, 2018, Federal Register Notice, and may elevate structures up to 3 feet above the base flood elevation for the subject property so that it qualifies for NFIP flood insurance premium discounts when it is cost reasonable for the state to do so, and when it does not create other conflicts.

17. A commenter expressed concern with the state's proposed plans to repair manufactured homes. The commenter references Monroe County's vulnerability and is concerned that mobile homes in the county would not be eligible for replacement. The county feels that as long a mobile home meets the Florida building codes and floodplain regulations, it should be eligible for replacement. Other commenters requested for specific funding to be set aside to repair these homes.

Staff response:

The proposed Action Plan allows for either the repair or replacement of manufactured homes damaged by Hurricane Irma.

18. A commenter requested clarification on the Home Buyout Program proposed by the state. There was confusion on what the applicants would be required to do with the land, such as if it was permissible to turn land into open green space or if new construction would be permitted?

Staff response:

The purpose of the Voluntary Home Buyout Program is to encourage risk reduction through the acquisition of residential property in high flood risk areas. Applicants for this program will be able to leverage either CDBG-DR funds as a match for projects that are also eligible for the Hazard Mitigation Grant Program (HMGP), or work directly with DEO on projects located in low- and moderate-income areas in support of turning the acquired land into an open space that supports green infrastructure or other floodplain management systems.

19. Clarification was requested on the summary of eligibility requirements for the Housing Repair Program.

Staff response:

The summary of eligibility requirements section of the Housing Repair Program details the additional eligibility requirements needed in order for homeowners and owners of rental properties to be served. The criteria includes: documented storm damage from Hurricane Irma, a primary focus on single-family owner-occupied homes and a clarification that all applicants must be owners of either a single-family home, manufactured/mobile home or rental property located in one of the HUD and state-identified most impacted and distressed counties and communities.

20. There were some concerns about the affordability period in the Housing Repair and Replacement Program and the Workforce Affordability Rental New Construction Program. The commenter believes that 50 years would be a better option for an affordability period. Commenters also requested more clarity when defining affordability and affordability requirements. Commenters felt data and budgets should reflect categories of 30 percent area median income (AMI), 30-50 percent AMI and 50-80 percent AMI. Overall, there was concern voiced that the proposed housing programs would not provide the adequate resources for accessible housing assistance to homeowners, renters and those experiencing homelessness within the impacted communities.

Staff response:

DEO appreciates the comments regarding the minimum affordability period and AMI categories. DEO has followed HUD guidance on minimum affordability periods for single family rental units will be a minimum of 1 year, unless local governments have established higher affordability periods. Public Housing Authorities seeking rehabilitation or reconstruction of multifamily housing units must ensure that the assisted rental property remains affordable for LMI tenants for a minimum of 15 years (if eight or more units).

21. Commenters requested the state's proposed plan further address the needs for transitional housing and needs of vulnerable populations, such as homelessness. Commenters suggested that the state should not refer vulnerable populations, who are not served under the current draft Action Plan programs, to other specialized service providers. These commenters felt that DEO needed to exercise more outreach in this area before submitting the final Action Plan to HUD. Commenters also felt that the draft Action Plan did not provide enough resources for renters or give enough attention to the elderly.

Staff response:

DEO appreciates the comments and concerns regarding transitional housing and vulnerable populations and will consider these comments and suggestions when finalizing the Action Plan. In addition, please note the prioritization criteria for the Housing Repair and Replacement Program on page 86, which prioritizes vulnerable populations and renters.

22. A commenter requested flexibility in small rental projects, requesting assurance that adequate funding would be provided for applicants in the small rental projects category. There was also a request for general flexibility in local design of each program.

Staff response:

DEO appreciates the concerns voiced regarding flexibility in small rental projects and will take this into consideration when finalizing the Action Plan.

Public Comment Related to Economic Revitalization

23. There was a need for clarification regarding participation with the Business Recovery Grant Program. Commenters requested information on how the county, local businesses and nonprofit organizations could give assistance and provide services to Puerto Rican clients in the Business Recovery Grant Program proposed by DEO. Commenters also requested clarification on how to contribute resources as leverage within this program.

Staff response:

New Floridians from Puerto Rico are eligible for assistance through the Business Assistance to New Floridians Program. This will likely be a competitive process that allows organizations to submit proposals outlining resources they can offer to assist new Floridians.

Public Comment Related to Infrastructure

24. Several commenters requested more funding to address infrastructure needs with the pressure to prioritize housing projects for local mitigation. Commenters wanted clarification as to whether funding for infrastructure would be available under the current Action Plan and if DEO plans to re-evaluate the unmet need for infrastructure. A commenter stated that table 27 within the Action Plan created confusion on the unmet need for infrastructure.

Staff response:

The state acknowledges that there is a need for infrastructure projects within the draft Action Plan. In the federal guidance released by HUD, it was determined that housing programs needed to be the main focus for the initial allocation of funding.

In April 2018, HUD announced Florida will receive a second allocation of \$791 million to support additional unmet needs, including infrastructure and mitigation efforts through the CDBG-DR Program. Funding for these programs will be included when the federal guidance is released.

25. A commenter requested additional clarification on the section titled “Use of CDBG-DR as Match” under infrastructure activities. Particularly, they asked how this match funding is awarded and whether it is separate from the Housing Repair Program.

Staff response:

The state recognizes that the existing federal infrastructure programs require the state or local government to provide matching funds. CDBG-DR funds can be used to cover all or part of those matching funds. The Infrastructure Program will be separate from the Housing Repair Program and will have its own rules and guidance. Additional guidance on this program, the application process, eligibility and program management will be defined after the Action Plan is approved.

26. A commenter requested the definition of broadband infrastructure and requested the definition to be placed within the Action Plan.

Staff response:

HUD defines broadband infrastructure as, “a common term referring to very fast connection to the Internet. Such connections are also referred to as high-speed broadband or high-speed Internet.” This definition has been added within the Action Plan.

27. A clarification to the maximum assistance per beneficiary was requested for the infrastructure section.

Staff response:

The state has a cap of \$150,000 per beneficiary for Housing Assistance Awards. The state acknowledges that infrastructure projects cost more money and benefit more people than a single house, so the state will allow the applicant jurisdictions to determine what the maximum assistance per applicant will be as part of their proposal. DEO will review these proposals and may use this information in determining award amounts.

Public Comment Related to Language Accessibility

28. Commenters stated that the draft Action Plan was only available in English and Spanish, and did not address Limited English Proficient (LEP) Floridians. Commenters suggested that the primary language in many of the low-income communities in the affected areas is Creole and felt that this lack of language accessibility did not allow DEO to gather accurate feedback from these communities.

Staff response:

DEO will provide a Creole translation of the final Action Plan along with other identified languages that meet the required threshold. DEO has also included interpretive and translation services on the CDBG-DR official webpage informing citizens in 15 different languages that translation services are available upon request. DEO will be happy to continue to work with the Creole community and other stakeholders to discuss the plan and programs.

Public Comment Related to Stylistic and Grammatical Recommendations

29. Several commenters addressed stylistic and grammatical issues within the document. A few communities requested the state to use updated numbers and different illustrations to better show their direct impacts from Hurricane Irma.

Staff response:

DEO acknowledges each recommendation made. Several adjustments were made to make tables and charts easier to comprehend and interpret. The few typos and grammatical errors have been corrected. Additionally, all counties have been included in the correct tables.

DEO used the best available data set at the time to display the direct impacts from Hurricane Irma.

Appendix 13: 30 – day Public Comment Period for Substantial Amendment 1

Responses to Public Comments

This document describes the comments received from the public following the release of the initial CDBG-DR draft Action Plan. Each section addresses comments and questions that correspond to specific topics mentioned in the draft Action Plan.

- Release Date: October 8, 2018
- Comment Period: October 9, 2018-November 8, 2018
- Approved by HUD: March 1, 2019
- Number of Comments Received: 51

Comments were received via email. The duration of the public comment period as well as instructions for how public comment submissions were posted to the webpage and expressed in a webinar overview of the draft Action Plan. Recordings of all webinars can be found on the CDBG-DR official webpage at www.floridajobs.org/CDBG-DR.

1. A few commenters requesting that Leadership in Energy and Environmental Design (LEED) measures are added to the housing Repair and Replacement Program with existing Green Building Standards.

Staff Response: DEO has reviewed and considered this request. DEO will continue to work to comply with the Green Building Standards for all new construction with Florida Green Building Coalition. The Green building standards will remain since it is HUD approved, meets all resiliency measures and is at a reasonable cost.

2. A commenter asked DEO to consider non-profit organizations in the Housing Repair and Replacement Program.

Staff Response: The Housing Repair and Replacement Program is available to homeowners and owners of rental properties. If a non-profit organization meets these criteria they are eligible to register for the program. DEO encourages non-profits to stay up to date with marketplace.myflorida.com for potential partnership opportunities.

3. A commenter requested that local governments have an opportunity to partner with for-profit and non-profit developers. They asked if they would be informed of Florida Housing Finance Corporation's competitive application release and any associated workshops. They asked if the jurisdictions will be a part of the evaluation committee for projects in their area and would DEO be encouraging the developers to collaborate with local governments?

Staff Response: DEO and Florida Housing encourages developers to participate in all workshops associated with collaborate with local governments the workforce affordable rental program and land acquisition program. To receive updates about these programs you can view the following link: <https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2018/community-development-block-grant-disaster-recovery-programs>

4. DEO received a comment from Monroe County asking for clarification on how the Rate of Growth Ordinances affects affordability periods.

Staff Response: Owners of rental properties must keep properties affordable for LMI tenants for the required affordability period. The affordability periods for single family rental units will be a minimum of 1 year, unless local governments have higher affordability periods. Insuring that rehabilitated or reconstructed multi-family rental housing units (8 units or more) must remain affordable for a minimum of 15 years. Special consideration may be given to the Florida Keys on a case by case bases.

5. DEO received a comment requesting consideration to allocate additional funds into the economic revitalization sections to harden and improve properties.

Staff Response: DEO appreciates the comment and concerns of taking resiliency measures with the \$157 million. Florida anticipates receiving \$634 million to support additional unmet need including infrastructure and mitigation efforts through the CDBG-DR Program. It is anticipated that this additional funding, could potentially be used to harden and improve property and structures.

6. DEO received a comment requesting that Monroe County exemption language increase per unit funding cap which was added to the Housing Repair and Replacement program and the Workforce Affordable Rental New Construction: Leveraging CDBG-DR Funds with Other Sources of Financing and the Land Acquisition for Affordable Workforce Housing. They also requested that the Florida Housing Finance Corporation acknowledge this increased per unit funding cap in their program documents.

Staff Response: Florida Housing Finance Corporation is willing to consider increasing the per unit limit amount. To do so, potential applicants must submit sufficient and specific information that justifies the need through public comment. Public comment can be submitted here: <https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2018/community-development-block-grant-disaster-recovery-programs/public-comments>.

7. DEO received comments stating that the funding should be used to help renters with low-to-moderate income households. They stated that resources should be put towards direct assistance to impacted renters before we diverted the funds to infrastructure projects.

Staff Response: DEO recognizes the importance of meeting the remaining unmet housing needs throughout Florida. Based on our unmet needs assessment and community feedback, DEO recognizes there is also a need for infrastructure activities. \$85 million of the additional \$157 million will go towards infrastructure needs that benefit low-to-moderate income households. The total housing budget for the Housing Repair Program, Workforce Affordable Rental New Construction, Land Acquisition and Voluntary Buyout is approximately \$556 million out of the \$773 million. All of these programs assist housing needs within the state.

8. DEO received comments stating how DEO plans to ensure a cost-effective system for replacing mobile or manufactured homes with high quality homes and that the resources for repair and replacement of homes and infrastructure fixes benefit the low-income residents. They wanted to ensure that the recover dollars are not incentivizing displacement of low-income residents through increases in lot rental amounts or fees.

Staff Response: Mobile/manufactured Homes Units (MHU) are eligible for rehabilitation under this program. The MHUs that need to be rehabilitated must be no more than five years old at the time of assistance. To remain

cost effective, repairs will not exceed \$15,000. If the MHU is older than 5 years or exceeds \$15,000 in repair, the unit will be replaced with another mobile or manufactured home. To insure the quality the MHU must be a new, unused unit that meets HUD & Energy Star compliance with a handicap accessible design that will obtain the necessary wind zone requirements. If the unit is on a property in a flood zone, DEO will elevate the unit up to 3 feet before replacing the unit with a stick built home. DEO is working to minimize and address displacement by ensuring all projects and potential subrecipients follow the requirements set forth under the Uniform Relocation Assistance (URA) and Real Property Acquisition Policies Act. Additionally, the housing and replacement program is a state directed program. The program will pay contractors directly and no funds will be paid to the homeowner for the repair, reconstruction or replacement of the damaged property. It is open to homeowners and owners of the rental properties with the condition that it is agreed upon to meet affordability requirements as prescribed in the Federal Register and the State of Florida Action Plan for Disaster Recovery.

9. Some commenters stated that the State of Florida Action Plan for Disaster Recovery fails to analyze racial disparities in funding. Commenters wanted to be sure the action plan is meeting the needs of communities of color and should describe impacts below the county level a functional racial impact analysis that truly evaluates impact on ethnically concentrated areas, for example, can only occur if the demographic information is made at the most granular level.

Staff Response: DEO has taken the comment into consideration. On November 11, 2018 DEO scheduled a call with Community Justice Project and the Hurricane Recovery Coalition to address concerns on the impacts to ethnically concentrated areas. The state was able to alleviate concerns by clarifying that DEO will monitor each program during implementation to ensure there will not be disadvantages between participants in the program. DEO conducted its analysis based off the best data available at the time, and will continue working closely with advocacy groups to ensure that all programs will adequately serve all protected classes. Additionally, the action plan seeks to comply with all applicable regulations set forth by HUD in FRN Vol. 83, No. 28. Table 4 profiles socio-economics and demographics across Florida's Hurricane Irma impacted counties. Most of Florida's 20 million people (92 percent) reside in the impacted area covered in this assessment. The population characteristics of those impacted differs in a few notable ways from the overall state population. First, the areas impacted by Hurricane Irma have a greater percentage of older residents (23 percent) per county than the entire state of Florida (20 percent). These impacted counties also have more occupied housing units, more people with disabilities, lower median and per capita incomes and more people living in poverty than the state as whole.

10. DEO received comments on the need for direct assistance to displaced renters through the Disaster Housing Assistance Program (DHAP). They stated the action plan does not adequately address the needs of tenants who were displaced due to hurricane damage and need housing assistance now. They recommended providing direct rental assistance that can be extended for up to 48 months while renters wait for new affordable rental housing to be constructed.

Staff Response: CDBG-DR funding is being used to meet the remaining unmet need from Hurricane Irma damage. DEO is working to minimize and address displacement by ensuring all projects and potential subrecipients follow the requirements set forth under the Uniform Relocation Assistance (URA) and Real Property Acquisition Policies Act. The Housing Repair and Replacement Program will repair, rebuild and replace qualifying homes damaged by Hurricane Irma, subject to sufficient funding availability and successful application by a homeowner. Additionally, DEO through the Workforce Affordable Rental: New Construction Program, DEO will provide new affordable rental units that could be available to support those people that

where displaced by the storm. The programs will provide two different opportunities to repair and rebuild housing units so tenants and homeowners have somewhere safe to return.

11. DEO received comments stating the allocation of funds for economic revitalization and infrastructure needs, unless this funding is also related to the housing needs. They also request that the language in the action plan reflect specifically: (1) identify how any remaining unmet housing needs will be addressed, and (2) identify how the economic revitalization and infrastructure activities will contribute to the long-term recovery and restoration of housing in the most impacted and distressed areas. The state action plan should also ensure that rebuilding plans address the infrastructure needs of all communities fairly, so that communities with inadequate infrastructure before the disaster emerge from the recovery process with an equitable level of infrastructure (roads, bridges, drainage, etc.) that will enable them to better weather future storms.

Staff Response: DEO recognizes the importance of meeting the remaining unmet housing needs throughout Florida due to Hurricane Irma damage. Based on our unmet needs assessment and community feedback DEO recognizes there is a need for infrastructure activities. Due to this need, DEO has decided to use approximately half of the additional funding under this supplemental award towards housing and the remaining funds for infrastructure. Please refer to comment number 6 addressing the breakdown of funding.

12. A commenter stated the CDBG-DR action plan should provide greater resources to address rental housing needs. The comment stated the Action Plan needs to set deeper income targeting within its rental housing programs to reach renters with the lowest incomes. As it stands, rental housing units have suffered four times as much damage as homeowner units throughout the state. This disparity, however, is not represented in the funding of programs; programs geared towards renters' unmet needs are funded at only a third of the level of homeowners-geared programs.

Staff Response: DEO recognizes the impact Hurricane Irma made on the rental housing market. The Rebuild Florida Housing Repair Program has allocated \$346 million that will benefit both homeowners and homeowners of rental properties, including multi-family properties as well as Public Housing Authorities. This program is intended to benefit unmet needs for renters.

13. DEO received a comment stating the Action Plan's proposal to address unmet housing needs. They state that Table 41 indicates the housing sector has the most remaining unmet need at nearly 65 percent, specific language should be added as to how DEO will specifically: "identify how unmet housing needs will be addressed," or how "infrastructure activities will contribute to the long-term recovery and restoration of housing in the most impacted and distressed areas."

Staff Response: DEO recognizes the importance of meeting the remaining housing needs throughout Florida. The total housing budget for the Housing Repair Program, Workforce Affordable Rental New Construction, Land Acquisition and Voluntary Buyout is approximately \$556 million out of the \$773 million. All of these programs assist unmet housing needs within the state. \$85 million of the additional \$157 million will go towards infrastructure needs that benefit low-to-moderate income households that will contribute to the long-term recovery and restoration of housing in the most impacted and distressed areas.

14. DEO received a comment stating that the draft substantial amendment should comply with Affirmatively Furthering Fair Housing (AFFH) obligation in allocating funds for the housing programs. Funding of programs

should comply with AFFH requirements in a manner that prevents displacement and provides impacted residents with the choice to stay in their existing communities or relocate to other desired locations.

Staff Response: DEO will continue to ensure all programs are in compliance with the Affirmatively Furthering Fair Housing (AFFH) Act providing communication, materials, and providing equal opportunity for everyone. DEO will develop policies and procedures for compliance with AFFH requirements during the implementation of this action plan. Policies and procedures will involve a review that will include an assessment of the proposed housing project area's demography, socio-economic characteristics, environmental hazards or concerns and other factors material to the AFFH determination.

15. A commenter stated the draft substantial amendment should provide a racial impact analysis of the damage from the storm and how resources will be allocated. The Federal Register allocation requires that the Florida Department of Economic Opportunity (DEO), as a grantee, "assess how planning decisions may affect members of protected classes, racially and ethnically concentrated areas, as well as concentrated areas of poverty." The requirement to assess the effects of planning decisions on members of protected classes and racially and ethnically concentrated areas should be incorporated into this Draft Substantial Amendment as "funds allocated under this notice and under the Prior Notice are subject to the requirements of this notice and the Prior Notice (as amended)." The February 2018 notice has language requiring an assessment of ethnically concentrated areas, which should also apply to funds from this most current allocation.

Staff Response: DEO appreciates this comment and has carefully taken the comment into consideration. DEO remains committed to serving LMI members of protected classes, racially and ethnically concentrated areas, as well as concentrated areas of poverty. Table 4 profiles socio-economics and demographics across Florida's Hurricane Irma impacted counties. Most of Florida's 20 million people (92 percent) reside in the impacted area covered in this assessment. The population characteristics of impacted homeowners differ in a few notable ways from the overall state population. First, the areas impacted by Hurricane Irma have a greater percentage of older residents (23 percent) per county than the entire state of Florida (20 percent). These impacted counties also have more occupied housing units, more people with disabilities, lower median and per capita incomes and more people living in poverty than the state as whole.

16. DEO received comments requesting the maximum affordability periods to address long-term affordability and maximize the federal investment. The comments asked that owners be required to disclose to residents the use of those funds to ensure long-term community resiliency. It was requested that the state establish a minimum affordability period of 5 years and permit longer affordability periods where required by local governments. The amendment proposes a 15-year affordability period for Public Housing Authorities for rehabilitation or reconstruction of multifamily units. While 15 years is permitted by the Federal Register Notice, given the mission of PHAs to provide housing for low income families, the affordability period for PHAs should be 20 years at a minimum.

Staff Response: DEO is upholding the minimum federal guidance by HUD to establish an affordability period with a minimum of 15 years for rehabilitation or reconstructed multifamily rental housing with eight units or less and 20 years for rental housing with 5 units or more for newly constructed multifamily rental housing.

17. A commenter stated the Federal Register notice requires that the Amendment define affordable rents. The Amendment provides that it is utilizing Florida Housing Finance Corporation's definition of affordable rentals

but the web site link included does not work. As such, those amounts should be appended to the substantial amendment so that the public can view and comment on them.

Staff Response: DEO has corrected the web link for the definition of affordable rents. Thank you for bringing this to our attention.

18. A commenter wanted to confirm that DEO will provide training to ensure that recipients of CDBG-DR funds comply with federal civil rights laws.

Staff Response: DEO will continue to ensure all programs comply with applicable federal regulations providing communication through materials and providing equal opportunity for everyone.

19. DEO received a comment regarding the 20 percent of funding allocated to the Florida Keys. What is the state's methodology for assessing the long-term economic impact of recovery efforts in the Key's? Was a similar methodology used for the other 13 communities impacted by the storms? In comparison to the other 13 communities was the level of damage and the resulting impact highest for Monroe County?

Staff Response: DEO recognizes that Hurricane Irma made landfall in the Florida Keys destroying approximately 1,200 homes. There are also 3,000 additional homes that received major damage. DEO created a set-aside for the Florida Keys when determining the program budget. This designation was based off community outreach data, strict building codes and limited available land that drives up the cost of residential development.

20. DEO received comments regarding maximum award amounts and unused funds. In reference to the Voluntary Home Buyout program, why is the estimated LMI benefit less than 70 percent? Also, the maximum award amount per community is \$5 million dollars for voluntary buyouts. If a community does not utilize the maximum award amount, how will the remaining funds be reallocated? The state appears to have also allocated \$5 million more than would be required to meet the maximum funding amount for 14 communities, i.e. the maximum amount required to distribute \$5 million to each of the communities would be \$70 million. The state currently has \$75 million allocated toward voluntary home buyouts.

Staff Response: 70 percent of CDBG-DR funds must serve LMI. The CDBG-DR buyout program will be required to meet a low-moderate area (LMA) benefit so that DEO meets or exceeds its overall LMI income support requirements. The Voluntary Buyout program takes into account that some areas across the state may not be LMI, however, these areas would benefit significantly from this program. All CDBG-DR programs are available to all communities impacted by Hurricane Irma with a set-aside for the Florida Keys. The \$5 million maximum award is not per MID community, but instead open to all counties and municipalities that received a declaration of both FEMA IA and PA after Hurricane Irma.

21. DEO received comments regarding the redistribution of unused program funds.

Staff Response: DEO will continue to reevaluate its unmet needs assessment. In the event a program has unused funds, DEO will use this data to determine where the unmet needs remain to reallocate the funding within existing programs in the action plan.

22. DEO received a request that the impacts to Lake Okeechobee from Hurricane Irma be included in the State of Florida's Action Plan to fund unmet needs through the HUD Community Development Block Grant Disaster Recovery (CDBG-DR) program.

Staff Response: DEO appreciates your comment. Okeechobee County is listed as a Florida Individual Assistance (IA) and Public Assistance (PA) County and therefore is eligible for 20 percent of the CDBG-DR funding. This 20 percent funding is available to all of the Florida IA and PA declared counties. Okeechobee County is encouraged to stay informed and register for any and all programs that apply to this funding.

23. DEO received a comment requesting clarification of original and additional most-impacted and distressed communities as reflected in Federal Register/Vol. 83, No. 28, Friday, February 9, 2018.

Staff Response: DEO has updated the Federal Register reference on page 91 to accurately reflect the correct Federal Register. Thank you for bringing this to our attention.

24. DEO received a comment as to how the announcement expanding the Most-Impacted and Distressed communities was made.

Staff Response: A second Federal Register Vol. 83, No. 157/ Tuesday, August 14, 2018 expands the MID areas to include 5 new counties and 8 new zip codes.

25. A commenter expressed concerns with how DEO proposes to allocate housing resources to benefit LMI households. The program budget estimates that 100 percent of the of the program funding for Workforce Affordable Rental New Construction Programs and the Land Acquisition for Affordable Workforce Housing will benefit LMI households. However, 90 percent of the program funding for the Housing Repair and Replacement Program (HRRP) will go to benefit LMI households and only 50 percent of the Voluntary Home Buyout Program. There is no explanation contained in the substantial amendment to the action plan to justify why these programs will not benefit 100 percent of LMI households nor is this supported by the data since the current funding allocations are not sufficient to address 100 percent of the need.

Staff Response: All housing activities for the HRRP will meet the national objective required under the authorizing statute of the CDBG program to benefit Low to Moderate Income (LMI) individuals. At least 70 percent of the funds will benefit these populations.

26. DEO received a comment in regards to allocating our funding for Tenant-Based Rental Assistance (TBRA) and prioritize households displaced by Hurricane Irma or Maria on waiting lists for Workforce Affordable Rental New Construction. Of the three rental housing needs listed in the Amendment, none of the proposed Housing Programs address the need to “assist currently displaced low- and moderate-income households.” As the Amendment recognizes, prior to the damage caused by Hurricane Irma, Florida was already experiencing an affordable rental housing shortage in several of the counties most impacted by the storm. In addition, many of the existing affordable rental units in impacted areas have long waiting lists. As such, we recommend providing TBRA that can be extended for up to 48 months while displaced households wait for new affordable rental housing to be constructed. Additionally, DEO should create a centralized waiting list for displaced LMI renters and owners who may qualify for Workforce Affordable Rental New Construction to be provided notice as such housing becomes available and to prioritize those households on waiting lists for such properties.

Staff Response: CDBG-DR funding is being used to meet the remaining unmet needs from Hurricane Irma damage. The Housing Repair and Replacement Program will repair, rebuild and replace any homes damaged by Hurricane Irma. Additionally, qualified and eligible applicants will be able to receive assistance to support

individuals that were displaced by the storm. The programs will provide two different opportunities to repair and rebuild housing units so tenants and homeowners have somewhere safe and affordable to return.

27. DEO received a comment regarding Affirmatively Furthering Fair Housing (AFFH).

The Draft Substantial Amendment should comply with AFFH's obligation to allocate funds for housing programs. Funding of programs should comply with AFFH requirements in a manner that prevents displacement and provides impacted residents with the choice to stay in their existing communities or relocate to other desired locations.

Staff Response: DEO will continue to insure all programs are in compliance with the Affirmatively Furthering Fair Housing (AFFH) act providing communication through materials and providing equal opportunity for everyone. DEO will develop policies and procedures for compliance with Affirmatively Furthering Fair Housing (AFFH) requirements during the implementation of this action plan. Such policies and procedures will involve a review that will include an assessment of the proposed housing project area's demography, socio-economic characteristics, environmental hazards or concerns and other factor's material to the AFFH determination.

28. DEO received comments regarding its information on impacts on special needs populations. A comment was made that this should include youth (between the ages of 13-24) who are experiencing homelessness or housing instability. Local Continuum of Care (CoC) recently approved its comprehensive plan to prevent and end youth homelessness in Miami-Dade County.

Staff Response: This section generally describes the sectors of our communities with individuals, including youth and children, who may have additional need related to accessing disaster recovery resources. The types of assistance offered through CBDG-DR grants is limited by many federal rules, regulations and the Federal Register Notices applicable to the funding allocation. The CDBG-DR grant will provide an opportunity for special needs populations through the stabilization of housing that has been affected by Hurricane Irma.

29. DEO received a comment to update its Transitional Housing/Homelessness data. The CoCs conduct annual point-in-time counts that HUD publishes. The definition(s) of "homeless" that the DEO is using should be identified.

Staff Response: DEO appreciate this comment and has included the recent data.

30. DEO receive a comment about the action plan's affordable housing language. The commenter recommended households who are on fixed incomes should also be considered when planning for and ultimately achieving sustainable growth in affordable housing.

Staff Response: DEO also recognizes that affordable housing is a serious issue for limited and fixed income populations. Though the analysis in this section focuses primarily on working families, the same and sometimes greater constraints, fall upon those with limited or fixed income. We have updated the action plan to include recognition of this fact.

31. DEO received comments for clarification to its housing impact methodology. Why is the category of "renters greater than 50 percent AMI with any kind of damage" excluded from the "drill down" on the unmet need calculation? This does not seem congruent with the Plan, which is designed to provide assistance to households with incomes at or below 80 percent of the AMI.

Staff Response: This description reflects the method of distribution as described by HUD in the Federal Register notice.

32. DEO received a comment regarding Public Housing, Affordable Housing and Housing for Vulnerable Populations. The commenter requests for DEO to clearly define "Workforce" as AMI. It should also be noted in the plan that the workforce captures individuals who are earning very-low and low-incomes. DEO should also consider the unintended consequences of allowing private multifamily owners to rehabilitate their properties without having guidance on re-renting the units to families within a certain AMI range. This commenter also has concerns of the inadvertent consequence of displacing low-to very-low income residents, including tenants without having guidance on re-renting the units.

Staff Response: Pursuant to CDBG-DR requirements, all affordable housing activities funded through the Rebuild Florida Housing Repair and Replacement Program will benefit at a minimum 70 percent low- to moderate-income individuals. Guidelines for each program have been developed requiring affordable rents for assisted units. DEO is working to minimize and address displacement by ensuring all projects and potential subrecipients follow the requirements set forth under the Uniform Relocation Assistance (URA) and Real Property Acquisition Policies Act.

33. DEO received a comment regarding Public Housing, Affordable Housing and Housing for Vulnerable Populations. The commenter strongly encouraged DEO to set aside funds for permanent supportive housing.

Staff Response: Due to the limited funding available, DEO has developed multiple eligible activities that span the multitude of needs demonstrated within Florida's communities. In addition to the option to provide new construction of transitional housing, more permanent housing options are also being funded. See description of current planned activities beginning on page 92.

34. DEO received a comment concerning Housing Activities definition of "workforce" as it relates to "affordable housing". Families who are working and earning incomes at 30, 40, or 50 percent of the AMI do not qualify for "workforce" housing as defined by the AMIs in HUD and/or local jurisdictions. The commenter requests for clarification from DEO to ensure that individuals earning incomes at 50 percent AMI and less will still qualify for all programs within the action plan, regardless of HUD's definition of "workforce".

Staff Response: Pursuant to CDBG-DR requirements, workforce housing will benefit low- to moderate-income individuals/households. This means that the program will benefit those earning 80 percent or less of AMI, which is inclusive of those either 30, 40, or 50 percent AMI.

35. DEO received a comment stating that the youth experiencing homelessness or housing instability be added to the Program Priorities.

Staff Response: DEO appreciates this comment. Based on the best available data sources, DEO has assessed the disaster-related need of Florida's communities. CDBG-DR funding, though flexible, does require adherence to HUD's CDBG eligible activities and requires a connection to the funded disaster. By providing housing programs to support the stabilization of disaster-affected individuals and households, DEO is maximizing the limited funding available to provide the broadest set of eligible housing activities that address the identified unmet need.

36. A commenter stated that public housing authorities should be added under Eligible Applicants.

Staff Response: DEO has clarified this language in its action plan.

37. DEO received a comment requesting set-asides for Miami-Dade County due to the size, number of people affected and the extent of the damage from Hurricane Irma.

Staff Response: DEO's impact and unmet needs assessment reflects the damage and impacts of the storm on other communities and has included 15 counties and 11 ZIP codes in the HUD-identified most impacted and distressed areas of the state. These communities will receive 80 percent of the total funding.

Appendix 14: 30 – day Public Comment Period for Substantial Amendment 6

Public Comments

This document describes the comments received from the public following the release of the CDBG-DR draft Action Plan Substantial Amendment 6.

- Release Date: March 18, 2020
- Comment Period: March 18, 2020 – April 17, 2020
- Approved by HUD: June 1, 2020
- Number of Comments Received: 0

The duration of the public comment period as well as instruction for public comment submissions were posted to the CDBG-DR official webpage at www.floridajobs.org/CDBG-DR.

Appendix 15: 30 – day Public Comment Period for Substantial Amendment 9

Public Comments

This document describes the comments received from the public following the release of the CDBG-DR draft Action Plan Substantial Amendment 9.

- Release Date: March 18, 2020
- Comment Period: March 18, 2020 – April 17, 2020
- Approved by HUD: June 1, 2020
- Number of Comments Received: 0

The duration of the public comment period as well as instruction for public comment submissions were posted to the CDBG-DR official webpage at www.floridajobs.org/CDBG-DR.

Appendix 16: 30 – day Public Comment Period for Substantial Amendment 10

Public Comments

This document describes the comments received from the public following the release of the CDBG-DR draft Action Plan Substantial Amendment 10.

- Release Date: May 13, 2020
- Comment Period: May 13, 2020 – June 12, 2020
- Approved by HUD: July 31, 2020
- Number of Comments Received: 0

The duration of the public comment period as well as instruction for public comment submissions were posted to the CDBG-DR official webpage at www.floridajobs.org/CDBG-DR.

Appendix 17: 30 – day Public Comment Period for Substantial Amendment 14

Public Comments

This document describes the comments received from the public following the release of the CDBG-DR draft Action Plan Substantial Amendment 14.

- Release Date: September 15, 2020
- Comment Period: September 15, 2020 – October 15, 2020
- Approved by HUD: November 19, 2020
- Number of Comments Received: 0

The duration of the public comment period as well as instruction for public comment submissions were posted to the CDBG-DR official webpage at www.floridajobs.org/CDBG-DR.



Florida Department of Economic Opportunity
107 East Madison Street | Caldwell Building | Tallahassee, FL 32399
www.FloridaJobs.org