

STATE OF FLORIDA

ACTION PLAN *for* DISASTER RECOVERY



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.

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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."

The State of Florida remains committed to helping Hurricane Irma and Maria impacted communities rebuild their lives, homes and businesses through the provision of disaster recovery funding through the Community Development Block Grant 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. 114-113, approved December 18, 2015) (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 hurricanes.

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, \$492,737,600 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, FDEM

Section 2: Florida Disaster Recovery Program

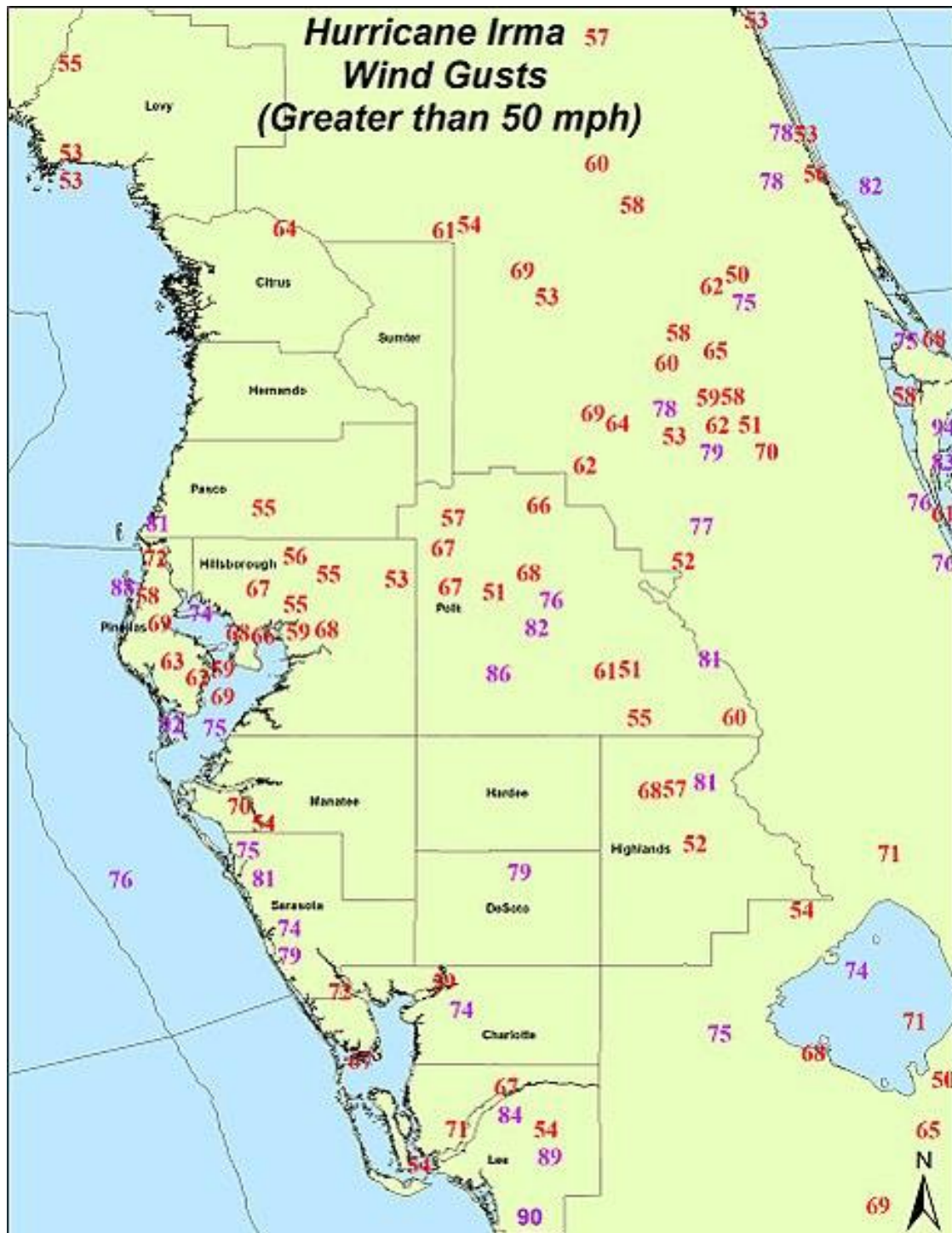
Community Profile: Summary of Impact and Presidentially Declared Counties

Hurricane Irma

Hurricane Irma was a Category 4 hurricane (on the Saffir-Simpson Hurricane Wind Scale) that 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

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.

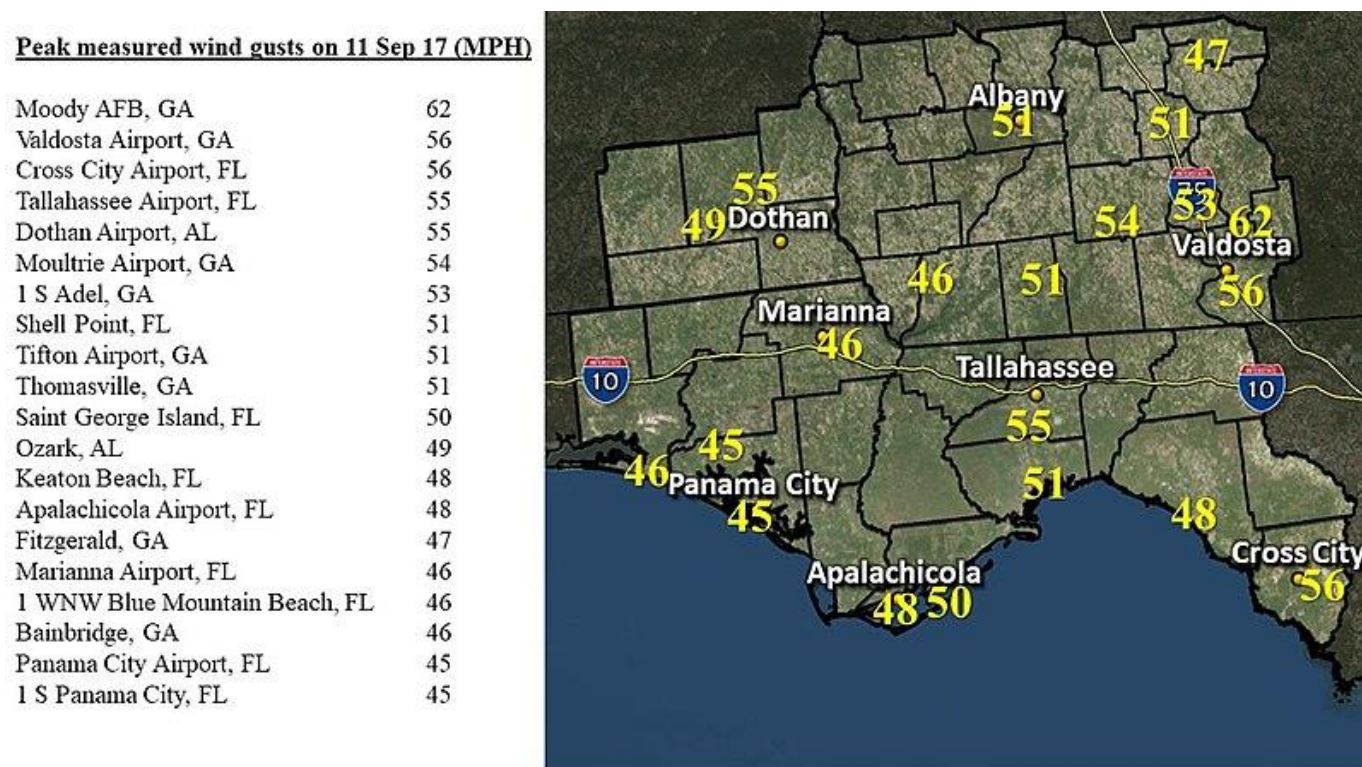


TABLE 2: MAXIMUM STORM SURGES FROM HURRICANE IRMA.

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

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

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

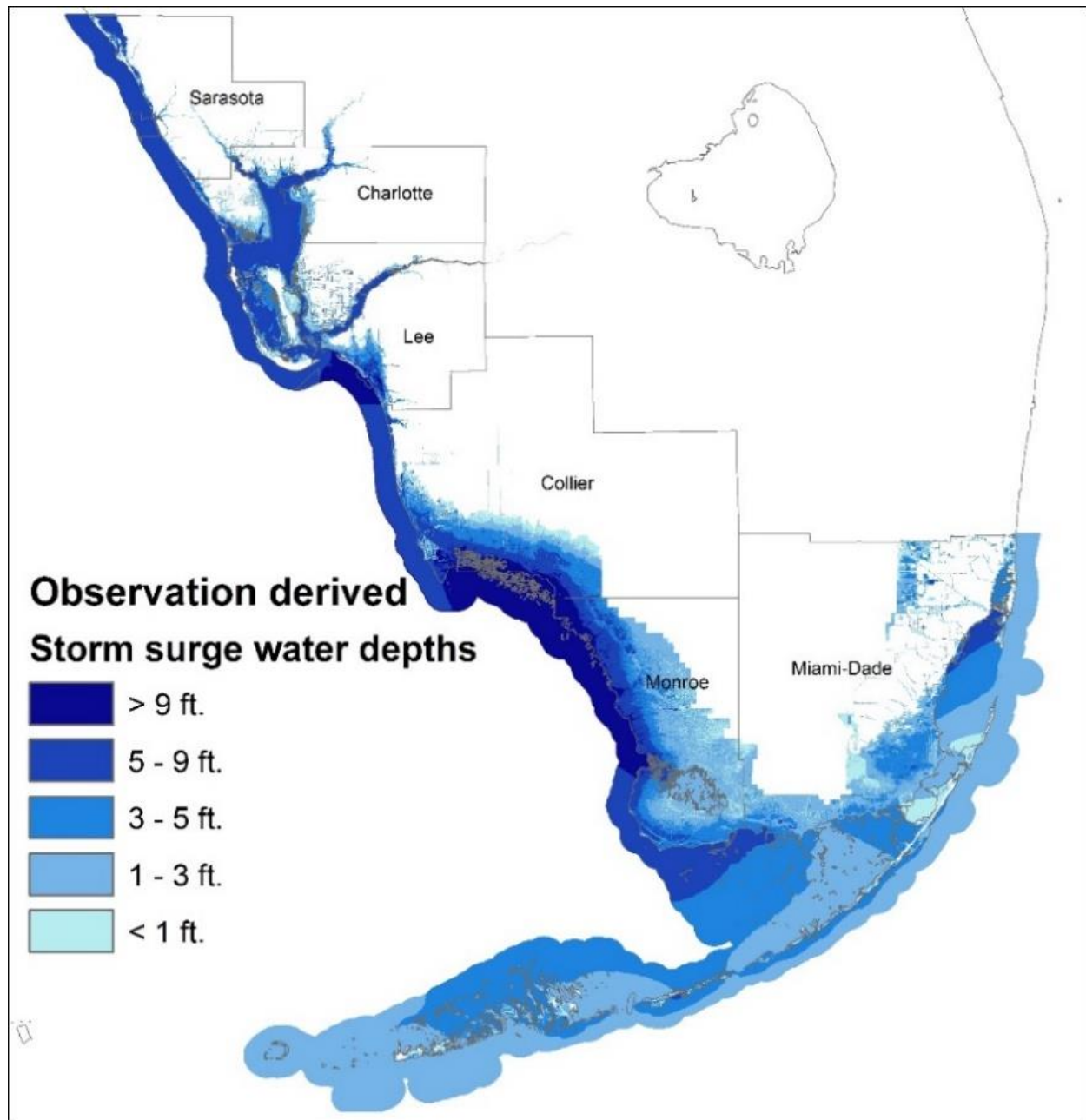


FIGURE 6: HURRICANE IRMA MODELED ESTIMATED FLOODING AROUND JACKSONVILLE, FL.

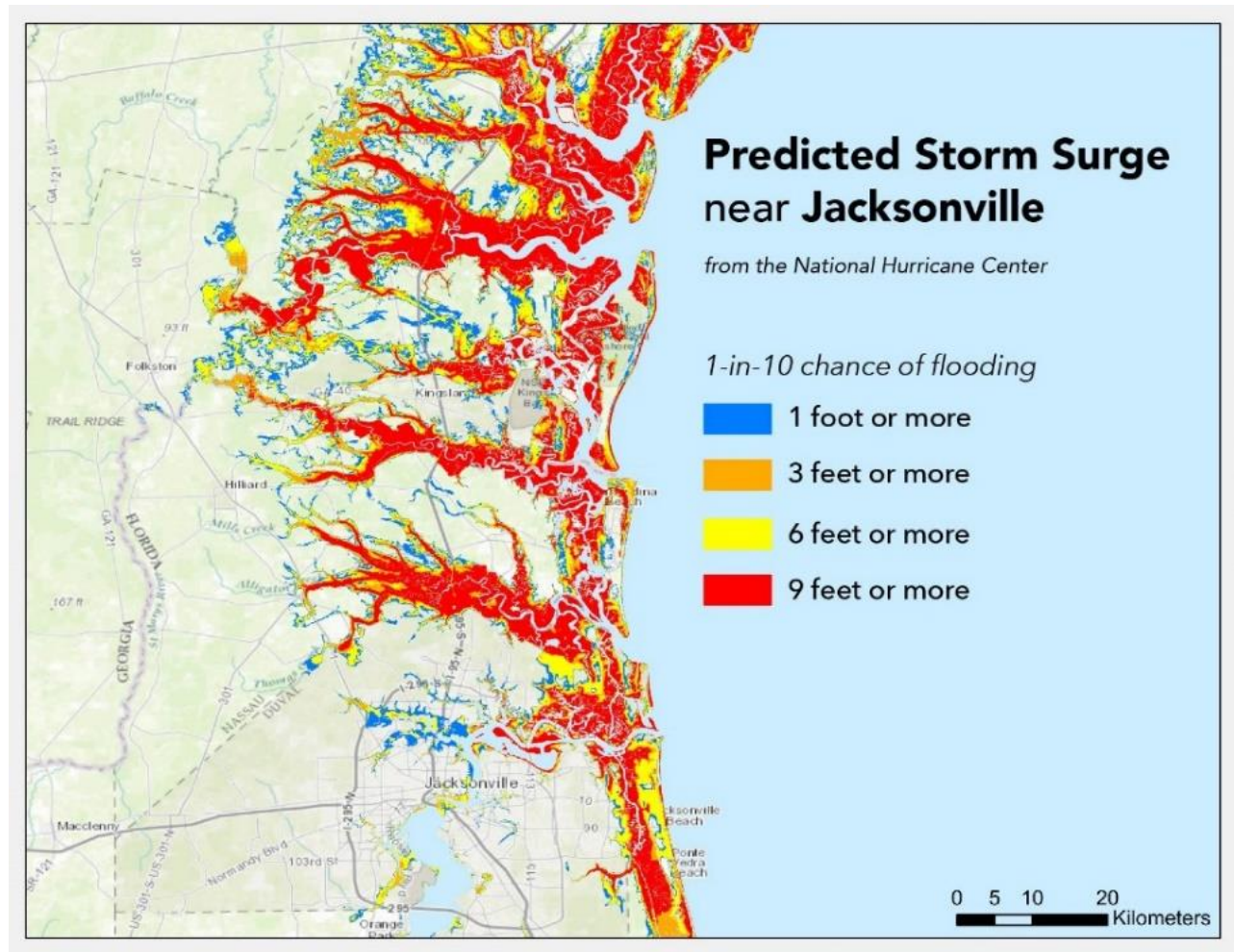
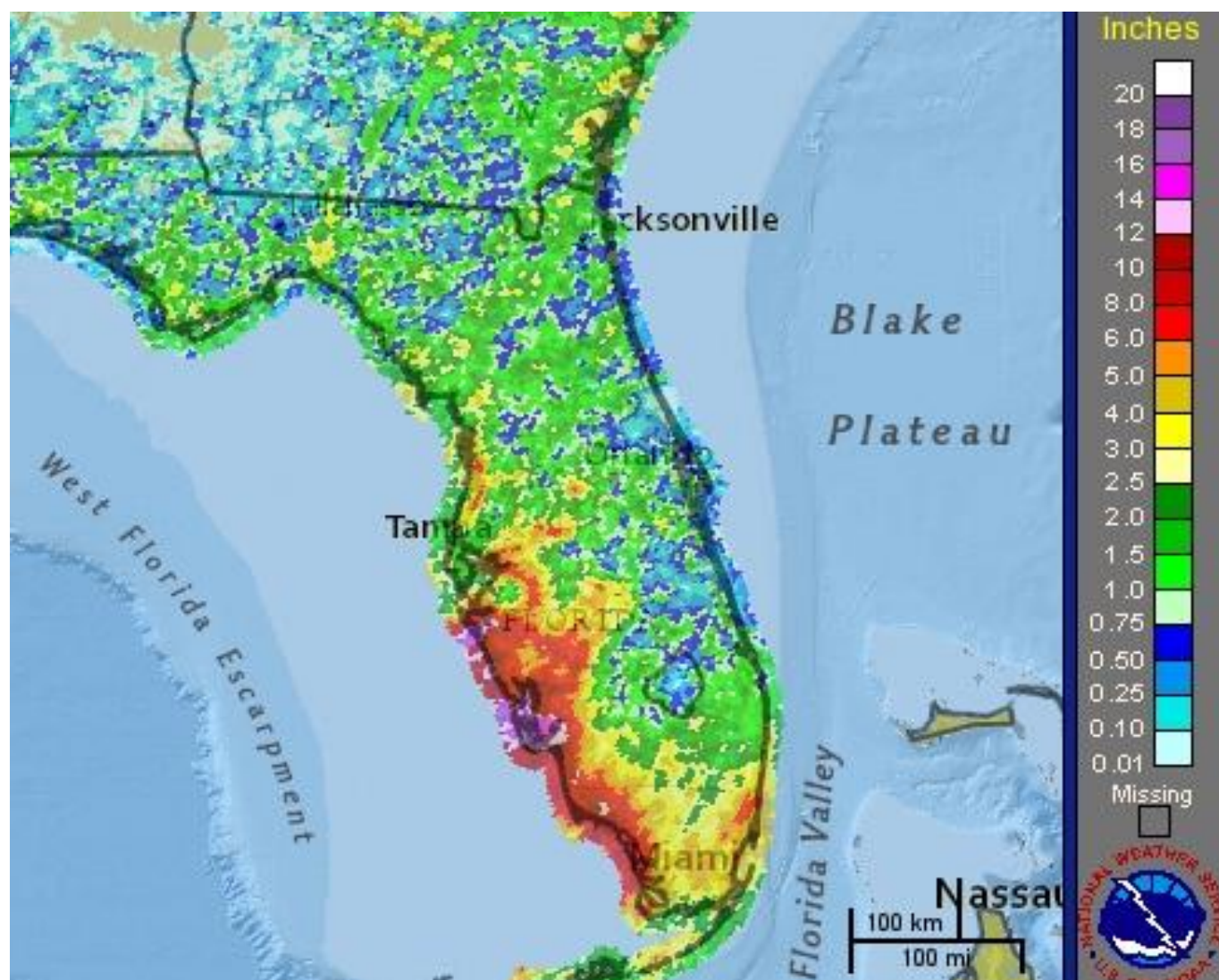


FIGURE 7: HURRICANE IRMA AND RAINFALL ESTIMATES⁶.



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, Collier, Dade, Duval, Lee, Miami-Dade, Monroe, Orange, Polk and Volusia counties and four separate zip codes outside of these areas (32136 in Flagler county, 32091 and 32068 in Bradford and Clay counties and 34266 in DeSoto county).

⁶ National Weather Service

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

Declared County List for Presidential Disaster Declaration 4337 (Hurricane Irma)			
County	Declaration Type	County	Declaration Type
Alachua	Individual and Public Assistance	Osceola	Individual and Public Assistance
Baker	Individual and Public Assistance	Palm Beach	Individual and Public Assistance
Bradford	Individual and Public Assistance	Pasco	Individual and Public Assistance
Brevard	Individual and Public Assistance	Pinellas	Individual and Public Assistance
Broward	Individual and Public Assistance	Polk	Individual and Public Assistance
Charlotte	Individual and Public Assistance	Putnam	Individual and Public Assistance
Citrus	Individual and Public Assistance	Sarasota	Individual and Public Assistance
Clay	Individual and Public Assistance	Seminole	Individual and Public Assistance
Collier	Individual and Public Assistance	St. Johns	Individual and Public Assistance
Columbia	Individual and Public Assistance	St. Lucie	Individual and Public Assistance
DeSoto	Individual and Public Assistance	Sumter	Individual and Public Assistance
Dixie	Individual and Public Assistance	Suwannee	Individual and Public Assistance
Duval	Individual and Public Assistance	Union	Individual and Public Assistance
Flagler	Individual and Public Assistance	Volusia	Individual and Public Assistance
Gilchrist	Individual and Public Assistance	Bay	Public Assistance Only
Glades	Individual and Public Assistance	Calhoun	Public Assistance Only
Hardee	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

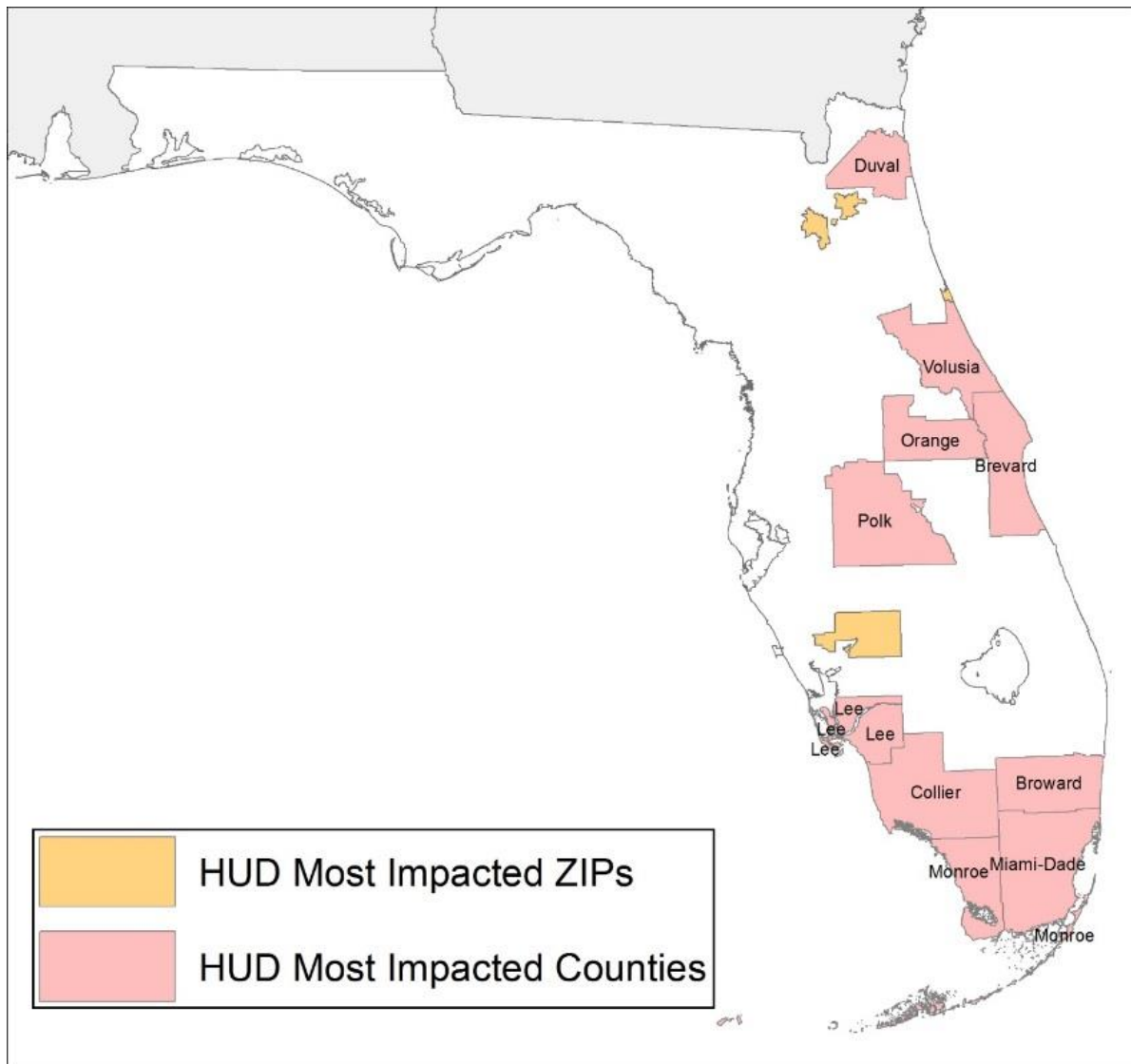
⁷ <https://www.fema.gov/disaster/4337>

Declared County List for Presidential Disaster Declaration 4337 (Hurricane Irma)			
County	Declaration Type	County	Declaration Type
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
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
Orange	Individual and Public Assistance		
Total		48 Individual and Public Assistance and 19 Public Assistance Only	

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



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



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 these hurricanes have a greater percentage of older residents (23 percent) per county than the entire state of Florida. 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
Building permits, 2016	107,885	116,240

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
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 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.

- 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 meets 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 9 through Figure 22 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		
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

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
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
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

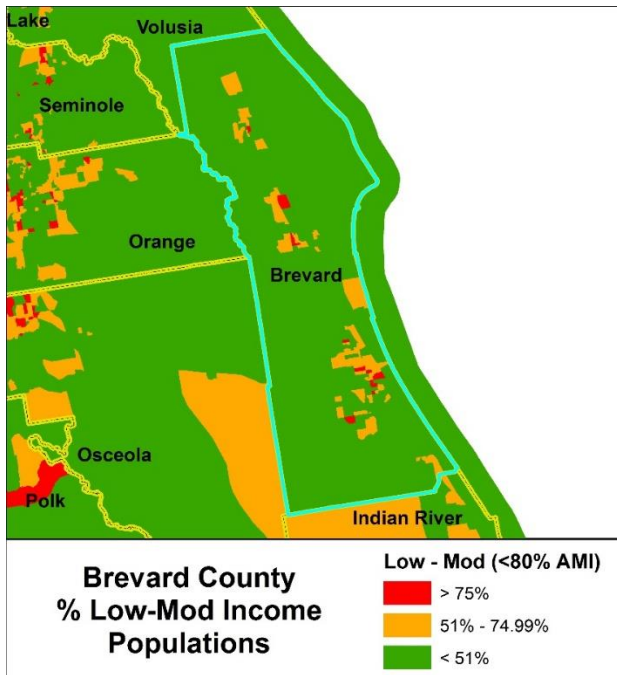


FIGURE 10: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – BREVARD COUNTY.

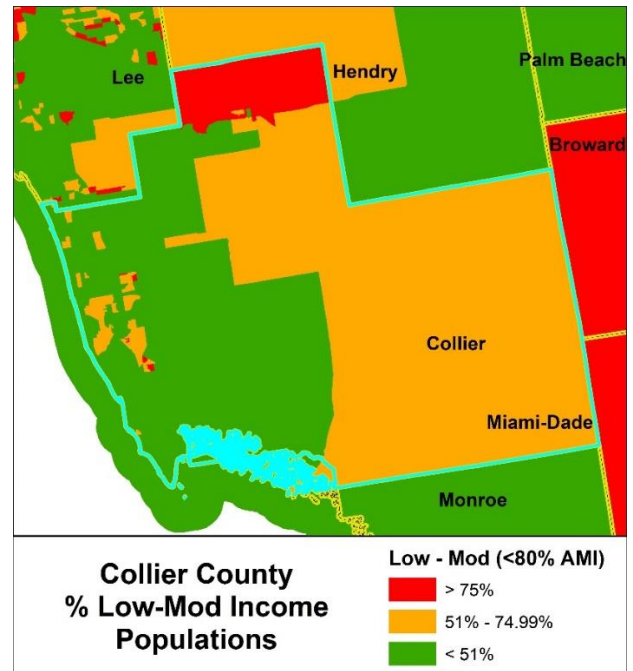


FIGURE 12: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – COLLIER COUNTY.

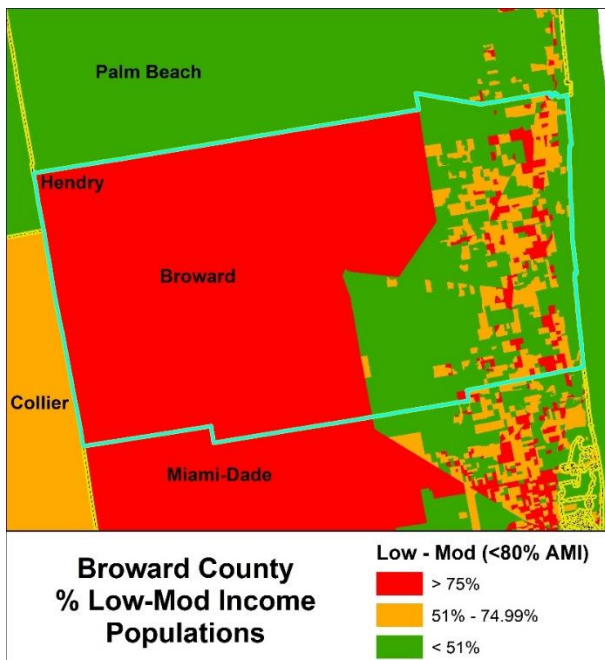


FIGURE 11: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – BROWARD COUNTY.

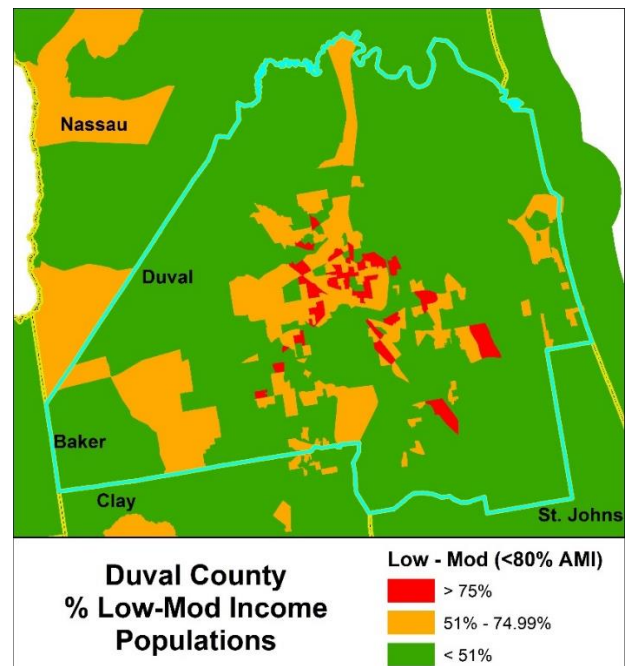


FIGURE 13: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – DUVAL COUNTY.

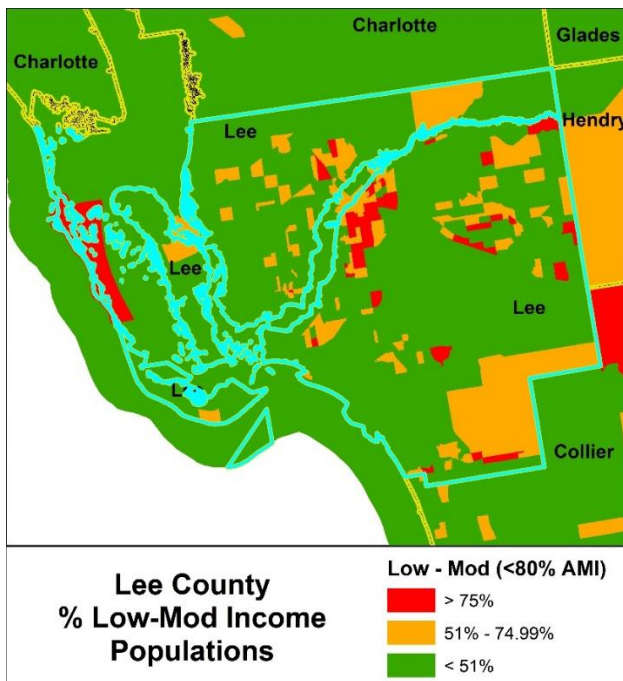


FIGURE 14: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – LEE COUNTY.

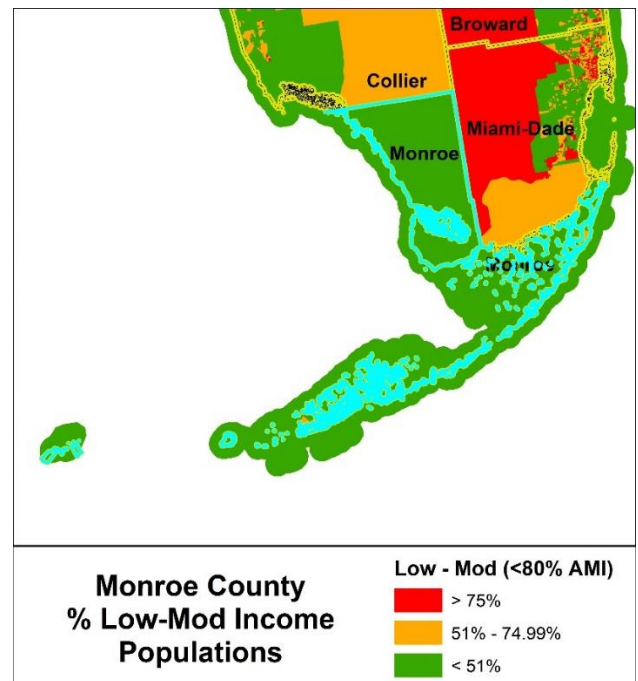


FIGURE 16: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – MONROE COUNTY.

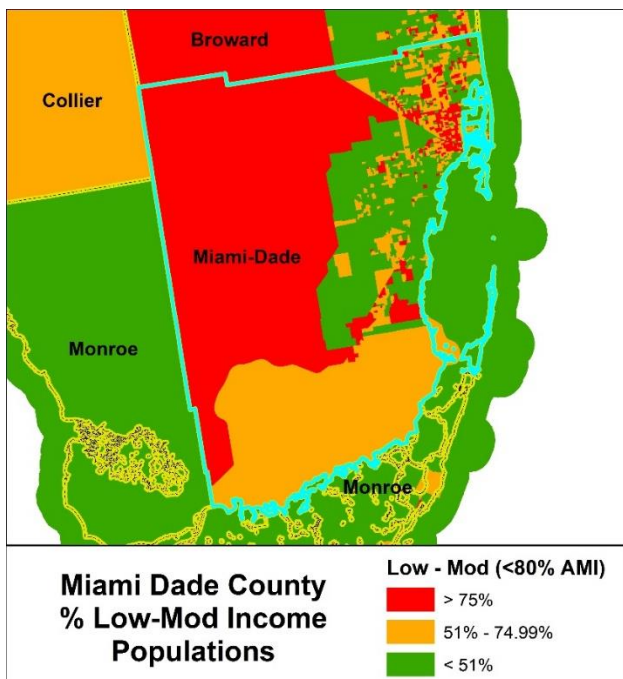


FIGURE 15: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – MIAMI-DADE COUNTY.

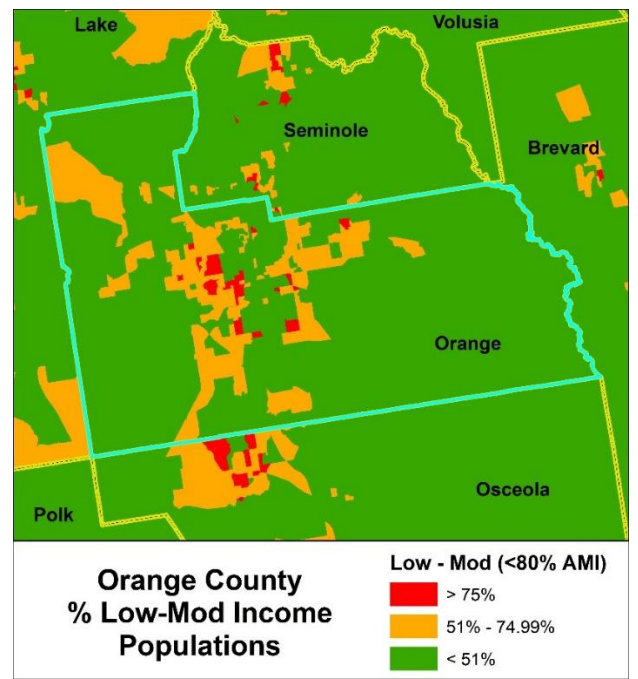


FIGURE 17: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ORANGE COUNTY.

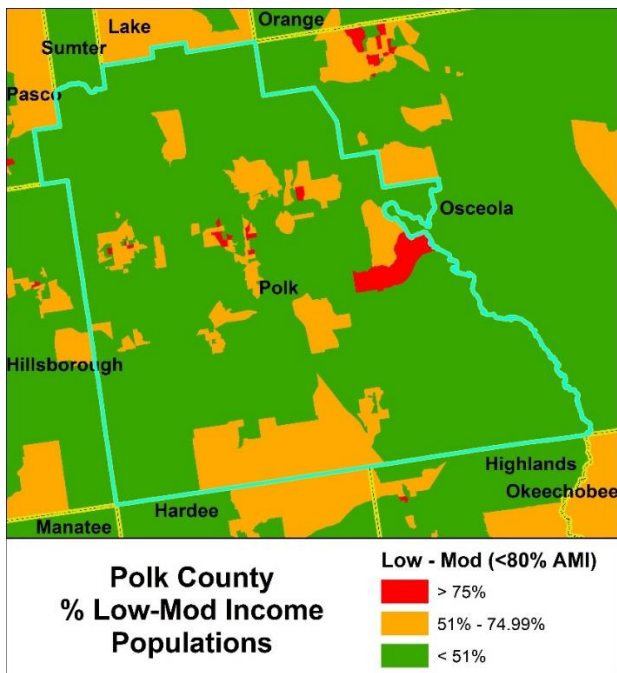


FIGURE 18: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – POLK COUNTY.

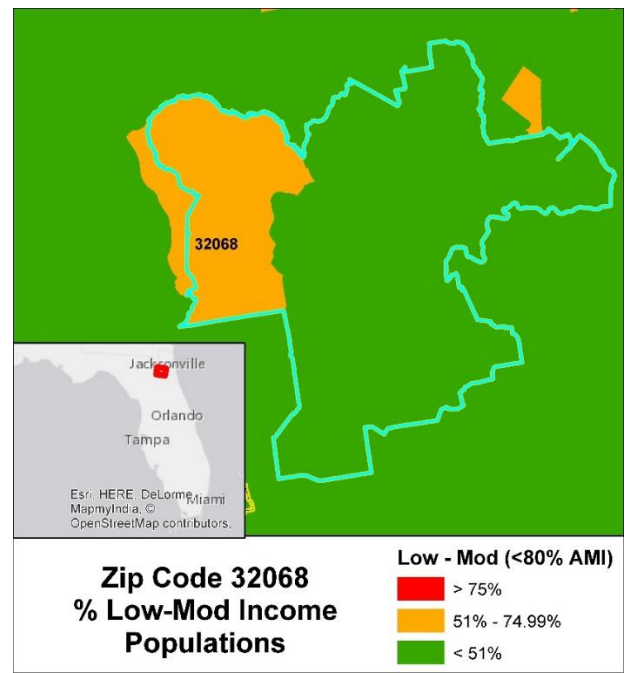


FIGURE 20: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ZIP CODE 32068.

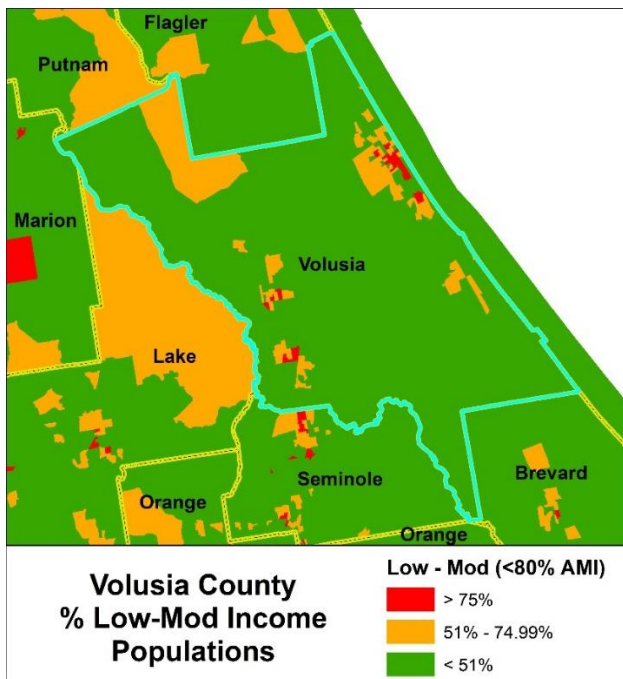


FIGURE 19: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – VOLUSIA COUNTY.

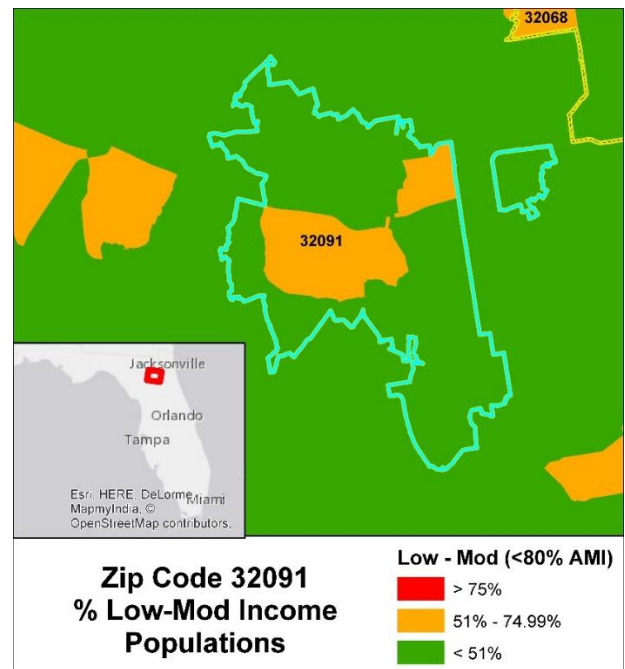


FIGURE 21: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ZIP CODE 32091.

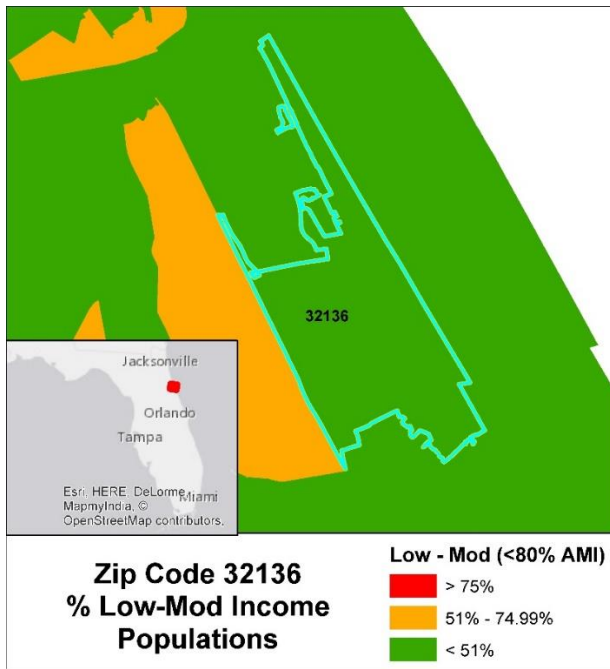


FIGURE 22: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ZIP CODE 32136.

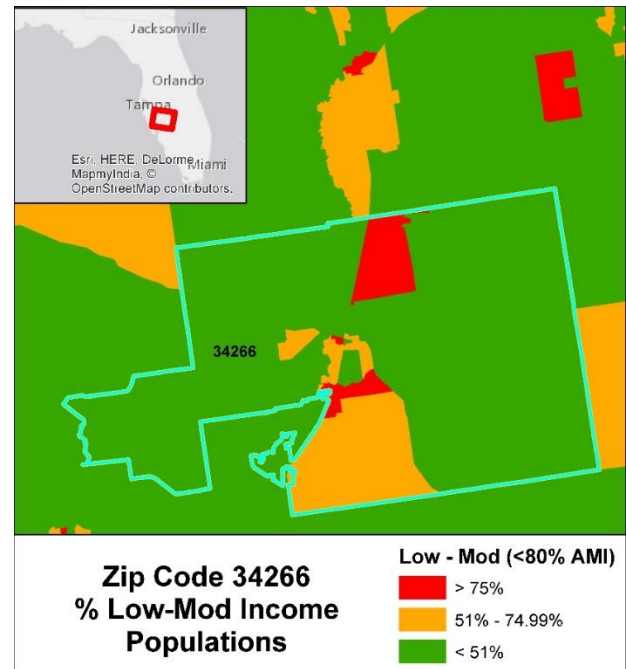


FIGURE 23: LOW-TO-MODERATE INCOME BY BLOCK GROUP FOR HUD IDENTIFIED MOST IMPACTED AREA – ZIP CODE 34266

Impact on Special Needs Populations

Individuals without access 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.

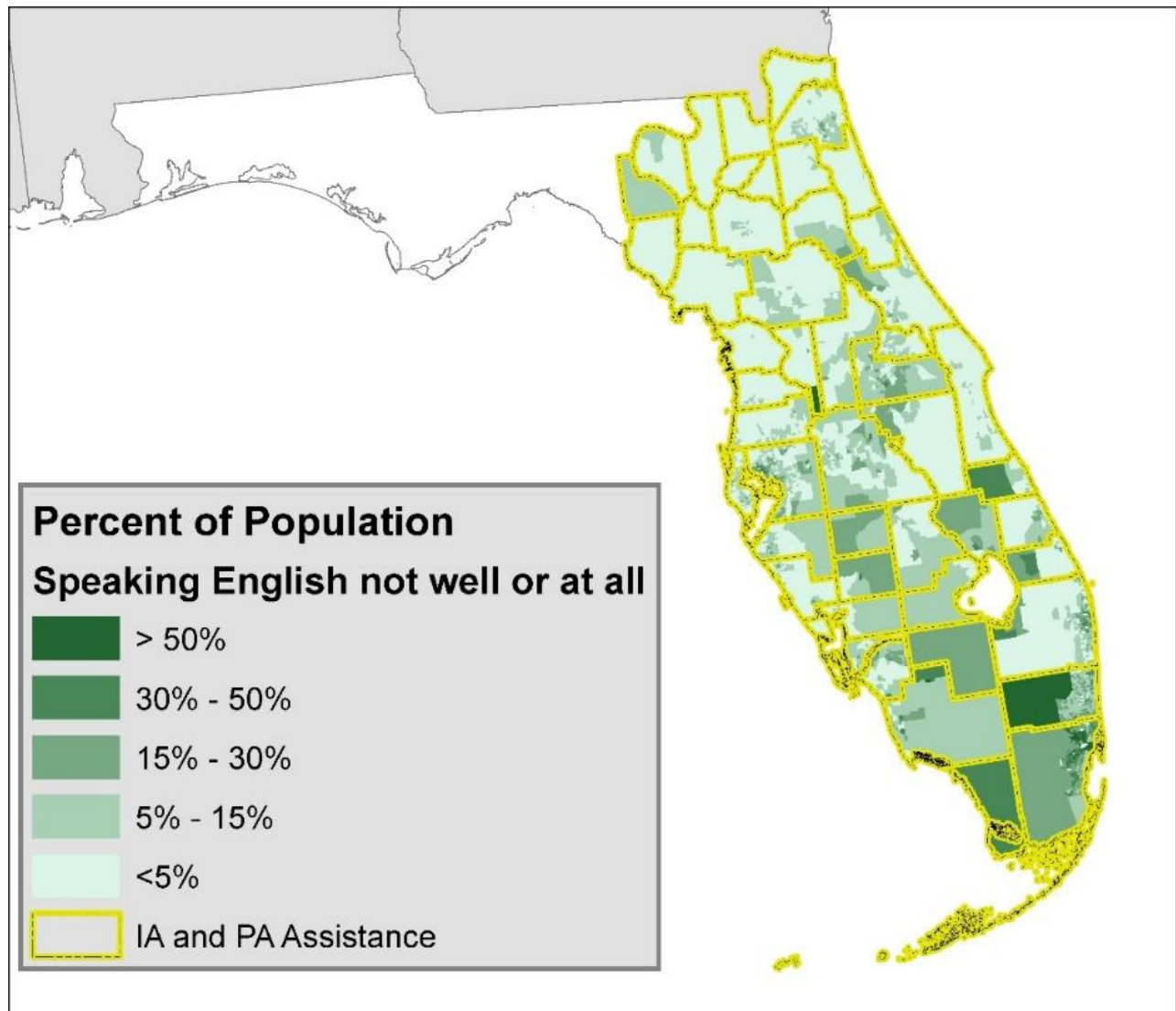
Specialized resources may include, but are not limited to public or private social services, accommodations, information, transportation or medications to maintain health. Regardless of the nature of the need, care must be taken to ensure that all individuals are able to access disaster recovery resources.

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 sections on Outreach and Citizen Participation for more information).

The map below shows concentrations of limited English by census tract (Figure 23).

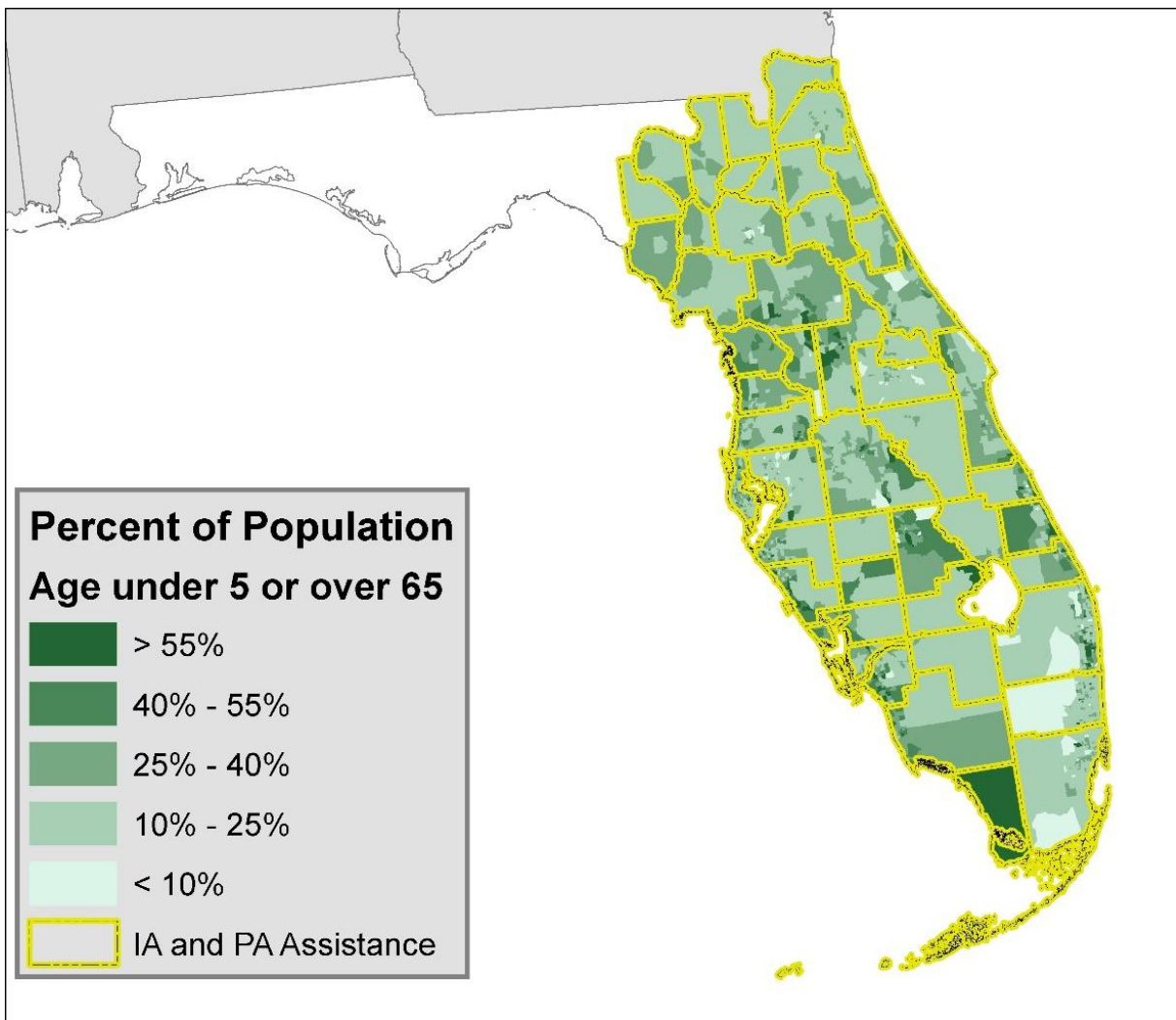
¹³ Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Table 16001. County-level percent calculations by the Florida Department of Revenue and Fiscal Affairs - Health and Demographics Section.

FIGURE 24: PERCENT OF TRACT NON-ENGLISH-SPEAKING POPULATION.



Populations over the age of 65 or households with children under the age of five increase vulnerability. The map below (Figure 24) 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 25: AGE DEPENDENT (< 5 YEARS OR > 65 YEARS) POPULATIONS BY TRACT.



Additionally, the map below (Figure 25) 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 26). Another population of note, those living in mobile homes (Figure 27), 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.

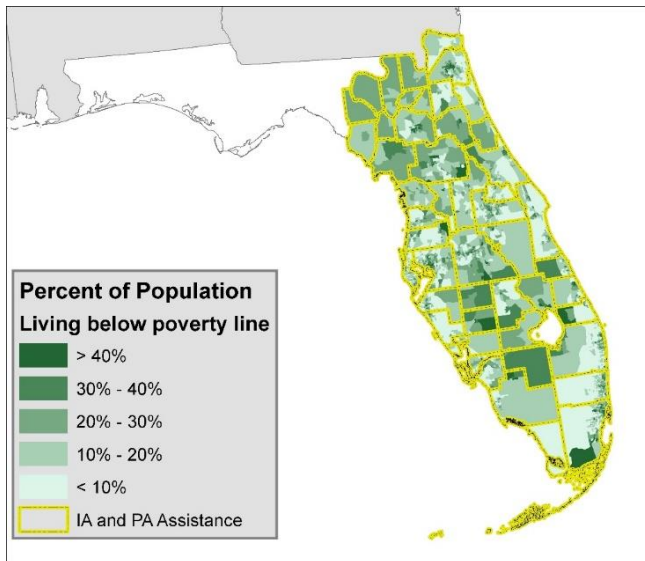


FIGURE 26: PERCENT OF POPULATION LIVING BELOW POVERTY LINE BY TRACT.

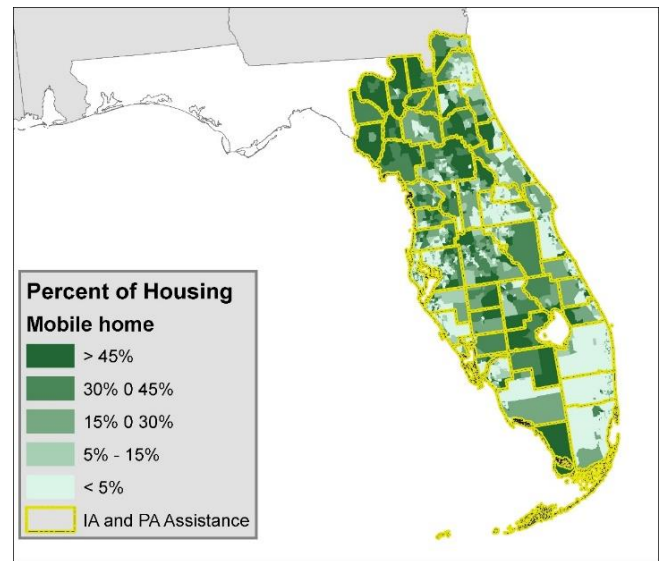


FIGURE 28: PERCENT MOBILE HOME POPULATIONS BY TRACT.

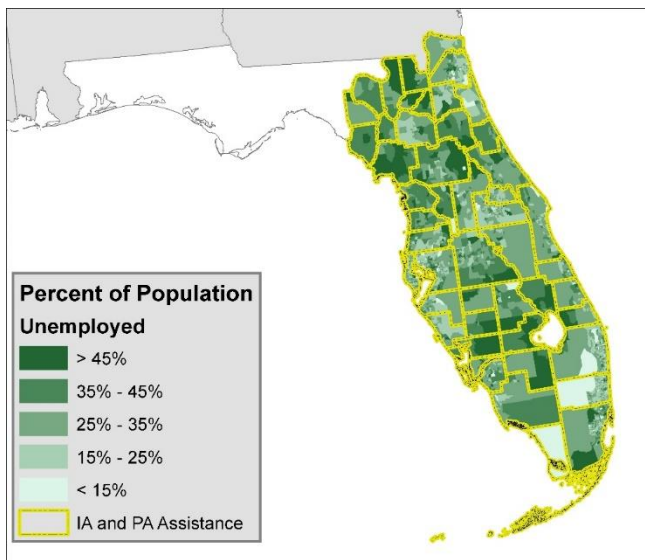


FIGURE 27: PERCENT UNEMPLOYMENT BY TRACT.

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 hurricanes. 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. These are estimates however, because homeless populations continue to be a difficult group to count accurately.

TABLE 6: CHANGES IN HOMELESSNESS POPULATION BY STATE CONTINUUM 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	1019	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	33,466	18,105	15,361	35,900	18,883	17,017	2,434	778	1,656
% CHANGE 2015-2016							-7%	-4%	-10%

Emergency Shelters

Emergency sheltering for Hurricane Irma was moderate with 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

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)
Indian River	6	4,478	Union	1	17
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 hotel 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 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

Estimated Number of Maria Evacuees Enrolled in Florida Schools by County				
School Districts	K-12 Students (2015)	Post-Maria Increase	% Increase	Date Gathered
Hillsborough	23,661	854	3.6	12/05/2017
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 Kids 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 Kids from Puerto Rico Enrolled in Florida Schools	10,324
Estimate of households with kids 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

Estimated Maria Evacuees as a Function of School Enrollments	
Categories	Data
Average LMI percent in Puerto Rico	48.81%
Estimate of LMI PR Families with kids 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 each of the three sectors; 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: 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	01/20/2018
FEMA Housing Assistance - Renters	Open FEMA Dataset	01/20/2018
FEMA FIDA Applicant Report	FEMA Regional Office	12/22/2017
SBA Home Applicant Report	Small Business Administration	02/11/2018
Florida Irma Flood Claims	National Flood Insurance Program	11/30/2017
SBA Business Applicant Report	Small Business Administration	02/11/2018
Infrastructure		
PA Project Worksheet Summary	Florida Department of Emergency Management	TBD
PA Project Worksheet Summary - Irma	Florida Department of Emergency Management	TBD
Public Assistance Funded Project Details	Open FEMA Dataset	01/20/2018
Economy		
SBA Business Applicant Report	Small Business Administration	02/11/2018

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 \$17.4 billion across the three sectors and total estimated unmet needs top \$10.9 billion. Evidence (discussed in greater detail below) indicates that the housing sector has the most remaining unmet need (62.51 percent), followed by the economy (33.95 percent) and infrastructure (3.54 percent), indicating that any program focused on housing recovery will have a high impact on overall recovery across the state (Figure 28 and Table 11).

FIGURE 29: BREAKDOWN OF IMPACTS, SUPPORT AND UNMET NEED BY RECOVERY CATEGORY.

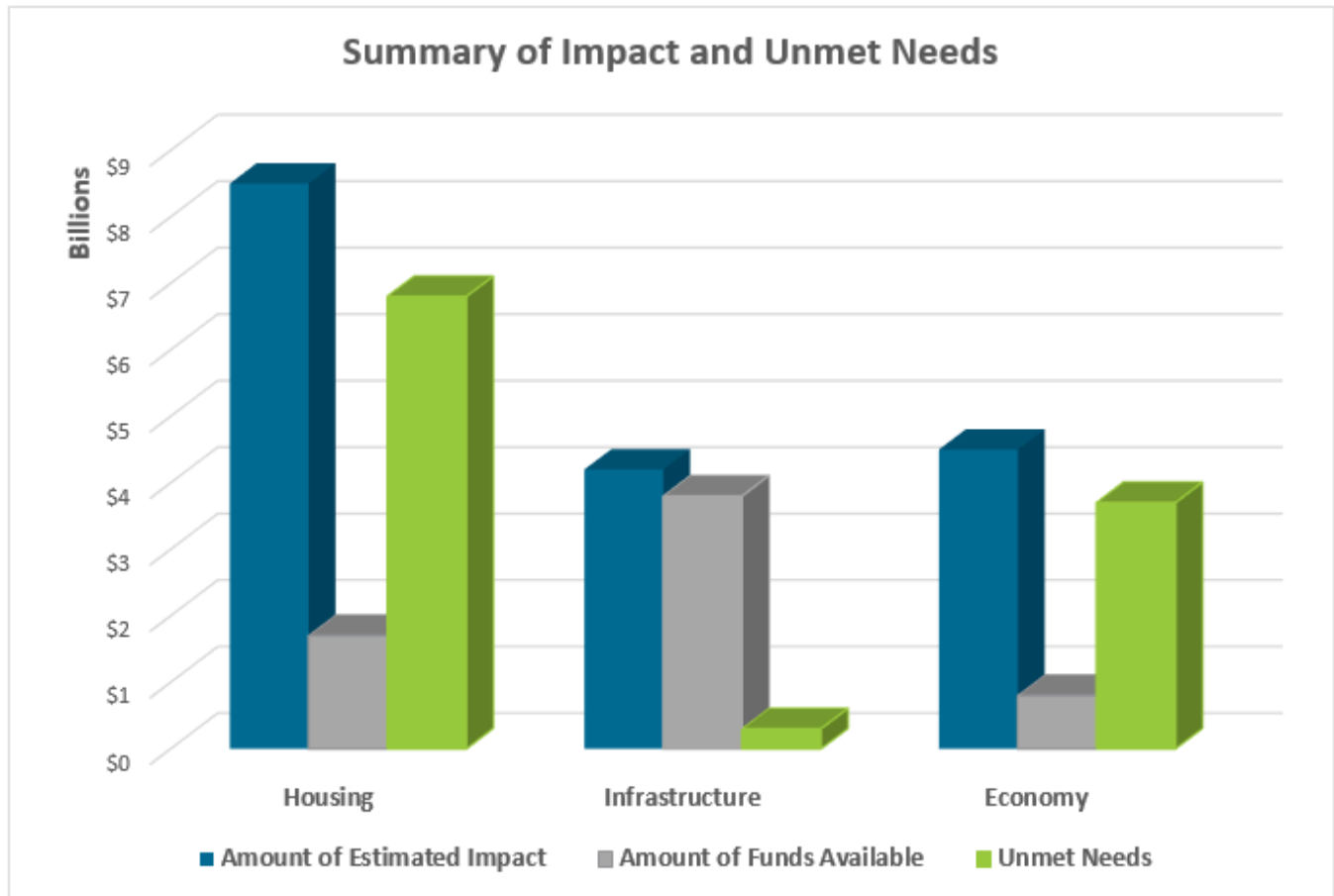


TABLE 11: ESTIMATED IMPACT, SUPPORT AND UNMET NEEDS.

Estimated Impact, Support and Unmet Needs				
Summary of Impacts/Support	Housing	Infrastructure	Economy	Total
Amount of Estimated Impact	\$8,547,356,706	\$4,274,430,191	\$4,531,186,545	\$17,352,973,442
Amount of Funds Available	\$1,706,211,312	\$3,886,914,370	\$814,906,921	\$6,408,032,603
Unmet Needs	\$6,841,145,394	\$387,515,822	\$3,716,279,624	\$10,944,940,840
Percent of Total Unmet Needs	62.51%	3.54%	33.95%	100.00%

Housing Impact

Table 12 below shows the FEMA Real Property Verified Loss (RPFVL) determinations 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, 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. With less than 50 percent of applicants served, DEO recognizes the unmet need for housing repair assistance.

TABLE 12: FEMA IA APPLICANTS IN THE HURRICANE IRMA IA IMPACTED COUNTIES¹⁶.

FEMA IA 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	9,233	1,263	13.68%	558	44.18%	2593	\$1,674,007	\$479
Baker	1693	414	24.45%	273	65.94%	482	\$659,703	\$611
Bradford	2158	561	26.00%	292	52.05%	615	\$1,205,229	\$688
Brevard	32,993	4,373	13.25%	2,838	64.90%	6458	\$9,540,450	\$1,742
Broward	122,766	15,593	12.70%	7,479	47.96%	29340	\$14,146,651	\$264
Charlotte	7791	1197	15.36%	601	50.21%	2006	\$1,584,170	\$563
Citrus	8340	964	11.56%	520	53.94%	2373	\$898,867	\$253
Clay	9108	1393	15.29%	884	63.46%	2183	\$5,983,929	\$653
Collier	37613	5979	15.90%	3,747	62.67%	9447	\$11,993,903	\$1,374
Columbia	3922	404	10.30%	161	39.85%	1072	\$391,758	\$466
DeSoto	2359	677	28.70%	482	71.20%	732	\$1,682,032	\$409
Dixie	1275	264	20.71%	192	72.73%	362	\$271,142	\$299
Duval	42,176	5921	14.04%	3,263	55.11%	11287	\$11,958,256	\$638
Flagler	5131	752	14.66%	427	56.78%	1133	\$2,632,468	\$1,134
Gilchrist	960	128	13.33%	48	37.50%	219	\$93,786	\$346
Glades	1180	393	33.31%	265	67.43%	267	\$536,707	\$646
Hardee	2,379	651	27.36%	497	76.34%	619	\$1,492,439	\$487
Hendry	4791	1362	28.43%	801	58.81%	1203	\$1,492,963	\$469
Hernando	8,670	1,122	12.94%	602	53.65%	2,272	\$1,532,894	\$528
Highlands	14273	3073	21.53%	2,000	65.08%	3077	\$3,945,757	\$419
Hillsborough	46500	5017	10.79%	2,287	45.59%	11839	\$5,394,589	\$485
Indian River	5730	1146	20.00%	696	60.73%	1340	\$1,520,096	\$425
Lafayette	616	73	11.85%	27	36.99%	200	\$32,816	\$206
Lake	21194	2574	12.14%	1,521	59.09%	4296	\$2,746,961	\$365
Lee	61368	11636	18.96%	6,857	58.93%	16007	\$16,963,748	\$494

¹⁶ <https://www.fema.gov/api/open/v1/HousingAssistanceOwners.csv>

FEMA IA 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
Leon	1	1	100.00%	0	0.00%	0	\$0	\$0
Levy	2584	317	12.27%	146	46.06%	736	\$163,140	\$173
Manatee	14111	1704	12.08%	821	48.18%	3339	\$1,493,204	\$325
Marion	25574	2221	8.68%	1,253	56.42%	7616	\$3,014,044	\$462
Martin	4257	835	19.61%	366	43.83%	923	\$623,278	\$295
Miami-Dade	213532	29657	13.89%	16,134	54.40%	55673	\$30,356,886	\$315
Monroe	18808	7115	37.83%	4,467	62.78%	6850	\$38,704,370	\$2,313
Nassau	3992	628	15.73%	368	58.60%	1055	\$1,181,186	\$765
Okeechobee	3245	1000	30.82%	627	62.70%	684	\$1,321,601	\$1,037
Orange	63796	8898	13.95%	4,864	54.66%	14449	\$9,598,248	\$290
Osceola	18100	2522	13.93%	1,680	66.61%	2615	\$3,839,746	\$309
Palm Beach	66049	6287	9.52%	2,952	46.95%	16883	\$5,264,168	\$197
Pasco	23312	2344	10.05%	1,243	53.03%	5523	\$2,744,093	\$384
Pinellas	67635	7638	11.29%	3,367	44.08%	19199	\$4,457,544	\$272
Polk	53051	8420	15.87%	5,355	63.60%	12695	\$12,461,126	\$390
Putnam	8280	1387	16.75%	868	62.58%	2272	\$1,961,535	\$603
Sarasota	16055	1529	9.52%	649	42.45%	4177	\$1,203,818	\$357
Seminole	26121	2428	9.30%	1,312	54.04%	6315	\$3,327,010	\$336
St. Johns	7365	1034	14.04%	667	64.51%	1963	\$2,812,870	\$1,040
St. Lucie	17128	2343	13.68%	1,404	59.92%	3064	\$3,651,879	\$422
Sumter	4249	848	19.96%	488	57.55%	1132	\$1,004,397	\$439
Suwannee	2918	479	16.42%	247	51.57%	912	\$390,998	\$280
Union	718	204	28.41%	116	56.86%	162	\$178,447	\$1,076
Volusia	30286	2638	8.71%	1,512	57.32%	7566	\$4,624,894	\$677
Total	1,145,390	159,411	24.71%	88,224	50.75%	287,226	\$234,753,803	\$513

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 13).

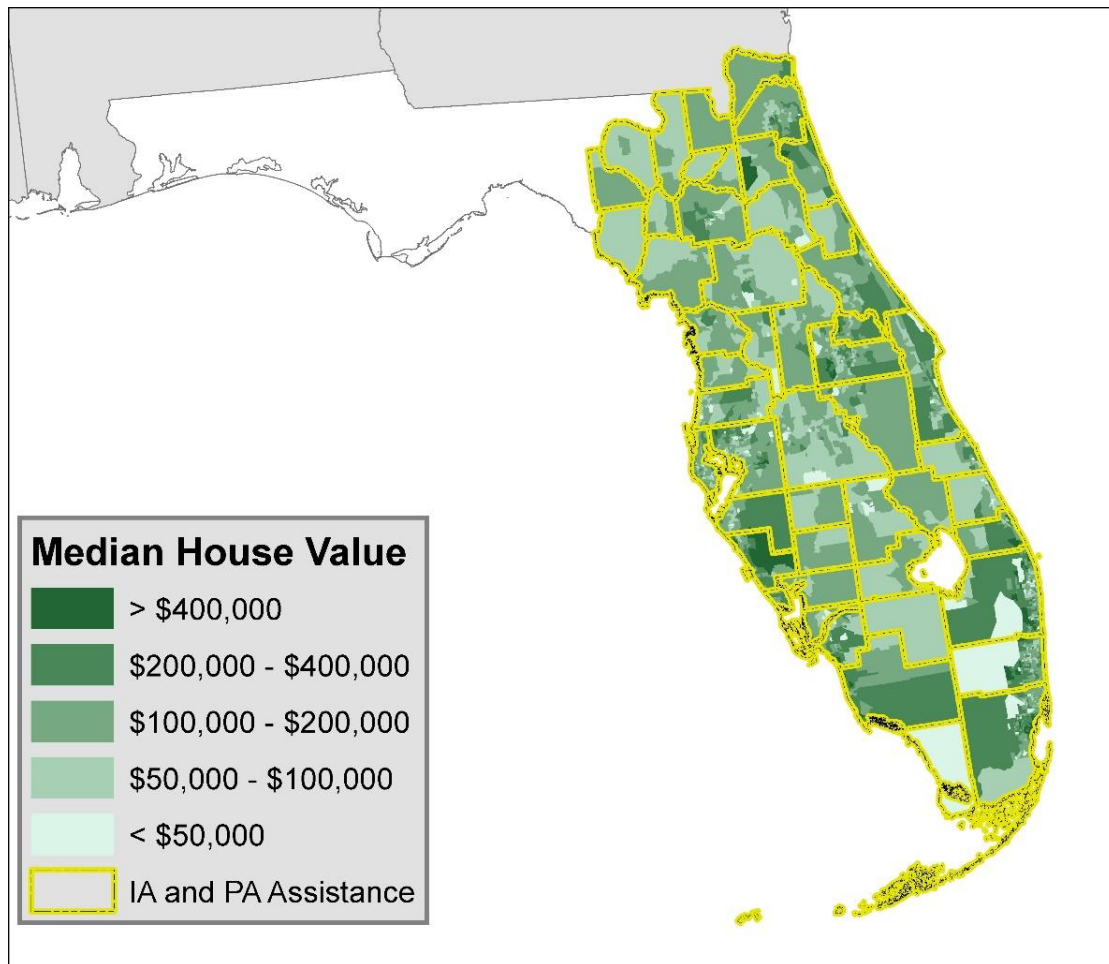
TABLE 13: FEMA IA APPLICANTS BY HOUSING TYPE.

FEMA IA Applicants by Housing Type					
Residence Type	Number of Applicants	Percent of Total	% Owners	% Renters	% Not Specified
Apartment	585,455	22.18%	0.18%	99.73%	0.09%
Assisted Living Facility	2,112	0.08%	0.33%	99.38%	0.28%
Boat	2,758	0.10%	76.83%	22.44%	0.73%
College Dorm	761	0.03%	0.13%	98.55%	1.31%
Condo	113,398	4.30%	54.24%	45.63%	0.13%
Correctional Facility	267	0.01%		99.25%	0.75%
House/Duplex	1,513,456	57.33%	61.19%	38.69%	0.12%
Military Housing	640	0.02%	0.47%	99.38%	0.16%
Mobile Home	202,957	7.69%	65.02%	34.73%	0.25%
Townhouse	107,649	4.08%	46.78%	53.15%	0.08%
Travel Trailer	9,944	0.38%	63.62%	36.01%	0.37%
Other	100,287	3.80%	32.19%	67.22%	0.59%
Unknown	192	0.01%	42.19%	54.17%	3.65%
Total	2,639,876		45.90%	53.96%	0.14%

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 29). 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 30: MEDIAN HOUSE VALUE.



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.

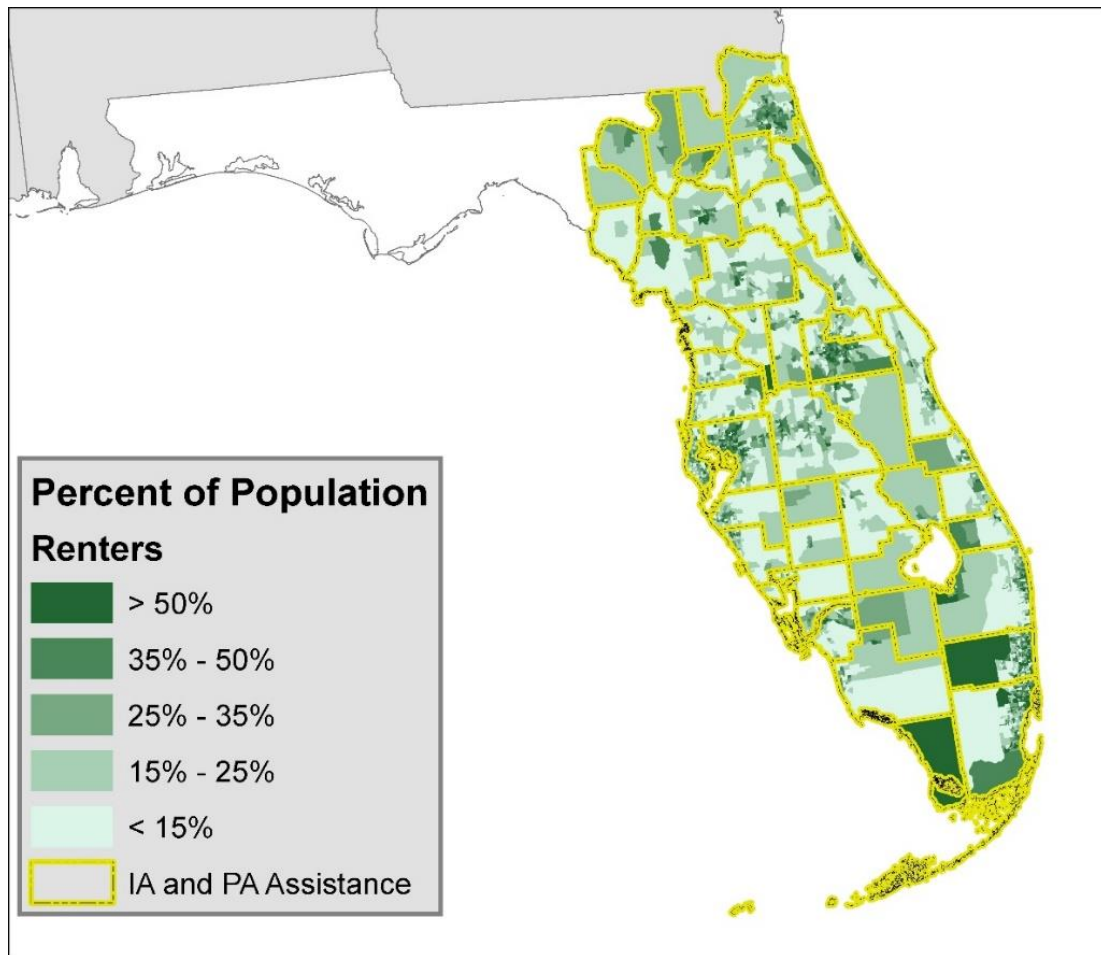
Rental Housing

Rental housing is an important component of affordable housing for impacted areas. Many areas in south and central Florida have large rental populations (Figure 30) and many live in older buildings (Table 14). Older building codes and in some cases, the lack of regular maintenance can make these units less desirable. The rental vacancy rate in Florida was 20 percent, according to the ACS 2016 five-year estimates.¹⁷ The median rent for the state is \$1,032 monthly.¹⁸

¹⁷ ACS 2012-2016, B25004 - VACANCY STATUS

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

FIGURE 31: RENTER POPULATIONS.



Rental units in non-urban counties are primarily single family and mobile home units, with the majority of renters 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 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 15, 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;

TABLE 14: 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	

TABLE 15: 2017 HURRICANE IMPACT TO HOMEOWNER UNITS AND RENTAL UNITS.

2017 Hurricane Irma Impact to Homeowner (HO) Units and Rental Units				
High Damage Properties as Percentage of State Total of High Damage				
County	Total HO Units with Property Damage over \$20,000	Total Rental Units with Major Structural Damage	Total Properties with High Damage	Percentage of State Damaged HO & Rental Properties/Units with High Damage Level
State Total	2,498	3,967	6,465	100.0%
Alachua	19	27	46	0.7%
Baker	1	1	2	0.0%
Bay	0	0	0	0.0%
Bradford	14	5	19	0.3%
Brevard	87	147	234	3.6%
Broward	120	284	404	6.3%
Calhoun	0	0	0	0.0%
Charlotte	10	15	25	0.4%
Citrus	6	7	13	0.2%
Clay	171	74	245	3.8%
Collier	143	169	312	4.8%
Columbia	9	13	22	0.3%
DeSoto	19	9	28	0.4%

¹⁹ ACS 2012-2016, B25127 - VACANCY STATUS

2017 Hurricane Irma Impact to Homeowner (HO) Units and Rental Units				
High Damage Properties as Percentage of State Total of High Damage				
County	Total HO Units with Property Damage over \$20,000	Total Rental Units with Major Structural Damage	Total Properties with High Damage	Percentage of State Damaged HO & Rental Properties/Units with High Damage Level
Dixie	1	0	1	0.0%
Duval	111	254	365	5.6%
Escambia	0	0	0	0.0%
Flagler	16	14	30	0.5%
Franklin	0	0	0	0.0%
Gadsden	0	0	0	0.0%
Gilchrist	1	1	2	0.0%
Glades	6	8	14	0.2%
Gulf	0	0	0	0.0%
Hamilton	0	0	0	0.0%
Hardee	21	5	26	0.4%
Hendry	28	25	53	0.8%
Hernando	14	13	27	0.4%
Highlands	44	55	99	1.5%
Hillsborough	58	118	176	2.7%
Holmes	0	0	0	0.0%
Indian River	11	18	29	0.4%
Jackson	0	0	0	0.0%
Jefferson	0	0	0	0.0%
Lafayette	0	1	1	0.0%
Lake	29	41	70	1.1%
Lee	116	192	308	4.8%

2017 Hurricane Irma Impact to Homeowner (HO) Units and Rental Units				
High Damage Properties as Percentage of State Total of High Damage				
County	Total HO Units with Property Damage over \$20,000	Total Rental Units with Major Structural Damage	Total Properties with High Damage	Percentage of State Damaged HO & Rental Properties/Units with High Damage Level
Leon	0	0	0	0.0%
Levy	2	7	9	0.1%
Liberty	0	0	0	0.0%
Madison	0	0	0	0.0%
Manatee	9	40	49	0.8%
Marion	51	57	108	1.7%
Martin	4	6	10	0.2%
Miami-Dade	241	828	1,069	16.6%
Monroe	657	413	1,070	16.6%
Nassau	14	16	30	0.5%
Okaloosa	0	0	0	0.0%
Okeechobee	14	9	23	0.4%
Orange	68	221	289	4.6%
Osceola	32	48	80	1.2%
Palm Beach	43	115	158	2.4%
Pasco	29	54	83	1.3%
Pinellas	26	115	141	2.3%
Polk	91	196	287	4.4%
Putnam	19	16	35	0.5%
Santa Rosa	0	0	0	0.0%
Sarasota	9	22	31	0.5%
Seminole	23	77	100	1.5%

2017 Hurricane Irma Impact to Homeowner (HO) Units and Rental Units				
High Damage Properties as Percentage of State Total of High Damage				
County	Total HO Units with Property Damage over \$20,000	Total Rental Units with Major Structural Damage	Total Properties with High Damage	Percentage of State Damaged HO & Rental Properties/Units with High Damage Level
St. Johns	26	26	52	0.8%
St. Lucie	38	53	91	1.4%
Sumter	9	6	15	0.2%
Suwannee	4	5	9	0.1%
Taylor	0	0	0	0.0%
Union	0	0	0	0.0%
Volusia	34	135	169	2.6%
Wakulla	0	0	0	0.0%
Walton	0	6	6	0.1%
Washington	0	0	0	0.0%
Note: Data from OpenFEMA and special data runs completed as of March 5, 2018 for the state of Florida; the Florida Housing Data Clearinghouse; the Bureau of Economic and Business Research; and the American Community Survey.				

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,” or 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 16: 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							
		Owner Households			Renter Households		
		# Spending Less than 30%	# Spending Over 30%	% Spending Over 30%	# Spending Less than 30%	# Spending Over 30%	% Spending Over 30%
Annual Household Income	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 17: 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% 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	7,217,510	28%
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	2,444,565	45%
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	4,772,945	19%

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 extremely high 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 we must first understand 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, but due to child care costs, transportation challenges, high cost of living and other variables, 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

²⁰ <http://apps.urban.org/features/rental-housing-crisis-map/>

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 18: 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	19%

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 19: 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%	a14,531	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

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
Osceola	98,301	60%	8,436	22
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.

²⁴ HUD Hurricane Irma SITREP 12 April 2018

TABLE 20: 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
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 Response	Total Number of Units Awaiting Response	Total Number of Assisted Units Awaiting Response
22	1,603	447

TABLE 21: 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 22: 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

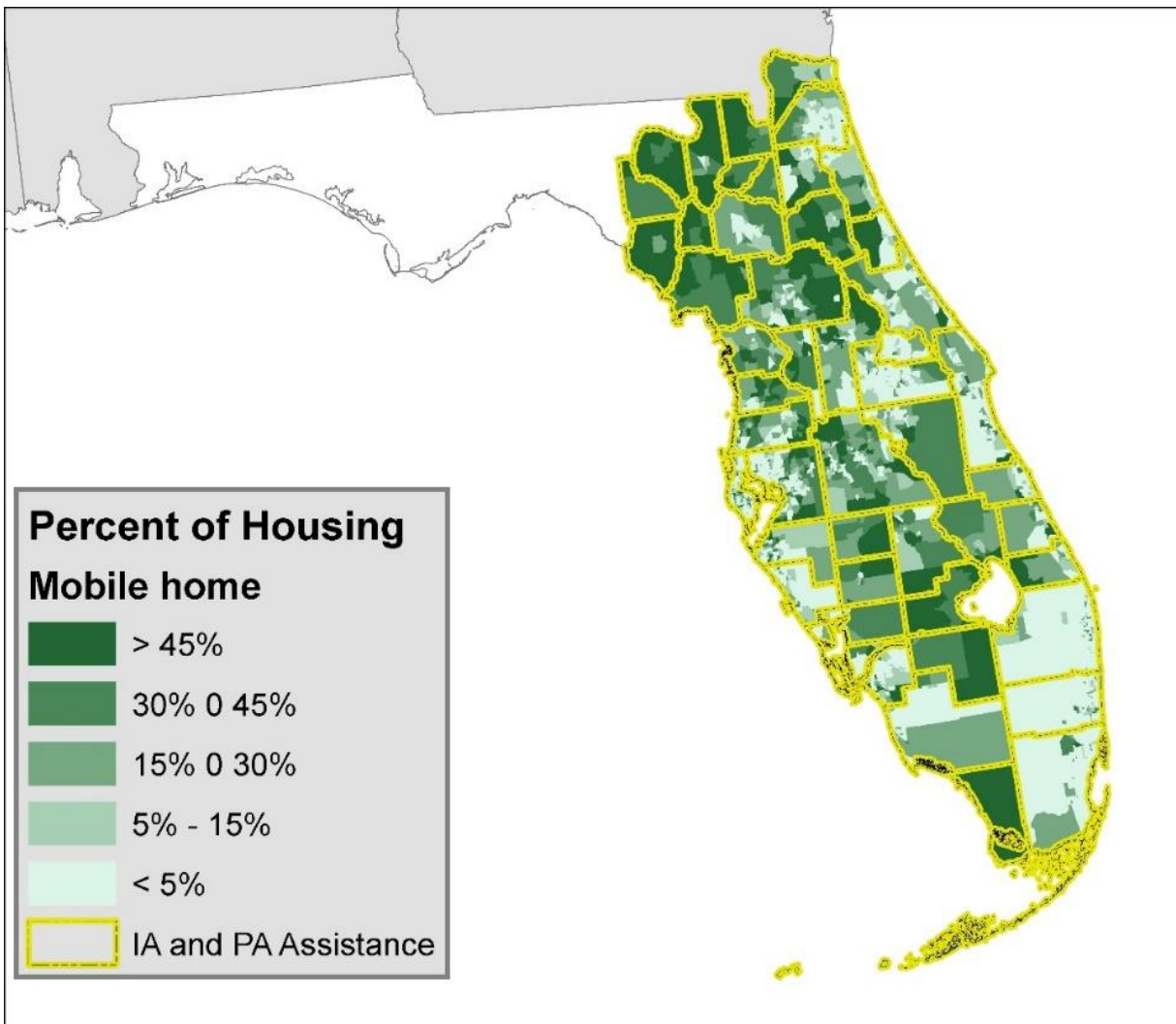
Mobile Homes

Mobile home affordability and ease of general maintenance provides housing independence and choice to residents across the state (Figure 31). 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, 202,927 of them reside in mobile home units.

FIGURE 32: MOBILE HOME POPULATIONS.



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. Nineteen counties, noted below with more than 1,000 mobile homes with FEMA verified losses, represent a potential cohort of 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 51,484 mobile homes with FEMA Real Property Verified Losses or losses identified by FEMA inspectors. Table 20 shows the number of mobile homes and FEMA verified property losses by county.

TABLE 23: 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	552	\$903,142	\$1,636	Levy	306	\$257,990	\$843
Baker	233	\$446,153	\$1,915	Manatee	822	\$957,336	\$1,165
Bradford	304	\$776,655	\$2,555	Marion	2,186	\$2,723,230	\$1,246
Brevard	1,854	\$4,125,716	\$2,225	Martin	307	\$422,796	\$1,377
Broward	2,248	\$2,075,779	\$923	Miami-Dade	3,129	\$3,755,502	\$1,200
Charlotte	325	\$599,887	\$1,846	Monroe	1,685	\$13,471,520	\$7,995
Citrus	663	\$820,217	\$1,237	Nassau	448	\$939,502	\$2,097
Clay	585	\$1,742,099	\$2,978	Okeechobee	729	\$1,117,059	\$1,532
Collier	2,171	\$7,530,180	\$3,469	Orange	2,182	\$2,097,677	\$961
Columbia	414	\$651,585	\$1,574	Osceola	1,227	\$1,607,822	\$1,310
DeSoto	455	\$956,306	\$2,102	Palm Beach	1,717	\$1,692,045	\$985
Dixie	235	\$249,247	\$1,061	Pasco	1,406	\$1,740,760	\$1,238
Duval	891	\$1,395,844	\$1,567	Pinellas	1,996	\$1,676,444	\$840
Flagler	294	\$1,176,636	\$4,002	Polk	5,331	\$7,222,104	\$1,355
Gilchrist	134	\$145,911	\$1,089	Putnam	1,441	\$1,938,119	\$1,345
Glades	317	\$566,504	\$1,787	Sarasota	389	\$443,098	\$1,139
Hardee	352	\$785,760	\$2,232	Seminole	481	\$738,813	\$1,536
Hendry	1,299	\$1,996,230	\$1,537	St. Johns	581	\$1,508,375	\$2,596
Hernando	598	\$975,435	\$1,631	St. Lucie	674	\$643,070	\$954
Highlands	1,589	\$2,109,404	\$1,328	Sumter	582	\$859,479	\$1,477
Hillsborough	1,618	\$2,380,054	\$1,471	Suwannee	335	\$402,538	\$1,202

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
Indian River	384	\$536,445	\$1,397	Union	115	\$178,731	\$1,554
Lafayette	20	\$18,819	\$941	Volusia	1,275	\$1,899,172	\$1,490
Lake	1,859	\$1,890,995	\$1,017	Grand Total	51,484	\$88,822,107	\$1,725
Lee	2,746	\$5,673,928	\$2,066				

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 flood insurance, those who do not have a mortgage are not required 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 22 provides a breakdown of parcels, residences and applicants to the Hurricane Irma FEMA Housing Assistance Program. 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 24: 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

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 BRADFORD	CITY OF BONITA SPRINGS	4	YES	Y	LETTER	6
	BRADFORD COUNTY *	2	YES	EXT_REQ		
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 COUNTY*	4	YES	Y - ONGOING	FCAC	2
LEE	VILLAGE OF ESTERO	4	YES	Y	LETTER	1
COLLIER	EVERGLADES CITY	4	YES	Y - ONGOING		130
VOLUSIA COUNTY/FLAGLER	CITY OF FLAGLER BEACH	2	YES	Y - PENDING	FCAC	8
FLAGLER	FLAGLER COUNTY*	2	YES	Y - PENDING		?
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	EXT_REQ		
VOLUSIA	CITY OF HOLLY HILL	3	YES	NO SD	FCAC	0
BROWARDY	CITY OF HOLLYWOOD	5	YES	Y - PENDING		?
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		?

Substantially Damaged Determined (SD) Structures and Respective Communities						
County	Community	Assigned Branch	Contacted	SD List Received?	SD Obtained by?	SD Structures
DUVAL	CITY OF JACKSONVILLE	2	YES	Y - PENDING	FCAC	?
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
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		?
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	?
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	?
CLAY	CITY OF ORANGE PARK	2	YES	NO SD	FCAC	0
VOLUSIA	CITY OF ORMOND BEACH	3	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
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	EXT_REQ		
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
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	N		

FIGURE 33: PROPERTIES IN A FLOOD ZONE.

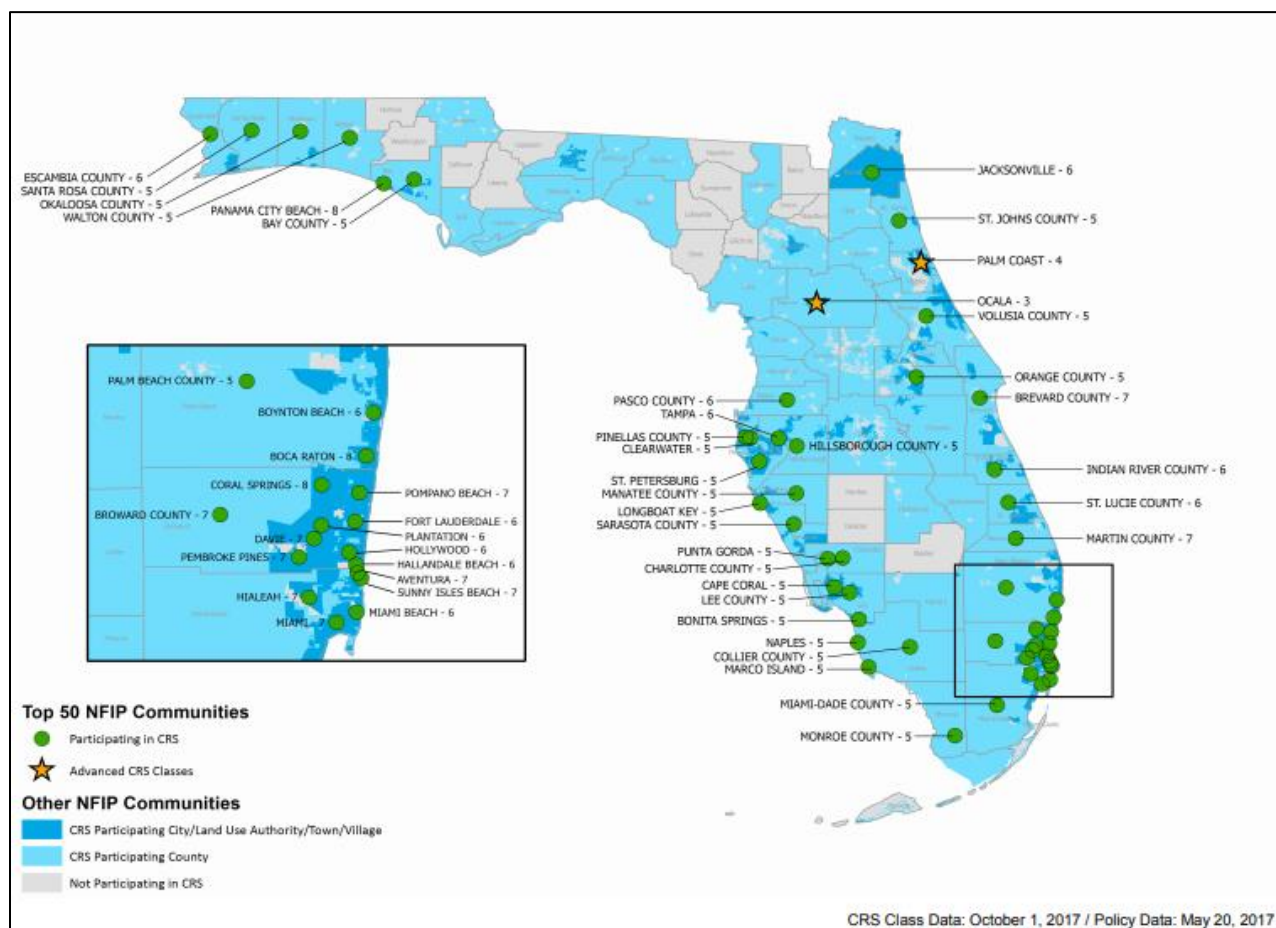


TABLE 25: HURRICANE IRMA FEMA HOUSING ASSISTANCE PROGRAM FUNDING BREAKDOWN

Hurricane Irma FEMA Housing Assistance Program Funding Breakdown							
County	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	1,905	94	\$481,793	\$340,078	\$141,715
Baker	42,847	35,985	239	45	\$313,716	\$219,216	\$94,500
Bradford	6,739	4,436	671	167	\$843,285	\$562,231	\$281,054
Brevard	76,201	67,165	3,738	504	\$1,598,758	\$927,298	\$671,460
Broward	352,667	450,302	57,199	2,531	\$3,452,018	\$984,154	\$2,467,864
Charlotte	114,121	55,798	5,555	436	\$1,009,741	\$669,676	\$340,064
Citrus	34,489	22,535	2,384	223	\$359,082	\$250,134	\$108,948
Clay	16,382	14,461	1,688	413	\$6,000,716	\$2,866,549	\$3,134,167

Hurricane Irma FEMA Housing Assistance Program Funding Breakdown							
County	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
Collier	293,716	252,508	43,020	5,153	\$14,914,532	\$9,977,280	\$4,937,251
Columbia	9,846	5,996	623	77	\$332,238	\$213,048	\$119,190
DeSoto	7,329	3,234	426	128	\$830,809	\$525,455	\$305,354
Dixie	8,736	4,171	359	67	\$91,709	\$63,006	\$28,703
Duval	65,552	87,252	5,599	626	\$4,664,168	\$2,201,633	\$2,462,535
Flagler	19,721	11,097	1,101	255	\$1,961,920	\$970,031	\$991,889
Gilchrist	4,326	1,919	186	24	\$50,824	\$38,817	\$12,007
Glades	20,015	7,722	147	26	\$42,994	\$20,293	\$22,701
Hardee	4,804	2,451	349	114	\$819,715	\$564,125	\$255,590
Hendry	10,349	5,306	1,562	287	\$378,142	\$221,983	\$156,159
Hernando	23,879	13,475	1,061	193	\$761,557	\$573,755	\$187,801
Highlands	17,847	8,601	927	178	\$288,394	\$164,586	\$123,808
Hillsborough	120,646	171,987	17,124	733	\$2,111,799	\$1,414,296	\$697,503
Indian River	43,007	28,865	986	126	\$335,315	\$173,236	\$162,079
Lafayette	4,037	1,317	175	14	\$34,244	\$33,643	\$601
Lake	41,050	46,819	2,322	365	\$637,663	\$369,367	\$268,296
Lee	230,917	205,763	38,030	3,198	\$9,535,647	\$5,645,113	\$3,890,534
Levy	20,652	9,387	229	25	\$13,989	\$6,673	\$7,316
Manatee	45,023	63,385	5,825	515	\$855,005	\$577,274	\$277,732
Marion	30,266	22,843	3,074	362	\$699,815	\$551,897	\$147,918
Martin	24,347	24,020	689	46	\$75,971	\$40,033	\$35,939
Miami-Dade	284,941	415,782	252,657	12,343	\$17,931,477	\$-	\$17,931,477
Monroe	83,064	37,832	35,244	5,703	\$49,079,548	\$31,902,390	\$17,177,158
Nassau	34,846	28,721	795	145	\$577,709	\$319,041	\$258,668
Okeechobee	16,632	7,226	1,277	330	\$742,251	\$353,074	\$389,177
Orange	51,458	90,272	6,579	493	\$825,692	\$439,364	\$386,328
Osceola	33,847	26,102	4,559	619	\$1,170,946	\$680,670	\$490,276
Palm Beach	186,680	230,498	9,942	737	\$1,084,235	\$665,435	\$418,800
Pasco	92,119	73,738	11,423	907	\$1,692,673	\$1,304,580	\$388,092
Pinellas	168,935	184,041	32,585	1,203	\$1,171,353	\$600,654	\$570,698
Polk	87,172	53,223	5,214	940	\$2,356,606	\$1,406,631	\$949,976
Putnam	22,619	12,070	1,242	282	\$900,476	\$488,877	\$411,599
Sarasota	94,793	93,011	4,265	280	\$448,331	\$330,291	\$118,040
Seminole	21,596	35,603	2,075	238	\$608,106	\$293,824	\$314,282
St. Johns	53,459	35,614	3,179	441	\$2,795,419	\$965,220	\$1,830,199
St. Lucie	41,182	30,558	1,467	126	\$480,165	\$310,098	\$170,067

Hurricane Irma FEMA Housing Assistance Program Funding Breakdown							
County	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
Sumter	11,526	5,060	764	131	\$242,802	\$219,118	\$23,684
Suwannee	19,317	8,728	486	51	\$35,640	\$18,594	\$17,046
Union	2,850	1,039	105	18	\$31,354	\$26,146	\$5,208
Volusia	135,379	95,560	7,877	762	\$3,375,049	\$2,426,264	\$948,785
Total	3,151,721	3,129,623	578,928	42,674	\$139,045,387	\$73,915,149	\$65,130,238

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 Association (SBA) 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.

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 2,639,876 applicants to FEMA’s Housing Assistance Program across the 49 presidentially declared counties. Of these, 192,928 had a FEMA Real Property Verified Loss (RPFVL) assessment; however, this does not mean that the applicant received funding (Table 23). Of the applicants with a RPFVL, 35,645 received FEMA housing assistance in the form of repair or replacement funds. An estimated \$360,956,426 in damage was assessed for the applicants with an FVL. This has resulted in \$182,774,184 in housing assistance to date. Interestingly, an additional \$288,097,837 in housing assistance has been provided to nearly 260,000 additional applicants who did not have recorded FEMA property loss.²⁶

TABLE 26: 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	2,639,876	\$470,872,021	\$178

²⁶ FEMA FIDA 25761_4337 as of 12/22/2107

FEMA Applicant Breakdown by Assessed Damage and Receipt of FEMA Housing Assistance			
Hurricane Irma Impact Areas	FEMA IA Applicants	Amount	Average Value
FEMA FVL	192,928	\$360,956,426	\$1,870.94
Received HA	35,645	\$182,774,184	\$5,128
Received No HA	157,283		
No FEMA FVL	2,446,948		
Received HA	258,291	\$288,097,837	\$1,115.40
Received No HA	2,188,657		

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 November 30, 2017, the NFIP has paid out on 27,041 claims across the state totaling more than \$343 million in property payouts (Table 24).

TABLE 27: NFIP PROPERTY CLAIMS AND TOTALS

NFIP Property Claims and Totals					
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
Hernando	64	\$627,553	\$145,029	\$0	\$772,582
Highlands	61	\$198,727	\$25,817	\$0	\$224,544

NFIP Property Claims and Totals					
County	Claims Submitted	Building Payments	Content Payments	ICC Payments	Total Paid
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	\$409,076,865

Small Business Association (SBA) Home Loans

The Small Business Administration (SBA) provided \$821,262,327 in repair assistance available to 46,634 homeowner applicants in Hurricane Irma-impacted areas. 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 \$33,204 and the median loan is \$24,071.

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 25). Furthermore, damage from this hurricane (as indicated by the number of insurance claims) is heavily tilted toward residential properties over businesses.

TABLE 28: 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
Residential Property		730,574	378,786	247,068	104,720	85.7%
	Homeowners	575,325	287,111	204,298	83,916	85.4%
	Dwelling	93,259	50,535	30,038	12,686	86.4%
	Mobile Homeowners	53,161	39,340	9,892	3,929	92.6%
	Commercial/ Residential	8,829	1,800	2,840	4,189	52.6%
Commercial Property		53,931	9,387	14,343	30,201	44.0%
Private Flood		1,699	786	538	375	77.9%
Business Interruption		3,754	1,300	1,420	1,034	72.5%
Other Lines of Business		87,885	59,605	19,021	9,259	89.5%
Total		877,843	449,864	282,390	145,589	83.4%

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

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 33).

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 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

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 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 a 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 applicant, returning a more comprehensive estimate of recovery than original estimates from FEMA. Further accounting for under-representation of impacted populations, stemming from FEMA-ineligible applicants 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 (46,634) 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, we utilize the median SBA real property damage amount of \$24,072 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 rentals with damages (82,897) this results in an adjusted housing impact of \$7.1 billion. Twenty percent in additional resiliency costs were applied to account for the additional cost of compliance in coastal areas, for a total impact of nearly \$8.5 billion. After deducting the funds already provided by FEMA, SBA, the National Flood Insurance Program (NFIP) and Public Housing Funds (\$1.7 billion) the remaining unmet need for housing is approximately \$6.8 billion when accounting for required additional resilience measures (Table 26).

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

FIGURE 34: HUD HOUSING UNMET NEEDS METHODOLOGY.

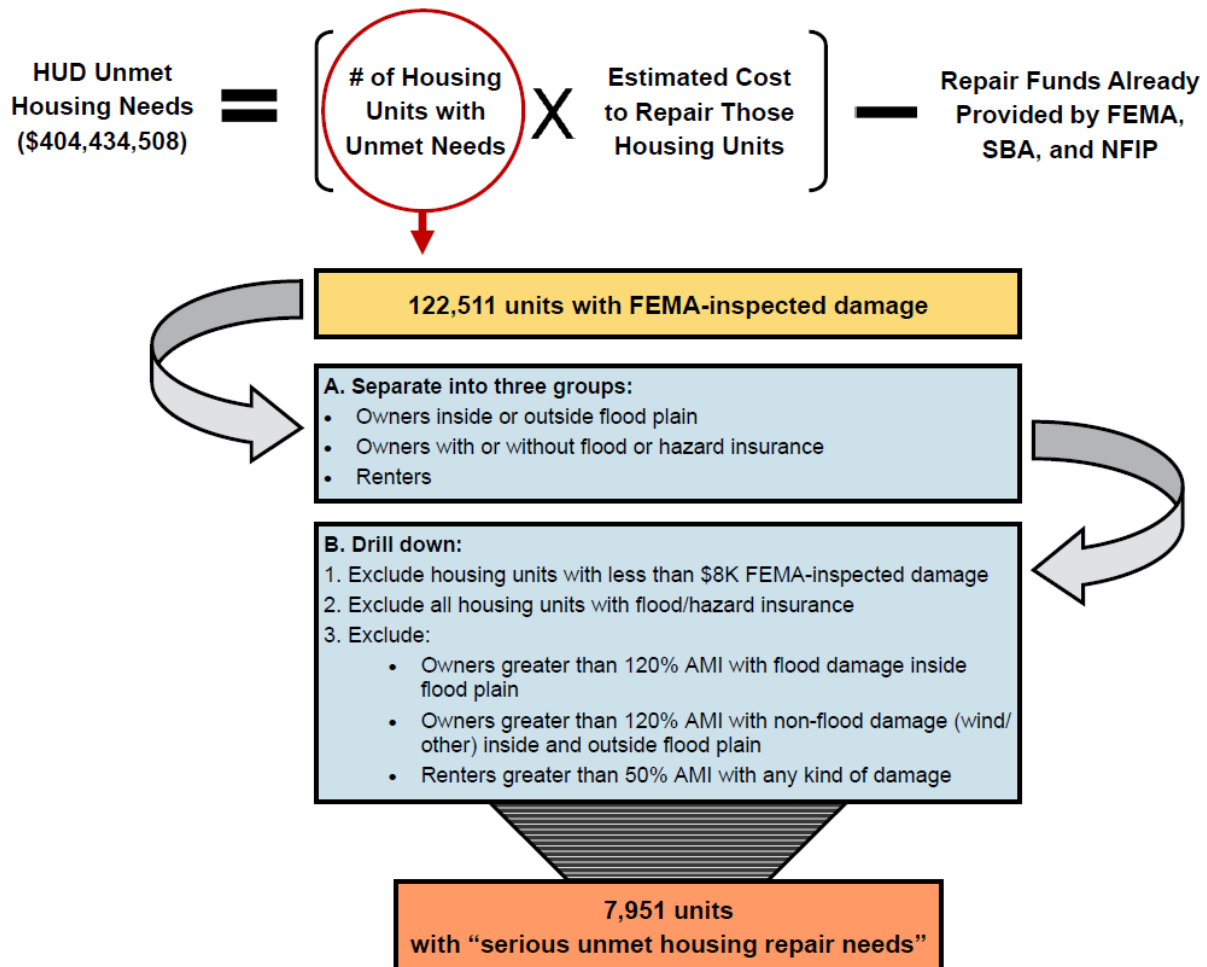


TABLE 29: TOTAL DERIVED IMPACTS AND UNMET NEEDS FOR HOUSING²⁹.

Total Derived Impacts and Unmet Needs for Housing	
Data	Dollars
Homeowner- SBA applicants that received a complete damage assessment (true dollar amount)	\$1,548,440,970
Homeowner - SBA applicants that did not receive a complete damage assessment (estimated dollar amount)	\$1,839,616,245
Homeowner - FEMA applicants that did not apply for SBA (estimated dollar amount)	\$1,681,899,777
Rental Property – FEMA applicants with verified loss (estimated dollar amount)	\$2,028,406,693
Other Housing – Real estate damage to public housing (true dollar amount)	\$2,407,150
Total Housing Loss	\$7,125,204,405
FEMA payments to repair homes	(\$470,872,021)
SBA home loans	(787,817,827)
Estimated NFIP building payments	(\$409,076,865)
Public housing funds	(\$5,000,000)
SBA rental property owner payments	(\$33,444,600)
Total Unmet Need	\$5,418,993,093
Accounting for an additional 20% in funding needed to support rebuilding to higher standards (resilience)	\$6,844,033,974
Community Development Block Grant – Disaster Recovery funds allocated to Florida	(\$404,434,508)
Total Unmet Housing Need	\$6,439,599,466

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

This is the best available data set at this time and only an estimate of actual infrastructure unmet needs. DEO will revisit Florida’s unmet infrastructure needs once more complete data becomes available for analysis.

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.

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

³¹ <https://www.fema.gov/media-library-data/1477681864977-04968ad6e3d2fab698e94c45322ea7c3/PDAReporFEMA4280DRFL.pdf>

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 27). 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 \$387,515,822 (applicant share) in identified infrastructure damage eligible under FEMA-PA Categories C-G remains.

TABLE 30: 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	\$3,285,577,514	\$988,852,677
Total without A&B	\$1,550,160,868	\$1,162,645,046	\$387,515,822

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.

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 (\$492,836,627) in addition to the FEMA Individual Assistance Program funds made available (\$70,630,803) 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 \$563,467,430.

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 \$191,522,580 in local match, representing an unmet need for resilience improvements. The HMGP process is in its initial stages at this time and will be rolled out over the coming months. HMGP 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 3,752 applicants had a verified property loss of \$944,498,448 and another 10,867 applicants either withdrew or were declined a loan from the program. The average verified loss for all applicants was \$251,933 and the median loss was \$38,370. Employing the general methodology put forth for the housing impact and unmet needs enables us to identify 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 \$1,696,240,668 by summing the verified real property losses of \$944,498,488, the estimated losses of \$416,966,790 (10,867 applicants either declined or withdrawn from the program), the median verified loss of \$38,370, the amount of verified reconstruction loss of \$20,204,438, and the amount of verified location (rebuild elsewhere) losses of \$68,193. DEO then used the same method to sum the verified and estimated losses to furniture, machinery, inventory and business operating expenses (\$314,502,799), conservatively accounting for the percentages of each applicant who we expect to see damages as a percentage of those with real verified losses (Table 28).

According to this method, total business impacts from Irma were \$1,696,240,668. 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 \$1,972,588,242. SBA payouts to businesses totaled \$219,193,400 for these lines of loss, leaving a potential unmet need of \$1,477,047,268 or \$1,753,394,842 when accounting for resilience additions.

FIGURE 35: HUD BUSINESS UNMET NEEDS METHODOLOGY.

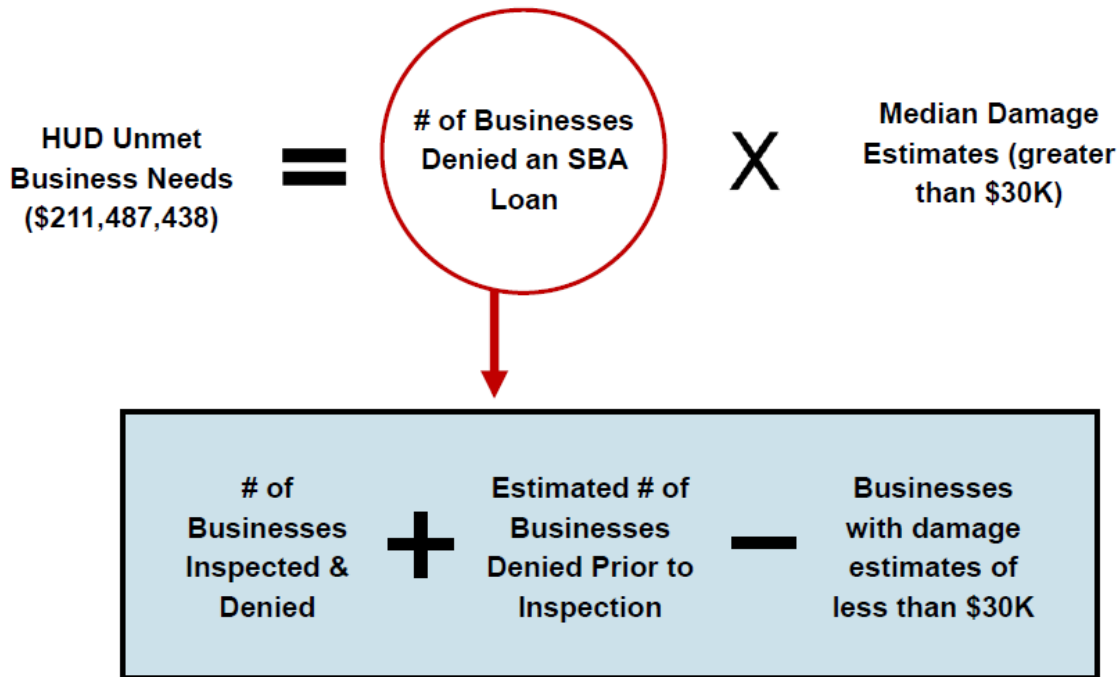


TABLE 31: TOTAL DERIVED IMPACTS AND UNMET NEEDS FOR BUSINESSES.

Total Derived Impacts and Unmet Needs for Businesses	
Data	Dollars
SBA applicants with a real estate verified loss (Repairs + Rebuild + Relocate True Dollar Amount)	\$964,771,079
SBA applicants without a real estate verified loss (Repairs + Rebuild Estimate)	\$416,966,790
SBA applicants with a business operational verified loss (True Dollar Amount)	\$208,618,332
SBA applicants without a business operational verified loss (Estimate)	\$105,884,468
Total estimated business loss	\$1,696,240,668
Assistance/Benefits Received To-Date	
SBA payments for business repairs/reconstruction	(\$78,623,400)
SBA payments for business operations	(\$140,570,000)
Total unmet business need	\$1,477,047,268
Accounting for an additional 20% in funding needed to support rebuilding to higher standards (resilience for real estate only)	\$1,753,394,842
Supplemental Assistance	
Community Development Block Grant – Disaster Recovery funding allocation to Florida	(\$211,487,438)
Total unmet need	\$1,541,907,404

TABLE 32: 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

TABLE 33: 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	1,616	\$3,000	10,867	43.1%	\$14 Million
Machinery	3,775	\$4,925	10,867	100%	\$53.8 Million
Inventory	1,828	\$5,000	10,867	48.7%	\$26.5 Million
EIDL	461	\$25,000	10,867	4.2%	\$11.5 Million

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, as mobile homes and older single-family homes that served as housing for their workforce were significantly damaged and are required to rebuilt to new building 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 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 were used to determine how much growth capacity remains before the Keys will no longer be able to 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 the 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. 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. Additionally, DEO has chosen to fund the creation of new affordable housing through the Florida Housing Finance Corporation. 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 PHAs once other funding streams are fully exhausted and if additional funding becomes available.

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 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.

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 at 49 CFR 24.402(b) that a displaced person is eligible to receive a rental assistance payments the covers a period of 42 months.

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.

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 to a beneficiary 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, prolonged job loss, substantial reduction to household income, death of a family member, unexpected and extraordinary medical bills, disability, etc.

5. Elevation Standards

DEO will develop and implement resilient home construction standards, including ensuring that 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), must be elevated with the lowest floor, including the basement. DEO at a minimum, will comply with the minimum height requirements set forth in the February 9, 2018, Federal Register Notice. 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, but 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 value. 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.

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 as well as 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 think 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. Any proposed projects must meet the requirements of both programs. If layering is included, it must meet the requirements of both programs. 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. All subrecipients will certify that they will affirmatively further fair housing in their grant agreements. Applications providing service to vulnerable populations will receive enhanced weighting.

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 stormwater 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.

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 require contractors to establish compliant standards in their request for qualifications for housing contractors. Contractors will be required to utilize builders qualified through a request for qualifications process. To ensure full and open competition, contractors are required at a minimum to follow 24 CFR 570.489(g). Contractor procurement procedures will be monitored by DEO.

DEO will provide a mechanism for homeowners to appeal the quality of the rehabilitation work. 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. Information about the complainant's rights and how to file a complaint or appeal regarding the quality of work will be printed on all program applications and/or guidelines. Records of each complaint will be kept on file and DEO consultants will respond to complaints and appeals in a timely manner, or within 15 business days, when practical. DEO consultants will be responsible for follow-up on construction quality complaints. Construction quality appeals will be verified by inspection and monitored by DEO.

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 regulations and Community Development Program Directives. Retention of program income will be in compliance with the subgrant 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 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.

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. 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. If DEO determines that it is appropriate, it will coordinate its investigation with the Florida Office of the Inspector General for further investigation (1-800-347-3735, <http://www.floridaoig.com/>).

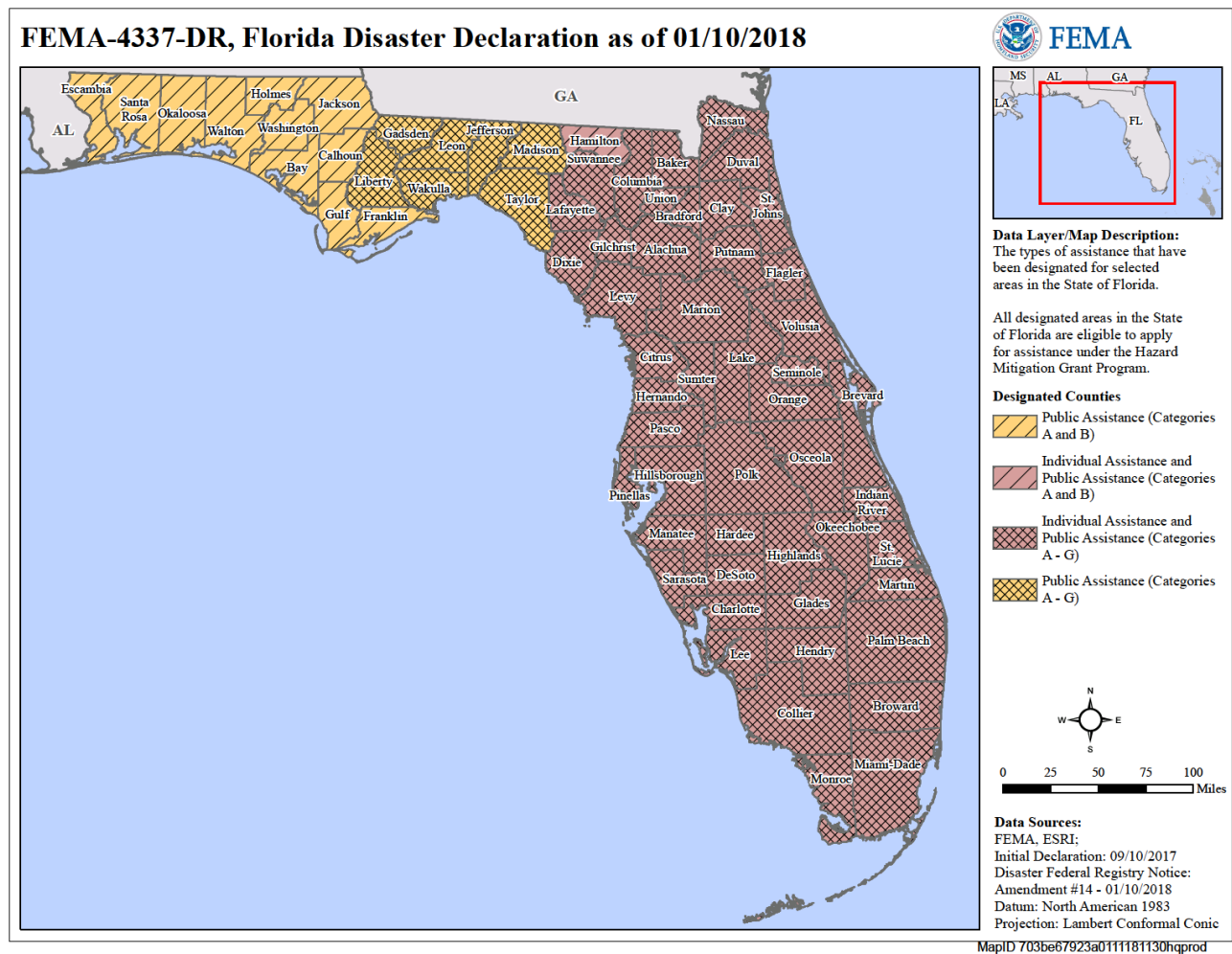
12. Broadband Infrastructure

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 in the impacted and distressed Florida counties 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:

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. 28, Friday, February 9, 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 in the first allocation of funding is limited to Monroe, Miami-Dade, Duval, Lee, Polk, Collier, Brevard, Broward, Orange, and Volusia counties; 32068, 34266, 32136, and 32091 zip codes and the jurisdictions within the counties.

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 \$615,922,000 in Community Development Block Grant Disaster Recovery (CDBG-DR) funds allocated to the state for recovery. In accordance with the Register, DEO's aggregate total for indirect costs, administrative and technical assistance expenditures will not exceed 5 percent of the total grant (\$30,796,100) 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. Planning costs subject to the 20 percent cap are those defined in 42 U.S.C. 5305(a)(12). State and local administration 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.

Eighty percent of each program allocation listed below 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 program budget outlined is as follows:

Program Budget								
Program	Total Budget	MID Budget Breakdown		Min Set-Aside for Keys	Estimated LMI Benefit	Maximum Award	Average award per unit	Estimated # of Units
		80%	20%					
Housing Repair Program	\$273,329,800	\$218,663,840	\$54,665,960	\$50,000,000	90%	\$150,000	\$45,000	6,000
Workforce Affordable Rental New Construction Program: Leveraging Other Sources of Financing	\$80,000,000	\$64,000,000	\$16,000,000	\$20,000,000	100%	\$8,000,000	\$60,000	1,350
Workforce Affordable Rental New Construction Program: Small Rental Developments	\$20,000,000	\$16,000,000	\$4,000,000	\$0	100%	\$5,000,000	\$125,000	160
Land Acquisition for Affordable Workforce Housing	\$20,000,000	\$16,000,000	\$4,000,000	\$10,000,000	100%	\$5,000,000	N/A	N/A
Voluntary Home Buyout Program	\$75,000,000	\$60,000,000	\$15,000,000	\$10,000,000	50%	\$5,000,000	\$225,000	300
ECONOMIC REVITALIZATION								
Recovery Workforce Training	\$20,000,000	\$16,000,000	\$4,000,000	N/A	100%	N/A	N/A	N/A
Business Recovery Grant	\$60,000,000	\$48,000,000	\$12,000,000	N/A	100%	\$50,000	N/A	1,200
PUBLIC SERVICES								
Business Assistance to new Floridians from Puerto Rico	\$6,000,000	\$4,800,000	\$1,200,000	N/A	N/A	N/A	N/A	N/A

Program	Total Budget	MID Budget Breakdown		Min Set-Aside for Keys	Estimated LMI Benefit	Maximum Award	Average award per unit	Estimated # of Units
		80%	20%					
INFRASTRUCTURE								
Infrastructure Repair and Mitigation Program	To be addressed with next allocation*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
STATE AND LOCAL ADMINISTRATION								
Administration (5%)	\$30,796,100	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Planning (5%)	\$30,796,100	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL	\$615,922,000	\$443,463,840	\$110,865,960	\$90,000,000				

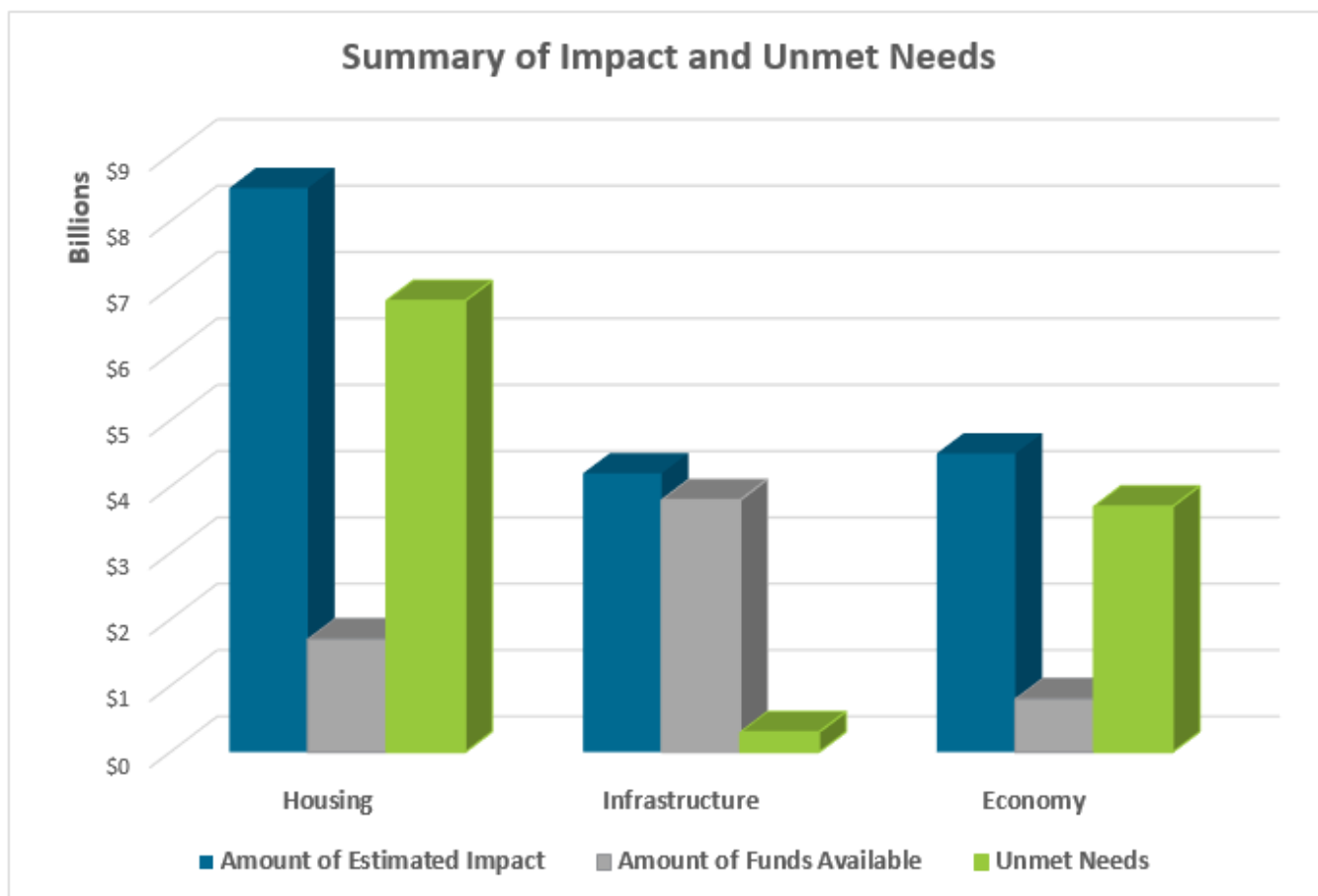
*Florida will receive an additional \$791 million to support additional unmet need, including infrastructure and mitigation efforts through the CDBG-DR program. Funding for these programs will be included when the federal guidance is released.

The state is required to spend 70 percent of total allocation to benefit LMI.

Program details will provide further detail on how each program will distribute funding. DEO will implement program management, monitoring, and oversight standards necessary to ensure compliance with state and federal requirements.

3. Basis for Allocations

In consideration of the unmet needs assessment and HUD requirements, 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, 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.



Summary of Impact and Unmet Needs				
Summary of Impacts/Support	Housing	Infrastructure	Economy	Total
Amount of Estimated Impact	\$8,547,356,706	\$4,274,430,191	\$4,531,186,545	\$17,352,973,442
Amount of Funds Available	\$1,706,211,312	\$3,886,914,370	\$814,906,921	\$6,408,032,603
Unmet Needs	\$6,841,145,394	\$387,515,822	\$3,716,279,624	\$10,944,940,840
Percent of Total Unmet Needs	62.51%	3.54%	33.95%	100.00%

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-6066-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
- Land Acquisition for Workforce Affordable Rental 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. The determination may be established based on the calculation that the cost of rehabilitation is close to or exceeds the cost to reconstruct.

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. Applicants will not select their own contractors and will not contract directly with the construction contractor. 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 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.

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 may be required by the program may be limited to reconstruction or replacement as a more cost reasonable option and therefore required. 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.

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. 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. 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.

Program Priorities

Recognizing that the \$273 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. Households with income higher than 120 percent of AMI will not be eligible for this program. Households with one or more of the below facts will be prioritized and processed in the order that they complete an application.

- Households with seniors age 65+
- Households with children age 5 or younger
- Households with special needs or special accommodation requirements (disabled)
- Low- to very-low incomes

As grant award agreements in either set of reserved funds approaches full obligation, DEO will analyze remaining potential eligible applicant pipeline and may choose to re-allocate funds from one reserved amount to the other or place remaining applicants on hold until priority household applicants are fully processed and needs most realized. As program application intake production is monitored, DEO may choose to adjust the percentage of reserved funding or re-allocate additional funding from other programs with less production to maximize assistance for priority applicants eligible and seeking Housing Repair Program assistance.

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 beneficiary under the Housing Repair Program 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.
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 after factoring in the inputs listed above, subtracting any duplication of benefit and qualified offsets for eligible repair estimates, and then factoring in the pre-determined program assistance maximums that apply to the housing assistance activities to be used. 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 by federal assistance to maintain flood insurance and notify future owners of flood insurance requirements. Federal law requires people who live in a floodplain and previously received Federal disaster funds to repair their homes as the result of a flood 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 covenant 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.

Allocation for Activity: \$273,329,800

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

Eligibility Criteria: For homeownership, the state will prioritize homeowner applicants earning less than or equal to 80 percent AMI. 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 5844 Volume 83, Number 23 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.

Owners of rental properties are also eligible for the Housing Repair Program, providing that the assisted rental property remains affordable for LMI tenants for a minimum of 20 years.

Maximum Award: \$150,000

Responsible Entity for Administering: Florida Department of Economic Opportunity

Eligibility: 105(a)(4)

National Objective: Low- and moderate-income benefit

Limited Temporary Relocation Assistance for Homeowners (Optional Relocation)

Limited temporary relocation assistance will be provided, at the discretion of DEO, to applicants needing to move out of homes during construction on a case-by-case basis. Assistance will be determined based on priority populations and resources available on a case-by case basis for eligible applicants.

Limited Temporary Relocation Assistance for Tenants (Optional Relocation)

If tenants are required to relocate, DEO will fund the cost. Policies and procedures will be developed at a later date and will follow requirements under URA.

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 assistance and the repair costs necessary to rehabilitate the mobile/manufactured home must not exceed \$5,000 (hard and soft construction costs). Any mobile/manufactured home that is older than five years old or has an estimated repair cost greater than \$5,000 shall require the mobile/manufactured home to be replaced with another mobile/manufactured home. The home must meet HQS upon completion.

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. Homeowners must prove Irma storm damage to qualify for home 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. Single occupancy homes will be served first. DEO may decide to serve owner occupied homes with rental units later in the program.
- C. All applicants must own a single-family home, mobile/manufactured home, or rental property located within one of the most impacted counties and zip codes prior to the Irma storm event.
- 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. This affordable housing is also intended to serve vulnerable population and reduce the risk of homelessness. 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. Development will be new construction and may include re-development of uninhabitable dwellings. 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.

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. 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.

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.

Allocation for Activity: \$80,000,000

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)(4)

National Objective: Low- and moderate-income benefit

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)(4)

National Objective: Low- and moderate-income benefit

Land Acquisition for Affordable Workforce Housing

Funding to purchase land for the development of affordable housing is also needed to address the workforce housing needs in communities around the state. This is especially true in the Florida Keys and other areas of the state where scarcity of land drives up the cost and can make it difficult to develop properties that the workforce of a community can rent at an affordable rate. DEO, in partnership with FHFC, will manage a program that will provide funding for the purchase of land with a priority for formal public/private commitments to develop affordable housing. This program may be used to complement the Workforce Affordable Rental New Construction Programs to ensure that affordable housing needs can be met in areas where land is scarce. The land may be owned separately from the affordable housing developments and will be subject to deed restrictions to ensure long-term affordability.

Allocation for Activity: \$20,000,000

Eligible Applicants: Eligible Applicants will include for-profit and nonprofit housing developers, local governments and public housing authorities with experience developing and managing rental properties in similar size and scope of the proposed development.

Eligibility Criteria: The proposed purchase of land must help address the unmet needs in the HUD-identified most-impacted and distressed areas, or other areas impacted by the storms and deemed as a priority by the state.

Maximum Award: \$5,000,000

Responsible Entity for Administering: Florida Housing Finance Corporation

Eligibility: 105(a)(4)

National Objective: Low- and moderate-income benefit

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. DEO will hire a contracted team to work with counties who are interested in pursuing the buyout projects to support and provide:

- Appraisals
- Title and legal 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 Grant Program (HMGP). The second option is to work directly with DEO on projects located in low- and moderate-income area 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.

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.

Allocation for Activity: \$75,000,000

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

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.

Economic Revitalization Activities

As recognized in the unmet needs assessment, businesses and local economies were impacted by Hurricane Irma. 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. To address these needs, DEO will implement the following programs:

- Workforce Recovery Training Program
- Business Recovery Grant Program

Workforce Recovery Training Program

The impacts of Hurricane Irma continue to pose significant challenges for residents of impacted communities to recover, including the needs for skilled labor. In order for the recovery process to continue, the need for skilled labor is vital. DEO, through its Division of Workforce Services, will utilize existing programs to bolster workforce recovery training throughout the state of Florida caused by Hurricane Irma. The Division of Workforce Services partners with CareerSource Florida and the state's 24 Local Workforce Development Boards to strengthen Florida's business climate by supporting employers and helping Floridians gain employment, remain employed, and advance in their careers. To ensure that there are resources to support the high demand of remaining work caused by Hurricane Irma, DEO will implement a workforce recovery training program that may include but may not be limited to the areas of:

- Roofing
- Masonry
- Carpentry
- Concrete finishers
- Plumbing
- HVAC (heating, ventilation, and air conditioning)
- Electricity
- Heavy equipment operations
- Customized training
- On-the-Job Training (OJT)

The Section 3 program requires that recipients of CDBG-DR provide to the greatest extent possible training, employment, contracting and other economic opportunities to low- and very low-income persons. DEO will work with its Division of Workforce Service to make sure successful graduates and residents receiving public housing assistance are referred to both programs and businesses supported by or working on CDBG-DR funded projects are referred to graduates of this training to meet their contracted Section 3 goals.

Allocation for Activity: \$20,000,000

Maximum Award: N/A

Responsible Entity for Administering: DEO, CareerSource Florida, Local Workforce Development Board

Eligibility: 105(a)(8)

National Objective: Low- and moderate-income benefit

Business Recovery Grant Program

Small businesses are the lifeblood of local economies throughout the state. This can include typical small shops and restaurants in communities, along with the farmers and fisherman who are important to the agriculture and commercial seafood industries in Florida. As evident in the unmet needs assessment, many of these small businesses, along with nonprofit organizations, were impacted by Hurricane Irma. Wind and flood events can damage structures, destroying vital equipment and inventory. While many business owners have insurance for structures and some also carry insurance on building contents, events such as these can require these small business owners to dip into savings accounts to complete bare minimum repairs and replacements to ensure that doors can remain open and work can be done to harvest crops and seafood. Recognizing this impact, DEO will create a grant program for eligible business owners who are seeking reimbursement for the cost of replacing equipment and inventory damaged by Hurricane Irma. The repayment of Small Business Administration (SBA) loans is not allowed under federal guidance for this funding and documentation of impacts from Hurricane Irma will be required. Additional guidance on the application process, eligibility and program management will be defined after approval of this action plan in state guidance issued on this program.

Allocation for Activity: \$60,000,000

Eligible Applicants: Owners of both for-profit and nonprofit small businesses.

Eligibility Criteria: Small businesses and non-profits with equipment and inventory damaged by Hurricane Irma.

Maximum Award: \$50,000

Responsible Entity for Administering: DEO

Eligibility: 105(a)(14)

National Objective: Jobs for LMI individuals

Public Assistance

As recognized in the unmet needs assessment, new Floridians who are migrating from Puerto Rico because of Hurricane Maria need support in rebuilding their lives. DEO proposes a public assistance program to support this new population.

Business Assistance to New Floridians from Puerto Rico

Hurricane Maria left devastating impacts on the island communities of Puerto Rico, forcing many families to flee to other parts of the United States seeking shelter and new opportunities. As documented in the unmet needs assessment, the State of Florida has served as a refuge for many of those displaced by Hurricane Maria. As new Floridians, this migrated population is seeking out assistance in assimilating to the business climate and practices of the State. This is especially true in the Tampa Bay area, Central Florida and Southeast Florida. To ensure that there are resources to support these new Floridians, DEO will implement a public assistance program for new businesses and entrepreneurs who have migrated from Puerto Rico. This program may include:

- Business plan guidance,
- Information about specific regional markets,

- Accounting and legal assistance,
- Licensing and permitting guidance, along with
- Seminars and other forms of assistance.

These services will be provided in Spanish to and will target specific communities that have received a recent influx of population following Hurricane Maria. Through this program, families impacted by storms in Puerto Rico will be able to establish thriving businesses and rebuild their lives in Florida.

Allocation for Activity: \$6,000,000

Maximum Award: N/A

Responsible Entity for Administering: DEO

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 and Mitigation 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.

Infrastructure Repair and Mitigation Program

The Federal Register Notice requires CDBG-DR recipients to consider housing needs first. DEO will focus the original CDBG-DR allocation of \$616 million on addressing remaining housing and economic development unmet needs. HUD has announced that Florida will receive an additional allocation of \$791 million and it is anticipated that a portion of this funding will go to the Infrastructure Repair and Mitigation Program. Additional guidance will be released in the federal register on how this funding can be used by states. DEO will further define this program in an amendment to this action plan, based on this guidance.

5. 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.

6. 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.

7. 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 160
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.

Local Government Stakeholder Meetings

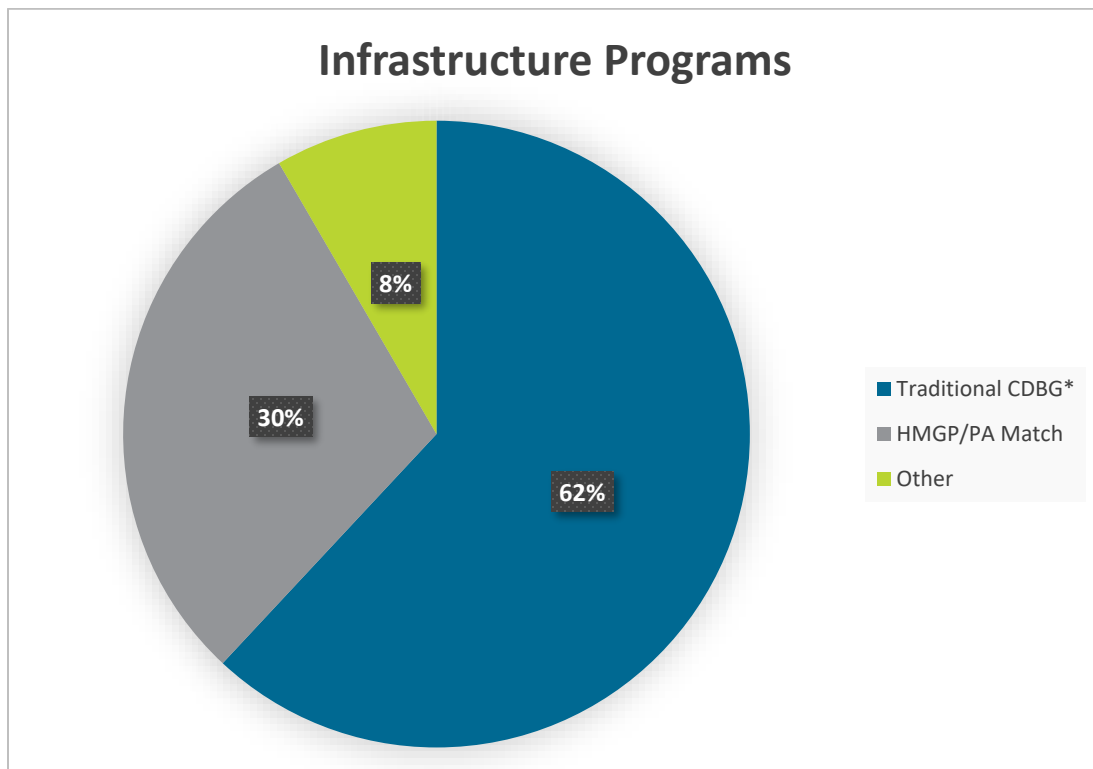
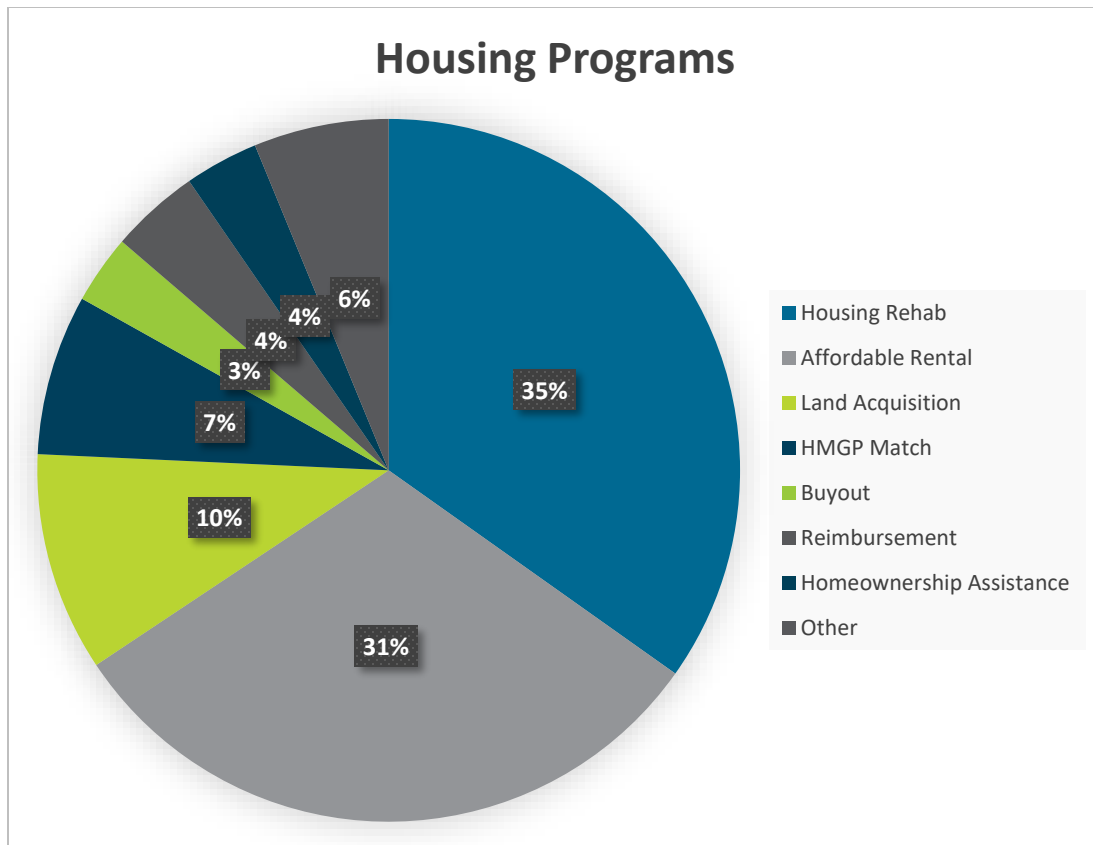
DEO, FDEM and HUD CDBG-DR staff traveled around the state and visited each of the 14 HUD-identified most-impacted and distressed areas. At these meetings, participants were given a brief overview of the program with an opportunity to ask any questions that they may have of staff. Most of the meeting 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
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

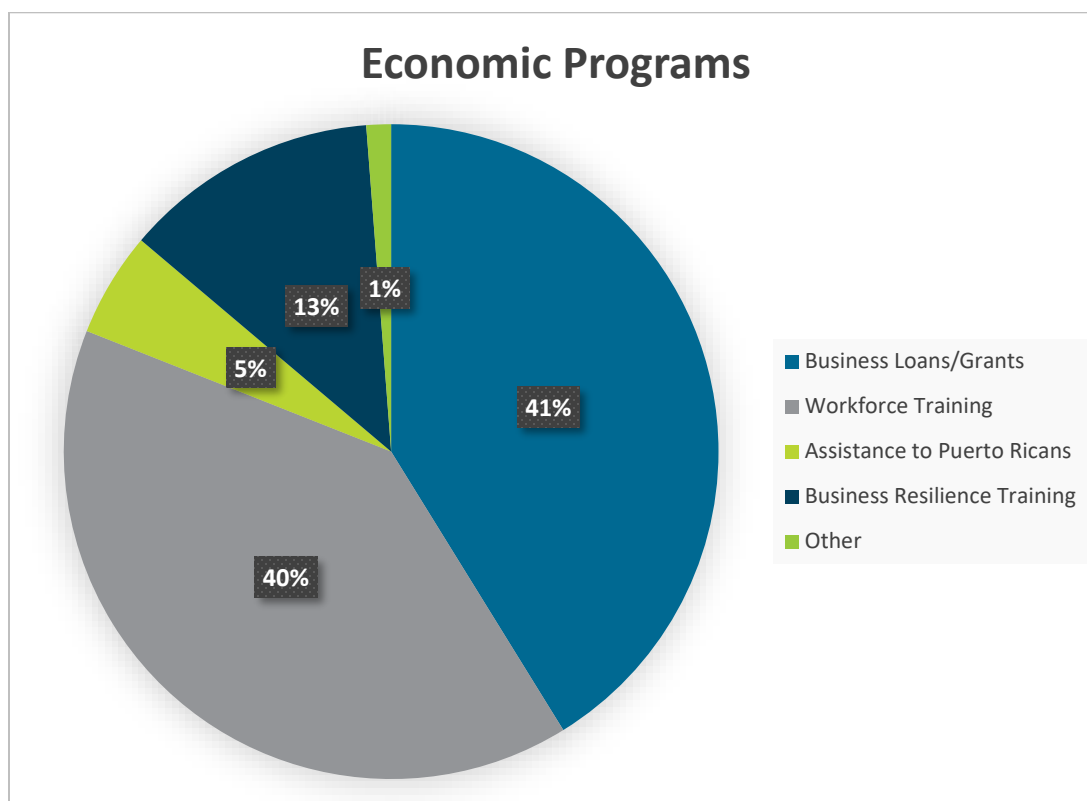
Community Stakeholder Survey

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, stormwater, etc.*



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.

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.

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 14 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 Appendix 11.

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 160
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, prolonged job loss, substantial reduction to household income, death of a family member, unexpected and extraordinary medical bills, 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 Counties³³

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								

³³ <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

2017 Family Income Limits for IA Declared Counties								
Household Composition								
Limit	Fam1	Fam2	Fam3	Fam4	Fam5	Fam6	Fam7	Fam8
Flagler								
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

2017 Family Income Limits for IA Declared Counties								
Household Composition								
Limit	Fam1	Fam2	Fam3	Fam4	Fam5	Fam6	Fam7	Fam8
LOW INCOME	\$27,100	\$31,000	\$34,850	\$38,700	\$41,800	\$44,900	\$48,000	\$51,100
Hernando								
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

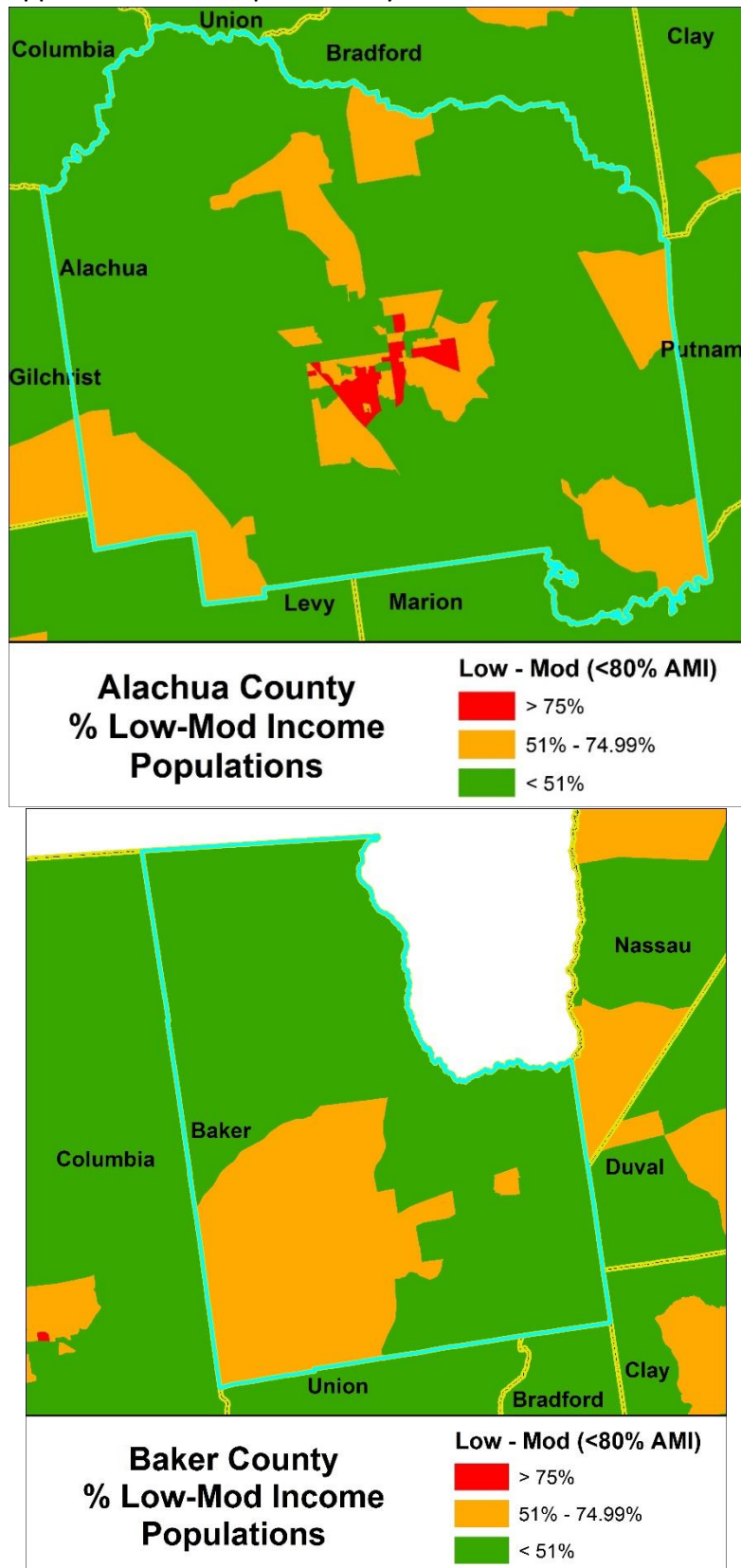
2017 Family Income Limits for IA Declared Counties								
Household Composition								
Limit	Fam1	Fam2	Fam3	Fam4	Fam5	Fam6	Fam7	Fam8
60% LIMITS	\$24,540	\$28,080	\$31,560	\$35,040	\$37,860	\$40,680	\$43,500	\$46,260
LOW INCOME	\$32,700	\$37,400	\$42,050	\$46,700	\$50,450	\$54,200	\$57,950	\$61,650
Lee								
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	\$24,800
60% LIMITS	\$22,140	\$25,320	\$28,500	\$31,620	\$24,200	\$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

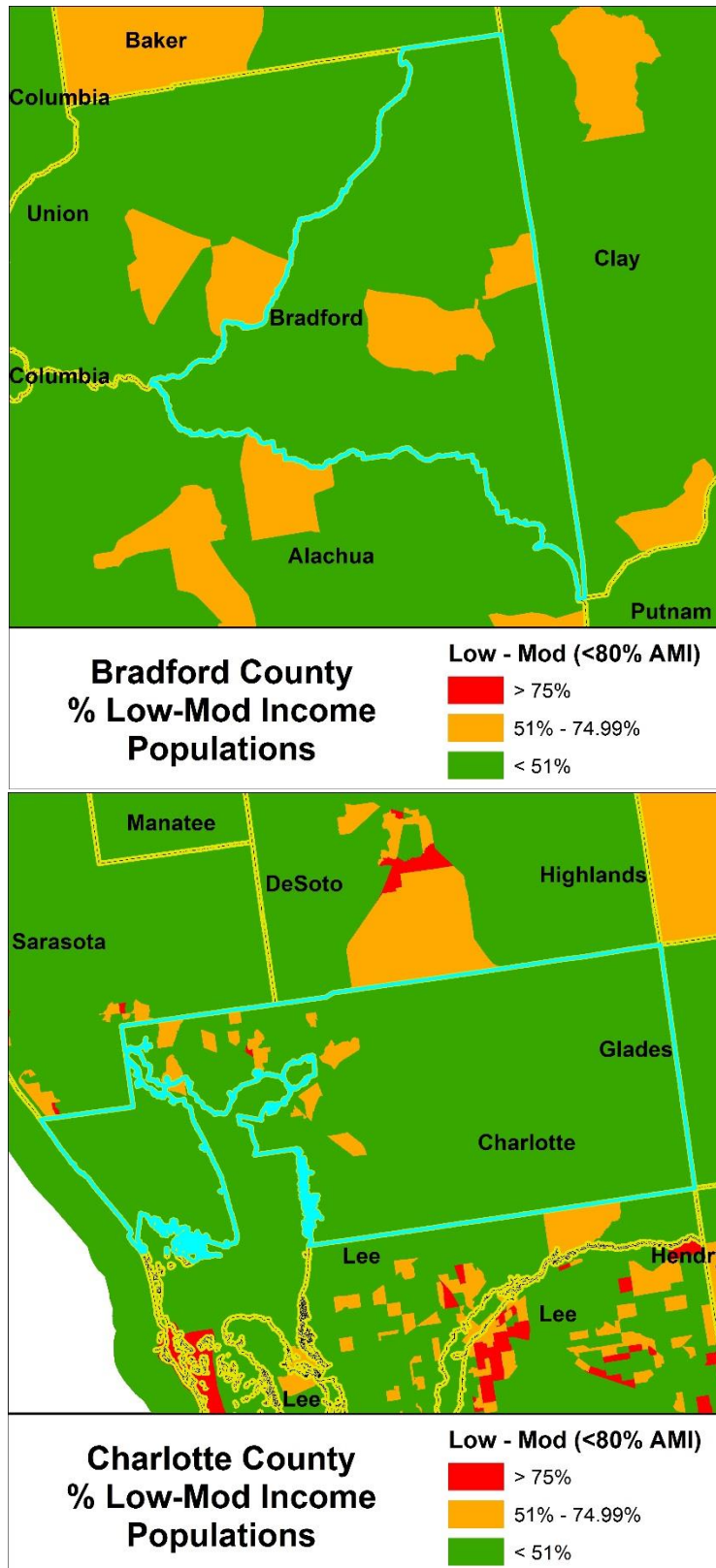
2017 Family Income Limits for IA Declared Counties								
Household Composition								
Limit	Fam1	Fam2	Fam3	Fam4	Fam5	Fam6	Fam7	Fam8
VERY LOW INCOME	\$26,450	\$30,200	\$34,000	\$37,750	\$40,800	\$43,800	\$46,850	\$49,850
60% LIMITS	\$31,740	\$36,240	\$40,800	\$45,300	\$48,960	\$52,560	\$56,220	\$59,820
LOW INCOME	\$42,300	\$48,350	\$54,400	\$60,400	\$65,250	\$70,100	\$74,900	\$79,750
Monroe								
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								

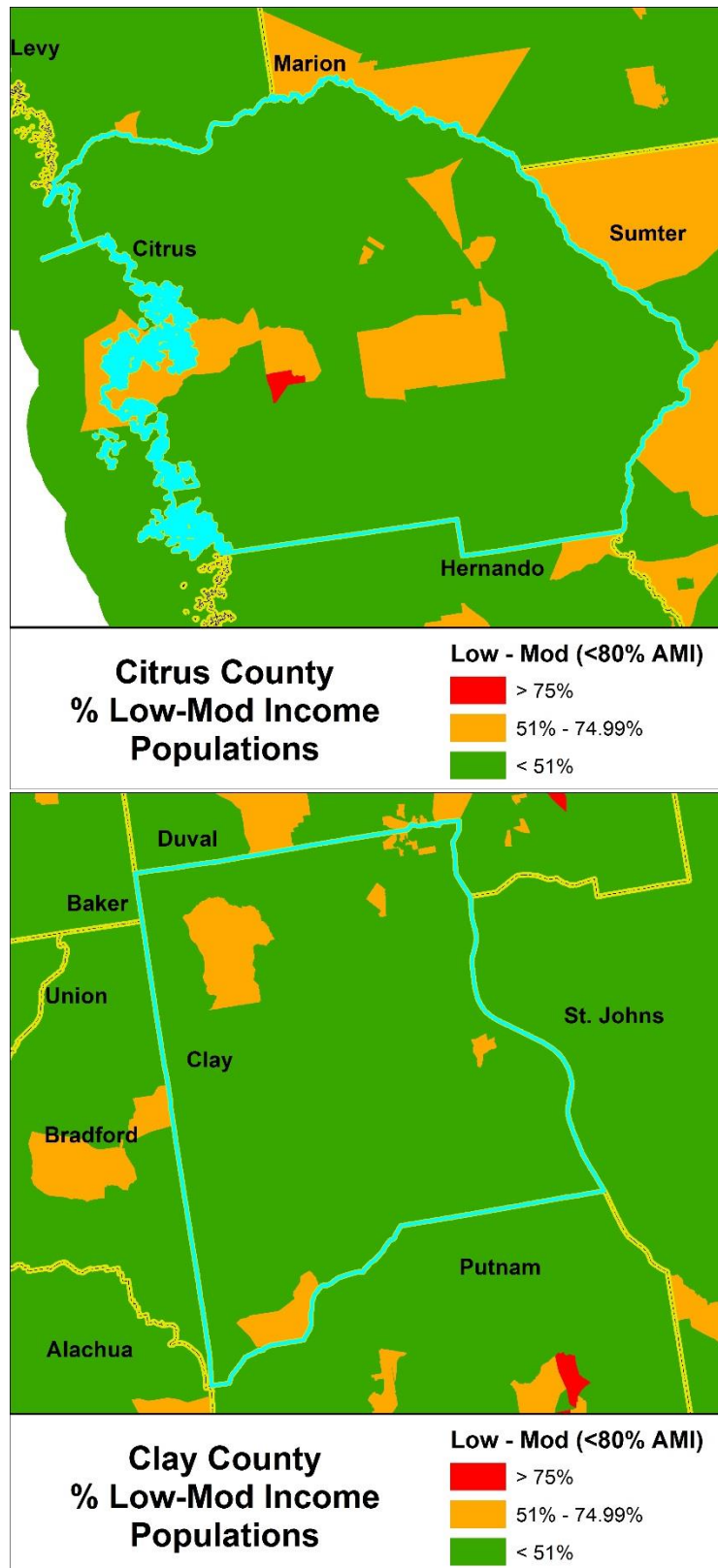
2017 Family Income Limits for IA Declared Counties								
Household Composition								
Limit	Fam1	Fam2	Fam3	Fam4	Fam5	Fam6	Fam7	Fam8
30% LIMITS	\$12,600	\$14,400	\$16,200	\$17,950	\$19,400	\$20,850	\$22,300	\$23,700
VERY LOW INCOME	\$20,950	\$23,950	\$26,950	\$29,900	\$32,300	\$24,700	\$37,100	\$39,500
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
Polk								
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

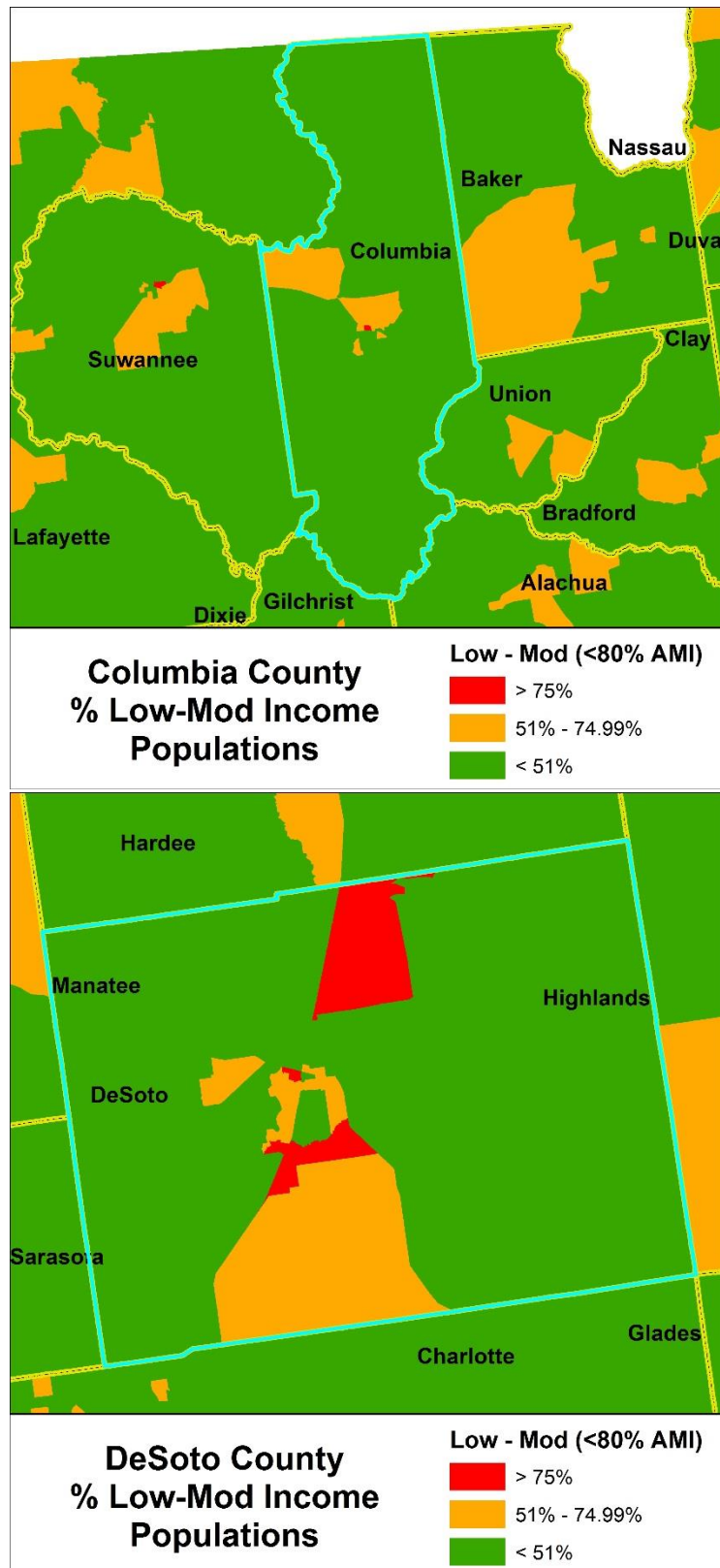
2017 Family Income Limits for IA Declared Counties								
Household Composition								
Limit	Fam1	Fam2	Fam3	Fam4	Fam5	Fam6	Fam7	Fam8
Suwanee								
30% LIMITS	\$10,150	\$11,600	\$13,050	\$14,500	\$15,700	\$16,850	\$18,000	\$19,150
VERY LOW INCOME	\$16,950	\$19,400	\$21,800	\$24,200	\$26,150	\$28,100	\$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								
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

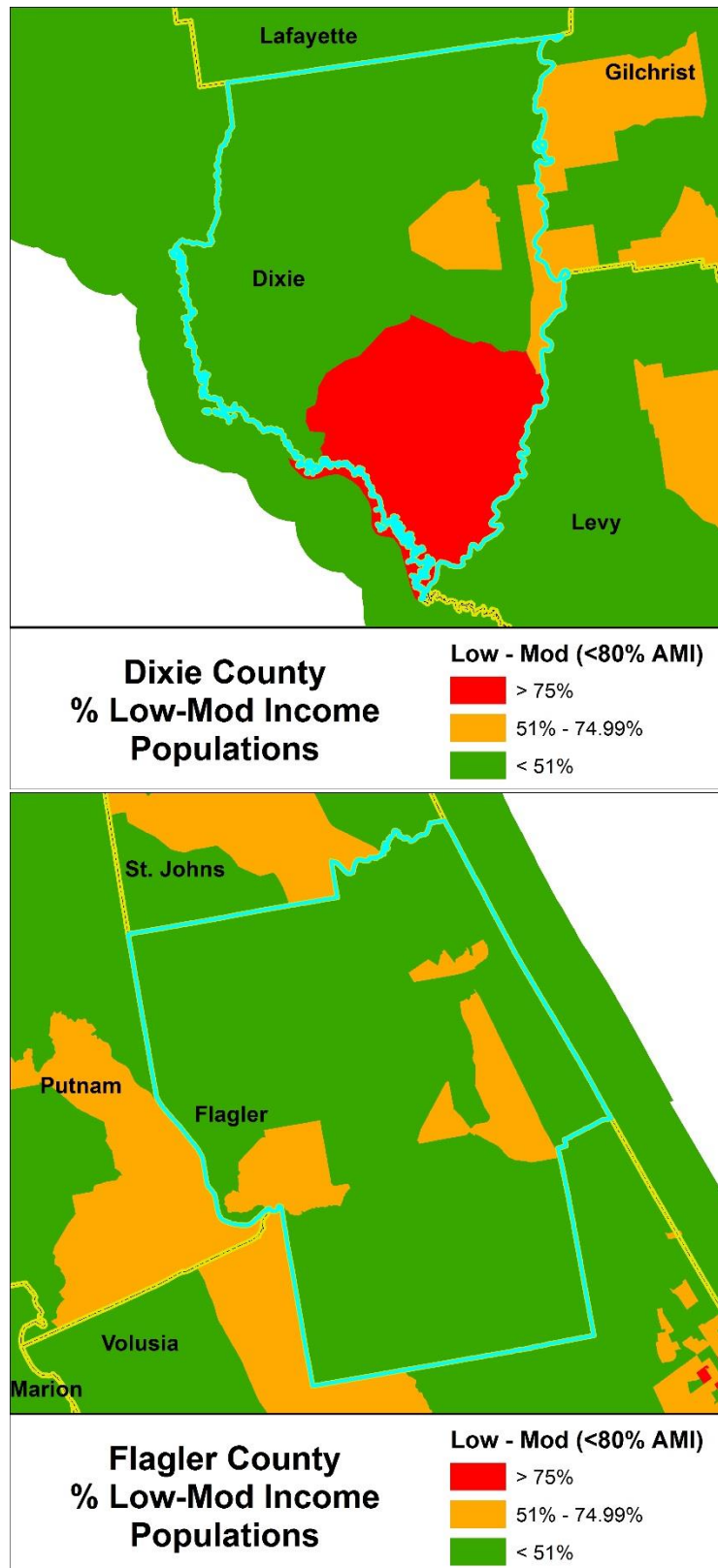
Appendix 2: 2016 Populations by LMI for IA Declared Counties

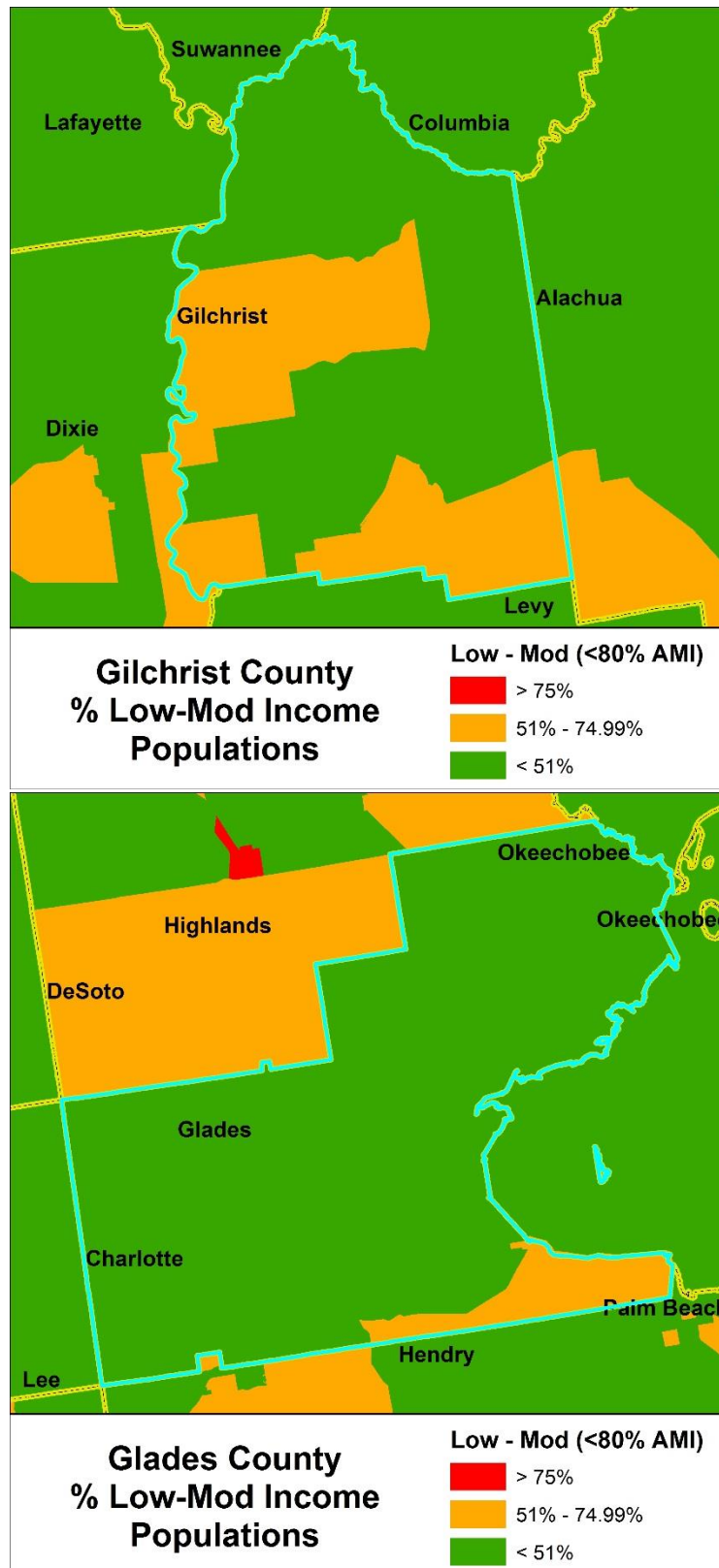


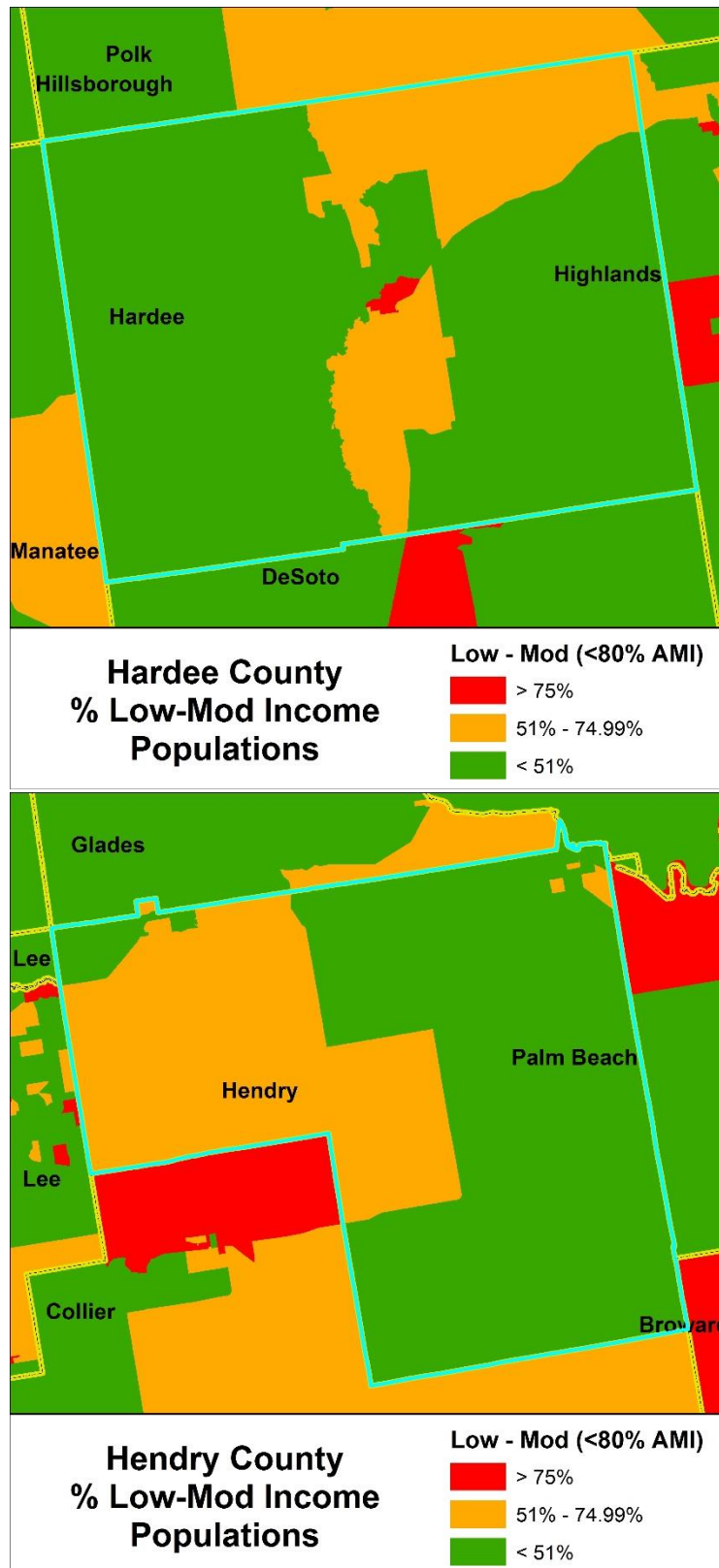


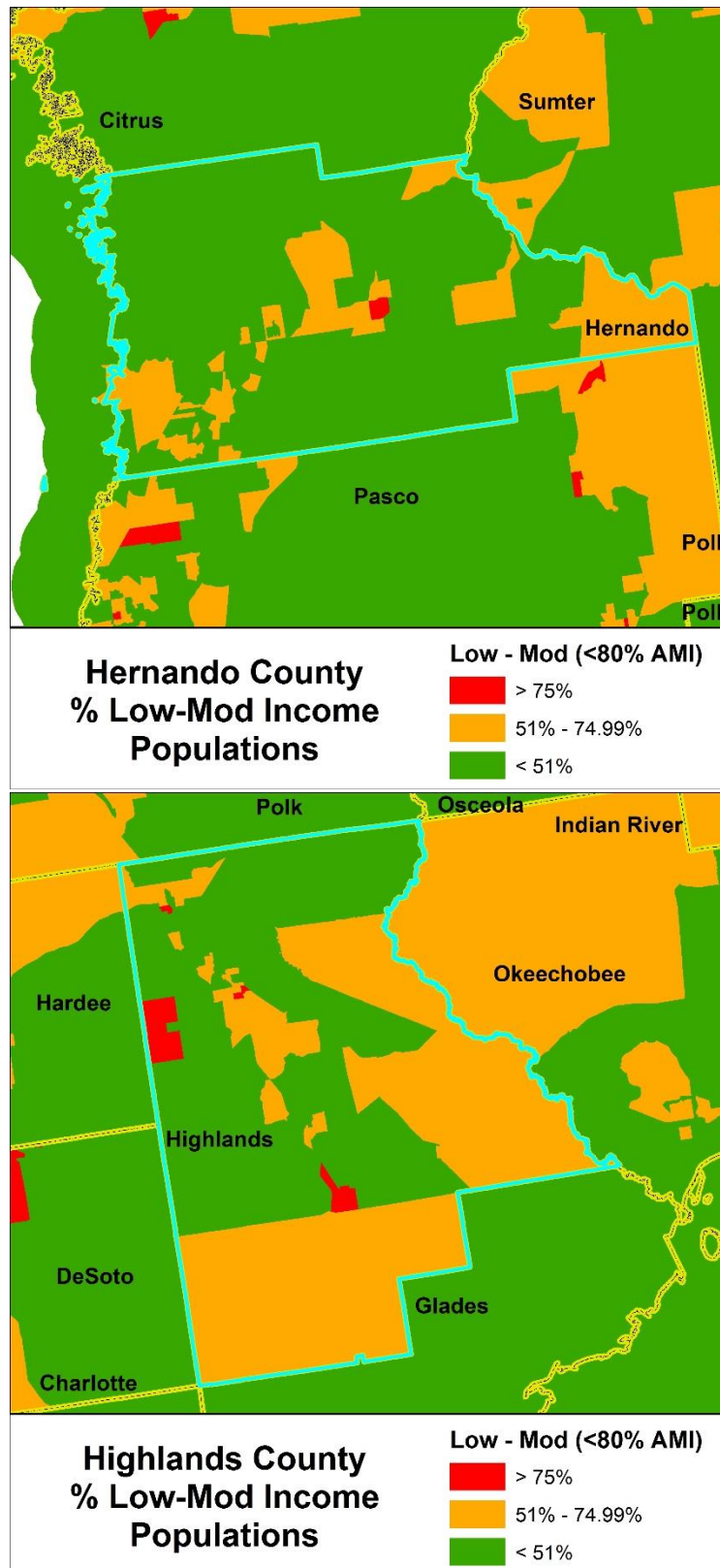


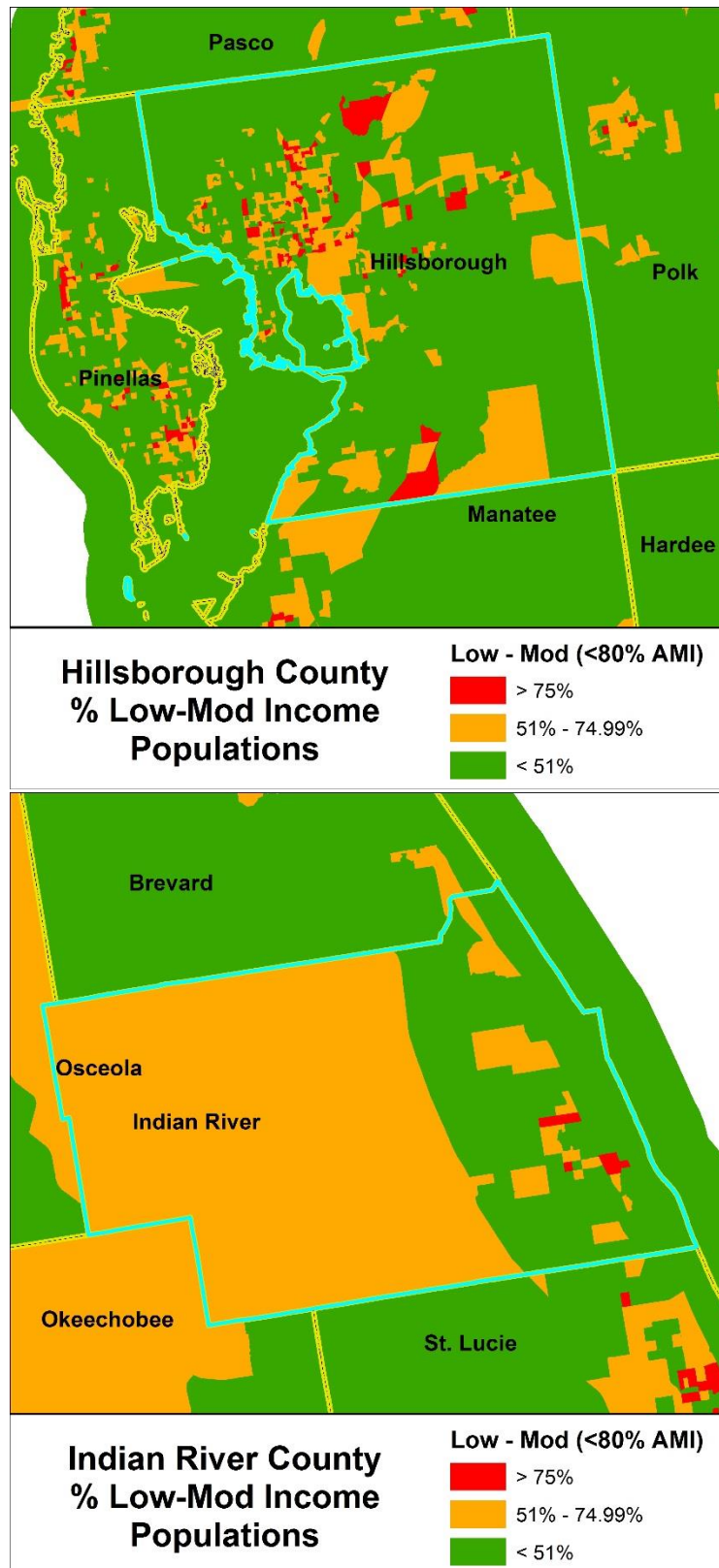


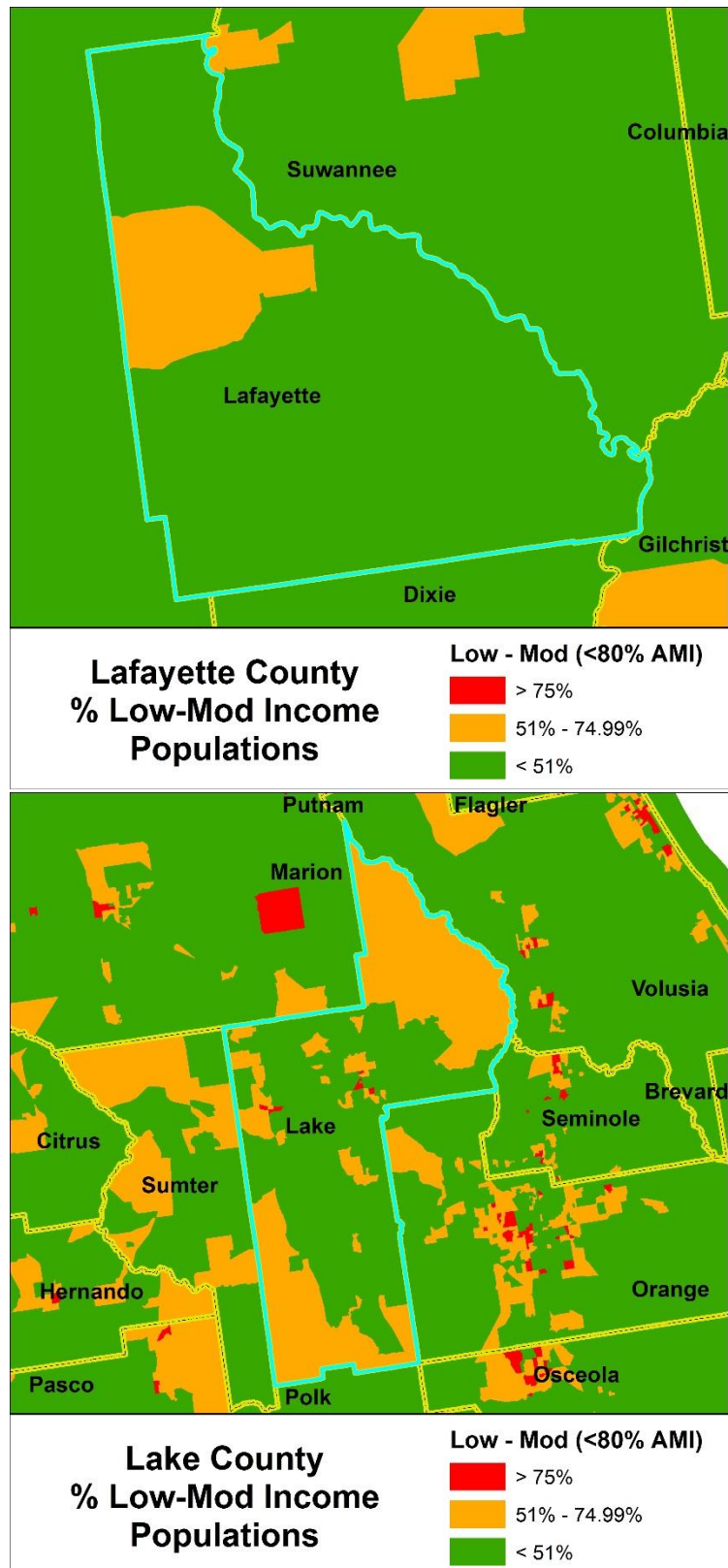


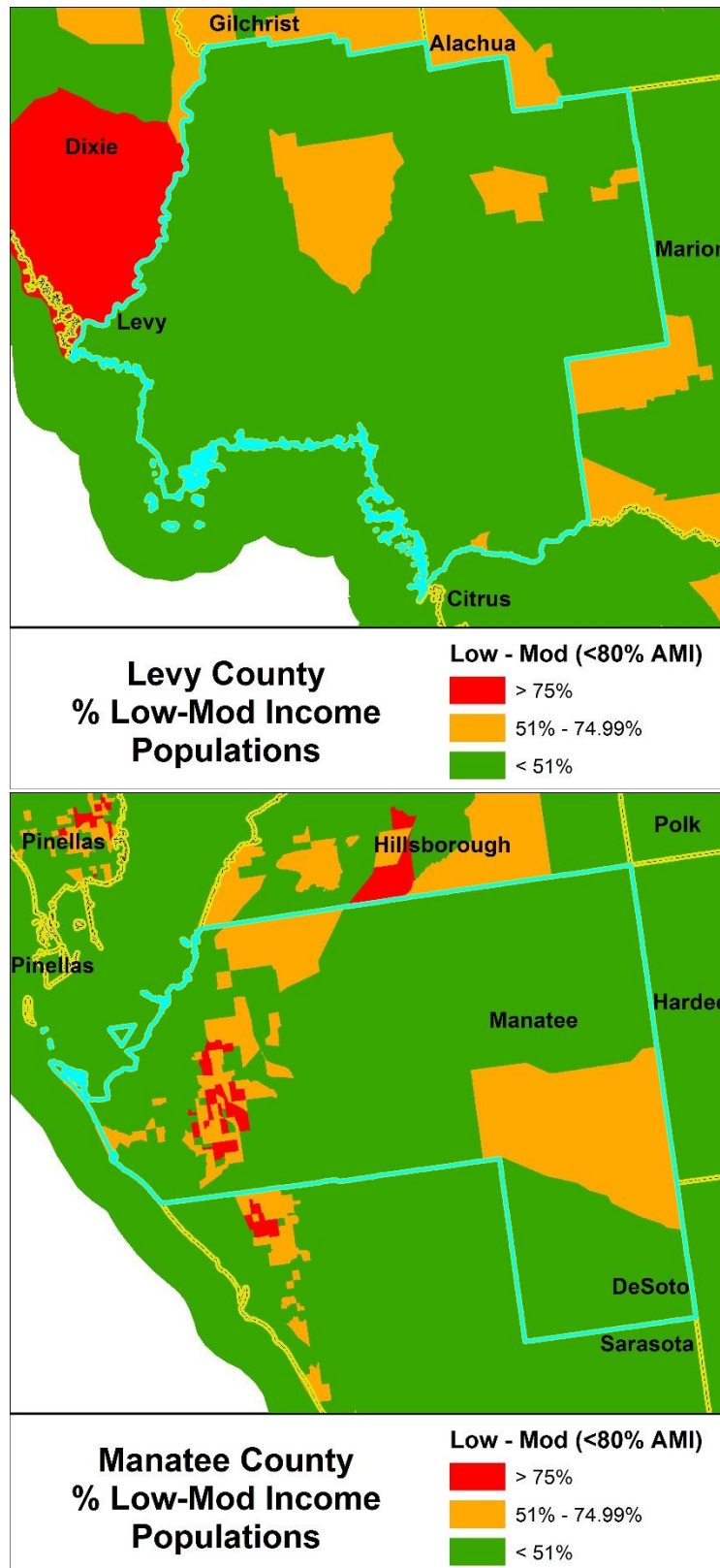


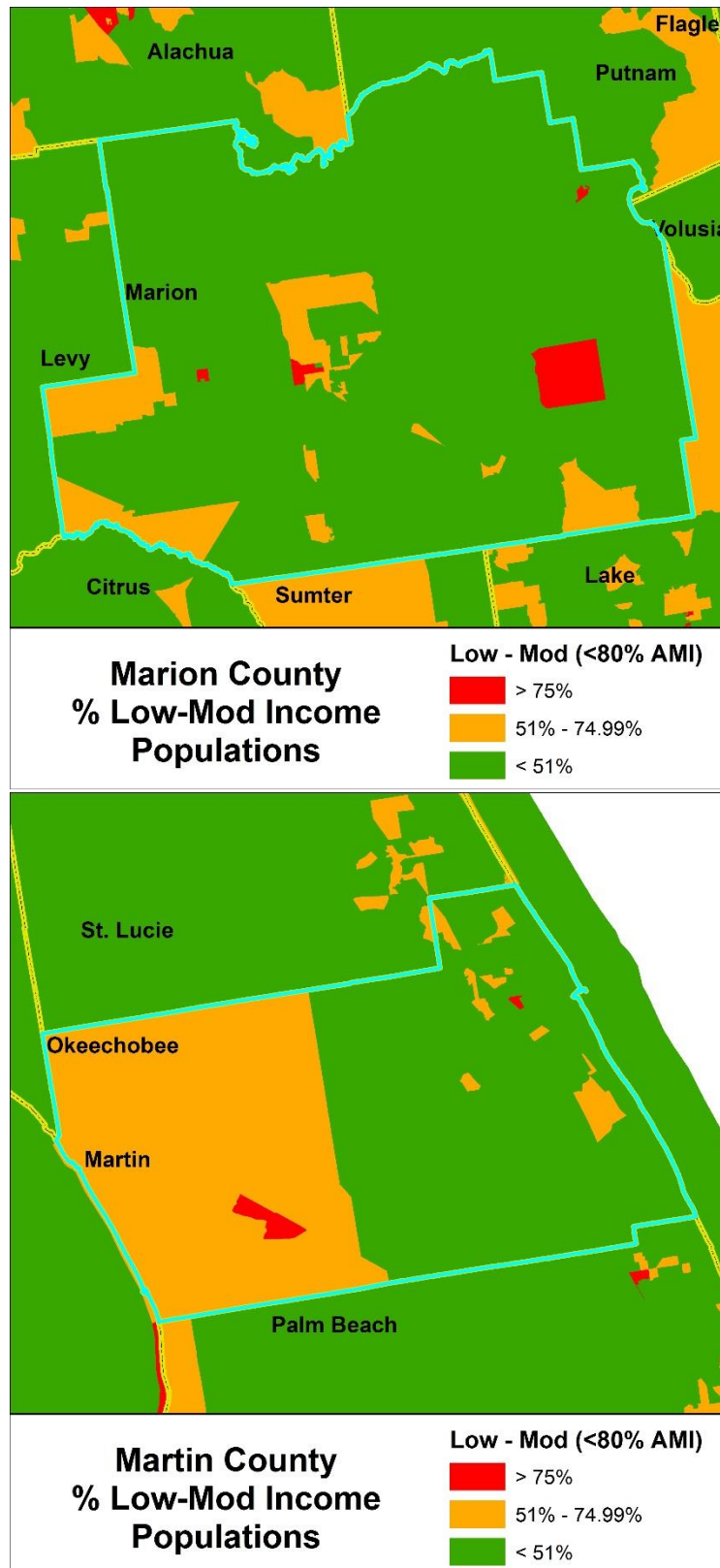


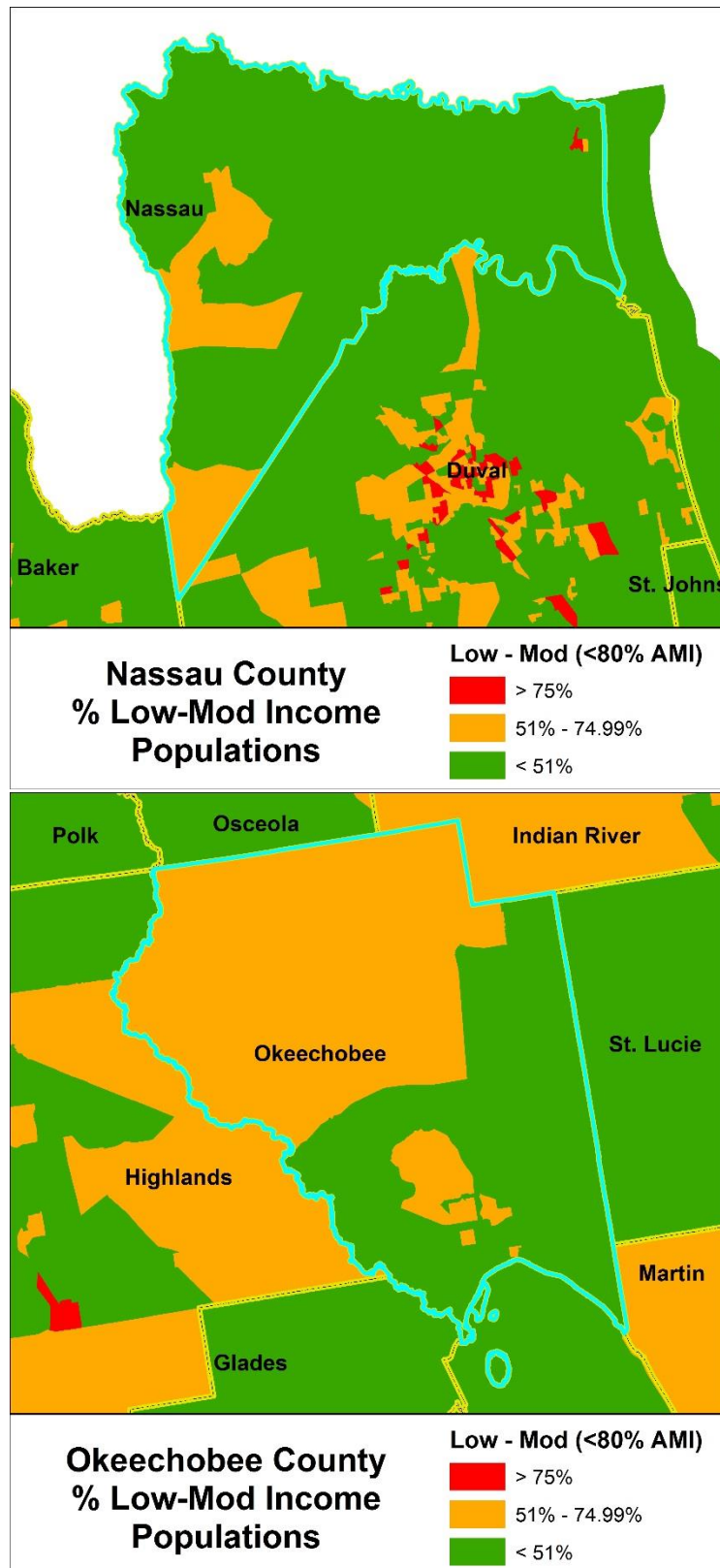


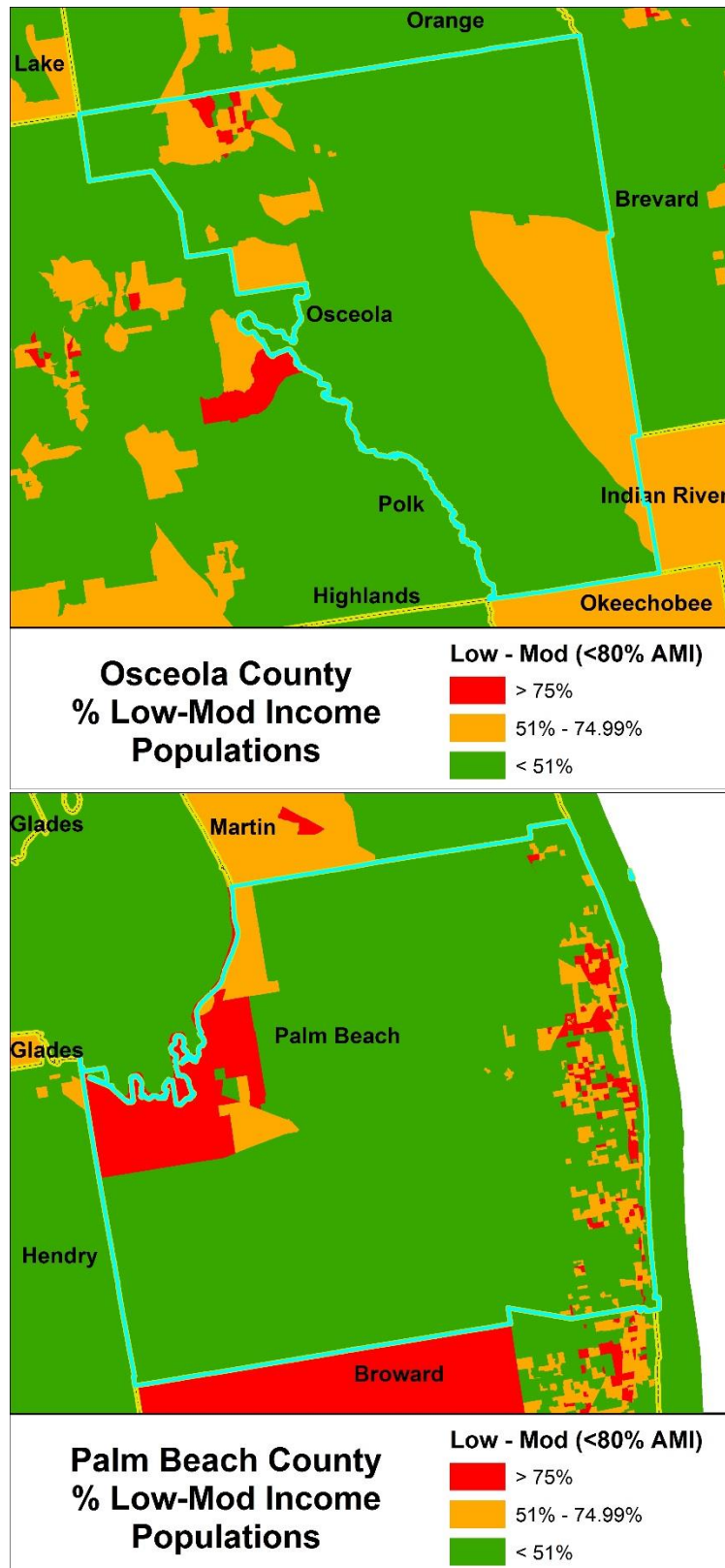


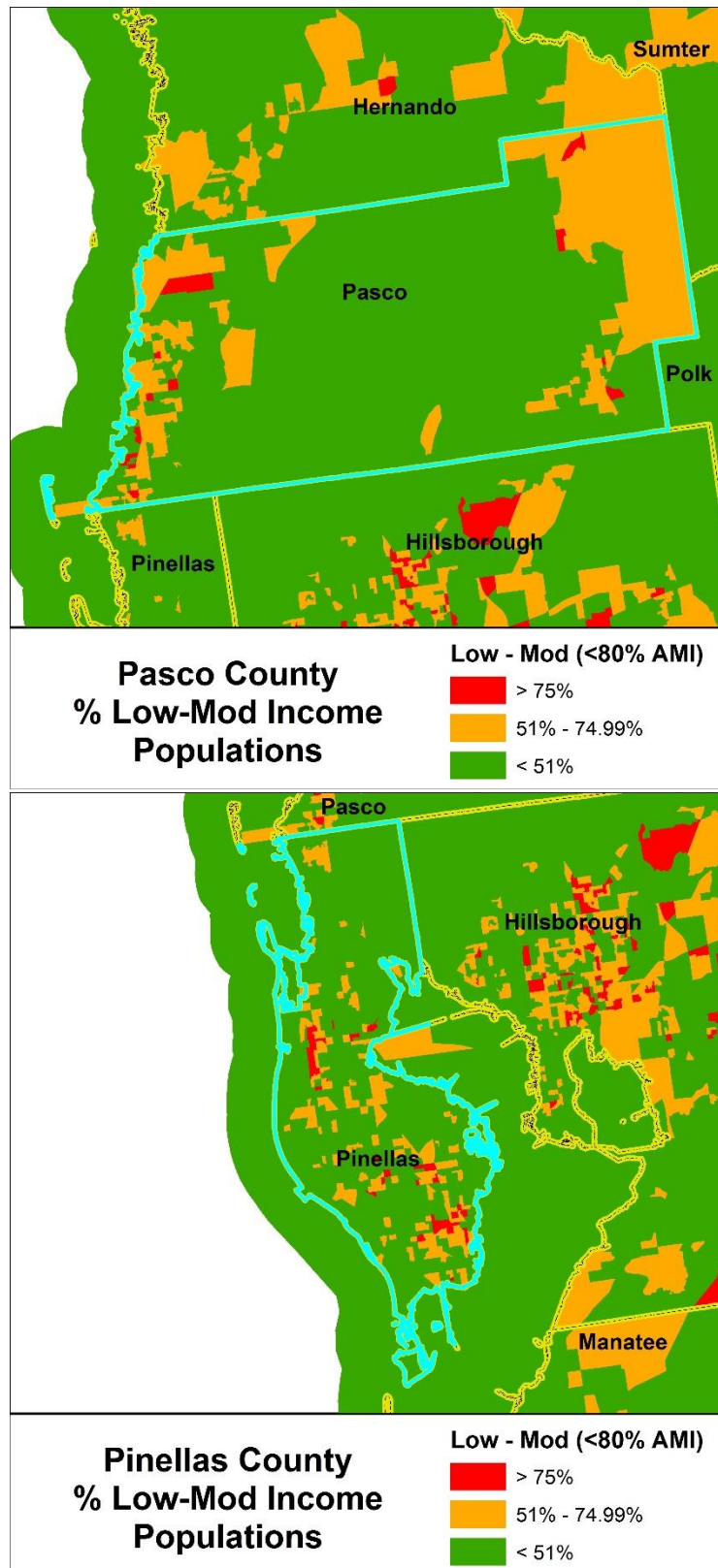


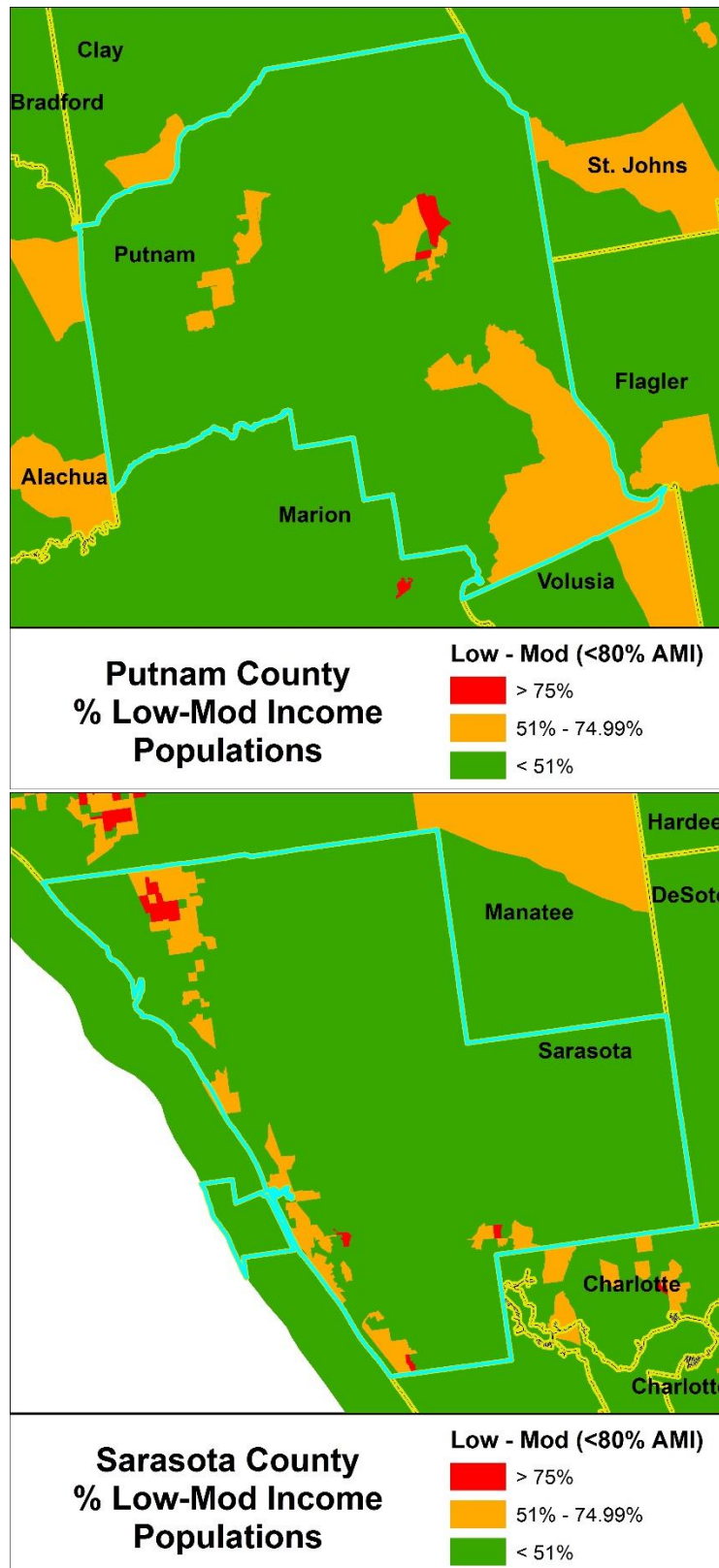


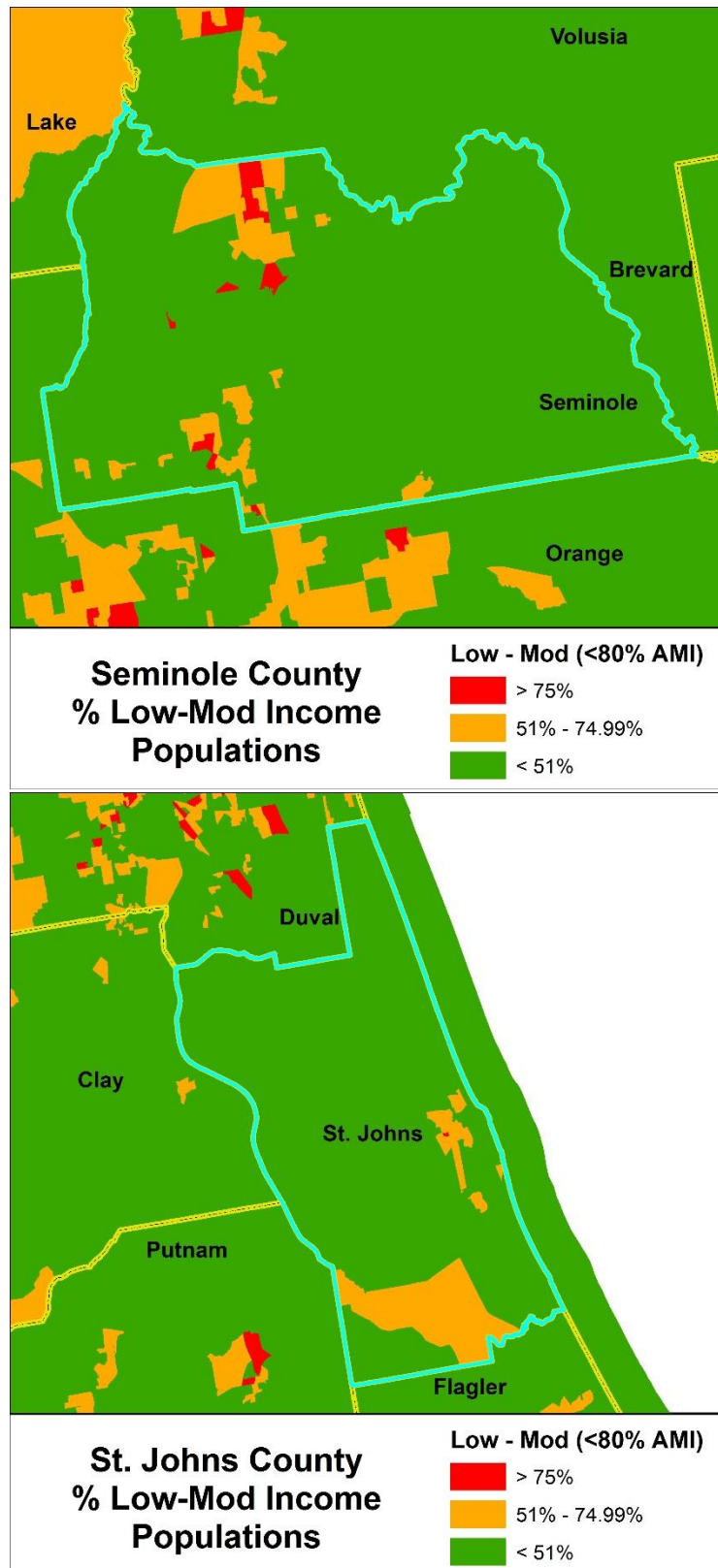


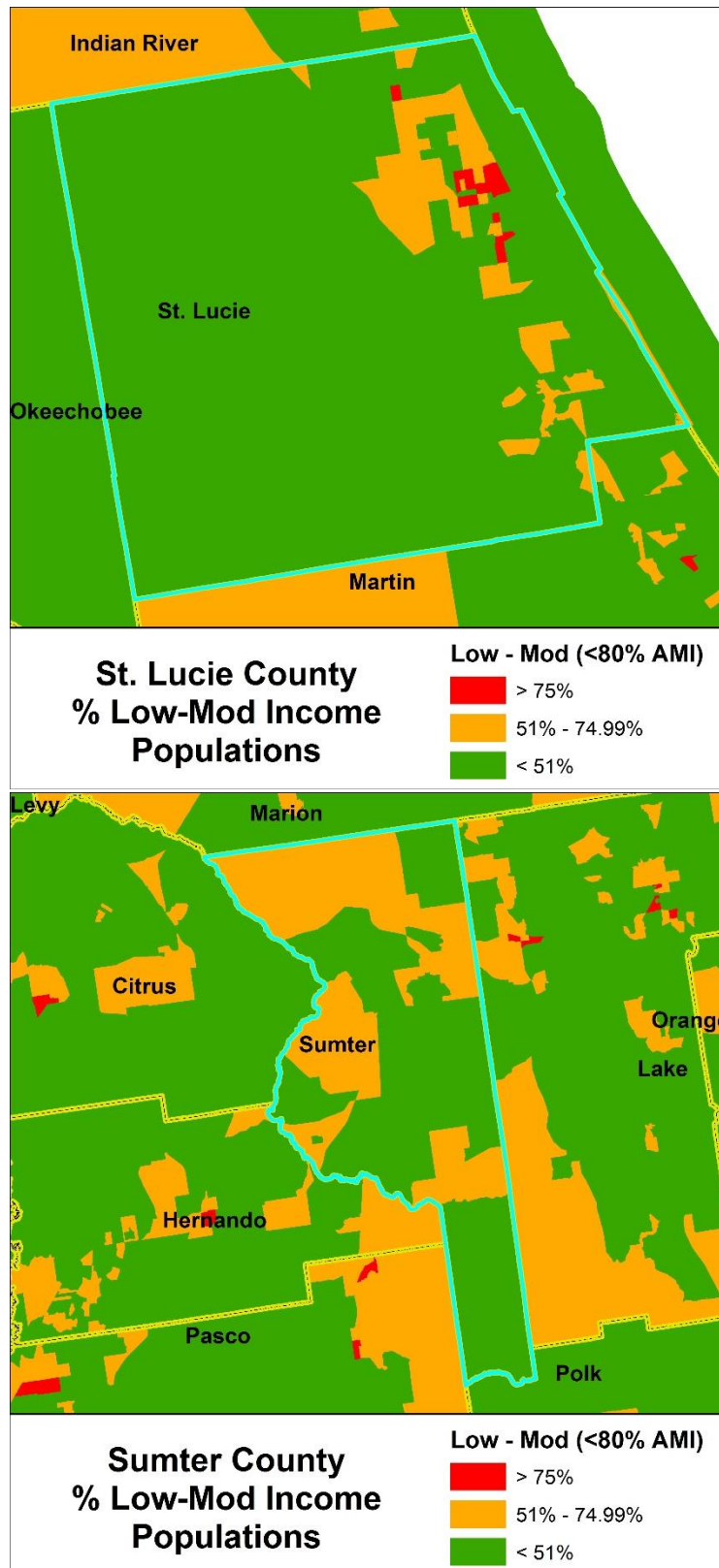


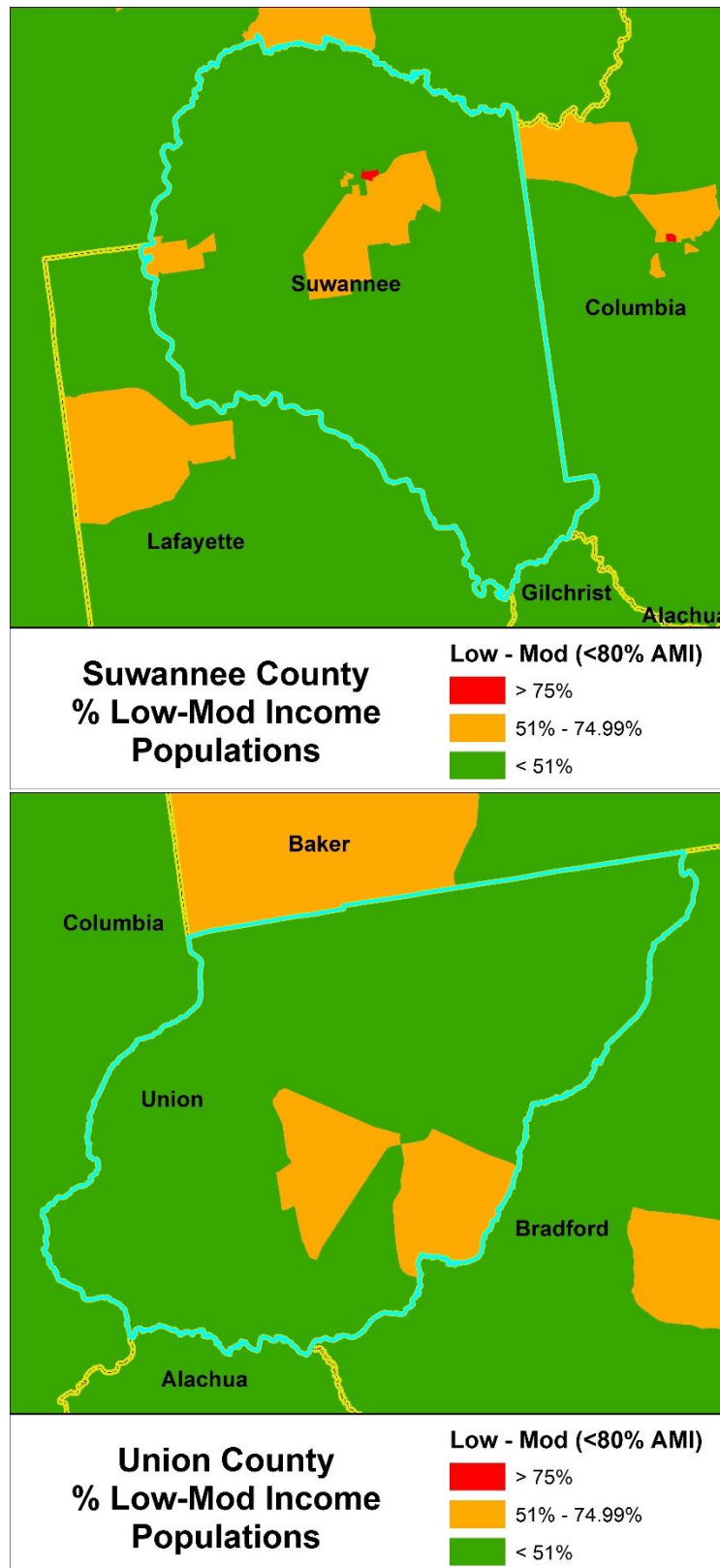












Appendix 3: Insurance claims by county for Hurricane Irma³⁴.

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%

³⁴ <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
Martin	3,644	2,027	1,130	487	86.6%
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	85.9%

Appendix 4: LMI population counts by block group and county for Irma impacted counties³⁵.

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		

³⁵ <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	> 75% Population
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		
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

National Flood Insurance Claims and Payments by County					
County	Claims Submitted	Building Payments	Content Payments	ICC Payments	Total Paid
Hendry	18	\$77,600	\$601	\$0	\$78,201
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	\$409,076,865

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: Comments Received During 14-Day Public Comment Period

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: TBA
- 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 was edited to display impacts specifically to homeowner units and rental units.

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

15. 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.

16. 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.

17. 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.

18. 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.

19. 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.

20. 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.

21. 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.

22. 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.

23. 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.

24. 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

25. 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.

26. 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.

27. 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.

28. 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.

29. 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.

30. 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.

31. 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 as 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.

32. 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.

33. 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.

34. 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 rental housing, which is at least 20 years.

35. 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.

36. 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

37. 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

38. 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.

39. 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.

40. 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.

41. 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

42. 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

43. 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.



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