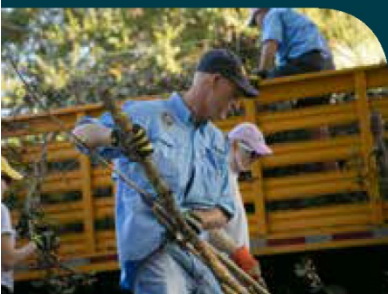


STATE OF FLORIDA
Action Plan for Disaster Recovery



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 Hurricanes Hermine and Matthew

Substantial Amendment 2-Updates to Action Plan, Approved by HUD April 27, 2018

Previous Page #	New Page #	Section	Change/Addition/Deletion
77	79	Section 16, Eligible Activities	Revised the Ranking Criteria into an updated Scoring Criteria.
77	78	Section 16, Eligible Activities	Removed (20% MID area) \$3,000,000 subrecipient allocation limit
77	78-79	Section 16, Housing Activities	Inserted per unit caps for single family repair/elevation/reconstruction as per application table based on Florida Housing Finance Corporation purchase limits. This cap only applies to single-family construction assistance and not buyout or other small rental projects.
78	80	Section 16, Affordable Rental	Inserted HOME program affordability period methodology for projects that are awarded more than \$1 million in CDBG-DR funds.
78	81	Section 16, Infrastructure, Economic Revitalization, and Planning	Removed stand-alone planning activity from infrastructure eligible projects list.
78	80	Section 16, Housing Activities	Clarified definition of shelters into two eligible activities.
79	79	Section 16, Scoring Criteria	Changed ranking criteria to scoring criteria and added the scoring criteria table.
79	82	Section 17, Criteria to Determine MOD	For the 20% MID deleted "thresholds" and added "scoring criteria".

SUBSTANTIAL AMENDMENT INTRODUCTION

This Action Plan guides the distribution of Community Development Block Grant (CDBG) funding associated with disaster recovery from Hurricanes Hermine and Matthew. Disaster recovery funding through the CDBG Program funding is designed to address unmet needs after other federal resources have been exhausted. On January 18, 2017, the U.S. Department of Housing and Urban Development (HUD) announced that the State of Florida was eligible to receive \$58,602,000 in funding through the CDBG Program to support long-term recovery after the 2016 hurricanes. On April 23, 2017, the state, working with impacted local governments, submitted an action plan to HUD that included:

1. A detailed assessment to determine what unmet needs remained after other federal funding had been exhausted,
2. A framework for how the CDBG funding will be used to address the unmet need,
3. A detailed management plan for how the program would ensure compliance with federal requirements.

This plan was approved on June 20, 2017, and the grant was awarded to the State of Florida on September 22, 2017.

On August 7, 2017, HUD announced that the state will receive an additional \$59,335,000 through the CDBG Program to support long-term recovery from Hermine and Matthew. This brings the total amount of funding available to support communities affected by these two hurricanes to \$117,937,000. The federal guidance associated with this second allocation required the state to submit a substantial amendment to their action plan to update the needs assessment and budget to reflect the additional funding by November 13, 2017.

In addition, Hurricane Irma made landfall in the State of Florida on September 10, 2017. This plan does not currently address disaster recovery from Hurricane Irma as HUD has not yet announced CDBG funding specifically for Florida's recovery from 2017 storms. However, it does recognize that some community impacts from Hermine and Matthew were exacerbated by Hurricane Irma.

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UNMET NEEDS ASSESSMENT

1. UNMET NEEDS ASSESSMENT

INTRODUCTION

This unmet needs assessment covers Florida's housing, infrastructure and business damage and recovery efforts for both Hurricane Hermine (September 2016) and Hurricane Matthew (October 2016).

In September 2016 and October 2016, Florida was impacted by two hurricanes, resulting in storm surge and high winds. Hurricane Hermine made landfall along the Big Bend area of the state. Hurricane Matthew traveled up the entire eastern coastline, eventually making landfall about 30 miles north of Charleston, South Carolina. Matthew's proximity to the coast of the United States is historic in that it is the only storm within the recent period of record to skirt the entire southeastern seaboard requiring evacuations in Florida, Georgia and South Carolina. More than 2.5 million people across these three states were asked to evacuate, making Matthew the second largest mass evacuation in U.S. history¹. Fortunately, Florida was well-rehearsed for a massive hurricane evacuation and most people were able to get out of harm's way. Although many lives were spared because of proper planning and execution of hurricane plans, the state still saw large storm surge and high winds, which caused damage to infrastructure, homes and businesses.

Hurricane Matthew's significant storm surge was also historic in some parts of Florida. Tide levels on the east coast from Cape Canaveral north to the state border peaked as Matthew passed and storm surge flooding was widespread. On October 7, a peak surge of 9.88 feet above normal was measured at a National Ocean Service tide gauge at Fernandina Beach, Florida. Matthew pummeled more than half the state with heavy rainfall and strong winds, each causing damage to homes in the Northeastern counties. Storm surge from Hurricane Hermine, although not as pronounced as Matthew, still resulted in 7.5 feet of additional flood waters in some coastal areas.

Both Hermine and Matthew caused beach erosion. Hermine damaged coastlines from Pinellas County north to Wakulla County, while Matthew eroded beaches in coastal counties from Martin County north to Nassau County. Matthew overtopped an estimated 40 miles worth of dunes and other coastal structures, according to the United States Geological Survey². Additionally, agricultural operations in 16 counties were affected mainly due to power outages and wind damage. Although damaged businesses faced a four to six week disruption, many stepped up to give back to their communities. Free meals were prepared and given out to flood victims by volunteers. First responders, as well as many residents, were given discounts on needed services to ease financial hardship.

In addition, Hurricane Irma made landfall in the State of Florida on September 10, 2017. This plan does not currently address disaster recovery from Hurricane Irma as HUD has not yet announced CDBG funding specifically for Florida's recovery from 2017 storms. However, it does recognize that some community impacts from Hermine and Matthew were exacerbated by Hurricane Irma.

As the state continues its long term recovery efforts from these three storms, 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 fiscal, social, and environmental challenges from these events for years to come.

BACKGROUND

The Disaster Relief Appropriations Act (Public Laws 114-223, 114-254, and 115-31) (Appropriations Act) appropriated federal funds to states or units of general local government (UGLGs) for disaster recovery efforts. Public Law 114-223 appropriated \$500 million, Public Law 114-254 appropriated \$1.8 billion, and Public Law 115-31 appropriated \$342 million in Community Development Block Grant Disaster Recovery (CDBG-DR) funds to be distributed to the various states that received a presidential disaster declaration in 2016. 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 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 \$117,937,000 in disaster recovery funds to assist in recovery from the hurricanes.

¹ https://www.washingtonpost.com/news/post-nation/wp/2016/10/07/hurricane-matthew-rumbles-along-floridas-coast-as-governor-warns-this-is-not-over/?utm_term=.5eb3105407ff

² <https://www.usgs.gov/news/and-after-photos-se-beach-dunes-lost-hurricane-matthew>

The Disaster Relief Appropriations Act requires that the state or local government must expend the funds within six years of the executed agreement between HUD and the grantee unless an extension is granted by HUD. In order to ensure that the funds assist the most impacted areas, 80 percent of the total award to the state will go to the HUD-identified Most Impacted and Distressed area. 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.

As with all proposed projects, communities will have to document that there will be no duplication of benefits. This is especially important in areas that may receive additional federal assistance to address Irma-related impacts.

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. It 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.

UPDATED NEEDS ASSESSMENT

DEO reached out to local units of government and asked them to report any updated data they had regarding needs assessments tied to Hurricanes Hermine and Matthew. Several counties reported they still had unmet needs even after payments from other sources.

The chart below shows the Real Property FEMA Verified Loss (FVL) determinations in the Florida Individual Assistance (IA) declared counties, from the approved Action Plan, and the most current data provided by HUD for FEMA Total Estimated Serious Unmet Needs. It shows Citrus, Volusia and St. Johns counties still have more than \$4,000,000 in unmet housing needs from damage resulting from Hurricanes Hermine and Matthew.

The most current FEMA data provided by HUD to DEO on August 22, 2017 shows the impacted counties listed below and their remaining unmet housing needs from damage resulting from Hurricanes Hermine and Matthew.

TABLE SA1: TOTAL ESTIMATED SERIOUS DAMAGED UNITS WITH UNMET NEEDS (HUD PROVIDED FEMA IA DATA MAY 22, 2017)		
COUNTY	COMBINED TOTAL FOR HOMEOWNERS AND RENTALS	
	COUNT	DOLLARS
St. Johns	573	\$18,637,274
Volusia	130	\$4,596,189
Citrus	132	\$4,116,872
Duval	36	\$1,198,320
Flagler	59	\$1,838,641
Pasco	92	\$2,813,160
Brevard	22	\$773,056
Putnam	55	\$1,633,228
Dixie	85	\$2,680,120
Levy	42	\$1,371,906
Hernando	34	\$1,056,673
Taylor	64	\$2,167,623
Leon	10	\$343,054
Nassau	12	\$347,693
Pinellas	10	\$292,783
Indian River	6	\$182,963
Manatee	62	\$2,030,404
Hillsborough	4	\$178,324
Seminole	1	\$45,688
Wakulla	1	\$27,455

The chart below shows the most current unmet need for disaster related home loans as of August 28, 2017.

TABLE SA2: HOME LOAN APPLICATIONS FOR FLORIDA			
COUNTY	APPLICATIONS RECEIVED	APPLICATIONS APPROVED	UNMET NEED (COUNT)
St. Johns	1063	488	575
Volusia	1801	678	1123
Citrus	212	85	127
Pasco	181	50	131
Dixie	55	5	50
Taylor	29	6	23
Manatee	49	4	45
Flagler	644	281	363
Putnam	185	61	124
Levy	72	24	48
Duval	604	204	400
Hernando	66	21	45

SBA Disaster Loan Statistics as of August 28, 2017

As stated in the Action Plan, mobile homes can be difficult to repair; cost may be disproportionately high compared to the overall structure. In addition to having a high number of mobile homes with verified loss, Volusia County is shown to have 81.64% of housing units built prior to 2000. Mobile homes built prior to 1994 are not insurable and cannot be repaired.

COMMUNITY PROFILE: SUMMARY OF IMPACT AND PRESIDENTIALLY DECLARED COUNTIES

HURRICANE HERMINE

Hurricane Hermine was a Category 1 hurricane (on the Saffir-Simpson Hurricane Wind Scale) that made landfall along the sparsely populated Big Bend coast of Florida just east of the City of St. Marks. Hermine was the first hurricane to make landfall in Florida since Wilma in 2005. There were no reports of hurricane force winds in the state (Figure 1)³.

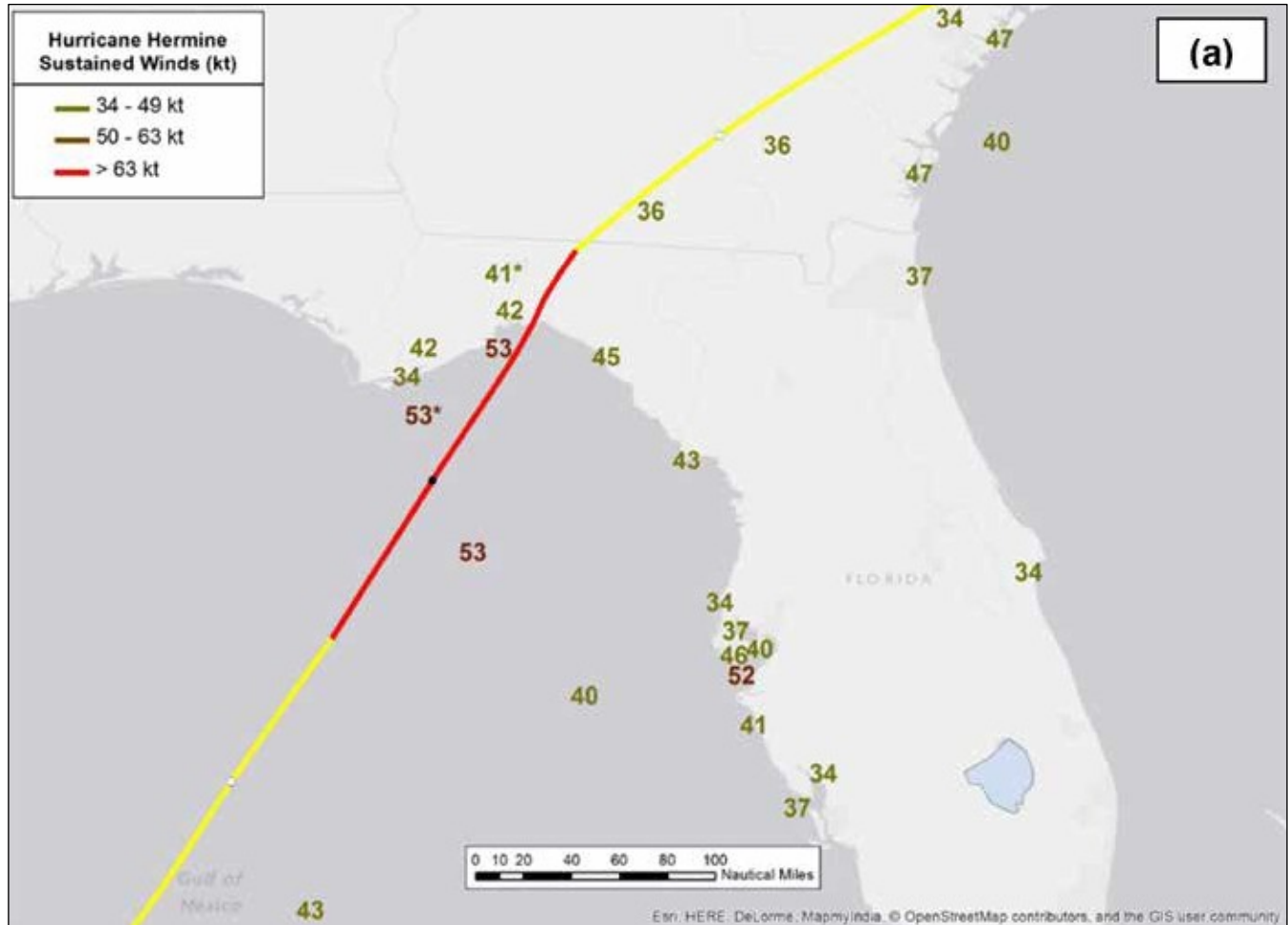


Figure 1: Hurricane Hermine Sustained Winds

Hermine brought moderate storm surge to coastal areas with the highest measured storm surge of 7.50 feet above normal tide levels occurring at a National Ocean Service gauge on Cedar Key. The combined effect of surge and tide produced maximum inundation levels of four to seven feet above ground level to the east of Hermine’s landfall location along the coastlines in Jefferson, Taylor, Dixie and Levy Counties (Figure 2).

³ http://www.nhc.noaa.gov/data/tcr/AL092016_Hermine.pdf

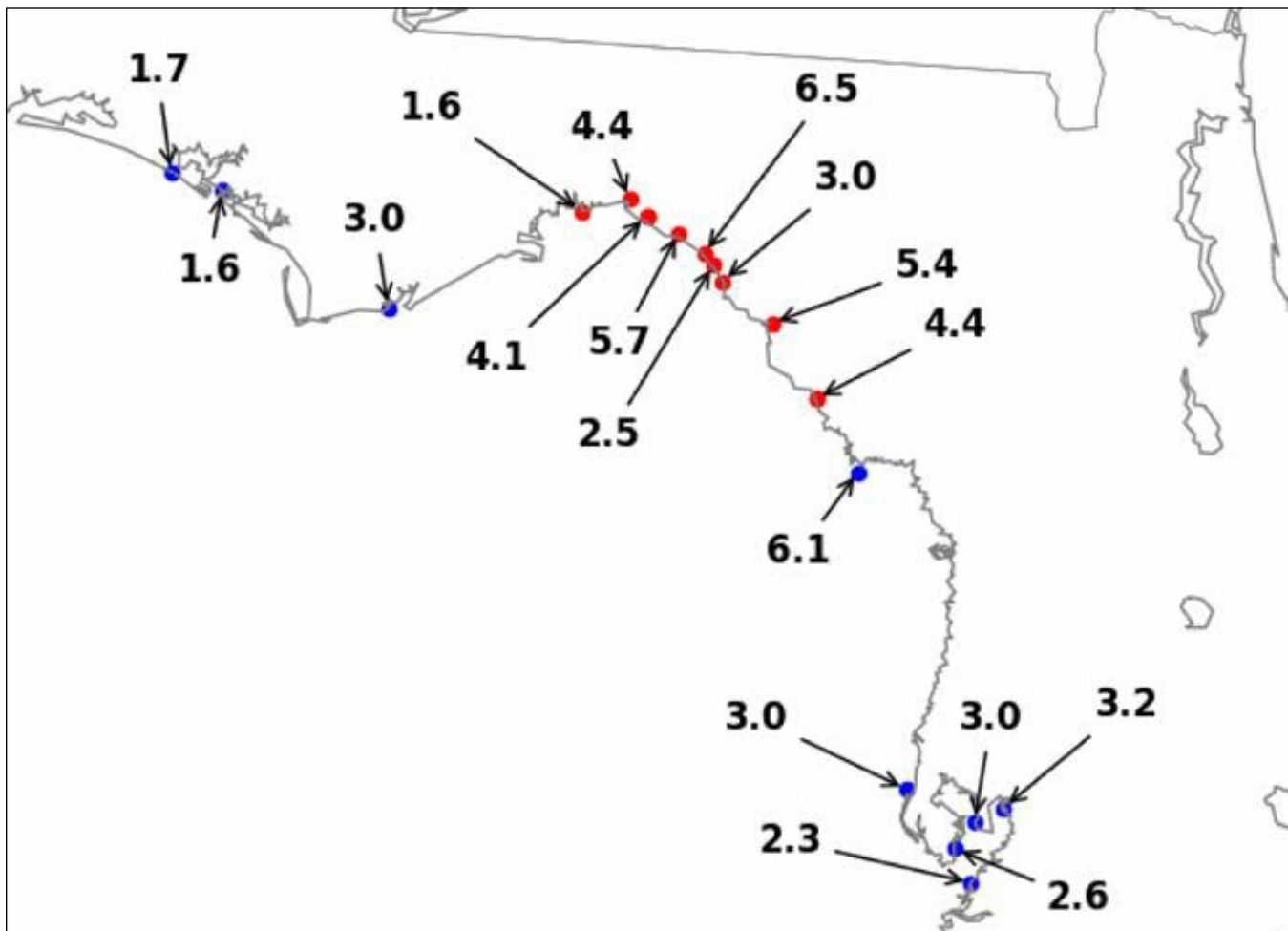


Figure 2: Hurricane Hermine Estimated Peak Inundation

Hermine produced heavy rainfall across much of western and northern Florida (Figure 3). The maximum reported storm-total rainfall was near Tarpon Springs, Florida, in Pinellas County, where 22.36 inches was measured between August 30 and September 2, 2016. More than 10 inches of rain were reported at other sites along the west coast of Florida, particularly in Pinellas, Pasco, Manatee and Charlotte Counties. The heavy rainfall caused flooding of streets and low-lying areas near the west coast of Florida, especially in Pinellas County where the rain was heaviest. Flooding occurred on several rivers in northern Florida, although only the Anclote River reached major flood stage. The river crested at 25.08 feet in Elfers, which was about seven feet above flood stage and one foot above major flood stage. Moderate flooding occurred on the Steinhatchee River near Steinhatchee, where the river crested almost four feet above flood stage at a level of 23.24 feet.

HURRICANE MATTHEW

Hurricane Matthew (Figure 4) brought storm surge up to eight feet in some areas, damaging winds (Figure 5), and rainfall (Figure 6) across most of the presidentially declared impact areas. In some places, these three hazards created a compound threat damaging homes and infrastructure.

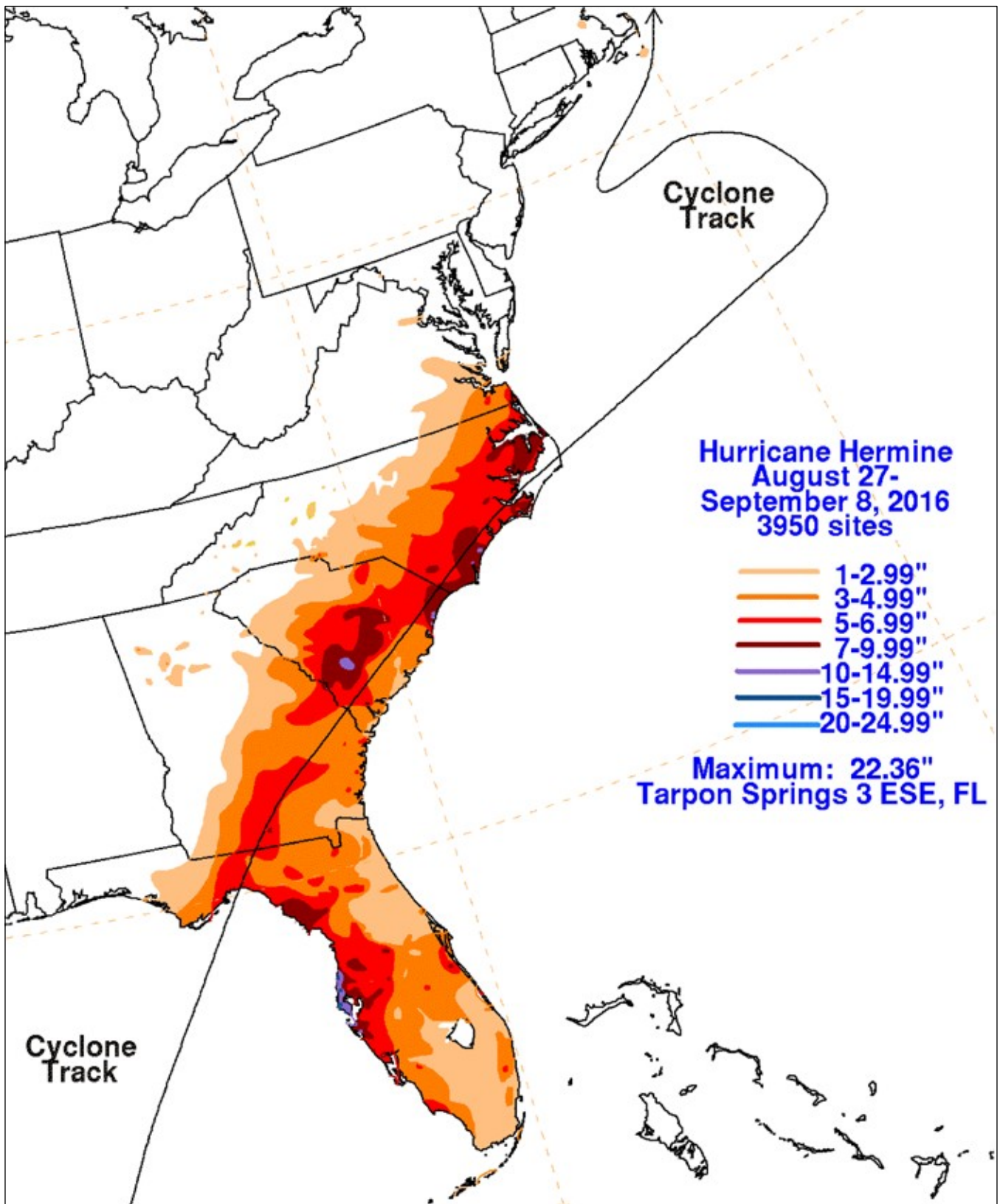


Figure 3: Hurricane Hermine Track and Rainfall Estimates

In addition to flooding, many homes were damaged by the combination of wind and rainfall. This has complicated the recovery process in that wind and rain damages can only be assessed on a case by case basis where areal flooding impacts are more easily ascertained for larger areas at once. Portions of the state saw high amounts of rainfall with several areas receiving more than 10 inches of rain in a 24 hour period⁴. Figure 6 below illustrates the extent and severity of the hurricane event and associated rainfall amounts. Inland areas, rather than the immediate coastline, experienced the largest amounts of rain. Orlando received nearly nine inches of rain, Jacksonville nearly seven inches, and Daytona Beach received almost six inches.

Storm surge flooding affected the St. Augustine area, including major flooding on Anastasia Island where water was reported to be 2.5 feet above ground level. To the south in nearby Flagler Beach, Florida, parts of Highway A1A were washed out by the storm surge. Some of the highest inundation occurred farther inland away from the immediate coast on smaller back bays and inland waterways. The St. Johns River in northeast Florida reached its highest level on record at Shands Bridge, along with 3 to 4.3 feet of storm surge inundation reported at the Racy Point, Red Bay Point and I-295 bridge tide gauges. The National Weather Service in Jacksonville conducted a storm survey and found that Matthew's force had carved a new inlet between Marineland and Matanzas Inlet, between Palm Coast and St. Augustine Beach, Florida.

A detailed accounting of post-storm impacts by counties can be found in the National Weather Service Post Tropical Cyclone Report. Included here are many references to wind, flooding, rain and surge damages⁵.

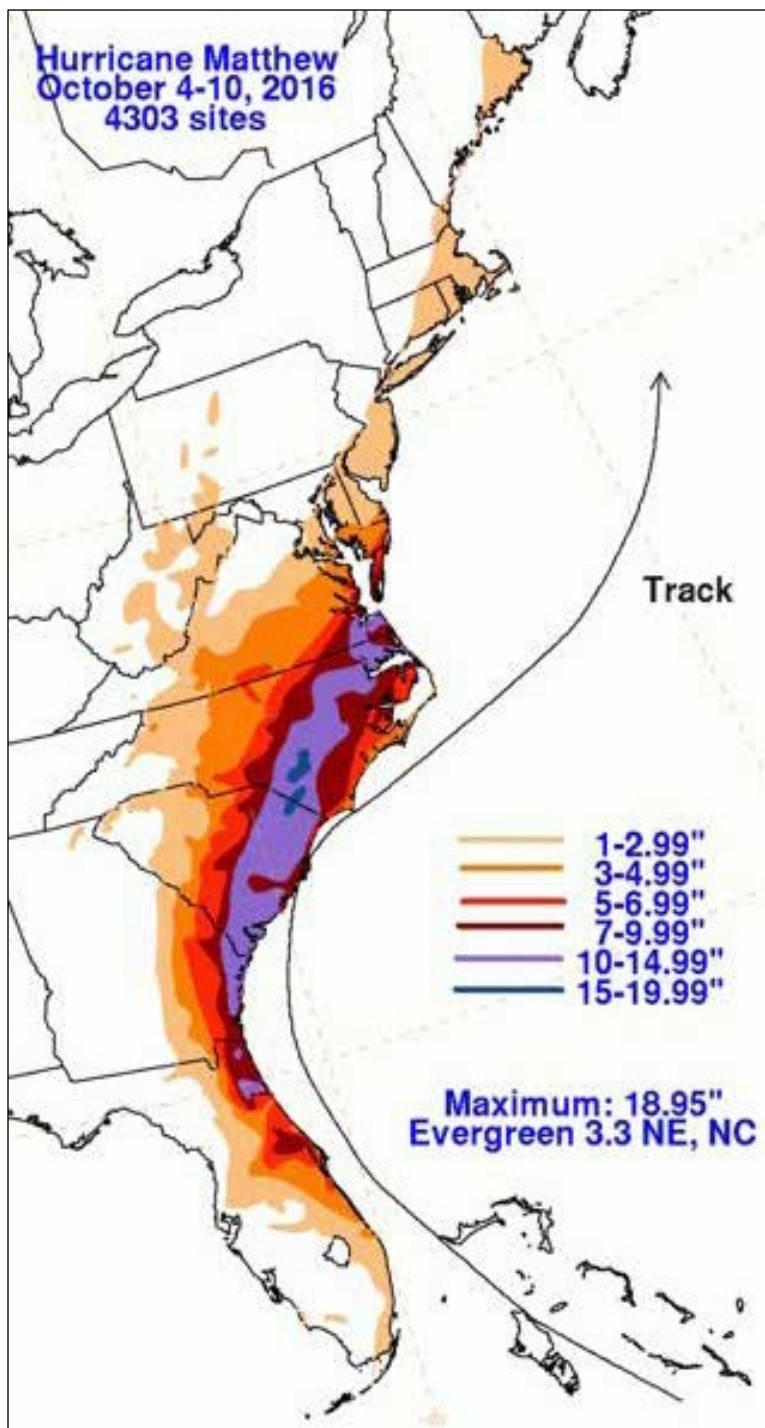


Figure 4: Hurricane Matthew Path and Associated Rainfall Areas

⁴ <https://weather.com/storms/hurricane/news/hurricane-matthew-bahamas-florida-georgia-carolinas-forecast>

⁵ <https://www.weather.gov/media/chs/MatthewPSH.pdf>



Figure 5: Hurricane Matthew Peak Wind Gusts⁶



Figure 6: Hurricane Matthew Rainfall Totals

⁶ <http://www.weather.gov/chs/HurricaneMatthew-Oct2016>

Major disaster declarations were issued for Hermine and Matthew on September 28 and October 11, 2016, respectively. The declarations for FEMA 4280 (Hermine) and 4283 (Matthew) included the following counties (Table 1, Table 2, and Figure 7):

TABLE 1 : DECLARED COUNTY LIST FOR PRESIDENTIAL DISASTER DECLARATION 4280 (HERMINE)

COUNTY	DECLARATION TYPE	COUNTY	DECLARATION TYPE
Citrus	Individual and Public Assistance	Columbia	Public Assistance Only
Dixie	Individual and Public Assistance	Franklin	Public Assistance Only
Hernando	Individual and Public Assistance	Gadsden	Public Assistance Only
Hillsborough	Individual and Public Assistance	Gilchrist	Public Assistance Only
Leon	Individual and Public Assistance	Jefferson	Public Assistance Only
Levy	Individual and Public Assistance	Lafayette	Public Assistance Only
Manatee	Individual and Public Assistance	Liberty	Public Assistance Only
Pasco	Individual and Public Assistance	Madison	Public Assistance Only
Pinellas	Individual and Public Assistance	Marion	Public Assistance Only
Taylor	Individual and Public Assistance	Sarasota	Public Assistance Only
Wakulla	Individual and Public Assistance	Sumter	Public Assistance Only
Alachua	Public Assistance Only	Suwanee	Public Assistance Only
Baker	Public Assistance Only	Union	Public Assistance Only

TOTALS: 11 INDIVIDUAL AND PUBLIC ASSISTANCE AND 15 PUBLIC ASSISTANCE ONLY

TABLE 2: DECLARED COUNTY LIST FOR PRESIDENTIAL DISASTER DECLARATION 4283 (MATTHEW)

COUNTY	DECLARATION TYPE	COUNTY	DECLARATION TYPE
Brevard	Individual and Public Assistance	Bradford	Public Assistance Only
Duval	Individual and Public Assistance	Broward	Public Assistance Only
Flagler	Individual and Public Assistance	Clay	Public Assistance Only
Indian River	Individual and Public Assistance	Lake	Public Assistance Only
Nassau	Individual and Public Assistance	Martin	Public Assistance Only
Putnam	Individual and Public Assistance	Orange	Public Assistance Only
Seminole	Individual and Public Assistance	Osceola	Public Assistance Only
St. Johns	Individual and Public Assistance	Palm Beach	Public Assistance Only
Volusia	Individual and Public Assistance	St. Lucie	Public Assistance Only

TOTALS: 9 INDIVIDUAL AND PUBLIC ASSISTANCE AND 9 PUBLIC ASSISTANCE ONLY



Figure 7: Declared Counties for Presidential Disaster Declarations 4280 (Hermine) and 4283 (Matthew)

DEMOGRAPHIC PROFILE OF THE IMPACTED AREA

Table 3 profiles socio-economics and demographics for the Hurricane Hermine and Matthew impacted counties of Florida. More than one-third (34 percent) of Florida’s population resides in the impacted area covered in this assessment. The population in the impacted area differs from the statewide population in several key areas.

First, the areas impacted by these hurricanes have a much higher population percentage per county than Florida as a whole (13 percent). These impacted counties also have a significantly higher elder population (10.5 percent) than the county average and 28 percent more veterans than the average county. Impacted counties have: higher poverty (16.6 percent of people), 23 percent more people with a disability, and 10 percent more people without health insurance than the rest of the state. Poverty is an indicator of places that might see greater impacts from disasters because of a general lack of ability to prepare.

TABLE 3: DEMOGRAPHIC PROFILE INFORMATION – AMERICAN COMMUNITY SURVEY DATA, 2015 RELEASE

POPULATION CHARACTERISTICS	HURRICANES HERMINE AND MATTHEW COUNTIES	FLORIDA – STATEWIDE
Population Estimates, July 1, 2015	6,954,534	20,271,272
Persons Under 5 Years, Percent, July 1, 2015	5.0%	5.4%
Persons 65 Years and Over, Percent, July 1, 2015	21.7%	19.4%
White Alone, Percent, July 1, 2015	82.7%	77.7%
Black or African American Alone, Percent, July 1, 2015	12.6%	16.8%
American Indian and Alaska Native Alone, Percent, July 1, 2015	0.5%	0.5%
Asian Alone, Percent, July 1, 2015	2.2%	2.8%
Two or More Races, Percent, July 1, 2015	2.0%	2.0%
Hispanic or Latino, Percent, July 1, 2015	10.2%	24.5%
Veterans, 2011-2015	625,796	1,507,738
Foreign Born Persons, Percent, 2011-2015	7.7%	19.7%
Total Housing Units, July 1, 2015	3,240,802	9,209,857
Owner-Occupied Housing Unit Rate, 2011-2015	71.6%	65.3%
Median Value of Owner-Occupied Housing Units, 2011-2015	\$139,405	\$159,000
Median Gross Rent, 2011-2015	\$887	\$1,002
Building Permits (Issued), 2015	35,430	109,924
Households, 2011-2015	2,635,072	7,300,494
Persons Per Household, 2011-2015	2.5	2.6
Language Other Than English Spoken at Home, Percent 5 Years+, 2011-2015	11.4%	28.1%
High School Graduate or Higher, Percent of Persons age 25 years+, 2011-2015	87.4%	86.9%
Bachelor's Degree or Higher, Percent of Persons Age 25 Years+, 2011-2015	23.4%	27.3%
With a Disability, Under Age 65 Years, Percent, 2011-2015	11.1%	8.5%
Persons Without Health Insurance, Under Age 65 Years, Percent	18.0%	16.2%
In Civilian Labor Force, Total, Percent of Population Age 16 Years+, 2011-2015	53.6%	58.8%
Median Household Income (in 2015 dollars), 2011-2015	\$45,808	\$47,507
Per Capita Income in Past 12 Months (in 2015 dollars), 2011-2015	\$25,255	\$26,829
Persons Living in Poverty, Percent	16.6%	15.7%

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)⁷.

Low- to moderate- income households are defined as households that do not exceed 80 percent of the area median income (AMI) for their area, as determined by HUD. These income categories are grouped into the following classifications⁸:

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

⁷ These National Objective definitions and corresponding language are set by HUD regulation.

⁸ 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.

For the purpose of CDBG-DR programs, grantees apply the above terminology consistent with the original language of the Housing Act and reporting designations in the HUD Disaster Recovery Grant Reporting (DRGR) system⁹. Please refer to *Appendix 1: HUD Income Limits* for income categories in the declared counties.

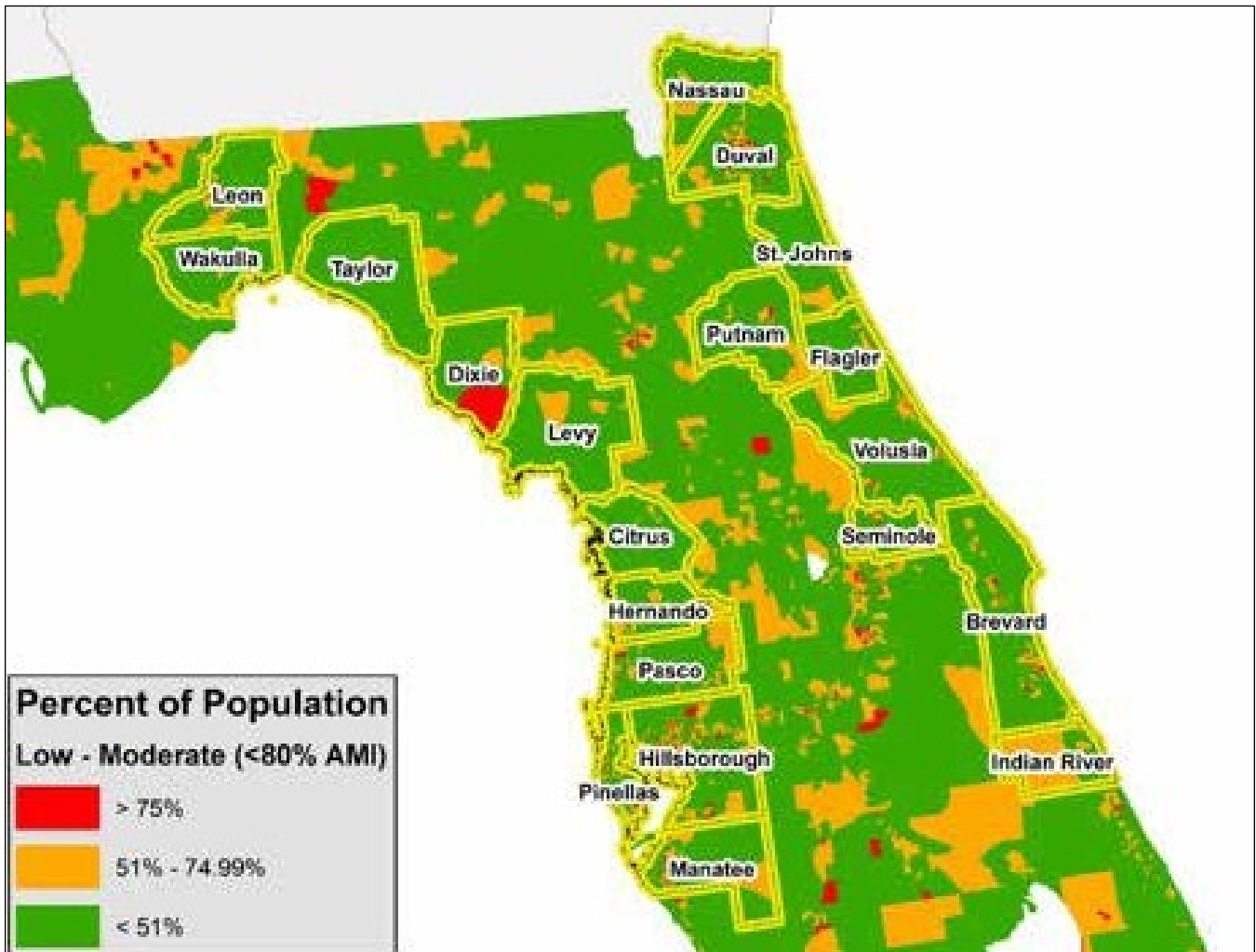


Figure 8: Low to Moderate Income by Block Group

Every impacted county has areas meeting HUD’s 51 percent LMI threshold criteria, but some counties have much larger LMI populations than others (Figure 8). Table 4 below illustrates the count of block groups and sum of populations by low-moderate income levels within impacted counties. What becomes clear when looking at the number of people who are 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 - Figure 13) below, and Appendix 2 where LMI Maps for Individual Assistance Designated Counties detail block group level LMI information for every presidentially declared county.

⁹ 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>

TABLE 4: LMI POPULATION COUNTS BY BLOCK GROUP AND COUNTY FOR MATTHEW IMPACTED COUNTIES¹⁰

COUNTY	< 51% COUNT	< 51% POPULATION	51% - 75% COUNT	51% - 75% POPULATION	> 75% COUNT	> 75% POPULATION
Brevard	239	124,655	66	55,205	13	12,430
Citrus	78	39,680	9	8,495	1	740
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		
Hernando	74	43,545	31	24,500	2	1,050
Hillsborough	590	220,115	223	162,995	68	62,740
Indian River	69	31,560	19	16,970	5	4,665
Leon	108	38,115	38	31,230	31	40,790
Levy	23	12,800	6	4,050		
Manatee	126	62,360	54	41,050	28	36,835
Nassau	34	19,940	5	3,775	1	470
Pasco	204	96,330	89	67,870	15	14,245
Pinellas	533	206,415	152	104,430	36	27,130
Putnam	42	17,685	17	12,460	2	2,120
Seminole	194	93,675	31	29,800	10	9,850
St. Johns	69	36,065	12	12,595	1	1,150
Taylor	15	5,590	4	1,760	1	500
Volusia	204	114,020	68	60,830	17	12,625
Wakulla	13	8,090	2	2,050	—	—
TOTAL	2,960	1,362,290	970	771,340	282	274,285

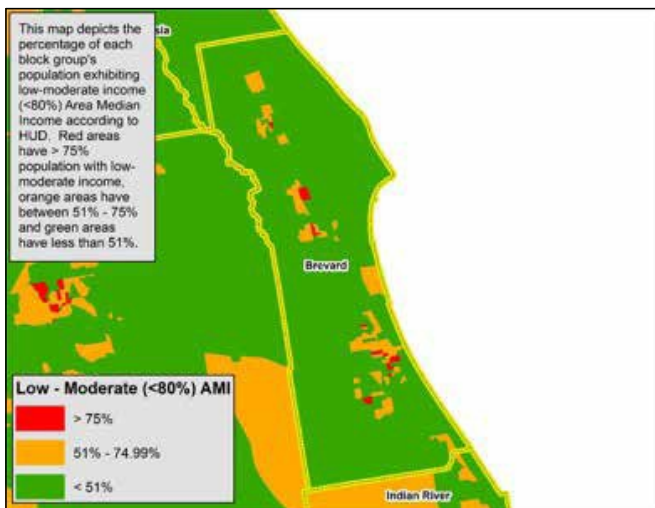


Figure 9: Low to Moderate Income by Block Group – Brevard County

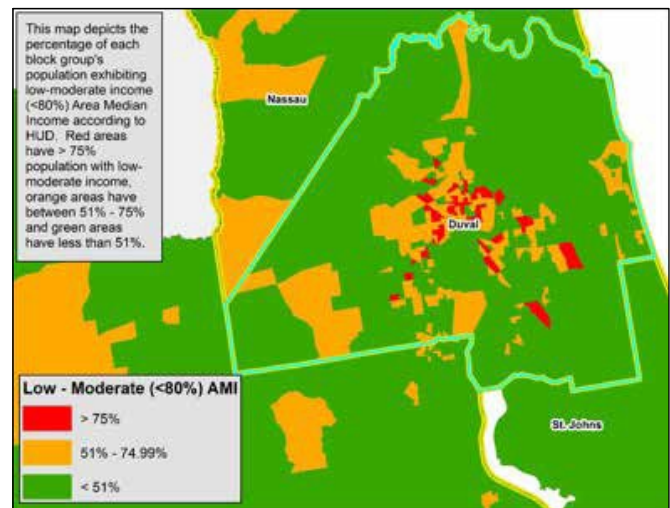


Figure 10: Low to Moderate Income by Block Group – Duval County

¹⁰ <https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-block-groups-places/>



Figure 11: Low to Moderate Income by Block Group – Flagler County

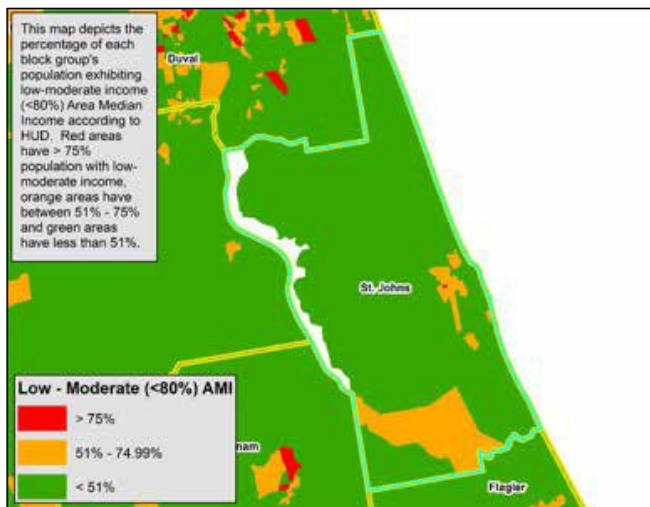


Figure 12: Low to Moderate Income by Block Group – St. Johns County

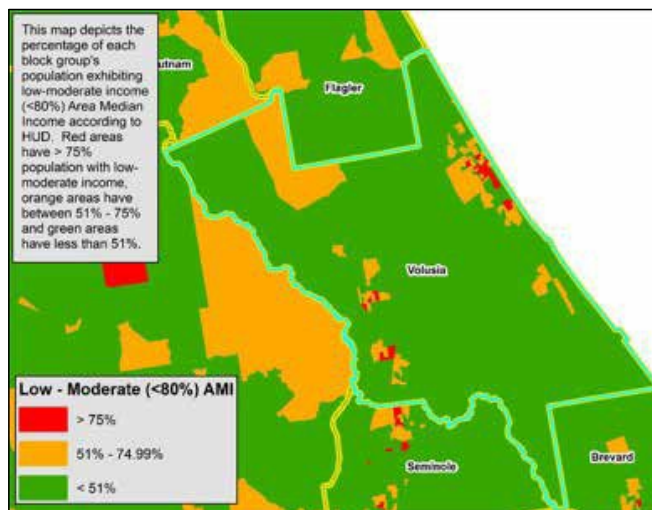


Figure 13: Low to Moderate Income by Block Group – Volusia County

IMPACT ON SPECIAL NEEDS POPULATIONS

Individuals with access and functional needs will require assistance with accessing and/or receiving disaster resources. These individuals could be children, older adults, pregnant women, from diverse cultures, transportation disadvantaged, homeless, have chronic medical disorders, and/or a pharmacological dependency. They could have disabilities, live in institutions, have limited English proficiency or altogether be non-English speaking¹¹.

Specialized resources may include, but are not limited to, public or private social services, accommodations, information, transportation or medications to maintain health. Care should be taken to ensure that individuals are able to access disaster recovery resources.

¹¹ US Dept. of Health and Human Services, Office of the Assistant Secretary for Preparedness and Response. "Public Health Emergency" – <http://www.phe.gov/Preparedness/planning/abc/Pages/atrisk.aspx>

According to U.S. Census data, approximately 5.54 percent of the population in the impacted counties speaks a language other than English at home and does not understand English well. Hillsborough (9.83 percent), Flagler (6.71 percent), Manatee (5.94 percent), Indian River (5.35 percent), Pinellas (5.28 percent) and Duval (5.15 percent) counties have the highest percent of the population speaking different languages and not understanding English well¹². 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 14), followed by Table 5 that shows the number of residents who speak only English or who speak Spanish or other languages, by county.

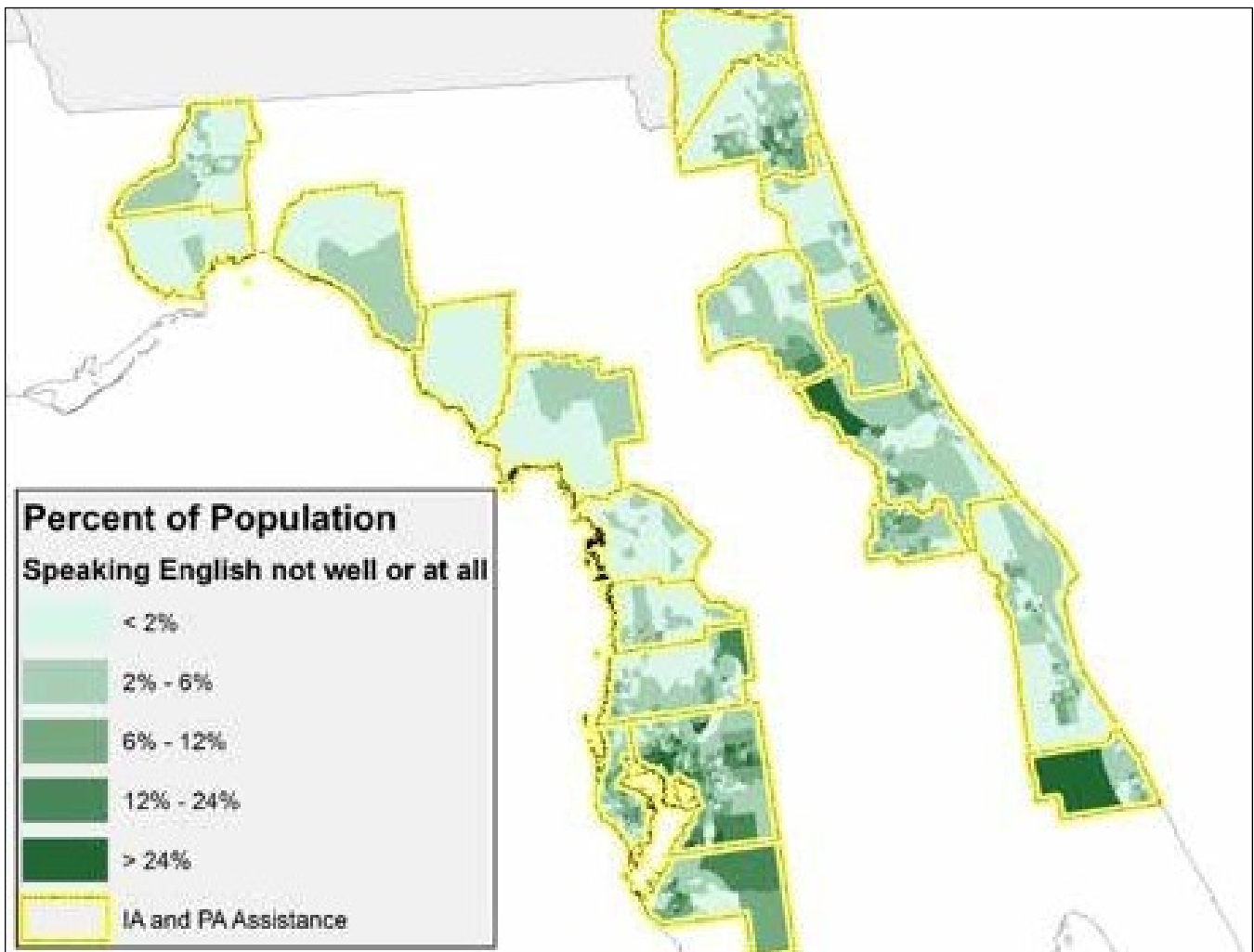


Figure 14: Percent of Tract Population Speaking English Not Well or Not At All

¹² 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.

**TABLE 5: LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH
FOR PERSONS 5 YEARS AND OVER IN FLORIDA (2011-2015)**

COUNTY	TOTAL	SPEAKS ONLY ENGLISH		SPEAKS SPANISH		SPEAKS OTHER LANGUAGE	
		NUMBER	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT
Brevard	527,527	472,256	89.52%	10,452	1.98%	7,274	1.38%
Citrus	134,267	126,237	94.02%	1,520	1.13%	1,073	0.80%
Dixie	15,275	14,701	96.24%	130	0.85%	44	0.29%
Duval	830,258	718,411	86.53%	18,401	2.22%	24,318	2.93%
Flagler	96,414	81,974	85.02%	2,578	2.67%	3,887	4.03%
Hernando	167,018	148,918	89.16%	3,763	2.25%	1,863	1.12%
Hillsborough	1,219,613	884,020	72.48%	96,961	7.95%	22,872	1.88%
Indian River	136,498	117,679	86.21%	5,493	4.02%	1,807	1.32%
Leon	267,894	240,146	89.64%	2,268	0.85%	4,353	1.62%
Levy	37,791	35,335	93.50%	865	2.29%	184	0.49%
Manatee	325,951	272,717	83.67%	17,522	5.38%	4,896	1.50%
Nassau	71,986	69,531	96.59%	406	0.56%	203	0.28%
Pasco	454,546	389,082	85.60%	12,914	2.84%	7,256	1.60%
Pinellas	889,154	767,354	86.30%	22,621	2.54%	24,282	2.73%
Putnam	68,427	62,335	91.10%	2,263	3.31%	292	0.43%
Seminole	200,082	183,365	91.64%	2,545	1.27%	2,393	1.20%
St. Johns	414,443	332,187	80.15%	17,525	4.23%	7,103	1.71%
Taylor	21,430	20,237	94.43%	329	1.54%	165	0.77%
Volusia	479,923	416,890	86.87%	14,882	3.10%	5,933	1.24%
Wakulla	29,546	27,752	93.93%	221	0.75%	108	0.37%
IMPACTED COUNTIES	6,388,043	5,381,127	84.24%	233,659	3.66%	120,306	1.88%

Populations over the age of 65 or households with children under the age of five increases vulnerability. The map below (Figure 15) shows concentrations of households with these 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.

Additionally, the map below (Figure 16) shows relative concentrations of poverty in Duval, Hillsborough, Levy and Putnam counties, followed by a map of larger concentrations of unemployment across the region (Figure 17).

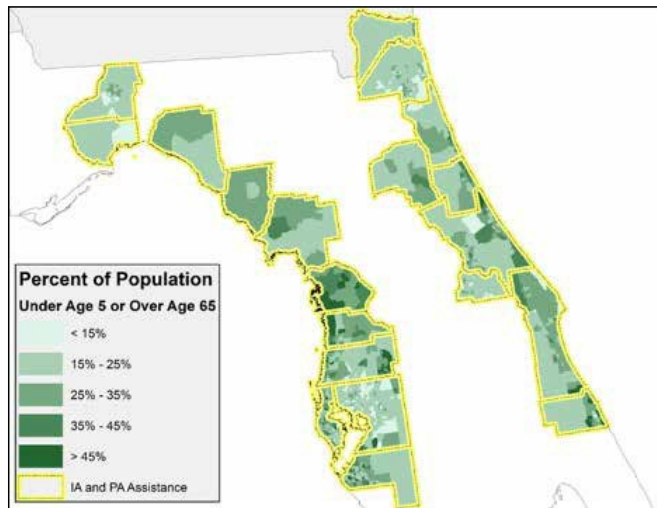


Figure 15: Age Dependent (< 5 Years or > 65 Years) Population by Tract

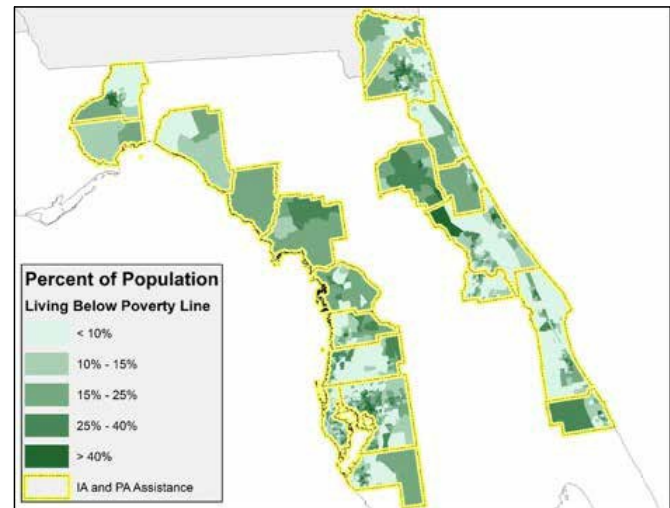


Figure 16: Percent of Population Living Below Poverty Line by Tract

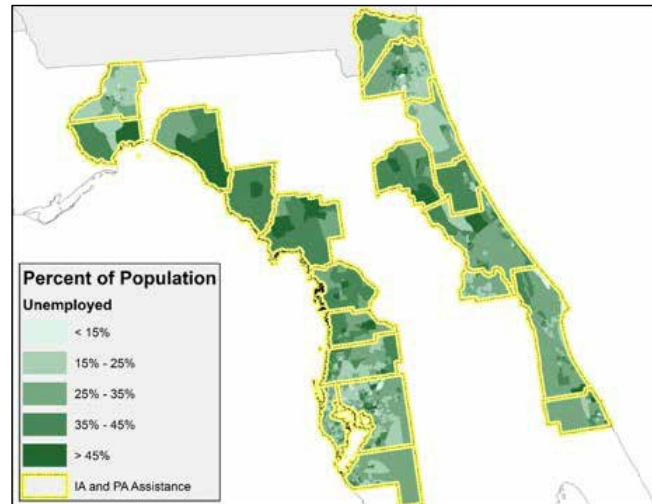


Figure 17: Percent Unemployment by Tract

In addition to the aforementioned disadvantaged populations, program intake should carefully consider the following social characteristics which may lead to a decreased ability to access intake centers. Table 6 displays counts of FEMA Individual Assistance applicants by specific special need category. Renters are a vulnerable subgroup because they must rely on landlords for safe and sanitary housing. Those over age 65 might have mobility and health issues making it difficult to leave home to access services (Figure 15). Those with identified access and function needs must be accounted for in any program deployment, and those living in mobile homes and travel trailers are more susceptible to future impacts than those living in more solid housing. Finally, those without access

to a vehicle (Figure 18) must be taken into account in deploying a successful action plan for disaster recovery. Either intake center placement should be nearer to these disadvantaged populations or plans should be made to ensure that those without mobility have equal access to program staff through outreach.

TABLE 6: FEMA INDIVIDUAL ASSISTANCE APPLICANTS BY SPECIAL NEEDS CATEGORY

COUNTY	RENTERS	AGE OVER 65	ACCESS AND FUNCTIONAL NEEDS	LIVING IN MOBILE HOMES/ TRAVEL TRAILERS
Brevard	1,345	1,409	93	1,051
Citrus	207	367	22	195
Dixie	51	136	4	191
Duval	1,442	1,073	75	372
Flagler	1,143	1,736	46	508
Hernando	76	107	6	52
Hillsborough	54	56	3	36
Indian River	230	133	14	127
Leon	563	200	37	276
Levy	73	125	6	140
Manatee	344	52	12	37
Nassau	110	154	6	131
Pasco	248	235	19	313
Pinellas	178	101	14	95
Putnam	429	478	27	770
Seminole	239	176	12	82
St. Johns	1,357	1,559	67	786
Taylor	32	130	10	109
Volusia	3,968	5,493	217	3,637
Wakulla	33	42	5	55

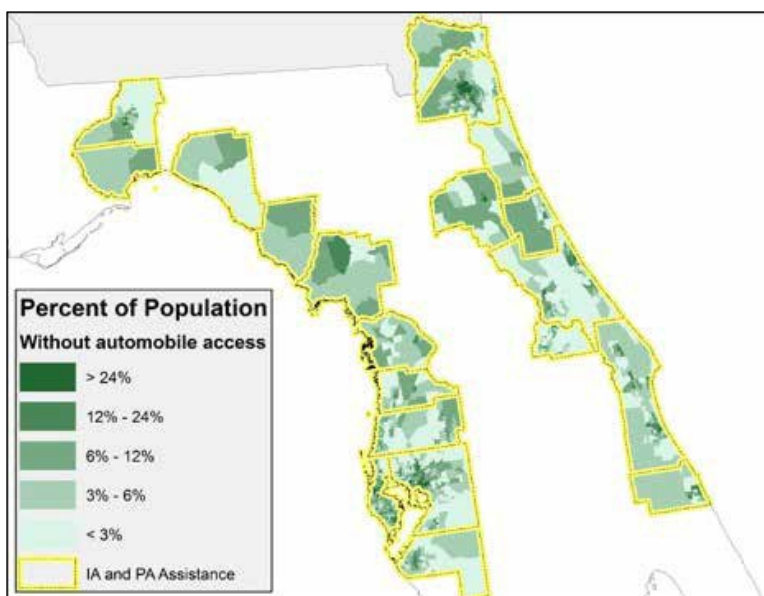


Figure 18: Percent of Tract Population without automobile access

TABLE 8: EVACUATION SHELTERS IN USE DURING HURRICANE HERMINE

COUNTY	SHELTER NAME
Columbia	Mason City Community Center
Dixie	Trail Rider Community Center
Leon	Bethel AME Church
Taylor	Williston High School
Pasco	Mike Fasano Regional Hurricane Shelter
Taylor	Taylor Elementary
Wakulla	Crawfordville Elementary School

TABLE 9: SHELTER OCCUPANCY BY COUNTY FOR HURRICANE MATTHEW¹³

COUNTY	SHELTERS IN OPERATION	TOTAL SHELTERED (ALL DAYS)	MAXIMUM SHELTERED (ANY SINGLE NIGHT)
Baker	1	15	8
Bradford	2	62	57
Brevard	17	3,035	1,621
Broward	10	3,962	2,625
Clay	5	769	429
Columbia	3	261	192
Duval	12	4,307	2,393
Flagler	3	464	201
Hendry	2	372	372
Hillsborough	5	129	115
Indian River	5	1,303	1,303
Lake	5	112	110
Leon	3	424	327
Madison	1	116	58
Manatee	1	39	39
Martin	7	1,717	1,495
Miami-Dade	4	1,031	797
Nassau	5	763	412
Okceechobee	3	468	468
Orange	2	415	235
Osceola	5	582	325
Palm Beach	14	8,083	7,304
Pinellas	1	3	3
Polk	6	543	543
Putnam	1	60	27
Saint Johns	2	636	87
Saint Lucie	7	1,937	1,907
Seminole	5	598	444
Sumter	1	88	44
Taylor	1	60	60
Volusia	10	751	569
TOTAL	149	33,105	24,570

¹³ Shelter data in this table was provided by the Florida Division of Emergency Management. Local municipalities may have additional data apart from this formal dataset.

UNMET NEEDS ASSESSMENT DATA

Understanding where impacts and unmet needs remain following these disasters 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 utilized. Data gathered and analyzed in the assessment of impacts and unmet needs is listed in Table 10 below.

TABLE 10: DATA SOURCES UTILIZED IN THE ASSESSMENT OF IMPACTS AND UNMET NEEDS		
DATA	SOURCE	DATE
HOUSING		
FEMA Housing Assistance - Owners	Open FEMA Dataset	3/28/2017
FEMA Housing Assistance - Renters	Open FEMA Dataset	3/28/2017
FEMA FIDA Applicant Report	FEMA Regional Office	3/22/2017
SBA Home Applicant Report	Small Business Administration	3/6/2017
Florida Matthew Flood Claims	National Flood Insurance Program	3/13/2017
INFRASTRUCTURE		
PA Project Worksheet Summary - Hermine	Florida Division of Emergency Management	3/27/2017
PA Project Worksheet Summary - Matthew	Florida Division of Emergency Management	3/27/2017
Public Assistance Funded Project Details	Open FEMA Dataset	3/10/2017
ECONOMY		
USDA Crop Indemnity	United States Department of Agriculture	3/9/2017
USDA Crop Coverage Levels	United States Department of Agriculture	3/9/2017

SUMMARY OF IMPACTS AND UNMET NEEDS

Analysis of available datasets indicates that residual need from Hurricanes Hermine and Matthew can be found across housing, infrastructure, and economic sectors. Estimated total impacts (Table 11) from these storms is about \$1.4 billion across the three sectors and total estimated unmet needs top \$494 million. Evidence (discussed in greater detail below) indicates that the housing sector has the most remaining unmet need (68.3 percent), followed by the infrastructure (25.4 percent), and economy (6.3 percent), indicating that any program focused on housing recovery will have a high impact on overall recovery across the state (Figure 19 and Table 11).

SUMMARY OF IMPACT AND UNMET NEEDS

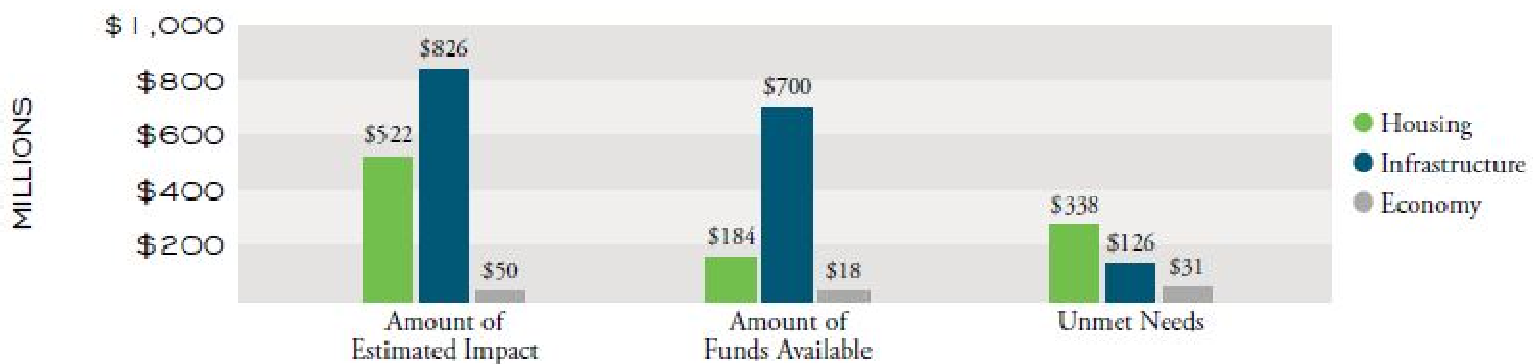


Figure 19: Breakdown of Impacts, Support, and Unmet Need by Recovery Category

TABLE 11: ESTIMATED IMPACT, SUPPORT, AND UNMET NEEDS

SUMMARY OF IMPACTS/SUPPORT	HOUSING	INFRASTRUCTURE	ECONOMY	TOTAL
Amount of Estimated Impact	\$521,878,904	\$825,884,954	\$49,679,691	\$1,397,443,549
Amount of Funds Available	\$184,102,929	\$700,135,842	\$18,495,843	\$902,734,614
Unmet Needs	\$337,775,975	\$125,749,112	\$31,183,847	\$494,708,934
PERCENT OF TOTAL	68.28%	25.42%	6.30%	

HOUSING IMPACT

Table 12 below shows the Real Property FEMA Verified Loss (FVL) determinations in the Florida (IA) Individual Assistance declared counties. Real Property FEMA 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. Inspection rates were higher for Hurricane Hermine than Hurricane Matthew. In some instances inspection rates, or the number of applicant homes visited by FEMA were less than 50 percent.

After review of the updated FEMA, SBA and NFIP data, as well as current data from FEMA online about renter and homeowner applicants, Table 12 has been updated to reflect a remaining net unmet need of \$192.4 million. The original table used all applicants whereas the more current, online FEMA data shown below uses verified applicants.

TABLE 12: FEMA IA APPLICANTS IN THE FL HERMINE AND MATTHEW IA IMPACTED COUNTIES¹⁴

COUNTY	# OF APPLICANTS ¹⁵	NUMBER INSPECTED	NUMBER WITH INSPECTED DAMAGE	% WITH INSPECTED DAMAGE	NUMBER RECEIVING REPAIR ASSISTANCE	TOTAL FEMA VERIFIED LOSS AMOUNT	AVERAGE FEMA VERIFIED LOSS
Brevard	3,835	1,941	1,513	77.95%	358	\$1,357,095	\$3,791
Citrus	766	596	508	85.23%	332	\$4,275,360	\$12,878
Dixie	327	258	189	73.26%	145	\$1,353,992	\$9,338
Duval	3,437	1,510	1,288	85.30%	406	\$2,483,879	\$6,118
Flagler	3,696	1,243	1,016	81.74%	266	\$1,724,813	\$6,484
Hernando	254	199	173	86.93%	104	\$859,797	\$8,267
Hillsborough	171	132	87	65.91%	23	\$152,078	\$6,612
Indian River	413	258	209	81.01%	54	\$228,247	\$4,227
Leon	832	369	293	79.40%	111	\$562,950	\$5,072
Levy	290	211	156	73.93%	95	\$877,753	\$9,240
Manatee	102	82	62	75.61%	32	\$158,928	\$4,967
Nassau	463	220	166	75.45%	69	\$366,753	\$5,315
Pasco	661	559	491	87.84%	285	\$1,819,594	\$6,385
Pinellas	398	327	193	59.02%	56	\$274,693	\$4,905
Putnam	1,343	881	696	79.00%	289	\$1,197,437	\$4,143
Seminole	564	288	222	77.08%	42	\$115,475	\$2,749
St. Johns	3,642	2,356	2,062	87.52%	1,243	\$14,935,828	\$12,016
Taylor	251	194	146	75.26%	100	\$854,895	\$8,549
Volusia	13,026	6,058	5,180	85.51%	1,587	\$6,931,350	\$4,368
Wakulla	110	57	40	70.18%	16	\$66,019	\$4,126
TOTAL	34,581	17,739	14,690	78.16%	5,613	\$40,596,936	\$129,549

¹⁴ <https://www.fema.gov/api/open/v1/HousingAssistanceOwners.csv>

¹⁵ FEMA Individual Assistance Applicant Report - FIDA_28630_H3_4280_4283_3-23-2017

HOUSING TYPES AFFECTED

Nearly 35,000 applicants filed for FEMA IA statewide as a result of the Hermine and Matthew disasters. Of those who specified housing unit type, more than 76 percent are home owners, including single family homes, duplex units, mobile homes and other housing types. The remaining 24 percent are renters, including renters of single family homes, mobile homes, apartment units and other housing types (Table 13).

TABLE 13: FEMA IA APPLICANTS BY HOUSING TYPE	
RESIDENCE TYPE	NUMBER OF FEMA IA APPLICANTS
Apartment	3,325
Assisted Living Facility	14
Boat	167
College Dorm	8
Condo	1,031
Correctional Facility	2
House/Duplex	37,467
Military Housing	11
Mobile Home	9,200
Other	2,460
Townhouse	513
Travel Trailer	434
TOTAL	54,632

SINGLE FAMILY

Housing values range from more than \$250,000 to below \$75,000 in different regions of the state. Higher value homes are concentrated along the coast from Jacksonville through Brevard (Figure 20). However, there are pockets along the entire coast with lower house values.

There are more than 2.6 million housing units in the entire impacted area, many of which were built between 1980 - 1999, and most of which are owner-occupied units, as shown in the map below (Figure 21). With much of the housing stock in the 30-year range (Table 14), key systems such as electrical, roofing, water heaters, and furnaces may have already cycled through a replacement life-span in many homes. Many of the impacted counties have a substantial rental population. Renter households may be adversely impacted during disasters due to the focus on repair of single family homes during disaster recovery.

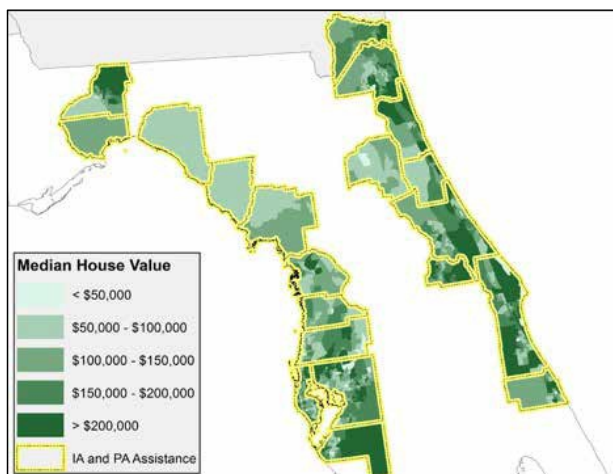


Figure 20: Median House Value

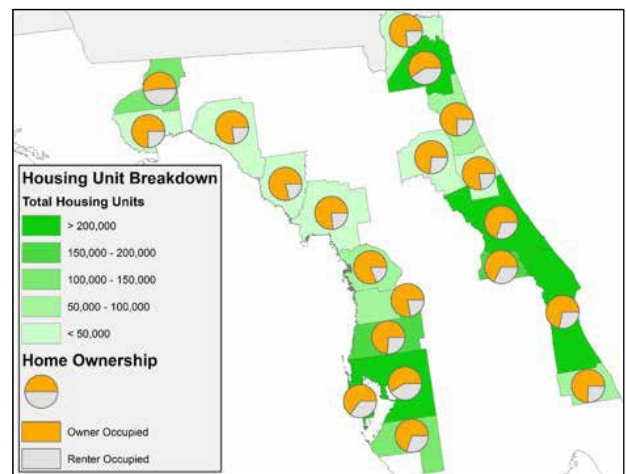


Figure 21: Housing Unit Tenure

TABLE 14: AGE OF HOUSING STOCK: PERCENTAGE OF UNITS BY YEAR BUILT, BY COUNTY (ACS 2011-2015)

COUNTY	TOTAL HOUSING UNITS	PERCENTAGE OF UNITS BY YEAR BUILT					
		2010 OR NEWER	2000-2009	1980-1999	1960-1979	1940-1959	PRE 1940
Brevard	271,654	0.86%	19.65%	42.92%	28.89%	6.85%	0.82%
Citrus	77,819	0.80%	22.37%	47.87%	24.46%	3.90%	0.60%
Dixie	9,192	1.32%	19.28%	45.03%	23.14%	8.76%	2.48%
Duval	393,571	1.81%	19.90%	31.42%	25.02%	16.79%	5.06%
Flagler	49,273	1.39%	44.62%	41.69%	10.47%	1.43%	0.40%
Hernando	84,630	1.12%	25.60%	50.88%	18.75%	2.98%	0.66%
Hillsborough	549,024	2.64%	22.93%	37.62%	24.00%	9.69%	3.12%
Indian River	77,059	0.88%	27.89%	42.00%	22.30%	5.43%	1.50%
Leon	125,915	1.56%	18.93%	42.88%	26.35%	8.77%	1.51%
Levy	19,917	1.61%	21.24%	46.25%	24.79%	3.96%	2.16%
Manatee	177,046	2.23%	22.19%	34.06%	30.67%	8.83%	2.02%
Nassau	35,681	3.21%	29.41%	39.36%	19.42%	5.51%	3.09%
Pasco	231,612	1.78%	24.02%	38.30%	31.66%	3.30%	0.93%
Pinellas	503,658	0.52%	6.34%	29.27%	44.40%	15.93%	3.54%
Putnam	36,824	1.02%	13.95%	40.65%	29.71%	10.52%	4.15%
Seminole	94,826	3.92%	34.85%	42.12%	12.25%	3.93%	2.94%
St. Johns	184,374	1.47%	17.73%	48.29%	26.37%	4.91%	1.22%
Taylor	10,906	1.16%	15.34%	37.40%	28.73%	11.32%	6.04%
Volusia	255,437	0.98%	17.39%	42.69%	27.02%	9.76%	2.17%
Wakulla	12,841	1.21%	31.20%	44.44%	16.52%	3.95%	2.69%
TOTAL	3,201,259	1.58%	19.63%	38.13%	28.42%	9.68%	2.56%

RENTAL HOUSING

Rental housing is an important component of affordable housing for the impacted area (Figure 21). Much of the rental housing (nearly 80 percent) in Florida was built prior to 1999 (Table 15). The older building code and in some cases, the lack of regular maintenance can make these units less desirable.

The rental vacancy rate in Florida was 23 percent, according to the ACS 2015 5-year estimates¹⁶. The median rent for the state is \$1,002 monthly¹⁷.

Of the FEMA applicants in the IA program for the impacted counties, nearly 24 percent live in rental housing; 8,271 of whom are also of low-and-moderate income.

As indicated by the map below (Figure 22), rental units in the 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/willing to commit resources to address shared problems (such as damaged roofs).

¹⁶ ACS 2011-2015, B25004 - VACANCY STATUS

¹⁷ <https://www.census.gov/quickfacts/table/HSG860215/12>

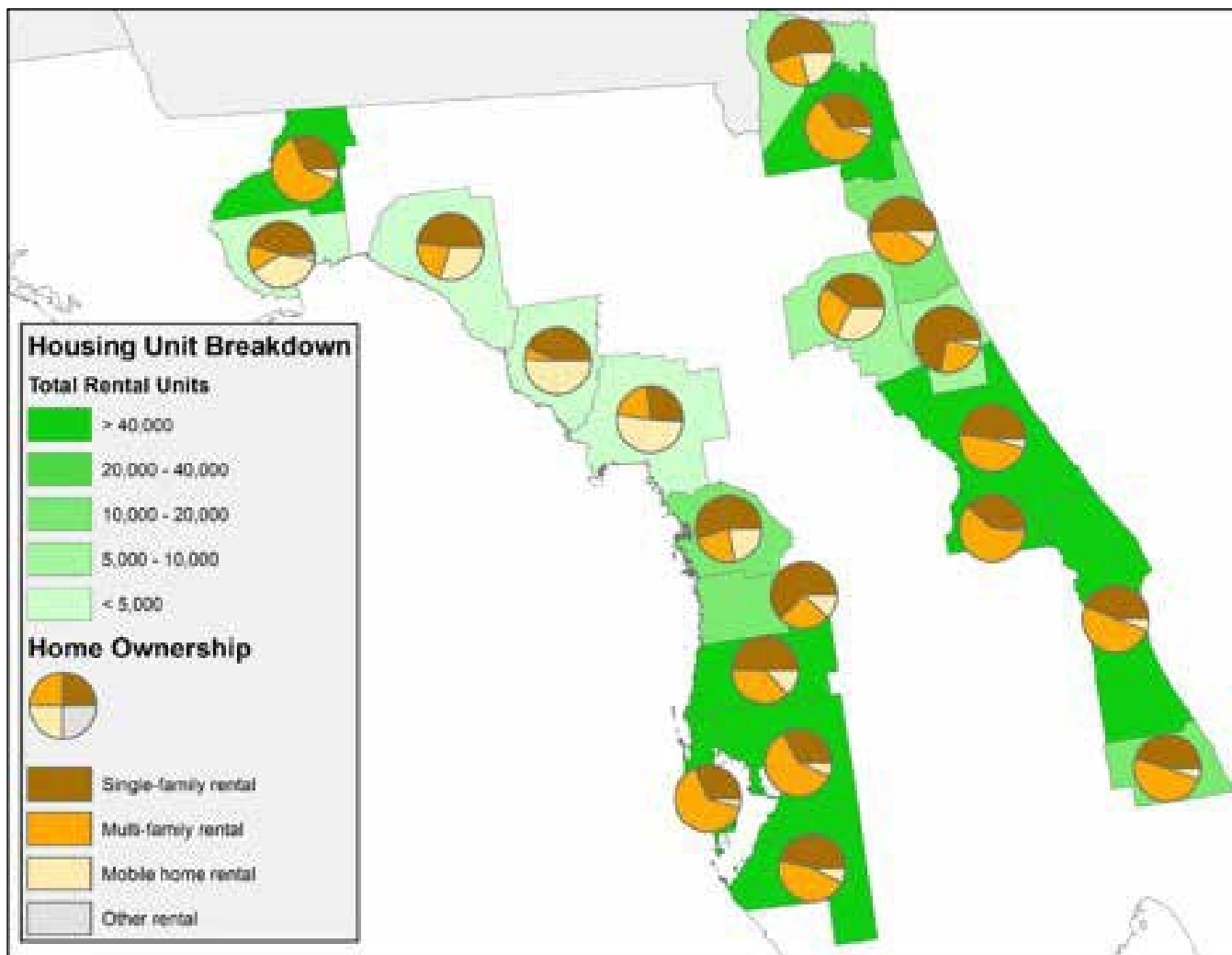


Figure 22: Rental Housing Unit Tenure

**TABLE 15: AGE OF RENTAL HOUSING STOCK:
PERCENTAGE OF UNITS BY YEAR BUILT, BY COUNTY (ACS 2011-2015)**

COUNTY	RENTAL HOUSING UNITS	PERCENTAGE OF UNITS BY YEAR BUILT					
		2010 OR NEWER	2000-2009	1980-1999	1960-1979	1940-1959	PRE 1940
Brevard	63,137	0.72%	18.81%	39.60%	32.33%	7.47%	1.07%
Citrus	11,478	1.12%	13.47%	45.12%	34.05%	4.87%	1.37%
Dixie	1,282	2.50%	24.10%	35.96%	25.20%	11.70%	0.55%
Duval	137,871	2.27%	19.39%	30.53%	28.97%	14.18%	4.66%
Flagler	8,325	1.85%	44.31%	40.14%	11.66%	1.74%	0.29%
Hernando	15,639	1.69%	26.86%	43.89%	23.84%	3.33%	0.39%
Hillsborough	201,793	3.03%	22.75%	38.23%	24.46%	8.45%	3.08%
Indian River	14,657	0.06%	26.77%	38.44%	22.08%	9.19%	3.46%
Leon	52,826	1.85%	19.71%	40.40%	28.48%	8.12%	1.44%
Levy	3,617	0.86%	21.59%	41.30%	30.08%	3.79%	2.38%
Manatee	40,696	1.89%	18.31%	33.01%	32.13%	11.88%	2.79%
Nassau	6,731	3.89%	28.39%	30.22%	24.11%	9.57%	3.82%
Pasco	48,853	2.36%	21.05%	34.48%	35.91%	4.66%	1.54%
Pinellas	141,805	0.95%	7.15%	30.32%	43.75%	13.63%	4.20%
Putnam	7,302	0.49%	8.89%	35.47%	37.72%	13.12%	4.31%
Seminole	19,431	3.15%	30.97%	38.35%	17.68%	4.88%	4.97%
St. Johns	49,348	1.85%	18.70%	48.09%	26.28%	3.89%	1.18%
Taylor	1,743	0.00%	9.06%	27.88%	39.99%	12.97%	10.10%
Volusia	59,977	1.40%	16.15%	39.35%	28.93%	11.18%	2.99%
Wakulla	2,693	0.00%	35.31%	34.72%	25.25%	1.89%	2.82%
TOTAL	889,204	1.94%	18.65%	36.29%	30.38%	9.71%	3.03%

MOBILE HOMES

Mobile home affordability and ease of general maintenance provides housing independence and choice to residents across the state (Figure 23). 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, 9,200 of them reside in mobile home units.

Mobile home damage was also concentrated in certain areas, as illustrated in the map below. These areas include Volusia, St. Johns, Putnam and Brevard Counties with either greater than 500 mobile homes damaged or more than \$500,000 in damage to mobile homes as 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 5,111 mobile homes with FEMA Real Property Verified Losses, or losses identified by FEMA inspectors. Table 16 shows the number of mobile homes and FEMA verified property losses by county.

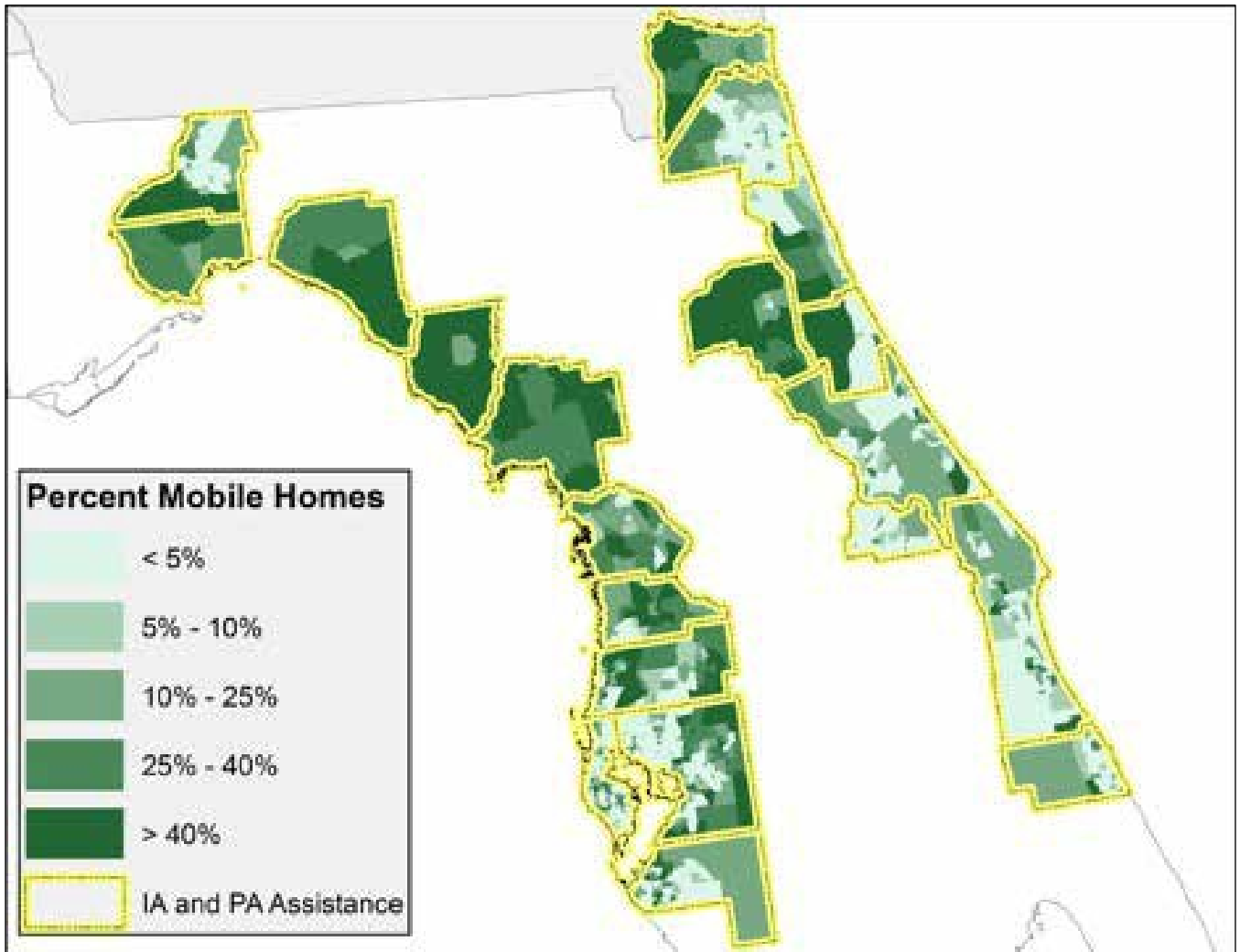


Figure 23: Mobile Home Populations

TABLE 16: MOBILE HOMES WITH VERIFIED LOSS, BY COUNTY

COUNTY	COUNT OF MOBILE HOMES WITH FEMA REAL PROPERTY VERIFIED LOSSES	TOTAL FEMA REAL PROPERTY VERIFIED LOSS
Volusia	2,327	\$2,808,673
St. Johns	391	\$1,161,656
Putnam	387	\$568,099
Brevard	583	\$409,290
Pasco	195	\$405,077
Flagler	279	\$401,546
Dixie	72	\$388,076
Citrus	83	\$279,930
Duval	209	\$257,024
Leon	128	\$177,237
Levy	66	\$156,525
Taylor	46	\$139,723
Nassau	69	\$112,070
Manatee	25	\$90,773
Pinellas	43	\$88,569
Indian River	84	\$78,967
Hernando	33	\$75,041
Hillsborough	20	\$54,778
Seminole	48	\$31,751
Wakulla	23	\$19,224
TOTAL	5,111	\$7,704,030

SUMMARY TABLES

The tables below (Table 17 - Table 19) display FEMA IA applicants by categories useful for understanding possible program enrollment, including ownership versus rental, age, and access and functional needs.

TABLE 17: FEMA APPLICANT BREAKDOWN BY < 30% LOW/MODERATE INCOME, AGE, AND ACCESS/FUNCTIONAL NEEDS FOR HOUSES AND MOBILE HOMES

FEMA IA APPLICANTS	LMI < 30%	OVER 65	AFN
NUMBER OF HOMES	7,597	1,555	87
Owners	5,730	1,445	53
Renters	1,867	110	34
NUMBER OF MOBILE HOMES	2,379	562	22
Owners	1,980	538	18
Renters	399	24	4

TABLE 18: FEMA APPLICANT BREAKDOWN BY < 50% LOW/MODERATE INCOME, AGE, AND ACCESS/FUNCTIONAL NEEDS FOR HOUSES AND MOBILE HOMES

FEMA IA APPLICANTS	LMI < 50%	OVER 65	AFN
NUMBER OF HOMES	11,811	3,304	160
Owners	9,090	3,093	97
Renters	2,721	211	63
NUMBER OF MOBILE HOMES	4,237	1,438	33
Owners	3,645	1,384	26
Renters	592	54	7

TABLE 19: FEMA APPLICANT BREAKDOWN BY < 80% LOW/MODERATE INCOME, AGE, AND ACCESS/FUNCTIONAL NEEDS FOR HOUSES AND MOBILE HOMES

FEMA IA APPLICANTS	LMI < 80%	OVER 65	AFN
NUMBER OF HOMES	17,459	5,283	212
Owners	13,677	4,996	132
Renters	3,782	287	80
NUMBER OF MOBILE HOMES	6,230	2,278	54
Owners	5,402	2,206	44
Renters	828	72	10

HOUSING FUNDS MADE AVAILABLE

The main federal funding sources that are available for impacted residents in the immediate aftermath of a disaster are FEMA Individual Assistance, low-interest loans from the U.S. Small Business Administration (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 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 bring a home back 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 54,632 applicants to FEMA’s Housing Assistance Program across the 20 presidentially declared counties. Of these, 16,821 had a FEMA Real Property Full Verified Loss (FVL) assessment; however, this does not mean that the applicant received funding (Table 20). Of the applicants with a FVL, 5,677 received FEMA housing assistance (HA) in the form of repair or replacement funds. An estimated \$37,201,261 in damage was assessed for the 16,821 applicants with a FVL. This has resulted in \$20,658,689 in housing assistance to date.

TABLE 20: APPLICANTS BY FEMA VERIFIED LOSSES AND HOUSING ASSISTANCE

HERMINE AND MATTHEW IMPACT AREAS	FEMA IA APPLICANTS	AMOUNT OF FEMA VERIFIED REAL PROPERTY LOSS	AMOUNT OF FEMA HOUSING ASSISTANCE PROVIDED
UNIVERSE	54,632	\$37,201,262	\$23,675,883
FEMA FVL	16,821	—	—
Received HA	5,677	\$27,025,562	\$20,658,689
Received No HA	11,444	\$10,175,700	—
NO FEMA FVL	37,811	—	—
Received HA	1,525	—	\$3,017,194
Received No HA	36,286	—	—

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 January 2017, there were 1,763,760 policies covering approximately \$428 million in property and contents across the state. The National Flood Insurance Program paid 2,980 claims totaling \$93,081,339 across 106 cities following Hermine and Matthew.

SMALL BUSINESS ADMINISTRATION (SBA) HOME LOANS

The Small Business Administration (SBA) provided \$62,382,900 in repair assistance available to 3,190 homeowner applicants in the Hurricane Matthew and Hurricane Hermine impact 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 \$33,963 and the median loan is \$25,058.

PRIVATE INSURANCE PROCEEDS

Detailed (homeowner level) information on private insurance for Matthew and Hermine 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 these hurricanes. Table 21 shows that Hurricane Hermine impacted many fewer individuals than Hurricane Matthew (Table 22). Furthermore, damage from both hurricanes (as indicated by the number of insurance claims) is heavily tilted toward residential properties over businesses.

¹⁸ <http://www.flor.com/Office/HurricaneSeason/HurricaneMatthewClaimsData.aspx>

¹⁹ <http://www.flor.com/Office/HurricaneSeason/HurricaneMatthewClaimsData.aspx>

TABLE 21: HURRICANE HERMINE INSURANCE CLAIMS DATA¹⁸

LINES OF BUSINESS	SUB-LINES	NUMBER OF CLAIMS	CLOSED CLAIMS (PAID)	CLOSED CLAIMS (NOT PAID)	NUMBER CLAIMS OPEN	PERCENT CLAIMS CLOSED
RESIDENTIAL PROPERTY		14,094	6,020	7,145	929	93.4%
	Homeowners Dwelling	10,967	4,385	5,795	787	92.8%
	Mobile Homeowners	1,724	805	819	100	94.2%
	Commercial Residential	1,342	818	499	25	98.1%
		61	12	32	17	72.1%
COMMERCIAL PROPERTY		994	326	424	244	75.5%
FLOODING		1,359	987	289	83	93.9%
	Private Flood	195	133	46	16	91.8%
	Federal Flood	1,164	854	243	67	94.2%
BUSINESS INTERRUPTION		56	30	20	6	89.3%
OTHER LINES OF BUSINESS		3,196	2,501	562	133	95.8%
TOTAL		19,699	9,864	8,440	1,395	92.9%

TABLE 22: HURRICANE MATTHEW INSURANCE CLAIMS DATA¹⁹

LINES OF BUSINESS	SUB-LINES	NUMBER OF CLAIMS	CLOSED CLAIMS (PAID)	CLOSED CLAIMS (NOT PAID)	NUMBER CLAIMS OPEN	PERCENT CLAIMS CLOSED
RESIDENTIAL PROPERTY		101,454	55,576	38,835	7,043	93.1%
	Homeowners Dwelling	82,957	43,838	33,322	5,797	93.0%
	Mobile Homeowners	11,383	6,719	3,857	807	92.9%
	Commercial Residential	6,599	4,917	1,461	221	96.7%
		515	102	195	218	57.7%
COMMERCIAL PROPERTY		6,698	1,295	2,480	2,923	56.4%
FLOODING		3,433	2,252	906	275	92.0%
	Private Flood	145	94	41	10	93.1%
	Federal Flood	3,288	2,158	865	265	91.9%
BUSINESS INTERRUPTION		229	60	103	66	71.2%
OTHER LINES OF BUSINESS		7,531	4,634	1,864	1,033	86.3%
TOTAL		119,345	63,817	44,188	11,340	90.5%

¹⁸ <http://www.flor.com/Office/HurricaneSeason/HurricaneMatthewClaimsData.aspx>¹⁹ <http://www.flor.com/Office/HurricaneSeason/HurricaneMatthewClaimsData.aspx>

HOUSING UNMET NEED

HOUSING IMPACT METHODOLOGY

HUD calculates “unmet housing needs” as the number of housing units with unmet needs times the estimated cost to repair those units less repair funds already provided by FEMA.

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 done 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.”²⁰

Previously approved impact assessment methodologies have utilized the SBA estimates of damage and repair needs, FEMA IA Housing Assistance data, and National Flood Insurance data in combination with each other 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 thus provides a more comprehensive look at recovery than simply looking at 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 solid 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. The full extent of Hermine and Matthew’s housing impact is more than \$600 million when utilizing SBA verified losses in combination with estimates based on the average verified loss of \$33,963.

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 loan amount of \$23,740 to account for outliers in the SBA data (a few very high and very low award amounts) that were impacting the average. When applied to the universe of FEMA applicants without a FVL, SBA applicants who were not approved, and FEMA data about the number of rentals with damages (2,482) this results in an adjusted housing impact of \$490,745,997. Twenty percent in additional resiliency costs were applied to account for the additional cost of compliance in coastal areas, for a total impact of \$588,895,196. After deducting the funds already provided by FEMA, SBA, NFIP and Public Housing Funds (\$298,322,735), the remaining unmet need for housing is approximately \$230,907,914 (Table 23).

²⁰ Federal Register Vol. 78, No. 43 /Tuesday, March 5, 2013

TABLE 23: SBA DERIVED IMPACTS AND UNMET NEEDS FOR HOUSING²¹

SMALL BUSINESS ADMINISTRATION VERIFIED LOSS OF ALL SBA APPLICANTS	
SBA applicants with a real estate verified loss	\$111,005,257
SBA applicants without a real estate verified loss (estimate)	\$64,905,160
Total verified loss of FEMA applicants referred to SBA (estimate)	\$175,910,417
ESTIMATED SMALL BUSINESS ADMINISTRATION VERIFIED LOSS OF FEMA APPLICANTS NOT REFERRED OT SBA	
Total FEMA applicants with FEMA inspected damage	16,877
Total SBA applicants	6,144
Potential unmet need population	10,733
Median verified loss	\$23,740
Verified loss of FEMA applicants not referred to SBA (estimate)	\$254,801,420
Total verified	\$430,711,837
ESTIMATED SMALL BUSINESS ADMINISTRATION VERIFIED LOSS OF RENTAL PROPERTY OWNERS	
FEMA renter applicants with personal property damage	2,482
Median verified loss	\$23,740
Total verified loss of rental property owners (estimated)	\$58,922,680
OTHER HOUSING DAMAGE ESTIMATES	
Real estate damage to public housing	\$1,111,480
Total housing verified loss	\$490,745,997
Accounting for 20% resilience addition	\$588,895,196
DUPLICATION OF BENEFITS	
FEMA repair payments	\$13,311,524
SBA home loan current real estate payments	\$59,548,800
SBA business loan payments to landlords	\$5,237,700
NFIP building payments	\$220,154,711
Public housing funds	\$70,000
Total benefit	\$298,322,735
Total unmet housing need	\$192,423,262
Accounting for 20% resilience addition	\$230,907,914

²¹ Values from SBA Home Loan Report, FEMA Individual Assistance Data, Survey of 62 Public Housing Authorities across declared region, and National Flood Insurance Program.

INFRASTRUCTURE IMPACT

Infrastructure systems affected by Hurricanes Hermine and Matthew included mainly roadways, bridges and protective coastal dunes 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 submitted for Public Assistance.^{22,23}

PUBLIC ASSISTANCE

The FEMA Public Assistance (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. If the PA applicant is a local government, then the State of Florida typically pays for one-half of the required match. In these cases, the local government pays 12.5 percent of the eligible costs; and, the State pays 12.5 percent. If, however, the applicant is not a local government (e.g. the applicant is an eligible private non-profit organization), then the applicant pays the entire required match. In other words, the applicant pays the entire 25 percent.

The Public Assistance Program for FEMA 4280 and 4283 has identified \$322,888,506 in public assistance spending on Categories A and B, emergency protective measures, and debris management. County specific project totals can be found in Table 24 (Hermine) and Table 25 (Matthew). Additionally, \$502,996,448 in infrastructure needs for Categories C-G (permanent repair) exist across the state-assessed counties. The 75 percent federal share of \$377,247,336 in funding will be provided to approved projects. These categories include:

Category C: Roads and Bridges

Category D: Water Control Facilities

Category E: Buildings and Equipment

Category F: Utilities

Category G: Parks, Recreational Facilities, and Other Facilities

County specific project totals can be found in Table 24 (Hermine) and Table 25 (Matthew). Based on this data, a remaining unmet need of \$125,749,112 (applicant share) in identified infrastructure damage eligible under FEMA-PA Categories C-G remains.

²² <http://www.floridadisaster.org/eoc/matthew2016/>

²³ <https://www.fema.gov/media-library-data/1477681864977-4968ad6e3d2fab698e94c45322ea7c3/PDAReportFEMA4280DRFL.pdf>

TABLE 24: PUBLIC ASSISTANCE CATEGORY A AND B TOTALS BY COUNTY, HURRICANE HERMINE²⁴

COUNTY	CATEGORY A (DEBRIS REMOVAL)		CATEGORY B (EMERGENCY PROTECTIVE MEASURES)		TOTAL DEBRIS REMOVAL AND EMERGENCY MEASURES	
	NUMBER OF PROJECTS	PROJECT TOTAL AMOUNTS	NUMBER OF PROJECTS	PROJECT TOTAL AMOUNTS	NUMBER OF PROJECTS	PROJECT TOTAL AMOUNTS
Alachua	3	\$145,515	4	\$203,000	7	\$348,515
Baker			1	\$40,000	1	\$40,000
Citrus	6	\$899,000	3	\$172,000	9	\$1,071,000
Columbia	1	\$175,000	1	\$60,000	2	\$235,000
Dixie	4	\$2,501,381	3	\$165,000	7	\$2,666,381
Franklin	2	\$136,000	5	\$102,393	7	\$238,393
Gadsden			3	\$11,100	3	\$11,100
Hernando	3	\$136,000	2	\$60,000	5	\$196,000
Jefferson	8	\$218,631	4	\$59,697	12	\$278,328
Lafayette	2	\$9,000	1	\$10,000	3	\$19,000
Leon	6	\$12,031,988	9	\$3,278,322	15	\$15,310,310
Levy	8	\$739,806	9	\$144,600	17	\$884,406
Liberty			2	\$11,250	2	\$11,250
Madison	4	\$291,708	3	\$62,237	7	\$353,945
Manatee	1	\$10,000	4	\$990,000	5	\$1,000,000
Marion	2	\$65,000	1	\$51,389	3	\$116,389
Pasco	4	\$765,000	5	\$970,000	9	\$1,735,000
Pinellas	11	\$470,000	23	\$4,538,318	34	\$5,008,318
Sarasota	3	\$65,000	3	\$258,115	6	\$323,115
Suwannee	3	\$91,000	3	\$93,000	6	\$184,000
Taylor	3	\$1,007,278	4	\$90,402	7	\$1,097,680
Union			1	\$30,000	1	\$30,000
Wakulla	4	\$217,152	4	\$20,402	8	\$237,555
Statewide	21	\$9,886,867	27	\$3,669,419	48	\$13,556,285
TOTAL	99	\$29,861,326	125	\$15,090,644	224	\$44,951,970

²⁴ Data as of 3/27/2017 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

TABLE 25: PUBLIC ASSISTANCE CATEGORY A AND B TOTALS BY COUNTY, HURRICANE MATTHEW²⁵

COUNTY	CATEGORY A (DEBRIS REMOVAL)		CATEGORY B (EMERGENCY PROTECTIVE MEASURES)		TOTAL DEBRIS REMOVAL AND EMERGENCY MEASURES	
	NUMBER OF PROJECTS	PROJECT TOTAL AMOUNTS	NUMBER OF PROJECTS	PROJECT TOTAL AMOUNTS	NUMBER OF PROJECTS	PROJECT TOTAL AMOUNTS
Bradford	2	\$11,004	3	\$72,471	5	\$83,475
Brevard	16	\$15,079,913	29	\$7,496,339	45	\$22,576,252
Broward	7	\$83,277	41	\$8,835,848	48	\$8,919,125
Clay	6	\$1,326,600	5	\$900,175	11	\$2,226,775
Duval	14	\$25,607,443	18	\$10,866,120	32	\$36,473,563
Flagler	10	\$13,167,534	13	\$11,928,286	23	\$25,095,820
Indian River	8	\$2,141,941	10	\$1,600,689	18	\$3,742,630
Lake	6	\$221,262	11	\$318,856	17	\$540,118
Martin	6	\$4,239,977	9	\$2,297,760	15	\$6,537,737
Nassau	3	\$385,064	3	\$914,000	6	\$1,299,064
Orange	6	\$1,254,859	11	\$961,500	17	\$2,216,359
Osceola	1	\$6,452	10	\$1,174,775	11	\$1,181,227
Palm Beach	14	\$1,715,404	29	\$6,636,433	43	\$8,351,837
Putnam	5	\$2,235,000	7	\$1,241,000	12	\$3,476,000
Seminole	9	\$1,261,671	11	\$2,284,958	20	\$3,546,629
St. Johns	10	\$25,543,626	16	\$12,206,082	26	\$37,749,708
St. Lucie	6	\$2,235,954	8	\$2,303,200	14	\$4,539,154
Sumter	1	\$210,000	1	\$60,000	2	\$270,000
Volusia	37	\$51,734,227	28	\$7,900,987	65	\$59,635,213
Statewide	24	\$14,763,927	27	\$34,711,923	51	\$49,475,850
TOTAL	191	\$163,225,134	290	\$114,711,402	481	\$277,936,536

²⁵ Data as of 3/27/2017 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

TABLE 26: PUBLIC ASSISTANCE CATEGORY C-G TOTALS BY COUNTY, HURRICANE HERMINE²⁶

COUNTY	CATEGORIES C-G		
	COST OF PROJECTS	FEDERAL SHARE	APPLICANT SHARE
Alachua	\$13,224	\$9,918	\$3,306
Citrus	\$339,791	\$254,843	\$84,948
Dixie	\$4,406,000	\$3,304,500	\$1,101,500
Franklin	\$4,540,844	\$3,405,633	\$1,135,211
Gadsden	\$20,000	\$15,000	\$5,000
Hernando	\$411,700	\$308,775	\$102,925
Lafayette	\$40,000	\$30,000	\$10,000
Leon	\$3,530,197	\$2,647,647	\$882,549
Levy	\$1,199,574	\$899,681	\$299,894
Madison	\$28,072	\$21,054	\$7,018
Manatee	\$11,251,000	\$8,438,250	\$2,812,750
Marion	\$187,000	\$140,250	\$46,750
Pasco	\$1,632,600	\$1,224,450	\$408,150
Pinellas	\$28,286,692	\$21,215,019	\$7,071,673
Sarasota	\$10,915,000	\$8,186,250	\$2,728,750
Statewide	\$28,267,596	\$21,200,697	\$7,066,899
Suwannee	\$872,828	\$654,621	\$218,207
Taylor	\$2,203,242	\$1,652,431	\$550,810
Wakulla	\$198,000	\$148,500	\$49,500
TOTAL	\$98,343,359	\$73,757,519	\$24,585,840

²⁶ Data as of 3/27/2017 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

TABLE 27: PUBLIC ASSISTANCE CATEGORY C-G TOTALS BY COUNTY, HURRICANE MATTHEW²⁷

COUNTY	CATEGORIES C-G		
	COST OF PROJECTS	FEDERAL SHARE	APPLICANT SHARE
Bradford	\$117,851	\$88,388	\$29,463
Brevard	\$37,961,662	\$28,471,247	\$9,490,416
Broward	\$2,898,815	\$2,174,111	\$724,704
Clay	\$4,730,055	\$3,547,541	\$1,182,514
Duval	\$60,563,088	\$45,422,316	\$15,140,772
Flagler	\$11,609,860	\$8,707,395	\$2,902,465
Indian River	\$18,825,421	\$14,119,066	\$4,706,355
Lake	\$82,137	\$61,603	\$20,534
Martin	\$8,952,674	\$6,714,506	\$2,238,169
Nassau	\$39,261,129	\$29,445,847	\$9,815,282
Orange	\$335,307	\$251,480	\$83,827
Osceola	\$144,244	\$108,183	\$36,061
Palm Beach	\$468,731	\$351,548	\$117,183
Putnam	\$8,129,000	\$6,096,750	\$2,032,250
Seminole	\$738,522	\$553,892	\$184,631
St. Johns	\$134,293,772	\$100,720,329	\$33,573,443
St. Lucie	\$7,392,207	\$5,544,155	\$1,848,052
Statewide	\$28,033,649	\$21,025,237	\$7,008,412
Sumter	\$1,700,000	\$1,275,000	\$425,000
Volusia	\$38,414,965	\$28,811,224	\$9,603,741
TOTAL	\$404,653,089	\$303,489,817	\$101,163,272

²⁷ Data as of 3/27/2017 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. However, for states, such as Florida, that complete FEMA requirements for enhanced mitigation planning, the amount of HMGP funds available increases from 15 percent of the Federal share of disaster assistance for that event to 20 percent of the Federal share of disaster assistance for that event. Twenty percent of the total PA funds provided by FEMA (\$700,135,842) plus the FEMA Individual Assistance Program funds made available (\$23,330,989) 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 \$144,693,366. Then, 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 \$36,173,342 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.

ECONOMIC IMPACT

BUSINESS & EMPLOYMENT

Utilizing SBA business data to understand the financial impact to livelihoods provides a more comprehensive understanding of impacts and recovery across the state. SBA makes low cost disaster loans available to qualified businesses. According to SBA business loan information, approximately 536 applicants had a verified property loss of \$20,521,037, and another 104 applicants either withdrew or were declined for a loan from the program. The average verified loss for all applicants was \$38,286 and the median loss was \$33,158. Utilizing the general methodology put forth for the housing impact and unmet needs enables us to identify the true impact and possible extra estimated impacts for businesses who did not qualify for loans.

Table 28 outlines the impacts, estimated impacts and support provided by the SBA. Here we capture the total loss of \$25,680,077 by summing the verified losses of \$20.5 million, the estimated losses of \$3.5 million (104 applicants either declined or withdrawn from the program times the median verified loss of \$33,158) and the amount of verified reconstruction loss of \$1.7 million. Next we use the same method to sum the verified and estimated losses to furniture, machinery, inventory, and business operating expenses (\$12,574,125).

According to this method, total business impacts from Hermine and Matthew were \$38,254,202. 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 \$43,390,217. SBA payouts to businesses totaled \$13,876,600 for these lines of loss, leaving a potential unmet need of \$24,377,602 or \$29,513,617 when accounting for resilience additions.

IMPACT TO AGRIBUSINESS

Hurricanes Hermine and Matthew caused moderate damages to a variety of crops across the state, from tomatoes and pepper crops in the southwestern counties to corn, peanuts, and tobacco in the north central counties to a mixture of cotton, peanuts, and soybeans along the northern panhandle counties (Figure 24). The US Census Bureau indicates that extractive industry (farming, fishing, logging, and mining) makes up more than 10 percent of occupations in some census tracts within the Hermine and Matthew impacted counties (Figure 25). Florida farmers and rangers export more than \$3.3 billion per year in agricultural commodities, most going to Canada²⁸.

The U.S. Department of Agriculture (USDA) designated Flagler, Putnam, St. Johns and Volusia Counties in Florida as primary natural disaster areas due to damage and losses caused by Hurricane Matthew that occurred from October 6, 2016, through October 8, 2016. Additional impacts reported by the University of Florida's Institute of Food and Agricultural Sciences (UF/IFAS) Extension (October 14, 2016) identified crop damage to 17 farms in St. Johns County. As of the date of the report, four farms had reported \$1.4 million in damage, seven were assessing their dollar amounts and six more had not yet been successfully contacted. The status of insurance coverage for these reported impacts is currently unknown²⁹.

²⁸<http://www.freshfromflorida.com/Divisions-Offices/Marketing-and-Development/Education/For-Researchers/Florida-Agriculture-Overview-and-Statistics>

²⁹ Information provided by St. Johns County public comment

Through the use of the most up-to-date USDA data, losses have been estimated for Florida's impacted counties (Table 30). The data covers insured crops for which indemnity was received as a result of cyclone, hurricane, flood, precipitation, excess moisture, tornado, wind or inability to plant from September 2016 through November 2016. By coupling the indemnity data and coverage level data from the USDA a total loss estimate, and corresponding unmet need has been estimated.

From October 2015 to December 2016, approximately \$4,619,243 of indemnity was paid out to farmers who suffered losses due from Hurricanes Hermine and Matthew impacts (Table 29). The estimated total loss (Table 30), derived by calculating the estimated additional losses based on coverage level (percent of crops not covered) by the indemnity payments from USDA data, (for September through December) was approximately \$6,283,473. This brings the estimated unmet need to \$1,670,230 (Estimated Total Loss – Indemnity Paid) for the three-month period directly following the hurricanes³⁰.

TABLE 28: SBA DERIVED IMPACTS AND UNMET NEEDS FOR BUSINESSES

SMALL BUSINESS ADMINISTRATION VERIFIED BUSINESS PROPERTY LOSS OF ALL SBA APPLICANTS

SBA applicants with a real estate verified loss	\$	20,521,037
SBA applicants without a real estate verified loss (estimate)	\$	3,448,380
SBA verified reconstruction loss	\$	1,710,660
Total real estate losses for businesses referred to SBA (estimate)	\$	25,680,077

SMALL BUSINESS ADMINISTRATION VERIFIED BUSINESS OPERATING LOSS OF ALL SBA APPLICANTS

Verified furniture loss	\$	1,500,657
Furniture loss (estimate)	\$	512,200
Verified machinery loss	\$	2,918,010
Machinery loss (estimate)	\$	459,160
Verified inventory loss	\$	810,198
Inventory loss (estimate)	\$	457,600
Verified EIDL loss	\$	4,013,100
EIDL loss (estimate)	\$	1,903,200
Sum of operational losses	\$	12,574,125
Total verified loss for all businesses (estimate)	\$	38,254,202
Accounting for 20% resilience addition	\$	43,390,217.40

DUPLICATION OF BENEFITS

SBA repair payments	\$	781,500
SBA reconstruction payments	\$	7,074,900
SBA furniture payments	\$	650,200
SBA machinery payments	\$	1,118,300
SBA inventory payments	\$	238,600
SBA EIDL payments	\$	4,013,100
Total benefit	\$	13,876,600
Total unmet business repair/replace payments	\$	17,823,677
Total unmet business operation payments	\$	6,553,925
Total unmet business needs	\$	24,377,602
Accounting for 20% resilience addition	\$	29,513,617

³⁰ Indemnity Data: <http://www.rma.usda.gov/data/cause.html>, USDA. Coverage Level Data: <http://prodwebnlb.rma.usda.gov/apps/SummaryofBusiness/ReportGenerator>, USDA.

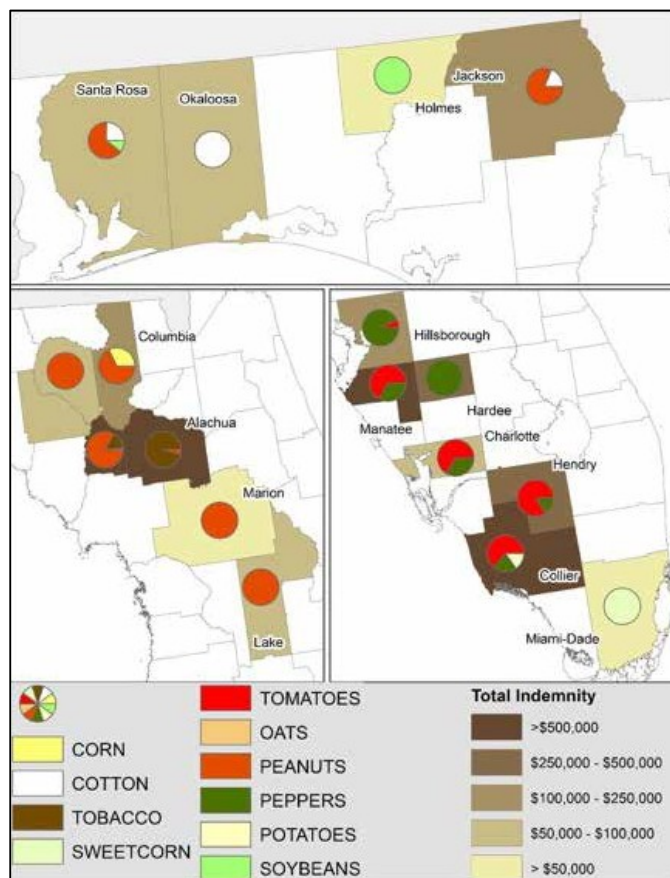


Figure 24: Crop Loss Based on USDA Indemnity

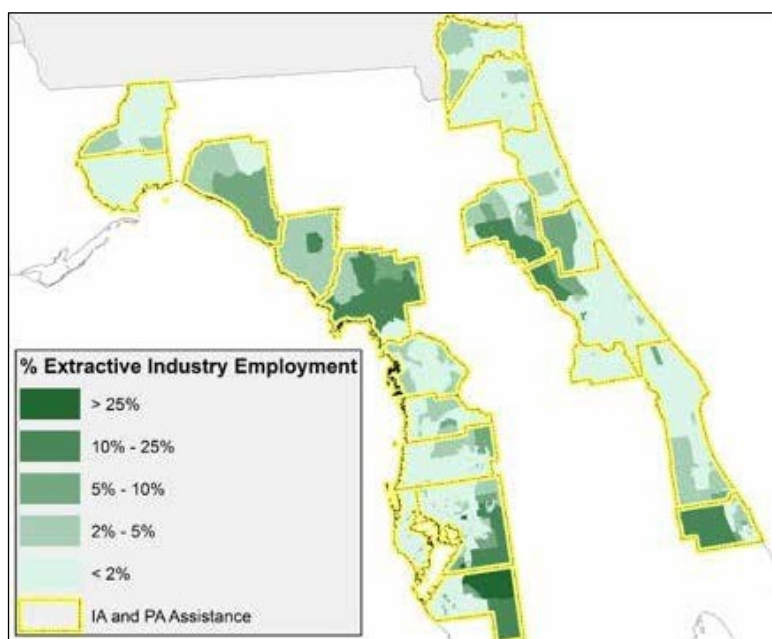


Figure 25: Primary Sector Employment for Impacted Counties

**TABLE 29: USDA INDEMNITY PAYMENTS FOR HERMINE AND MATTHEW DAMAGE IN FLORIDA
(SEPTEMBER – NOVEMBER 2016)**

CROP	NUMBER OF CLAIMS	ACRES AFFECTED	INDEMNITY
All other crops	2	211	\$141,321
Corn	2	251	\$51,888
Cotton	3	630	\$108,979
Flue cured tobacco	3	286	\$726,406
Fresh market sweet corn	1	227	\$30,687
Fresh market tomatoes	7	483	\$1,438,367
Oats	1	61	\$2,420
Peanuts	13	3,587	\$1,009,655
Peppers	7	297	\$1,022,530
Potatoes	2	127	\$80,362
Soybeans	2	155	\$6,629
TOTAL	43	6,314	\$4,619,243

TABLE 30: ESTIMATED CROP LOSSES BASED ON INSURANCE LEVEL COVERAGE

USDA DATA FOR MATTHEW IMPACTED COUNTIES (OCTOBER-NOVEMBER, 2016)

Actual Indemnity	\$4,619,243
Estimated Additional Loss	\$1,670,230
Estimated Total Need	\$6,289,473
Insurance Paid	\$4,619,243
Estimated Unmet Need	\$1,670,230

The estimates referenced in this section do not include uninsured crops, losses on timber, or uncovered damage to machinery, facilities and equipment. The cyclical nature of the agriculture business may result in additional losses continuing far past November 2016 as a result of the Hurricanes Hermine and Matthew, and may be captured in an updated Unmet Needs Assessment at a later date. Some of these losses are directly accounted for in the business losses discussed above in the Business and Employment section.

UNMET NEEDS ASSESSMENT: APPENDICES

APPENDIX 1: 2016 HUD INCOME LIMITS FOR IA DECLARED COUNTIES ³¹								
IA DECLARED COUNTIES	1 PERSON	2 PERSON	3 PERSON	4 PERSON	5 PERSON	6 PERSON	7 PERSON	8 PERSON
BREVARD								
30% Limits	\$12,000	\$13,750	\$15,450	\$17,150	\$18,550	\$19,900	\$21,300	\$22,650
50% Limits	\$20,000	\$22,900	\$25,750	\$28,600	\$30,900	\$33,200	\$35,450	\$37,750
80% Limits	\$32,050	\$36,600	\$41,200	\$45,750	\$49,400	\$53,100	\$56,750	\$60,400
CITRUS								
30% Limits	\$12,000	\$13,750	\$15,450	\$17,150	\$18,550	\$19,900	\$21,300	\$22,650
50% Limits	\$20,000	\$22,900	\$25,750	\$28,600	\$30,900	\$33,200	\$35,450	\$37,750
80% Limits	\$32,050	\$36,600	\$41,200	\$45,750	\$49,400	\$53,100	\$56,750	\$60,400
DIXIE								
30% Limits	\$11,880	\$16,020	\$20,160	\$22,700	\$24,550	\$26,350	\$28,150	\$30,000
50% Limits	\$15,900	\$18,200	\$20,450	\$22,700	\$24,550	\$26,350	\$28,150	\$30,000
80% Limits	\$25,450	\$29,050	\$32,700	\$36,300	\$39,250	\$42,150	\$45,050	\$47,950
DUVAL								
30% Limits	\$12,000	\$13,750	\$15,450	\$17,150	\$18,550	\$19,900	\$21,300	\$22,650
50% Limits	\$20,000	\$22,900	\$25,750	\$28,600	\$30,900	\$33,200	\$35,450	\$37,750
80% Limits	\$32,050	\$36,600	\$41,200	\$45,750	\$49,400	\$53,100	\$56,750	\$60,400
FLAGLER								
30% Limits	\$12,000	\$13,750	\$15,450	\$17,150	\$18,550	\$19,900	\$21,300	\$22,650
50% Limits	\$20,000	\$22,900	\$25,750	\$28,600	\$30,900	\$33,200	\$35,450	\$37,750
80% Limits	\$32,050	\$36,600	\$41,200	\$45,750	\$49,400	\$53,100	\$56,750	\$60,400
HERNANDO								
30% Limits	\$12,000	\$13,750	\$15,450	\$17,150	\$18,550	\$19,900	\$21,300	\$22,650
50% Limits	\$20,000	\$22,900	\$25,750	\$28,600	\$30,900	\$33,200	\$35,450	\$37,750
80% Limits	\$32,050	\$36,600	\$41,200	\$45,750	\$49,400	\$53,100	\$56,750	\$60,400
HILLSBOROUGH								
30% Limits	\$12,450	\$16,020	\$20,160	\$24,300	\$28,440	\$32,580	\$36,730	\$39,100
50% Limits	\$20,750	\$23,700	\$26,650	\$29,600	\$32,000	\$34,350	\$36,750	\$39,100
80% Limits	\$33,150	\$37,900	\$42,650	\$47,350	\$51,150	\$54,950	\$58,750	\$62,550
INDIAN RIVER								
30% Limits	\$12,000	\$13,750	\$15,450	\$17,150	\$18,550	\$19,900	\$21,300	\$22,650
50% Limits	\$20,000	\$22,900	\$25,750	\$28,600	\$30,900	\$33,200	\$35,450	\$37,750
80% Limits	\$32,050	\$36,600	\$41,200	\$45,750	\$49,400	\$53,100	\$56,750	\$60,400

³¹ <http://www.flor.com/Office/HurricaneSeason/HurricaneHermineClaimsData.aspx>

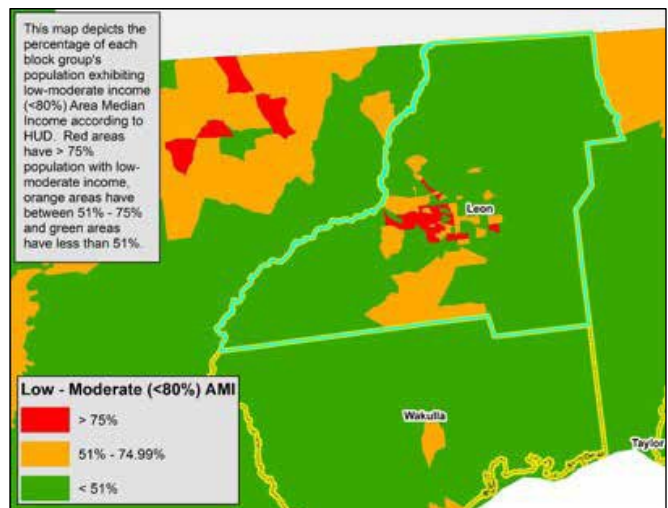
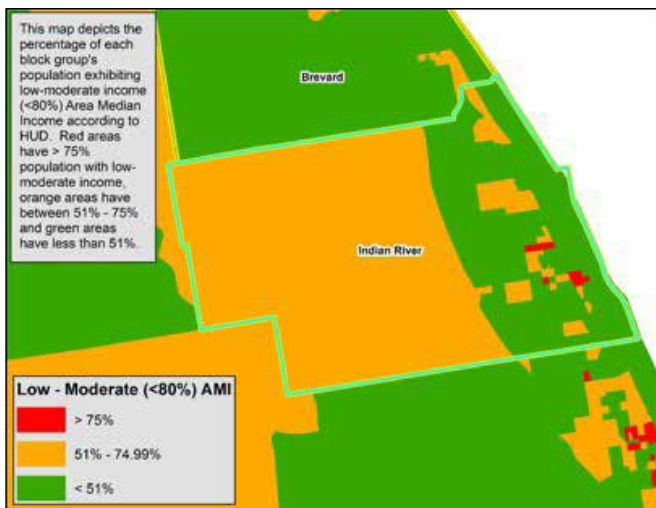
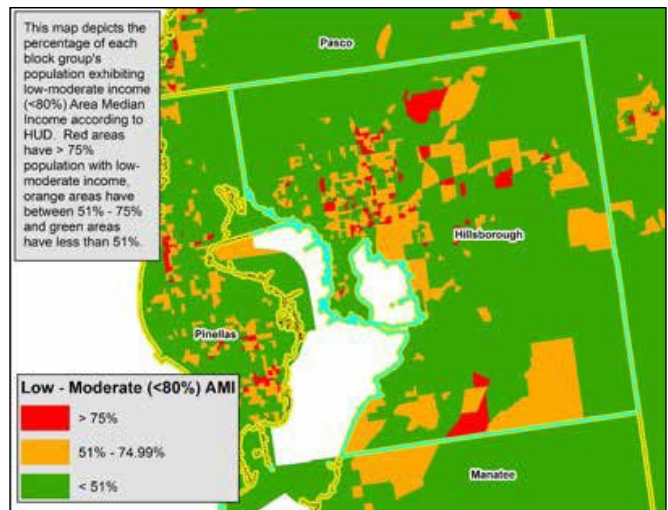
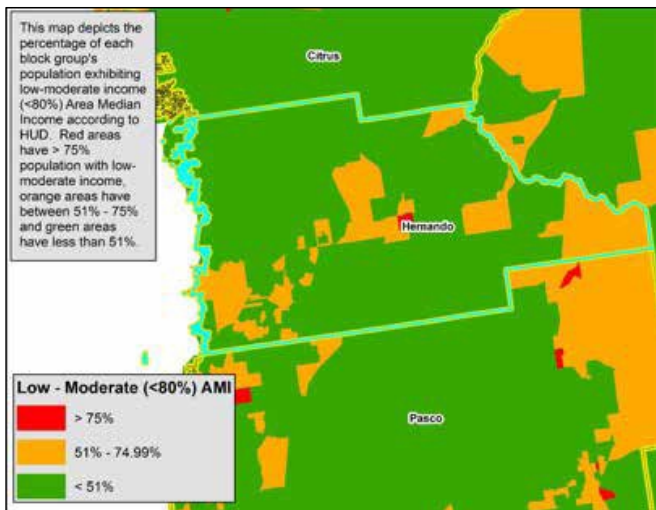
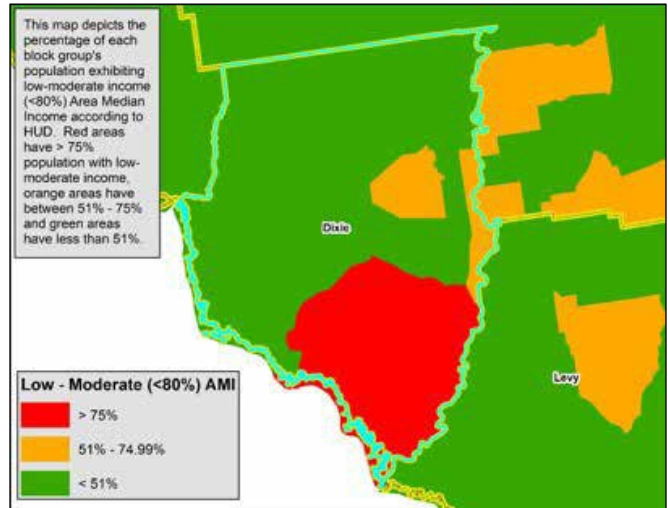
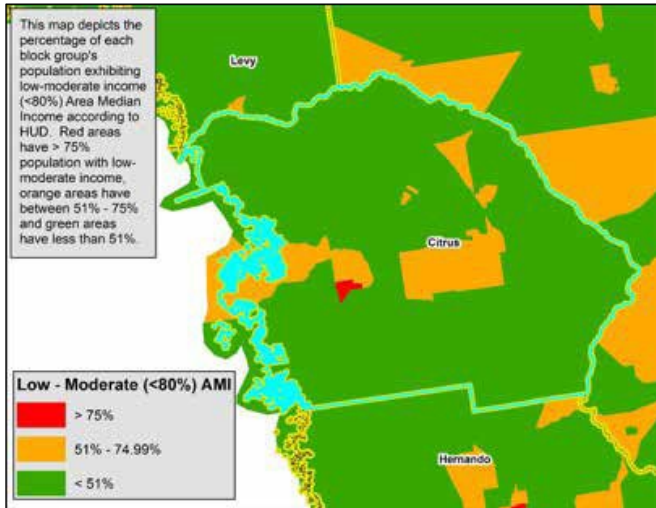
APPENDIX 1: 2016 HUD INCOME LIMITS FOR IA DECLARED COUNTIES, CONTINUED

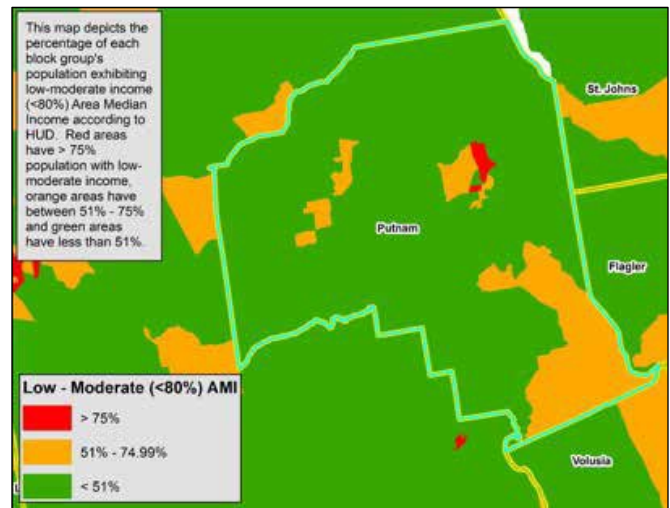
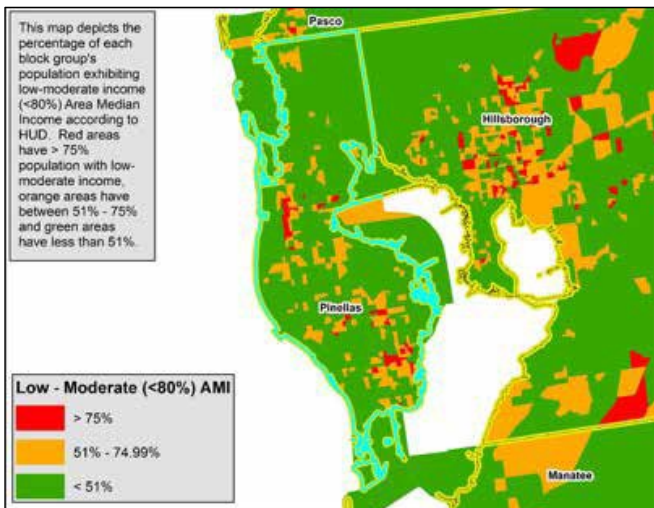
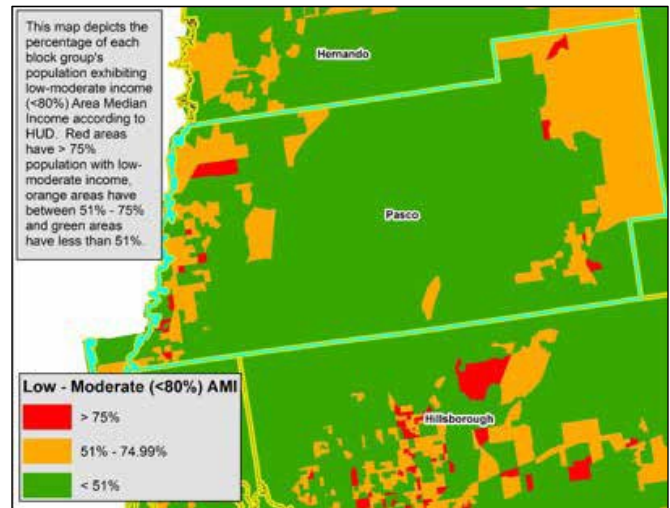
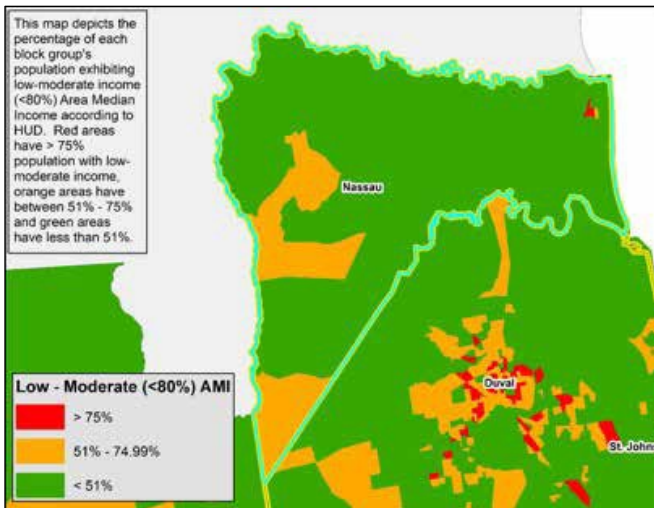
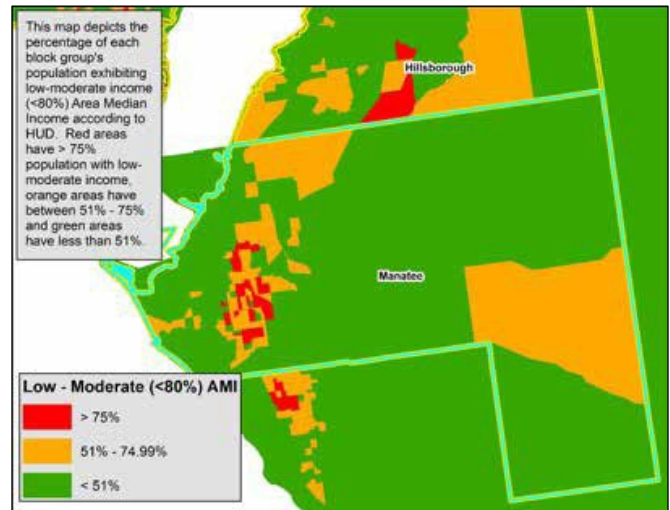
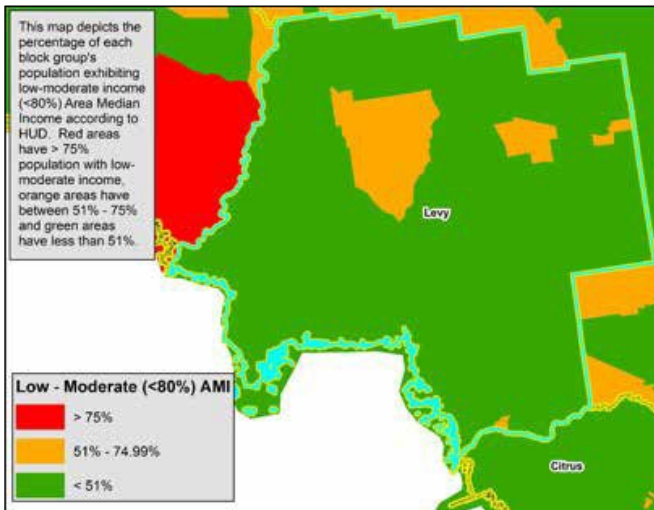
IA DECLARED COUNTIES	1 PERSON	2 PERSON	3 PERSON	4 PERSON	5 PERSON	6 PERSON	7 PERSON	8 PERSON
LEON								
30% Limits	\$13,700	\$16,020	\$20,160	\$24,300	\$28,440	\$32,580	\$36,730	\$40,890
50% Limits	\$22,800	\$26,050	\$29,300	\$32,550	\$35,200	\$37,800	\$40,400	\$43,000
80% Limits	\$36,500	\$41,700	\$46,900	\$52,100	\$56,300	\$60,450	\$64,650	\$68,800
LEVY								
30% Limits	\$11,880	\$16,020	\$20,160	\$22,700	\$24,550	\$26,350	\$28,150	\$30,000
50% Limits	\$15,900	\$18,200	\$20,450	\$22,700	\$24,550	\$26,350	\$28,150	\$30,000
80% Limits	\$25,450	\$29,050	\$32,700	\$36,300	\$39,250	\$42,150	\$45,050	\$47,950
MANATEE								
30% Limits	\$12,000	\$13,750	\$15,450	\$17,150	\$18,550	\$19,900	\$21,300	\$22,650
50% Limits	\$20,000	\$22,900	\$25,750	\$28,600	\$30,900	\$33,200	\$35,450	\$37,750
80% Limits	\$32,050	\$36,600	\$41,200	\$45,750	\$49,400	\$53,100	\$56,750	\$60,400
NASSAU								
30% Limits	\$12,000	\$13,750	\$15,450	\$17,150	\$18,550	\$19,900	\$21,300	\$22,650
50% Limits	\$20,000	\$22,900	\$25,750	\$28,600	\$30,900	\$33,200	\$35,450	\$37,750
80% Limits	\$32,050	\$36,600	\$41,200	\$45,750	\$49,400	\$53,100	\$56,750	\$60,400
PASCO								
30% Limits	\$12,000	\$13,750	\$15,450	\$17,150	\$18,550	\$19,900	\$21,300	\$22,650
50% Limits	\$20,000	\$22,900	\$25,750	\$28,600	\$30,900	\$33,200	\$35,450	\$37,750
80% Limits	\$32,050	\$36,600	\$41,200	\$45,750	\$49,400	\$53,100	\$56,750	\$60,400
PINELLAS								
30% Limits	\$12,450	\$16,020	\$20,160	\$24,300	\$28,440	\$32,580	\$36,730	\$39,100
50% Limits	\$20,750	\$23,700	\$26,650	\$29,600	\$32,000	\$34,350	\$36,750	\$39,100
80% Limits	\$33,150	\$37,900	\$42,650	\$47,350	\$51,150	\$54,950	\$58,750	\$62,550
PUTNAM								
30% Limits	\$11,880	\$16,020	\$20,160	\$22,700	\$24,550	\$26,350	\$28,150	\$30,000
50% Limits	\$15,900	\$18,200	\$20,450	\$22,700	\$24,550	\$26,350	\$28,150	\$30,000
80% Limits	\$25,450	\$29,050	\$32,700	\$36,300	\$39,250	\$42,150	\$45,050	\$47,950
SEMINOLE								
30% Limits	\$12,000	\$13,750	\$15,450	\$17,150	\$18,550	\$19,900	\$21,300	\$22,650
50% Limits	\$20,000	\$22,900	\$25,750	\$28,600	\$30,900	\$33,200	\$35,450	\$37,750
80% Limits	\$32,050	\$36,600	\$41,200	\$45,750	\$49,400	\$53,100	\$56,750	\$60,400
ST. JOHNS								
30% Limits	\$12,000	\$13,750	\$15,450	\$17,150	\$18,550	\$19,900	\$21,300	\$22,650
50% Limits	\$20,000	\$22,900	\$25,750	\$28,600	\$30,900	\$33,200	\$35,450	\$37,750
80% Limits	\$32,050	\$36,600	\$41,200	\$45,750	\$49,400	\$53,100	\$56,750	\$60,400

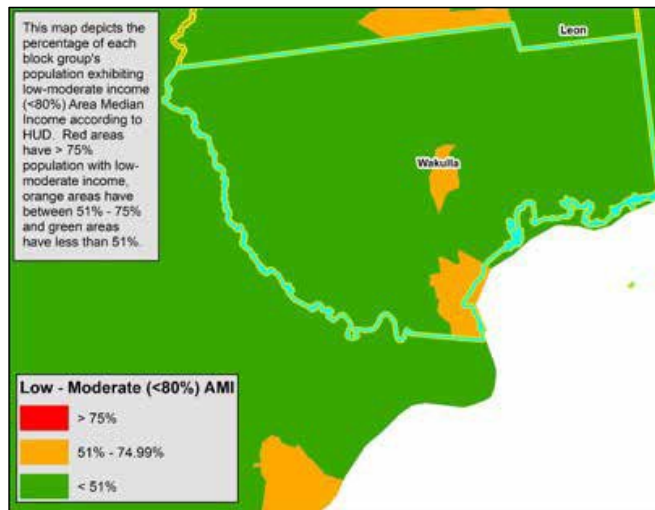
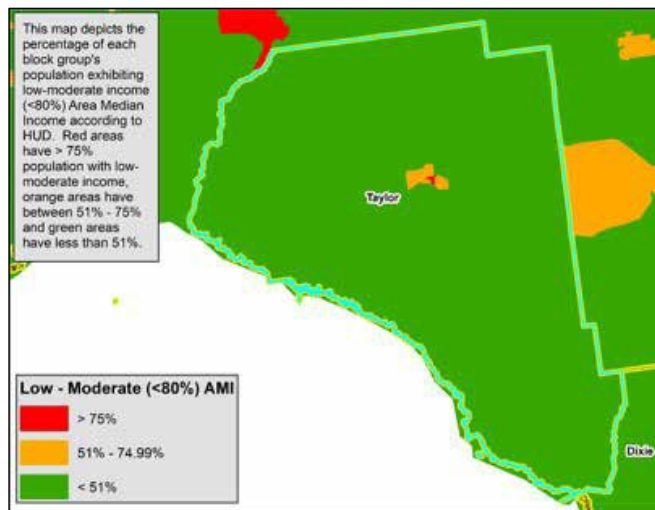
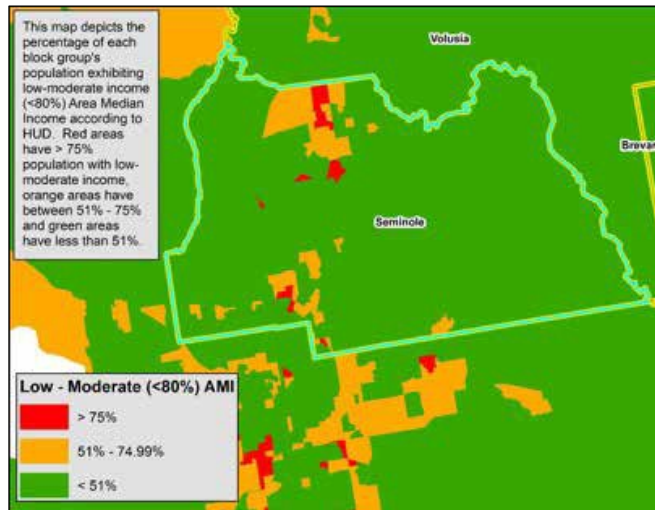
APPENDIX I : 2016 HUD INCOME LIMITS FOR IA DECLARED COUNTIES, CONTINUED

IA DECLARED COUNTIES	1 PERSON	2 PERSON	3 PERSON	4 PERSON	5 PERSON	6 PERSON	7 PERSON	8 PERSON
TAYLOR								
30% Limits	\$11,880	\$16,020	\$20,160	\$22,700	\$24,550	\$26,350	\$28,150	\$30,000
50% Limits	\$15,900	\$18,200	\$20,450	\$22,700	\$24,550	\$26,350	\$28,150	\$30,000
80% Limits	\$25,450	\$29,050	\$32,700	\$36,300	\$39,250	\$42,150	\$45,050	\$47,950
VOLUSIA								
30% Limits	\$12,000	\$13,750	\$15,450	\$17,150	\$18,550	\$19,900	\$21,300	\$22,650
50% Limits	\$20,000	\$22,900	\$25,750	\$28,600	\$30,900	\$33,200	\$35,450	\$37,750
80% Limits	\$32,050	\$36,600	\$41,200	\$45,750	\$49,400	\$53,100	\$56,750	\$60,400
WAKULLA								
30% Limits	\$13,100	\$13,100	\$20,160	\$24,300	\$28,440	\$32,580	\$36,730	\$40,890
50% Limits	\$21,750	\$21,750	\$27,950	\$31,050	\$33,550	\$36,050	\$38,550	\$41,000
80% Limits	\$34,800	\$34,800	\$44,750	\$49,700	\$53,700	\$57,700	\$61,650	\$65,650

APPENDIX 2: 2016 POPULATIONS BY LMI FOR IA DECLARED COUNTIES







APPENDIX 3: INSURANCE CLAIMS BY COUNTY FOR HURRICANE HERMINE³²

INSURANCE CLAIMS BY COUNTY FOR HURRICANE HERMINE					
COUNTY	NUMBER OF CLAIMS	CLOSED CLAIMS (PAID)	CLOSED CLAIMS (NOT PAID)	NUMBER CLAIMS OPEN	PERCENT CLAIMS CLOSED
Alachua	516	285	208	23	95.5%
Baker	25	15	9	1	96.0%
Bay	58	34	20	4	93.1%
Bradford	19	11	8	0	100.0%
Brevard	147	65	64	18	87.8%
Broward	112	44	45	23	79.5%
Calhoun	3	1	1	1	66.7%
Charlotte	67	30	27	10	85.1%
Citrus	1,522	866	575	81	94.7%
Clay	194	112	75	7	96.4%
Collier	41	15	17	9	78.0%
Columbia	159	108	49	2	98.7%
De Soto	12	3	8	1	91.7%
Dixie	145	76	54	15	89.7%
Duval	993	437	461	95	90.4%
Escambia	31	17	10	4	87.1%
Flagler	36	11	22	3	91.7%
Franklin	124	45	68	11	91.1%
Gadsden	152	88	62	2	98.7%
Gilchrist	29	18	11	0	100.0%
Glades	0	0	0	0	N/A
Gulf	7	2	5	0	100.0%
Hamilton	82	50	31	1	98.8%
Hardee	13	8	5	0	100.0%
Hendry	1	0	0	1	0.0%
Hernando	513	265	223	25	95.1%
Highlands	24	12	11	1	95.8%
Hillsborough	1,486	675	706	105	92.9%
Holmes	2	0	1	1	50.0%
Indian River	20	6	11	3	85.0%
Jackson	18	11	6	1	94.4%
Jefferson	78	41	35	2	97.4%
Lafayette	32	26	6	0	100.0%
Lake	227	122	96	9	96.0%
Lee	106	37	46	23	78.3%
Leon	3,782	2,077	1,475	230	93.9%
Levy	391	193	172	26	93.4%
Liberty	4	3	1	0	100.0%
Madison	197	104	82	11	94.4%
Manatee	663	373	239	51	92.3%
Marion	313	160	144	9	97.1%
Martin	20	11	8	1	95.0%
Miami-Dade	138	52	56	30	78.3%
Monroe	5	2	3	0	100.0%

³² <http://www.flor.com/Office/HurricaneSeason/HurricaneHermineClaimsData.aspx>

INSURANCE CLAIMS BY COUNTY FOR HURRICANE HERMINE, CONTINUED

COUNTY	NUMBER OF CLAIMS	CLOSED CLAIMS (PAID)	CLOSED CLAIMS (NOT PAID)	NUMBER CLAIMS OPEN	PERCENT CLAIMS CLOSED
Nassau	73	43	27	3	95.9%
Okaloosa	28	11	11	6	78.6%
Okeechobee	11	3	6	2	81.8%
Orange	526	220	274	32	93.9%
Osceola	120	44	62	14	88.3%
Palm beach	102	37	46	19	81.4%
Pasco	1,484	621	773	90	93.9%
Pinellas	1,959	816	1,024	119	93.9%
Polk	353	177	157	19	94.6%
Putnam	48	24	18	6	87.5%
Santa Rosa	51	13	7	31	39.2%
Sarasota	364	158	160	46	87.4%
Seminole	150	56	79	15	90.0%
St. Johns	145	72	65	8	94.5%
St. Lucie	35	11	22	2	94.3%
Sumter	54	28	25	1	98.1%
Suwannee	197	142	50	5	97.5%
Taylor	440	244	174	22	95.0%
Union	14	10	4	0	100.0%
Volusia	124	52	66	6	95.2%
Wakulla	391	227	141	23	94.1%
Walton	8	2	5	1	87.5%
Washington	8	6	1	1	87.5%
County unknown	507	336	87	84	83.4%
STATEWIDE	19,699	9,864	8,440	1,395	92.9%

APPENDIX 4: INSURANCE CLAIMS BY COUNTY FOR HURRICANE MATTHEW³³

INSURANCE CLAIMS BY COUNTY FOR HURRICANE MATTHEW					
COUNTY	NUMBER OF CLAIMS	CLOSED CLAIMS (PAID)	CLOSED CLAIMS (NOT PAID)	NUMBER CLAIMS OPEN	PERCENT CLAIMS CLOSED
Alachua	199	93	93	13	93.5%
Baker	49	31	15	3	93.9%
Bay	17	6	10	1	94.1%
Bradford	42	27	15	0	100.0%
Brevard	15,967	9,092	5,410	1,465	90.8%
Broward	1,046	348	531	167	84.0%
Calhoun	6	2	3	1	83.3%
Charlotte	36	17	18	1	97.2%
Citrus	41	22	18	1	97.6%
Clay	2,751	1,472	1,132	147	94.7%
Collier	41	18	17	6	85.4%
Columbia	44	23	19	2	95.5%
De Soto	8	2	3	3	62.5%
Dixie	5	3	2	0	100.0%
Duval	19,090	9,610	7,893	1,587	91.7%
Escambia	21	11	3	7	66.7%
Flagler	7,939	4,309	2,937	693	91.3%
Franklin	5	2	2	1	80.0%
Gadsden	6	4	1	1	83.3%
Gilchrist	4	2	2	0	100.0%
Glades	6	3	3	0	100.0%
Gulf	3	0	1	2	33.3%
Hamilton	7	6	0	1	85.7%
Hardee	7	3	4	0	100.0%
Hendry	6	2	3	1	83.3%
Hernando	34	11	22	1	97.1%
Highlands	51	24	25	2	96.1%
Hillsborough	256	95	125	36	85.9%
Holmes	1	0	0	1	0.0%
Indian River	2,180	1,051	878	251	88.5%
Jackson	11	6	1	4	63.6%
Jefferson	1	1	0	0	100.0%
Lafayette	0	0	0	0	N/A
Lake	864	406	401	57	93.4%
Lee	75	27	39	9	88.0%
Leon	88	20	35	33	62.5%
Levy	20	12	8	0	100.0%
Liberty	0	0	0	0	N/A
Madison	6	1	5	0	100.0%
Manatee	81	34	42	5	93.8%
Marion	364	174	165	25	93.1%
Martin	859	442	345	72	91.6%
Miami-Dade	794	249	363	182	77.1%
Monroe	23	12	9	2	91.3%

³³ <http://www.flor.com/Office/HurricaneSeason/HurricaneHermineClaimsData.aspx>

INSURANCE CLAIMS BY COUNTY FOR HURRICANE MATTHEW, CONTINUED

COUNTY	NUMBER OF CLAIMS	CLOSED CLAIMS (PAID)	CLOSED CLAIMS (NOT PAID)	NUMBER CLAIMS OPEN	PERCENT CLAIMS CLOSED
Nassau	1,881	1,007	681	193	89.7%
Okaloosa	15	8	3	4	73.3%
Okeechobee	51	34	14	3	94.1%
Orange	6,012	2,849	2,598	565	90.6%
Osceola	883	398	378	107	87.9%
Palm Beach	1,675	635	834	206	87.7%
Pasco	113	33	74	6	94.7%
Pinellas	127	46	72	9	92.9%
Polk	414	163	215	36	91.3%
Putnam	1,105	594	444	67	93.9%
Santa Rosa	624	275	323	26	95.8%
Sarasota	393	206	169	18	95.4%
Seminole	3,705	1,717	1,736	252	93.2%
St Johns	10,802	5,421	4,285	1,096	89.9%
St Lucie	2,488	1,118	1,100	270	89.1%
Sumter	63	26	37	0	100.0%
Suwannee	14	1	12	1	92.9%
Taylor	6	4	1	1	83.3%
Union	6	4	2	0	100.0%
Volusia	34,403	20,919	10,169	3,315	90.4%
Wakulla	14	6	8	0	100.0%
Walton	8	4	2	2	75.0%
Washington	3	1	2	0	100.0%
County unknown	1,486	675	431	380	74.4%
STATEWIDE	119,345	63,817	44,188	11,340	90.5%

APPENDIX 5: SBA LOANS BY NAICS CODE³⁴

FLORIDA COUNTIES AFFECTED BY HURRICANES HERMINE OR MATTHEW			
NAICS CODE	NAICS CATEGORY	TOTAL LOAN AMOUNT APPROVED	TOTAL DISTRIBUTED
112519	Other Animal Aquaculture	\$198,400	\$49,600
114112	Shellfish Fishing	\$2,800	\$2,800
115112	Soil Preparation, Planting, and Cultivating	\$500	\$500
236118	Residential Remodelers	\$9,700	\$9,700
238390	Other Building Finishing Contractors	\$18,000	\$18,000
336611	Ship Building and Repairing	\$7,400	\$7,400
424470	Meat and Meat Product Merchant Wholesalers	\$21,600	\$21,600
424910	Farm Supplies Merchant Wholesalers	\$11,000	\$11,000
424930	Flower, Nursery Stock, and Florists' Supplies Merchant Wholesalers	\$58,500	\$58,500
441228	Boat Dealers	\$43,300	\$43,300
442110	Furniture Stores	\$16,100	\$16,100
445110	Supermarkets and Other Grocery (except Convenience) Stores	\$18,400	\$18,400
445230	Fruit and Vegetable Markets	\$2,800	\$2,800
445299	All Other Specialty Food Stores	\$7,300	\$7,300
447110	Gasoline Stations with Convenience Stores	\$39,600	\$39,600
451110	Sporting Goods Stores	\$24,900	\$24,900
451130	Sewing, Needlework, and Piece Goods Stores	\$42,700	\$42,700
451140	Musical Instrument and Supplies Stores	\$5,400	\$5,400
453220	Gift, Novelty, and Souvenir Stores	\$14,600	\$7,300
453910	Pet and Pet Supplies Stores	\$8,600	\$8,600
487210	Scenic and Sightseeing Transportation, Water	\$2,900	\$2,900
488390	Other Support Activities for Water Transportation	\$200	\$2,900
511199	All Other Publishers	\$47,700	\$47,700
518210	Data Processing, Hosting, and Related Services	\$25,000	\$25,000
522298	All Other Nondepository Credit Intermediation	\$137,300	\$137,300
525990	Other Financial Vehicles	\$10,400	\$10,400
531110	Lessors of Residential Buildings and Dwellings	\$9,560,400	\$3,672,700
531120	Lessors of Nonresidential Buildings (except Miniwarehouses)	\$65,300	\$65,300
531130	Lessors of Miniwarehouses and Self-Storage Units	\$62,600	\$31,300
531190	Lessors of Other Real Estate Property	\$941,400	\$156,900
531311	Residential Property Managers	\$17,100	\$17,100
531312	Nonresidential Property Managers	\$8,800	\$17,100
531390	Other Activities Related to Real Estate	\$1,608,300	\$348,000
532292	Recreational Goods Rental	\$24,800	\$2,000
541110	Offices of Lawyers	\$13,900	\$13,900
541211	Offices of Certified Public Accountants	\$221,600	\$221,400
541219	Other Accounting Services	\$13,100	\$13,100
541310	Architectural Services	\$11,300	\$11,300
541990	All Other Professional, Scientific, and Technical Services	\$23,900	\$23,900
561710	Exterminating and Pest Control Services	\$100,200	\$56,500
561720	Janitorial Services	\$2,000	\$2,000
561730	Landscaping Services	\$9,000	\$9,000
621111	Offices of Physicians (except Mental Health Specialists)	\$4,700	\$4,700
621210	Offices of Dentists	\$44,000	\$44,000

³⁴ <http://www.flair.com/Office/HurricaneSeason/HurricaneHermineClaimsData.aspx>

FLORIDA COUNTIES AFFECTED BY HURRICANES HERMINE OR MATTHEW, CONTINUED

NAICS CODE	NAICS CATEGORY	TOTAL LOAN AMOUNT APPROVED	TOTAL DISTRIBUTED
621399	Offices of All Other Miscellaneous Health Practitioners	\$15,700	\$15,700
621610	Home Health Care Services	\$79,200	\$140,100
623312	Homes for the Elderly	\$68,100	\$68,100
623990	Other Residential Care Facilities	\$100,000	\$25,000
624190	Other Individual and Family Services	\$10,900	\$10,900
624410	Child Day Care Services	\$8,100	\$4,300
711510	Independent Artists, Writers, and Performers	\$5,200	\$5,200
713930	Marinas	\$969,300	\$300,000
713990	All Other Amusement and Recreation Industries	\$116,200	\$69,800
721110	Hotels (except Casino Hotels) and Motels	\$1,480,200	\$623,900
721191	Bed-and-Breakfast Inns	\$121,600	\$121,600
721211	RV (Recreational Vehicle) Parks and Campgrounds	\$175,600	\$121,600
722310	Food Service Contractors	\$27,700	\$27,700
722330	Mobile Food Services	\$25,000	\$25,000
722511	Drinking Places (Alcoholic Beverages)	\$931,700	\$774,300
722513	Drinking Places (Alcoholic Beverages)	\$11,800	\$11,800
811111	General Automotive Repair	\$133,600	\$69,600
811121	Automotive Body, Paint, and Interior Repair and Maintenance	\$31,500	\$10,500
811191	Automotive Oil Change and Lubrication Shops	\$27,700	\$27,700
811192	Car Washes	\$20,500	\$20,500
811310	Commercial and Industrial Machinery and Equipment (except Automotive and El)	\$21,200	\$21,200
812210	Funeral Homes and Funeral Services	\$10,000	\$10,000
812910	Pet Care (except Veterinary) Services	\$1,600	\$800
812930	Parking Lots and Garages	\$59,000	\$29,500
812990	All Other Personal Services	\$9,100	\$9,100
813110	Religious Organizations	\$328,900	\$324,800
813410	Civic and Social Organizations	\$1,008,300	\$336,100
813990	Other Similar Organizations (except Business, Professional, Labor, and Politics)	\$10,606,800	\$1,362,700
TOTAL		\$29,912,000	\$9,899,400

GENERAL ACTION PLAN REQUIREMENTS

2. CONNECTION BETWEEN NEEDS AND ALLOCATION OF FUNDS

Federal Register volume 81, Number 224 dated November 21, 2016 states:

“Grantees must propose an allocation of CDBG–DR funds that primarily considers and addresses unmet housing needs. Grantees may also allocate funds for economic revitalization and infrastructure activities, but in doing so, must identify how any remaining unmet housing needs will be addressed or how its economic revitalization and infrastructure activities will contribute to the long-term recovery and restoration of housing 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, as required by HUD. As outlined in the Assessment, the largest portion of unmet need resulting from Hurricanes Hermine and Matthew is in the Housing sector, particularly in the single-family market.

Therefore, in compliance with the housing-emphasis required by the 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.

Federal Register volume 82, Number 150 dated August 7, 2017 states:

“Grantee must consult with affected citizens, stakeholders, local governments and public housing authorities to determine updates to its needs assessment.”

The programs and funding outlined in this Substantial Amendment to Florida’s approved Action Plan have been revised to reflect new figures obtained through an updated needs assessment conducted in compliance with this requirement.

3. PUBLIC HOUSING, AFFORDABLE HOUSING, AND HOUSING FOR VULNERABLE POPULATIONS

PUBLIC HOUSING

DEO consulted with Public Housing Authorities (PHA) and agencies dedicated to serving vulnerable populations as part of the Action Plan development. The state developed and distributed a PHA disaster-impact survey to all Authorities in the declared region³⁵. The survey requested information on any storm-related damage to units, funds received for assistance, the number of units impacted, and information on whether any residents were displaced due to the hurricane events. The PHAs were also provided an opportunity to provide comments or additional information as desired. DEO received 14 responses, indicating disaster-related impact to 128 public housing units and no remaining displacement³⁶. Of the damaged units, 127 units are in Volusia County, and one unit is in Levy County. The Housing Authority of the City of New Smyrna Beach, which reported damage to 126 units, estimated an impact of over \$1.1 million and that they are awaiting funding from FEMA and other sources. The PHAs were also invited to the Stakeholder Session for public comment on the proposed Action Plan. 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.

AFFORDABLE HOUSING

The Unmet Needs Assessment identifies that 24 percent of the impacted residents accounted for in the FEMA IA application process were renters. However, a closer look at extremely low-income FEMA IA applicants, as well as those with age and access/ functional needs (AFN) as outlined in Tables 17-19 of the Unmet Needs Assessment shows that the overwhelming majority of LMI and age/ AFN applicants are home owners as opposed to renters. The state is establishing an Affordable Rental program in the Method of Distribution, for which subrecipients may submit projects for the replenishment of affordable rental stock in their jurisdiction. DEO will review such projects for consistency with the identified unmet needs in the jurisdiction, as well as the threshold requirements of the Action Plan and the requirements of the Register and other state and federal requirements, including but not limited to the Uniform Relocation Act (URA), income verification and rent restrictions. Any unutilized affordable rental funds will be reallocated to another eligible activity through the non-substantial or substantial amendment process, as applicable.

³⁵ The survey was sent to 62 PHAs in the FEMA declared counties.

³⁶ The 128 units were reported from the Housing Authority of the City of New Smyrna Beach (126), North Central Florida Regional Housing Authority (1), and Ormond Beach Housing Authority (1)

VULNERABLE POPULATIONS

A request for feedback on storm impact was also sent to the Florida Housing Finance Corporation, the Florida Department of Children and Families and the Florida Department of Health. The Emergency Solutions Grant (ESG) program, which is managed by the Florida Department of Children and Families, reported damage to two shelters in St. Johns County. The Emergency Services and Homeless Transitional Housing and St. Francis House shelters both sustained damage. They also reported an “overall increase in persons needing assistance with past due rent/utilities or re-housing due to expenses related to storm recovery” amongst the service providers within their Continuum of Care. There was also a reported increase in residents requesting and needing assistance with re-housing or homeless prevention due to lost wages or having to cover storm-related expenses³⁷.

The Department of Health Housing Opportunities for Persons with AIDS (HOPWA) Program surveyed its project sponsors and reported assistance to one client who had roof damage resulting in potential displacement in which the client was helped with moving to avoid homelessness³⁸.

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. This includes the network of Florida service providers who serve the homeless, those living with AIDS, and those at risk of becoming homeless. An overview of the state’s homeless population counts is included in the Unmet Needs Assessment, and was informed in part by the 2015 Annual Report from the Council on Homelessness.

HUD’s Initial Action Plan Review Checklist requires DEO to consider “How planning decisions may affect racial, ethnic, and low- income concentrations, and ways to provide the availability of affordable housing in low-poverty, non-minority areas where appropriate and in response to natural hazard-related impacts.”³⁹ To meet this requirement and the requirements to affirmatively further fair housing as outlined in the Register, each project 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.

4. 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. This is not intended to limit the ability of the state or its subrecipients to conduct buyouts or acquisitions for destroyed and extensively damaged unit or units in a floodplain. Should any proposed projects cause displacement of people, DEO will ensure subrecipients follow the requirements set forth under the Uniform Relocation Assistance (URA) and Real Property Acquisition Policies Act, as waived.

5. MAXIMUM ASSISTANCE AND COST REASONABLE 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 necessity⁴⁰. 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.

³⁷ Statement from ESG program managers

³⁸ Confirmation from HOPWA program 3/10/2017

³⁹ HUD Initial Action Plan Review Checklist, item 3.

⁴⁰ DEO Purchasing and Contracting Guidelines, June 2014

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 subrecipient recovery programs is \$100,000. In cases of demonstrable hardship or where local housing markets warrant an increase of the cap, subrecipients 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.

6. ELEVATION STANDARDS

DEO will develop and will require subrecipients to implement resilient home construction standards, including ensuring that all structures 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), must be elevated with the lowest floor, including the basement, at least two feet above the one percent annual floodplain elevation. Residential structures with no dwelling units and no residents below two feet above the one 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 one 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.

7. PLANNING & COORDINATION

DEO has consulted with and will continue to coordinate with the planning, preparation and response community throughout the affected areas of the state. DEO consulted with the Florida Division of Emergency Management through the development of the program. This includes reviewing disaster mitigation planning documents and long-range planning which considers natural hazard risk. The State of Florida has a robust planning field due to the natural hazard risk and unique challenges of the state's geography.

DEO reviewed the State of Florida Division of Emergency Management Recovery Plan, Recovery Annex to the State Comprehensive Emergency Management Plan. The Recovery Plan applies to all agencies and government entities that are tasked to provide recovery assistance. The Recovery Plan describes long-term and short-term action to be taken and considered when providing recovery assistance. The Recovery Plan is based on existing federal statutory authorities, existing state policies, and specific functional mission assignments made under Florida Statute PL 93-288 and Chapter 252, both as amended.

The Recovery Plan provides an overview of the recovery purpose, process, and programs and addresses the short-term priority needs of disaster survivors and local damaged infrastructure through a daily Incident Action Plan. It is applicable to natural disasters such as hurricanes, floods, droughts, and fires. It also becomes applicable should there be a technological or man-made emergency such as hazardous material release or other incidents requiring state assistance. The Recovery Plan utilizes other plans and standard operating guidelines, depending on the type of incident requiring recovery assistance and whether recovery activities are being initiated pre- or post-incident.

⁴¹ <http://www.floridadisaster.org/documents/FDEM%20Strategic%20Plan%202014-2019.pdf>

⁴² See <http://floridajobs.org/community-planning-and-development/programs/community-planning-table-of-contents/post-disaster-redevelopment-planning> for more information.

The Recovery Plan is updated at a minimum annually through a formalized planning process involving stakeholder input, and within 30 days following major incidents to capture lessons learned and develop best practices. Due to the strength of the existing planning tools available, DEO does not anticipate pursuing additional disaster recovery and response planning activities at this time.

Additionally, the Division of Emergency Management (DEM) has published a 2014-2019 Strategic Plan which charts the course to prepare for, respond to, recover from, and mitigate against the impacts of emergencies across the state⁴³. DEO has also partnered with DEM in the creation of guidance for the Statewide Post-Disaster Redevelopment Plan Planning Initiative, funded by the National Oceanic and Atmospheric Administration (NOAA)⁴⁴. The initiative helps “a community plan for the long-term disaster recovery period to ensure that they are able to recover faster and more efficiently, maintain local control over recovery and take advantage of opportunities to build back better.”

DEO surveyed the 10 Regional Planning Councils in the impacted area to gain additional information on storm impacts.

8. INFRASTRUCTURE ACTIVITIES

DEO will encourage its subrecipients to incorporate mitigation measures into rebuilding activities. Grantees are encouraged to consider the extent to which infrastructure activities funded through the CDBG-DR grant will achieve objectives outlined in both regionally or locally established plans and policies that are designed to reduce future risk to their jurisdiction.

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. Cost benefit analysis may be considered by DEO through a points system, allocating more points to jurisdictions that provide greater impact to the LMI population they serve (program criteria are outlined in greater detail in Section 16).

HUD requires DEO to “ensure that infrastructure activities will avoid disproportionate impact on vulnerable communities and create opportunities to address economic inequities facing local communities.”⁴⁵ DEO will seek to ensure that infrastructure activities will avoid disproportionate impact by requiring a review and approval process to determine if the project meets AFFH requirements. The proposed program plans should articulate that projects are likely to lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing in low-poverty, nonminority areas in response to natural hazard-related impacts. All DEO CDBG-DR grant subrecipients will certify that they will affirmatively further fair housing in their grant agreements, and will receive DEO training and technical assistance in meeting their AFFH obligations.

DEO will encourage and coordinate with private and non-profit, local, state, and federal entities to assist subrecipients with maximizing investments with other planned capital improvements and infrastructure development efforts. These efforts will encourage and help to foster the potential for additional infrastructure funding from multiple sources, including existing state and local capital improvement projects, and the potential for private investment.

⁴³ <http://www.floridadisaster.org/documents/FDEM%20Strategic%20Plan%202014-2019.pdf>

⁴⁴ See <http://floridajobs.org/community-planning-and-development/programs/community-planning-table-of-contents/post-disaster-redevelopment-planning> for more information.

⁴⁵ HUD Action Plan Checklist item 8

DEO will rely on professional engineers, procured by the subrecipients, to employ adaptable and reliable technologies to guard against premature obsolescence of infrastructure.

9. 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 to the fullest possible extent. DEO will report on leveraged funds in the DRGR system.

10. 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 at least one of the following programs:
 - (i) ENERGY STAR;
 - (ii) Enterprise Green Communities;
 - (iii) LEED (iv) ICC-700 National Green Building Standard;
 - (iv) EPA Indoor AirPlus (ENERGY STAR a prerequisite); or
 - (v) any other equivalent comprehensive green building program acceptable to HUD.
- 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.
- Where practicable and as outlined in the DEO Housing Guidelines, components of the Weatherization Assistance Program (WAP) may be incorporated into the minimum standards.

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

DEO will require subrecipient housing programs to 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 in regards to the quality of work should be

printed on all subrecipient program applications and/or guidelines. Records of each complaint should be kept on file and subrecipients must respond to complaints and appeals in a timely manner, or within 15 business days, when practical. Subrecipients will be responsible for follow-up on construction quality complaints. Construction quality appeals will be verified by inspection and monitored by DEO.

The state program will not participate in dam or levee work at this time.

11. 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.

12. 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.

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/>).

13. 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 subrecipients shall install broadband infrastructure as required.

14. 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 Hermine and Hurricane Matthew as declared in DR-4280 and DR-4283. 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 counties (and municipalities within those counties) that received FEMA Individual Assistance (IA) declarations in addition to their Public Assistance (PA) declaration.

DECLARED COUNTIES RECEIVING FEMA IA					
PDD 4283 – HURRICANE MATTHEW			PDD 4280- HURRICANE HERMINE		
Duval	Flagler	Volusia	Hillsborough	Wakulla	Leon
Indian River	Nassau		Levy	Citrus	Manatee
Seminole	Putnam		Pinellas	Dixie	Pasco
Brevard	St. Johns		Taylor	Hernando	

As required by the Federal Registers, Vol. 81, No. 224, Monday, November 21, 2016, Vol. 82, No.11, Wednesday, January 18, 2017 and Vol 82, No. 150, August 7, 2017, 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 is currently limited to St. Johns County and the jurisdictions within the county. However, DEO may continue to review Unmet Needs data to assess whether additional county areas demonstrate sufficient need to warrant proposal to HUD for inclusion in the 80 percent MID allocation. Should such a proposal be made by DEO and approved by HUD, changes to the Action Plan would be amended through the substantial amendment process. If more than one county is designated as being Most Impacted and Distressed, the 80 percent will be further allocated as described in the substantial amendment.

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.

PROGRAM BUDGET

DEO is the lead agency and responsible entity for administering \$117,937,000 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 five percent of the total grant (\$5,896,850) 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 may provide additional guidance to jurisdictions through the application process regarding the amount of administrative funds available to awardees. Eligible project delivery costs are presumed included in the grant award amounts, as applicable.

The program budget is outlined as follows:

SUMMARY OF IMPACTS/SUPPORT	GENERAL HOUSING ACTIVITIES	AFFORDABLE RENTAL ⁴⁶	NON-HOUSING OR ADDITIONAL HOUSING	SUB-TOTAL
80% HUD Defined Most Impacted and Distressed (MID)	\$52,882,951	\$5,377,927	\$31,371,242	\$89,632,120
20% Other Most Impacted and Distressed (MID)	\$13,220,738	\$1,344,482	\$7,842,811	\$22,408,030
State & Local Administration ⁴⁷				\$5,896,850
TOTAL	66,103,689	\$6,722,409	\$39,214,053	\$117,937,000

⁴⁶ Affordable rental projects have tenant income requirements and rent restrictions in order to qualify.

⁴⁷ State and local administration are capped at 5% in aggregate by federal regulations. The State may provide additional guidance to jurisdictions through the application process regarding the amount of administrative funds available to awardees. Eligible project delivery costs

HURRICANE IRMA

Hurricane Irma made landfall in the State of Florida on September 10, 2017 causing significant damage to the Florida Keys and peninsula of the state. This has resulted in the exacerbation of impacts in some communities that were also hit by Hurricanes Hermine Matthew. Almost all communities that received a Public Assistance (PA) and Individual Assistance (IA) declaration in 2016 received a 2017 declaration for Hurricane Irma. This includes:

1. Brevard
2. Citrus
3. Dixie
4. Duval
5. Flagler
6. Hernando
7. Hillsborough
8. Indian River
9. Levy
10. Manatee
11. Nassau
12. Pasco
13. Pinellas
14. Putnam
15. Seminole
16. St. Johns
17. Volusia

In many of these communities it will be difficult, if not impossible to delineate impacts from these three distinct storms. Therefore, in the communities listed above, Florida will consider any eligible projects that address unmet need from Hurricanes Hermine, Matthew or Irma. As with all proposed projects, communities will have to document that there will be no duplication of benefits. This is especially important in areas that may receive additional federal assistance to address Irma-related impacts.

PROJECTS AND ACTIVITIES

Jurisdictions from each of the budget areas (80 percent MID or 20 percent MID) will select projects to propose to DEO for funding in accordance with DEO thresholds and criteria. DEO will execute contracts with awarded jurisdictions, including municipalities within counties that receive a separate award. In other words, municipalities may apply directly to DEO and will be contracted with directly, if awarded.

Non-entitlement municipalities may choose to submit projects to DEO through their county. In these instances, the partnering jurisdictions must submit an executed agreement to DEO with their application. The county will be the awardee and no further pass-through will be allowed. DEO may consider requests from entitlement jurisdictions to apply through their county for efficiency or capacity purposes, however the county will be the awardee and no further pass-through will be allowed.

DEO will implement program management, monitoring, and oversight standards necessary to ensure compliance with state and federal requirements.

DEO PROGRAM OVERSIGHT, MONITORING, COMPLIANCE	
APPROXIMATELY \$89.6 MILLION	APPROXIMATELY \$22.4 MILLION
80% MOST IMPACTED DISTRESSED AREA	20% MOST IMPACTED DISTRESSED AREA
<ul style="list-style-type: none"> Jurisdictions submit projects or programs to DEO for ranking & funding 	<ul style="list-style-type: none"> Jurisdictions submit projects or programs to DEO for ranking & funding
<ul style="list-style-type: none"> Awarded jurisdictions implement projects under DEO oversight 	<ul style="list-style-type: none"> Awarded jurisdiction implement projects under DEO oversight

15. 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 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.

The Unmet Needs Analysis identified that approximately 68 percent of the Unmet Need is in the housing sector, 25 percent in infrastructure, and the remainder in the economic sector. The MOD budget categories are closely aligned with the Unmet Needs Analysis, with approximately 65 percent of the funds allocated towards housing (59% General Housing and 6% Affordable Rental). Approximately 35 percent of program funds may be used for infrastructure in support of LMI housing, economic recovery, or other eligible activities, including additional housing needs.

Updated needs assessment continues to support the percentages listed above regarding allocation of funds to support remaining unmet needs.

METHOD OF DISTRIBUTION – BUDGET CATEGORIES



16. PROGRAM DETAILS

ELIGIBLE ACTIVITIES

Units of General Local Government, referred to as jurisdictions throughout this Action Plan, will select projects or programs to propose to DEO for funding in accordance with DEO thresholds and objectives. These thresholds are:

- Projects must demonstrate tie-back to the hurricane event (Hermine or Matthew).
- Projects must not duplicate benefits.

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

- Projects must primarily address unmet housing needs.
- Projects must primarily serve LMI populations.
- Projects for infrastructure must support LMI housing.

As with all proposed projects, communities will have to document that there will be no duplication of benefits. This is especially important in areas that may receive additional federal assistance to address Irma-related impacts.

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

Each project approved for a subrecipient will be subject to the grant minimum and maximum amounts, subject to the extent of funds available. The \$750,000 minimum applies to subrecipients and projects. The county may submit a smaller project to DEO for consideration as a special request, but is encouraged to couple the project with a similar project (for beneficiary population and activity type) to ensure effective use of grant funds. In the competitive allocation (20%), the minimum and maximum cumulatively apply to one county so that DEO may ensure that the funding is distributed throughout the impacted area.

Minimum Award Amount will be: \$750,000

Maximum Award Amount will be:

(80% MID area) Entire allocation available to local government

DEO follows total development cost limits as specified by the Florida Housing Finance Corporation. Please see: <http://www.floridahousing.org/programs/special-programs/ship---state-housing-initiatives-partnership-program/purchase-price-limits>

County	90% Average Area Purchase Price
Duval, Nassau	\$303,882
Manatee	\$264,706
Seminole	\$255,176
Brevard, Citrus, Dixie, Flagler, Hernando, Hillsborough, Indian River, Leon, Levy, Pasco, Pinellas, Putnam, Taylor, Volusia, Wakulla	\$253,809

DEO expects average per unit total housing repair or reconstruction costs to be substantially lower. However, this cap provides flexibility for cases where a project may cost more than average market prices due to complexity of construction, resilience and green building improvements. When reviewing project proposals DEO applies an evaluation of cost reasonableness to its scoring criteria for allocation decisions.

CDBG-DR funding limits for buyout proposals are calculated based on analysis of third party appraisals and evidence of the need for an incentive to facilitate voluntary participation and are not subject to the above noted single-family project maximums.

DEO will potentially utilize all three national objectives to carry out all programs under this allocation. Only mitigation measures related to repairing damage caused by the declared hurricane events will be considered for funding.

SCORING CRITERIA

Projects proposed for funding to DEO will be scored for funding in order of the following criteria. The maximum Scoring Criteria score is 200.

		Max. Points
1	Management Capacity: Jurisdictions program manager and/or developer presents depth of program or project, case and compliance management capacity to deliver services on-time and on-budget. Citizen Complaint Policy is in place.	35
2	Readiness to Proceed and Viable Production Plan: Applicant must show evidence of how proposed program or project will mobilize and operate in a timely manner.	25
3	Proposes Cost Reasonable Budget: Proposal budgets reflect cost reasonableness and affirmative efforts to leverage CDBG-DR funds with additional funding to address unmet needs. Budget narrative reflects research, quotes and/or contracted pricing.	25
4	Storm Resilience: In addition to addressing unmet needs, program or project proposals need to show how they make investments that improve resilience to future storm-related damage.	15
5	Overall LMI benefit (Percent LMI benefit of the activity): Higher LMI benefit of the activity will receive a higher score. For example, a project with 100 percent LMI benefit would be scored higher than a project with 65 percent LMI benefit.	50
6	Overall Housing Eligible Activities: Programs and projects with housing related eligible activities will receive a higher score.	30
7	<p>Vulnerable Populations: Applications which address the following vulnerable populations will receive higher scores. This includes non-housing services such as infrastructure, public facilities, economic development, etc. that provide benefits to these vulnerable populations.</p> <ul style="list-style-type: none"> a. The transitional housing, permanent supportive housing and permanent housing needs of individuals and families that are homeless or at-risk of homelessness; b. The prevention of low-income individuals and families with children (especially those with incomes below 30 percent of the area median) from becoming homeless; c. The special needs of persons who are not homeless but require supportive housing (e.g., elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families and public housing residents, as identified in 24 CFR 91.315(e)). 	20
Total Maximum Score:		200

HOUSING ACTIVITIES

Housing activities allowed under CDBG-DR include, but are not limited to:

- Temporary Relocation;
- Buyouts/Acquisitions;
- Demolition/Clearance;
- Single-Family Housing Rehabilitation/Repair;
- Multi-Family Housing Rehabilitation/Repair;
- Housing Construction;
- Public housing;
- Emergency Community Shelters (public facility);
- Homeless Shelter;
- Repair and replacement of manufactured housing units;
- Hazard mitigation;
- Elevation;
- Planning activities related to housing; and
- Other activities associated with the recovery of housing stock impacted.

For any residential rehabilitation or reconstruction program, DEO will establish housing guidelines to set housing assistance caps. Subrecipients may establish housing assistance caps for their rehabilitation or reconstruction programs equal to or less than DEO’s housing assistance caps. A waiver request must be submitted to DEO if the subrecipient seeks to set housing assistance caps that exceed DEO’s housing assistance caps. DEO will evaluate each housing assistance waiver request for cost effectiveness.

AFFORDABLE RENTAL

Benefit to Low and Moderate Income (LMI) persons is the only National Objective that is approved for Affordable Rental projects. In order to receive assistance, the rental property owner must agree to a five-year affordability requirement. A longer affordability period may be required by DEO for proposed multi-family projects over \$1 million. The affordability requirement requires the property owner to lease the units to LMI households earning 80% or less of the AMI and to lease the units at affordable rents. Rents must comply with the maximum HUD HOME rent limits. The maximum HUD HOME rents are the lesser of:

- 1) The fair market rent for existing housing for comparable units in the area as established by HUD under 24 CFR 888.111; or
- 2) A rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65 percent of the AMI, as determined by HUD, with adjustments for number of bedrooms in the unit. The HOME rent limits provided by HUD will include average occupancy per unit and adjusted income assumptions⁴⁸.

All affordable rental projects seeking over \$1 million and serving low- and moderate-income residents must remain affordable for the compliance terms listed below. DEO follows HOME program affordability terms for low- and moderate-income rental housing. Please see for details: <https://www.hudexchange.info/resource/2312/home-maximum-purchase-price-after-rehab-value/>

Rental Housing Activity	Minimum period of affordability in years
Rehabilitation or acquisition of existing housing per unit amount of CDBG-DR funds: Under \$15,000	5
\$15,000 to \$40,000	10
Over \$40,000 or rehabilitation involving refinancing	15
New construction or acquisition of newly constructed	20

housing	
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INFRASTRUCTURE, ECONOMIC REVITALIZATION, AND PLANNING

Other eligible activities include, but are not limited to the following however, subrecipients must identify how unmet housing needs will be addressed or how its economic revitalization or infrastructure activities will contribute to the long-term recovery and restoration of housing in the most impacted and distressed areas.

- Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, drainage, bridges, etc.);
- Demolition, rehabilitation of publicly or privately owned commercial or industrial buildings, and code enforcement;
- Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities);
- Public service (such as job training and employment services, healthcare, child care, and crime prevention within the 15 percent cap);
- Renourishment of protective coastal dunes systems⁴⁹; and
-

⁴⁸ More information on HOME rents may be found at: <https://www.hudexchange.info/manage-a-program/homerent-limits/>

⁴⁹ Note: Beach renourishment activities may have enhanced environmental review requirements.

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 by, or for which funds are also made available, by FEMA or USACE.

INELIGIBLE ACTIVITIES

Ineligible activities identified in the Federal Register, Vol. 81, No. 224, Monday, November 21, 2016, include the use of CDBG-DR for forced mortgage payoff, construction of a dam/levee beyond original footprint, 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, allowed by waiver, or published in the Federal Register, Vol. 81, No. 224, Monday, November 21, 2016, are eligible.

17. CRITERIA TO DETERMINE METHOD OF DISTRIBUTION

FOR THE 80 PERCENT MOST IMPACTED AND DISTRESSED AREAS (ST. JOHNS COUNTY)

The area designated by HUD to be the Most Impacted and Distressed (MID) will be allocated 80 percent of Florida's CDBG-DR Allocation from HUD. This 80 percent MID area is currently limited to St. Johns County and the jurisdictions within the county. However, DEO may continue to review Unmet Needs data to assess whether additional county areas demonstrate sufficient need to warrant proposal to HUD for inclusion in the 80 percent MID allocation. Should such a proposal be made by DEO and approved by HUD, changes to the Action Plan would be amended through the substantial amendment process. If more than one county is designated as being Most Impacted and Distressed, the 80 percent will be further allocated as described in the substantial amendment.

Each designated county will work with its municipalities and other respective partners to package projects for DEO to review for eligibility and consistency with the Federal Register Notice and CDBG-DR regulations. Those projects deemed eligible will be funded through subgrant agreements with the counties for projects proposed in unincorporated areas and with municipalities for projects proposed within eligible incorporated areas. Non-entitlement jurisdictions may partner with their county as outlined in Section 14. The grant period for awardees will be 24 months **unless otherwise extended by DEO after review of justification for the extension from the subgrantee.** Funds that remain unexpended after the 24-month CDBG-DR agreement period may be subject to reallocation to other projects within the MID area. Proposed projects must meet the thresholds **and must support the objectives outlined in Section 16 of this plan, and will be weighted and ranked in accordance with the criteria, also** outlined in Section 16 of this plan.

FOR THE 20 PERCENT MOST IMPACTED AND DISTRESSED AREAS

Communities not designated as the HUD Most Impacted and Distressed counties, but that are a part of the 20 percent Other Most Impacted and Distressed counties, will be able to receive CDBG-DR assistance through a competitive application process. In other words, cities and counties listed in the FEMA IA declared county table in Section 14, apart from St. Johns and its jurisdictions, may submit proposed projects. Proposed projects must meet the **scoring criteria** and must support the objectives outlined in Section 16 of this plan and will be weighted and ranked in accordance with the criteria, also outlined in Section 16. The grant period for awardees will be 24-months unless otherwise extended by DEO after review of justification for the extension from the subgrantee. Funds that remain unexpended after the 24-month CDBG-DR agreement period may be subject to reallocation to other projects.

LOCATION, MITIGATION MEASURES AND URGENT NEED

18. PRESIDENTIALLY-DECLARED COUNTY

All activities must be located in a Presidentially-declared county that is eligible for assistance under FEMA declarations 4280 and 4283, as outlined in this Action Plan.

19. MITIGATION MEASURES

The state encourages the use of mitigation measures (including but not limited to wind storm, flooding, and energy efficiency) related to the long-term recovery and restoration of infrastructure, housing, or economic revitalization and allows them as a necessary expense related to the recovery so long as the cost is a necessary expense related to disaster relief or long-term recovery that responds to the eligible disaster. Furthermore, the costs associated with these measures may not prevent the state or subrecipients from meeting unmet needs.

20. 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.

All applications for funding which include Urgent Need activities must be accompanied by a properly completed Urgent Need National Objective Form – Supplement to DRI Application for Funding. Eligible units of local government will be able to download a copy of the form (including sample of a properly completed form) along with the boilerplate application.

The Department will review the form and consult with HUD to confirm eligibility prior to making an award for the proposed Urgent Need activities. In accordance with the Federal Register Volume 81 No. 224, November 21, 2016, the Florida Disaster Recovery Action Plan must be amended to incorporate each Urgent Need program and/or activity within 24-months of its first obligation of grant funds. Following this 24-month period, no new program or activity may be introduced and allocated funds without a waiver from HUD.

CITIZEN PARTICIPATION

21. CLARITY

The Action Plan includes sufficient information so that all citizens, subrecipients, and applicants are able to understand and comment on the Action Plan.

22. BUDGET

The Plan includes a budget in Section 14, Method of Distribution.

23. TIME FOR CITIZEN COMMENT

Notice of public comment period was provided by publication on the Department of Economic Opportunity disaster recovery website, in addition to targeted state outreach to stakeholders. The state will provide notice and open the citizen comment period for the following time frames per action:

- Comment period for the original Action Plan will take place for 14 days after the publication of the Action Plan.
- Comment period for Substantial Amendments will take place for no less than 14 days after the publication of the Substantial Amendment.

In addition to posting on the official website, DEO conducted four stakeholder webinars as outlined in the Consultation section below.

24. PUBLICATION (A)

The proposed Action Plan was published on the DEO website before its adoption and citizens were provided 14 days for public comment. DEO published a notice of the posting in the Florida Administrative Register (FAR) on April 7, 2017.

25. PUBLICATION (B)

Before its adoption, the proposed Action Plan was published on the DEO website, <http://floridajobs.org/news-center/public-notice>, for a 14 day citizen comment period. DEO published a notice of the posting in the Florida Administrative Register (FAR) on April 7, 2017. DEO incorporated and addressed citizen comments received during that period into the final Action Plan.

26. 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” that includes information on disaster recovery activities assisted with CDBG-DR funds due to 2016 Hurricanes Hermine and Matthew. 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.

Information pertaining to recovery from the 2016 Hurricanes Hermine and Matthew posted to the webpage includes, but is not limited to, program design and reporting, the citizen participation plan, procurement, executed CDBG-DR contracts, and their statuses. Program announcements and details of activities will also be posted on DEO's website on an ongoing basis along with program guidebooks and manuals in English and made available in other languages for limited English proficiency audiences, as applicable.

27. CONSULTATION

DEO has consulted directly with local governments, including, but not limited to, Brevard, Volusia, Pasco, and St. Johns counties. DEO has also consulted with Public Housing Authorities to develop and distribute a PHA disaster-impact survey to all Authorities in the FEMA disaster declared counties requesting information of storm-related damage and whether any residents were displaced due to the hurricane events. DEO also requested feedback on the storm-related damage from the Florida Housing Finance Corporation, the Florida Department of Children and Families, and the Florida Department of Health.

In addition, all stakeholders were invited to four stakeholder session webinars and slides were made available to interested parties. A Spanish-speaking interpreter was available at each session. The dates were:

- **Stakeholder Session 1** - CDBG-DR Overview of Requirements (3/9/2017)
- **Stakeholder Session 1 Repeat** - CDBG-DR Overview of Requirements (3/17/2017)
- **Stakeholder Session 2** - Impact and Unmet Needs Assessment (3/28/2017)
- **Stakeholder Session 3** - Draft Action Plan (4/7/2017)

The state published a notice in the Florida Administrative Register (FAR) on April 7, 2017, announcing the availability of the funding and the development of a draft Action Plan. The information was also emailed to all eligible local governments and posted to the Department's website. Comments from the public on the Action Plan were accepted from April 7, 2017 until April 21, 2017. A summary of public comments received, and the state's response to each comment, is included in Appendix Six. The state also collected attendee lists for each webinar.

LOCAL EFFORTS

Counties and other units of local government eligible to receive funds must coordinate to consider the needs of all municipalities (and Federally Recognized Indian Tribes) within the incorporated as well as unincorporated area of the county (and reservations contiguous to the county). Eligible units of government should also consult with local housing providers regarding funding for affordable rental housing needs related to the storms. Applicants for funding must provide DEO with documentation that all parties were allowed an opportunity to discuss unmet needs and the best use of the funding.

Applicants are required to conduct at least one public hearing or meeting to receive comments from residents of the community. Applicants will be required to post a public notice in a newspaper of general circulation and to their website, that states the types of projects to be undertaken, the source and amount of funding available for the activities, a date by which public comments must be made, and who to contact for a copy of the proposed application (i.e., name or office and telephone number). This notice, which must provide for a 14-day comment period, must be published prior to the submission of their application. A compilation of the public comments received must be included as an appendix to the application.

Additionally, applicants are required to conduct outreach to vulnerable populations and are required to have at least one outreach session in an area or areas targeting different special needs populations throughout the county or municipality to ensure best efforts to maximize community outreach are achieved and documented. Since certain areas throughout the state have bilingual and multi-lingual populations, there should be at least a Spanish translation of all relevant documentation available for the public. It would be helpful, if applicable, to have a Spanish translator available during public meetings. This could also be applicable for disabled individuals that may be hearing-impaired or blind.

Applicants for funding must allow their citizens access to grant information pursuant to Florida's Government in the Sunshine Law as well as federal requirements. Records should be made available for public inspection during normal business hours. In addition, if possible, information should be posted to websites. Upon request, information must be provided in a format accessible to persons with disabilities. Retention of records must meet existing public record requirements.

28. 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.

29. 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.

30. 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 (approximately \$5.8 million).

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.

31. 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 Six.

32. CONSISTENCY OF BUDGET

The combined activities are equal to or less than the total CDBG-DR amount available and amounts are consistent throughout the plan.

33. CITIZEN COMPLAINTS

The State of Florida will handle citizen complaints received by the state, its subrecipients, vendors, and/or other program sources by conducting:

1. Investigations as necessary;
2. Resolution; or
3. 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 are allowed to 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, Bureau of Small Cities and Rural Communities
 Florida Department of Economic Opportunity
 107 East Madison Street
 The Caldwell Building, MSC 160
 Tallahassee, Florida 32399

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 at the conclusion of 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), 1-800-927-9275 (TTY) or www.hud.gov/fairhousing.

34. CERTIFICATION AND RISK ANALYSIS DOCUMENTATION

The State of Florida DEO submitted the Certification and Risk Analysis Documentation to HUD on March 23, 2017, as required.

35. CDBG-DR CERTIFICATIONS

24 CFR 91.325 is waived. Each state 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 anti-displacement 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 to fund, 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 91.105 or 91.115, as applicable (except as provided for in notices providing and alternative requirements for this grant). Also, each UGLG 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. Each state receiving a direct award under this notice certifies that it has consulted with affected UGLGs 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.) but prior to September 29, 2016.

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) and 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, states receiving a direct award must certify that they will require UGLGs 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 non-violent 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 has adopted and is enforcing the following policies, and, in addition, states receiving a direct award must certify that they will require UGLGs 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.

l. 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 and requirements of the Appropriations Act applicable to funds allocated by this notice, and certifies to the accuracy of its certification documentation referenced at A.1.a. under section VI and its risk analysis document referenced at A.1.b. under section VI.

m. 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 in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the state, local, and tribal government land use regulations and hazard mitigation plans and the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

n. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.

o. The grantee certifies that it and all subrecipients will comply with environmental requirements at 24 CFR part 58 and Section 582 of the NFIP.

p. The grantee certifies that it will comply with applicable laws.

The Florida Department of Economic Opportunity (DEO) hereby certifies to the above, as authorized by the Chief Executive Officer:

Signature: Signed version submitted to HUD

36. SF-424

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

CONCLUSION

37. COMPLETE AND COMPLIANT

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

38. 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 114-254.

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. The Department 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 prepare the Action Plan and Unmet Needs Assessment and other costs associated with its preparation, 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.

39. UNIFORM RELOCATION ACT

HUD requires DEO to define what would constitute a housing unit "not suitable for rehabilitation. In addition, HUD requires DEO to define "demonstrable hardship" and how it applies to Applicants.

DEO defines "not suitable for rehabilitation" as one of the three following definitions (1, 2, or 3):

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 exceeds 70 percent of the market value for the property or that the property is deemed a blighted structure consistent with state or local ordinance; in which case the property would be a candidate for demolition and/or reconstruction and not subject to one-for-one replacement.
3. A "blighted structure" is any structure unfit for use, habitation, or dangerous to persons or other property. In addition, a structure is blighted when it exhibits objectively determinable signs of deterioration sufficient to constitute a risk to human health, safety, and public welfare. This includes structures showing evidence of physical decay or neglect, or lack of maintenance. Characteristics may also include any nuisance conditions including but not limited to:

Any "Nuisance" as defined by law, or:

- a. Physical conditions. Examples of these include, but are not limited to, old, dilapidated, abandoned: scrap or metal, paper, building materials and equipment, bottles, glass, appliances, furniture, rags, rubber, motor vehicles, and parts thereof; or

- b. Physical conditions posing fire hazards,
- c. Physical conditions posing a hazard. Examples include, but are not limited to dead or damaged trees.
- d. Unsanitary conditions or anything offensive to the senses or dangerous to health. Examples of these include, but are not limited to, the emission of odors, sewage, human waste, liquids, gases, dust, smoke, vibration or noise, or whatever may render air, food, or drink detrimental to the health of human beings;
- e. Any residential property that poses a public nuisance, which may be detrimental to health or safety, whether in a building, on the premises of a building, or upon an unoccupied lot. Examples of these items include, but are not limited to: abandoned wells, shafts, basements, excavations, unclean swimming pools or spas, abandoned iceboxes, refrigerators, motor vehicles, and any structurally unsound fences or structures, lumber, trash, fences, or debris which may prove a hazard for inquisitive minors;

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.

40. DEADLINES

See Expenditure and Projections attached to this Plan.

41. MOST IMPACTED AND DISTRESSED

The program budget reflects the 80 percent allocation to the HUD-identified Most Impacted and Distressed area.

42. 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. Copies of the timeline will be e-mailed to eligible local governments simultaneous with its posting to the DEO website. The timeline, which is approximate and subject to revision, will include such information as the date the boilerplate Local Government Application for Funding will be posted to the website; the date of the Disaster Recovery Application Workshop, etc. A copy of the application workshop agenda will also be posted to the website after it has been finalized.

43. LOCAL GOVERNMENT APPLICATION FOR FUNDING

Eligible UGLG will be able to download a boilerplate copy of the application for funding and National Objective after it is posted to DEO’s Internet website at the following location: www.floridajobs.org/CDBG-DR.

44. 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. Citizens must apply for assistance through their local government. 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>.

APPENDICES AND SUPPORTING DOCUMENTS

APPENDIX 6: RESPONSE TO PUBLIC COMMENT

ST. JOHNS COUNTY

Comment:

On 4/13/2017, St. Johns County submitted Document 1, Attachment A, titled St. Johns County CDBG-DR DEO White Paper presenting subsequent data related to several Figures and Tables provided in the Unmet Needs Assessment as well as summary of unmet needs for Hurricane Matthew related housing, economic development and infrastructure projects.

Response:

DEO has reviewed and considered all data provided by St. Johns County in Document 1 and has updated the Unmet Needs Assessment portion of the Action Plan where applicable. Also, DEO encourages the county to package projects during the application period for DEO to review for eligibility and consistency with the Federal Register Notice and CDBG-DR regulations. Those projects deemed eligible will be funded through subgrant agreements. Proposed projects must meet the thresholds outlined in Section 16 of the Action Plan and will be weighted and ranked in accordance with the criteria in Section 16.

Comment:

On 4/13/2017, St. Johns County submitted Document 2, Attachment B, titled USDA Designates 4 Counties in Florida as Primary Natural Disaster Areas.

Response:

DEO has reviewed and considered all data provided in Document 2 regarding St. Johns County as one of the primary natural disaster areas due to Hurricane Matthew and has added this information to the Unmet Needs Assessment.

Comment:

On 4/13/2017, St. Johns County submitted Document 3, Attachment C, titled Preliminary Report on Crop Losses Due to Hurricane Matthew in St. Johns County.

Response:

DEO has reviewed and considered all data provided in Document 3 identifying estimated damage from Hurricane Matthew to be at least \$1.4 million in St. Johns County. USDA crop indemnity data does not show crop losses in St. Johns County through December 2016. As such, while the Unmet Needs figures on crop damage utilize USDA indemnity reports, the information provided by St. Johns has been added to the description of need. DEO may continue to monitor changes reported by USDA and has included the County's data in the public comment record.

Comment:

On 4/13/2017, St. Johns County submitted Document 4, Attachment D, titled 2017 Qualified Census Tracts.

Response:

DEO has reviewed the data provided in Document 4 regarding 2014 LMI area data by block group in relation to fire stations and encourages the county to package projects during the application period for DEO to review for eligibility and consistency with the Federal Register Notice and CDBG-DR regulations. Those projects deemed eligible will be funded through subgrant agreements. Proposed projects must meet the thresholds outlined in Section 16 of the Action Plan and will be weighted and ranked in accordance with the criteria in Section 16.

Comment:

On 4/13/2017, St. Johns County submitted Document 5, Attachment E, titled Hurricane Matthew HMGP Ranked Project List -2017.

Response:

DEO has reviewed the data provided in Document 5 regarding Hurricane Matthew HMGP Ranked Project List and encourages the county to package projects during the application period for DEO to review for eligibility and consistency with the Federal Register Notice and CDBG-DR regulations. Those projects deemed eligible will be funded through subgrant agreements. Proposed projects must meet the thresholds outlined in Section 16 of the Action Plan and will be weighted and ranked in accordance with the criteria in Section 16.

Comment:

On 4/13/2017, St. Johns County submitted Document 6, Attachment F, titled St. Johns County Dune Restoration.

Response:

DEO has reviewed the data provided in Document 6 regarding 2014 LMI area data by block group in relation to dune restoration and encourages the county to package projects during the application period for DEO to review for eligibility and consistency with the Federal Register Notice and CDBG-DR regulations. Those projects deemed eligible will be funded through subgrant agreements. Proposed projects must meet the thresholds outlined in Section 16 of the Action Plan and will be weighted and ranked in accordance with the criteria in Section 16.

Comment:

On 4/13/2017, St. Johns County submitted Document 7, Attachment G, titled St. Johns County Florida Recommendation For Funding To The Department Economic Opportunity, Florida for the Use Of CDBG-Disaster Funds.

Response:

DEO has reviewed the data provided in Document 7 regarding the proposed application for subgrantee funding and appreciates the County's input on the application process.

Comment:

On 4/20/2017, St. Johns County submitted Document 8, Attachment H, providing additional information and updated data to Document 1 titled St. Johns County CDBG-DR DEO White Paper presenting subsequent data related to several Figures and Tables provided in the Unmet Needs Assessment as well as summary of unmet needs for Hurricane Matthew related housing, economic development and infrastructure projects.

Response:

DEO has reviewed and considered all data provided by St. Johns County in Document 8 and has updated the Unmet Needs Assessment portion of the Action Plan in Table 12 [*previously located in Table 11*] with a mixture of data from FEMA Applicant level data and FEMA online data. Information on local shelter figures has been added to the applicable section. Also, DEO encourages the county to package projects during the application period for DEO to review for eligibility and consistency with the Federal Register Notice and CDBG-DR regulations.

Additionally, the feedback from the County regarding the extent of need in the infrastructure sector supported the budget breakout in the Method of Distribution for approximately \$15.5 million available for eligible infrastructure project applications in the County.

Comment:

On 4/20/2017, via St. Johns County: 1. "On page 88 [*now located on page 67*] of the State Action Plan it states; "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." Question 1: If all projects that can benefit LMI have been funded and the 70% cannot be met, will the state consider a waiver to HUD to lower the LMI to 50.01%?"

Response:

DEO has reviewed and considered the question submitted by St. Johns County. 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 of the state's grant amount is expended for activities that benefit such persons. DEO may consider a waiver for approval from HUD if all needs that meet this threshold in all eligible communities have been met.

Comment:

On 4/20/2017, via St. Johns County: 2. "The State Action Plan says that the Minimum Award for a single project will be \$750,000. Question 2: Is the \$750,000 the minimum amount that the state will provide any one subrecipient or is that the minimum amount for a single project requested for funding. For example, if St. Johns County has a particular project that is consistent with the priorities of this allocation and benefits the LMI population but costs less than \$750,000, can the project be considered as a special request or coupled with other projects that are less than \$750,000 to meet the minimum dollar requirement?"

Response:

The \$750,000 minimum applies to subrecipients and projects. The County may submit a smaller project to DEO for consideration as a special request, but is encouraged to couple the project with a similar project (for beneficiary population and activity type) to ensure effective use of grant funds. In the competitive allocation (20%), the minimum and maximum cumulatively apply to one county so that DEO may ensure that the funding is distributed throughout the impacted area.

Comment:

On 4/20/2017, via St. Johns County: 3. "On page 91 [*now located on page 71*] of the States Action Plan, it states: "The county designated by HUD to be the Most Impacted and Distressed will be allocated 80 percent of Florida's CDBG-DR Allocation from HUD. If more than one county is designated as being Most Impacted and Distressed, the 80 percent will be further allocated in equal portions to those determined by HUD to be designated counties." Question 3: With this data support, will DEO recommend the original direction stated in the applicable Federal Register by HUD be followed? In accordance to the Federal Register Volume 82, Number 11 dated January 18, 2017, St. Johns County was the only County listed as meeting HUD criteria as the most impacted county. This designation provided a specific set-aside for St. Johns County of \$46,881,600. While the state has received damage reports from many counties, at this time St. Johns County strongly supports moving forward as documented in the existing Federal Register. The County would not want the process to be slowed and recovery delayed by such a shift when data supports the original assessment as accurate in its intent. The County has projects that are shovel-ready to be moved forward as soon as the CDBG DR funds are made available to the County."

Response:

DEO has reviewed and considered the question submitted by St. Johns County. The Federal Register requires that "Each grantee must develop a needs assessment to understand the type and location of community needs and to target limited resources to those areas with the greatest need. Grantees receiving an award under this notice must conduct a needs assessment to inform the allocation of CDBG-DR resources."

The state may continue to review Unmet Needs data to assess whether additional county areas demonstrate sufficient need to warrant proposal to HUD for inclusion in the 80 percent MID allocation. Should such a proposal be made by DEO and approved by HUD, the Action Plan would be amended through the substantial amendment process. If more than one county is designated as being Most Impacted and Distressed, the 80 percent will be further allocated as described in the substantial amendment.

Comment:

On 4/20/2017, via St. Johns County: 4. "On page 101 [*now located on page 82*] of DEO's Action Plan, it discusses the eligibility of the reimbursement of pre-award costs in accordance to the Federal Regulation. It then further clarifies by stating: "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." Question 4: Because St. Johns County has incurred costs to be ready to implement this program, will the DEO consider the addition of language to include "Florida's Department of Economic Opportunity (DEO) and St. Johns County incurred.....?"

Response:

DEO has clarified the Action Plan to state that 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. State and local administration are capped at 5% in aggregate by federal regulations. DEO may provide additional guidance to jurisdictions through the application process regarding the amount of administrative funds available to awardees. Eligible project delivery costs are presumed included in the grant award amounts, as applicable.

FLAGLER COUNTY

Comment:

On 4/17/2017, via Flagler County: 1. "The County states that Unmet Needs Table 8 [*now located in Table 9, page 24*], page 24- "Flagler County did operate 3 shelters but our numbers were much higher than what is currently in the table. At our highest count we had 1,853 people in our shelters...waiting on a number from our School Board for the Total Sheltered (All Days) ... our max sheltered was 1,853 not 201."

Response:

DEO has reviewed and considered data provided by Flagler County and has updated the Unmet Needs Assessment regarding shelters where applicable. The table on shelters utilizes data provided by the Florida Division of Emergency Management at a certain point in time, which may reflect a lower number of sheltered populations than information from local data sources. The information from Flagler County has been included in the description of need regarding shelters.

Comment:

On 4/17/2017, via Flagler County: 2. "Page 36 [*now located on page 26*]- There is a sentence that reads 'Inspection rates were higher for Hurricane Hermine and Hurricane Matthew.' Is it supposed to say 'higher for Hurricane Hermine than Hurricane Matthew'?"

Response:

Yes, DEO has clarified the language to reflect that inspection rates were higher for Hurricane Hermine than Hurricane Matthew.

Comment:

On 4/17/2017, via Flagler County: 3. "Page 51 [*now located on page 38*]- end of the first paragraph under the Public Assistance heading... The State of Florida generally contributes 12.5% and the local jurisdictions contribute the other 12.5% to make up the 25% cost share."

Response:

DEO has reviewed and has clarified this portion of the Unmet Needs Assessment.

Comment:

On 4/17/2017, via Flagler County: 4. "Page 56 [*now located on page 43*]-HMGP & Resilience- Florida is an Enhanced State so we receive 20% of the total IA, PA AND SBA towards our HMGP allocation. I know that there are still some data limitations in regard to calculating the amount of HMGP available, but the Notice of Funding Available (NOFA) has been out on FDEM's website for both Matthew and Hermine since late January and late February, respectively. The NOFA contains 90-day estimates from FEMA on available HMGP. Matthew's 90-day estimate is 30,007,575 federal and Hermine is \$6,783,319 federal. This is a SIGNIFICANT difference from what's written in this section and it also fails to include SBA. More info can be pulled from the NOFAs found here-<http://www.floridadisaster.org/Mitigation/Hazard/currentdisasterdeclarations.htm#matthew>

Response:

DEO has reviewed and considered data provided by Flagler County and has updated the Unmet Needs Assessment where applicable.

Comment:

On 4/17/2017, via Flagler County: 5. "Page 83 [*now located on page 62*] states at the beginning of the 2nd paragraph under #7, "DEO reviewed the Florida Emergency Management Action Plan (EMAP) in consideration of the state level Recovery process." I've never heard of this EMAP. To emergency managers, EMAP is actually an accreditation program. Is this action plan something that is related to the state's Comprehensive Emergency Management Plan (CEMP)? The state CEMP has a recovery annex and I was able to find a 2008 version of a State Recovery Plan, but nothing referencing the Florida Emergency Management Action Plan."

Response:

DEO reviewed the State of Florida Division of Emergency Management Recovery Plan, Recovery Annex to the state Comprehensive Emergency Management Plan, 2013 version. The language in the Action Plan has been clarified accordingly.

CITRUS COUNTY

Comment:

On 4/20/2017, via Citrus County: 1. "We would like to impress the importance of distributing CDBG-DR funds equally and equitably across all Counties listed on both Declarations (Hermine & Matthew). Awarding 80% of the total funds to St. Johns County due to HUD identifying it as the County with the "most impacted and distressed area" will leave 19 Counties with approximately \$3,000,000 in funds to apply for, and with a minimum application threshold of \$750,000, only four (4) Counties at the most will have an opportunity to receive this funding. FEMA fairly allocated Disaster funding by a percentage of damage estimates reported by each County listed on the Declarations. We strongly recommend that funds be distributed in a fair manner, understanding that these Counties were listed on the Declarations for a reason and that substantial damage was reported to FEMA by most of them. Citrus County residents living in the unincorporated areas of Homosassa and Crystal River received flood damage to their homes and many are still displaced. This funding opportunity may give us an avenue for helping these residents restore their homes and their lives. Thank you for the opportunity to comment."

Response:

DEO has reviewed and considered the comment submitted by Citrus County. As required by the Federal Registers, Vol. 81, No. 224, Monday, November 21, 2016, and Vol. 82, No.11, Wednesday, January 18, 2017, 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 is currently limited by HUD to St. Johns County and the jurisdictions within the county. The state may continue to review Unmet Needs data to assess whether additional county areas demonstrate sufficient need to warrant proposal to HUD for inclusion in the 80 percent MID allocation. Should such a proposal be made by DEO and approved by HUD, the Action Plan would be amended through the substantial amendment process.

VOLUSIA COUNTY

Comment:

On 4/20/2017, via Volusia County: 1. "The \$3,000,000 maximum award per applicant set forth in the Draft Action Plan is not sufficient to address the unmet need in Volusia County.

- a. The Draft Action Plan identified the total FEMA Real Property Verified Loss in Volusia County to be \$3,130,060. The verified loss is only looking at the 6,058 residents that applied and were inspected by FEMA. Of those inspected, 85.51% had verified loss. Of those with verified loss, only 1,587 received repair assistance. According to the data presented, 2,842 applicants with verified loss did not receive assistance and another 6,968 that applied for assistance were not inspected. If a similar damaged rate of 85.51% is true of uninspected properties, Volusia County has a large gap of unmet needs to address regarding real property loss.
- b. As demonstrated in the Draft Action Plan, the damage to mobile homes in Volusia County due to Hurricane Matthew is extensive. There were 2,327 mobile homes with FEMA verified loss in Volusia County, this accounts for 46% of the mobile homes with FEMA verified damage statewide. The real property verified loss of mobile homes in Volusia County is \$2,808,673, which is more than double the verified mobile home loss in St. Johns County. The data mentioned above only includes verified loss, and actual damage in Volusia County may be much higher.
- c. As stated on page 42 [*now located on page 30*] of the Draft Action Plan, mobile homes can be difficult to repair; cost may be disproportionately high compared to the overall structure. In addition to having a high number of mobile homes with verified loss, Volusia County is shown to have 81.64% of housing units built prior to 2000. Mobile homes built prior to 1994 are not insurable and cannot be repaired. The inability to repair some mobile homes may make a replacement or buyout approach the most effective strategy for Volusia County. A replacement or buyout program could be advantageous to residents, but it will likely be costly to implement. The costs associated with the replacement of damaged mobile homes is expected to be much higher than the verified loss of \$2,808,673.

Response:

DEO has reviewed and considered the comment submitted by Volusia County and has clarified that repair and/or replacement of mobile homes is an eligible activity. Additionally, the method to determine unmet housing need utilizes a multiplier to account for the potential unmet need of FEMA applicants who did not receive assistance and understands that unmet need may extend beyond the universe of FEMA applicants.

The state duly notes the County’s comment regarding need in excess of available funding, and the County’s comment shall be made part of the public record submitted to HUD for review.

Comment:

On 4/20/2017, via Volusia County: 2. Volusia County requests a waiver of the 20% funding limitation for “other most impacted and distressed areas,” implemented by HUD

- a. Based on the data and unmet needs presented in the Draft Action Plan it is not evident how \$44,537,520 could be spent to address unmet housing needs related to Hurricane Matthew and Hermine in St. Johns County alone.
- b. The Draft Action Plan identifies several areas with extensive damage and unmet needs, including Volusia County. Dividing 20% of the statewide CDBG-DR funding between all the “other most impacted and distressed areas,” will not sufficiently address unmet needs.

Response:

DEO has reviewed and considered the comment submitted by Volusia County. As required by the Federal Registers, Vol. 81, No. 224, Monday, November 21, 2016, and Vol. 82, No.11, Wednesday, January 18, 2017, 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 is currently limited by HUD to St. Johns County and the jurisdictions within the county.

The state may continue to review Unmet Needs data to assess whether additional county areas demonstrate sufficient need to warrant proposal to HUD for inclusion in the 80 percent MID allocation. The state duly notes the County’s comment regarding need in excess of available funding, and the County’s comment shall be made part of the public record submitted to HUD for review.

Comment:

On 4/20/2017, via Volusia County: 3. “Volusia County disagrees with the contract methodology set forth in the Draft Action Plan and is requesting a waiver of contract methodology.

- a. The Draft Action Plan indicates that counties would only be eligible to apply for assistance for unincorporated areas, and jurisdictions within each county would be responsible for submitting their own application and implementing their own CDBG-DR housing program. There are 16 jurisdictions within Volusia County. If every city and the county applied for assistance, limited to the \$750,000 minimum and \$3,000,000 maximum, there could be \$12,000,000 to \$51,000,000 in applications received from one county. It would be unlikely that all programs could be funded; this would result in a significant impact of unmet needs in some jurisdictions.
- b. We are proposing that a methodology similar to what is used for the regular CDBG Entitlement Program be used to ensure programmatic compliance and to ensure unmet needs can be addressed in all jurisdictions effectively and equitably. As a Federal entitlement community, we currently have signed cooperation agreements with 11 jurisdictions in Volusia County. There are five jurisdictions that are not part of Volusia County’s entitlement area. Daytona Beach, Port Orange, and Deltona are entitlement communities. Ponce Inlet and Oak Hill have elected not to participate in the entitlement community. The cooperation agreements allow HUD to use the populations of the participating jurisdictions in determining the CDBG allocation. In turn, we administer the CDBG program and provide a certain allocation to each of the cities. The cities are not allowed administration funds and are provided funding on a reimbursement basis for eligible CDBG activities within their city limits. Therefore, the service area for Volusia County’s CDBG entitlement includes unincorporated County and the city limits of the participating jurisdictions. Volusia County has received CDBG funds for over 25 years, partnering with jurisdictions and providing successful oversight to participating jurisdictions with no significant findings.

- c. Participating jurisdictions are not experienced in applying for or implementing CDBG eligible projects. Some jurisdictions would not have the capacity to apply for or regulatory implement CDBG eligible activities, specifically related to housing. A lack of capacity may prohibit jurisdictions from applying; therefore, these residents would be excluded from receiving assistance.
- d. If every jurisdiction were to implement a unique housing program, they could all differ slightly. Varying assistance caps, types of assistance provided and procurement methodologies could cause confusion and frustrations among applicants to programs. These differences could result in negative political ramifications among Units of General Local Government.
- e. Reviewing and implementing one application from the Volusia County Entitlement Community would save administrative time and funds for DEO, allowing more to be allocated to direct services.
- f. Volusia County has reached out to the 11 participating jurisdictions of the entitlement community. Of the responses received, none of the cities had been involved in or made aware of the availability of funds, the stakeholder sessions, or the public comment period of the Draft Action Plan. If the intent is to have jurisdictions apply directly to DEO, jurisdictions should have been adequately notified and involved in the planning process and given an opportunity to provide feedback.”

Response:

DEO has reviewed and considered the comment submitted by Volusia County and has changed the contracting requirements outlined in the initial draft of the Action Plan. The revised language allows non-entitlement jurisdictions to submit applications through their county government so long as both parties enter a formal agreement to do so. DEO understands that some local governments have limited capacity for managing grants and appreciates Volusia County proposing a solution. Additionally, DEO has clarified that in the competitive allocation (20%), the minimum and maximum cumulatively apply to one county so that DEO may ensure that the funding is distributed throughout the impacted area.

Comment:

On 4/20/2017, via Volusia County: 4. “Volusia County disagrees with housing assistance caps being set for residential rehabilitation or reconstruction.

- a. The Draft Action Plan does not indicate what assistance caps will be, but it does state that DEO will determine caps. It would be more appropriate for each applicant to identify an assistance cap for their specific service. Needs differ greatly, evident by the number of mobile homes and age of housing stock in Volusia County shown in the plan. If Volusia County is able to address the unmet needs gap of mobile home owners, the costs of a replacement or buyout program will differ greatly from traditional homeowner rehabilitation or reconstruction. The plan does allow for waivers to be granted in special circumstance; however, it would be ideal to review each applicants request individually rather than implementing a statewide minimum or maximum assistance level.”

Response:

DEO has reviewed and considered the comment submitted by Volusia County. DEO is required by HUD to publish “the maximum amount of assistance available to a beneficiary under each of the grantee’s disaster recovery programs” to ensure reasonable use of grant dollars. Subrecipients may establish housing assistance caps for their rehabilitation or reconstruction programs equal to or less than DEO’s housing assistance caps. A waiver request may be submitted to DEO if the subrecipient seeks to set housing assistance caps that exceed DEO’s housing assistance caps. DEO will evaluate each housing assistance waiver request for cost effectiveness.

Comment:

On 4/20/2017, via Volusia County: 5. “Half of the 5% administration allowed by HUD will not be sufficient to administer a housing related program for two years.

- a. The Draft Action Plan does not state what amount, if any, in administration funds may be retained by each applicant implementing a CDBG-DR activity, however it does affirm that DEO does intend to retain administrative funds. HUD is allowing 5% of the allocation to be used for administration. If applicants are allotted half of the available administration funds, 2.5%, it will be difficult to implement an effective housing program for two years with such limited funds.”

Response:

DEO has reviewed and considered the question submitted by Volusia County. State and local administration are capped at 5% in aggregate by federal regulations and the cap cannot be waived by HUD. The state may provide additional guidance to jurisdictions through the application process regarding the amount of administrative funds available to awardees. Eligible project delivery costs are presumed included in the grant award amounts, as applicable.

CITY OF ST. AUGUSTINE**Comment:**

On 4/21/2017, via the City of St. Augustine: 1. "Appendix 2: 2016 Populations by LMI for IA Declared Counties starting on page 65 does not include a map of St. Johns County."

Response:

The LMI map for St. Johns County is in page 18 of the document.

Comment:

On 4/21/2017, via the City of St. Augustine: 2. "Tables 23 through 26 [*now located in Tables 24 through 27*] show the totals projections for each PA category. Can you confirm that the totals for St. Johns County include the data... sent for the City of St. Augustine? Our category totals are not yet in the FloridaPA.org system, so the spreadsheet that I sent to you would need to be "manually" added to the data if it hasn't been already."

Response:

The Unmet Needs Assessment utilizes statewide data at a certain point in time to ensure consistency in comparison between jurisdictions. However, locally supplied data is important and additional impact supported by the data may inform the Unmet Need narrative and will be attached to the public record and submitted to HUD for review.

Comment:

On 4/21/2017, City the St. Augustine submitted Document 1, Attachment I, titled City of St. Augustine Capital Improvement Plan FY 201-2021. "As an addition to what the County submitted, I would like to send you excerpts from the City's approved Capital Improvement Plan for FY 2017-2021.

These projects are as follows:

- 1) King Street Drainage and Electric Undergrounding: A map of the area is also included.
- 2) Downtown Drainage Improvement: This project is ranked first on the County's HMGP and we are currently working on the application for that funding. The project is expected to exceed our initial expectation and will be approximately \$6,500,000. That application can be sent to you if needed.
- 3) Davis Shores Backflow Prevention: This project was also included in our legislative ask for the current year.
- 4) Neighborhood Drainage Improvements
- 5) West Augustine Sewer: A full West Augustine Water and Sewer Master Plan has been completed and I can submit that to you if needed."

Response:

DEO has reviewed the data provided and encourages the St. Augustine to package projects during the application period for DEO to review for eligibility and consistency with the Federal Register Notice and CDBG-DR regulations. Those projects deemed eligible will be funded through subgrant agreements. Proposed projects must meet the thresholds outlined in Section 16 of the Action Plan and will be weighted and ranked in accordance with the criteria in Section 16.

EMERGENCY MANAGEMENT PLANNING CONSULTANT

Comment:

On 4/21/2017, via Planning Consultant: 1. “References to the Florida Division of Emergency Management – there are several references to the “Department” of Emergency Management in the document.”

Response:

DEO appreciates this feedback and has made the appropriate edits.

Comment:

On 4/21/2017, via Planning Consultant: “Mitigation funding – as an Enhanced Plan state, Florida receives additional federal Hazard Mitigation Grant Program (HMGP) Funding from the Federal Emergency Management Agency. The Division of Emergency Management has released the Notices of Funding Opportunity for the HMGP funds available to eligible applicants for Hurricanes Hermine and Matthew – the Action Plan document needs to be revised to more accurately reflect these funding levels.”

Response:

DEO appreciates the feedback provided by the Emergency Management Planning Consultant and has updated the Unmet Needs Assessment where applicable.

Comment:

On 4/21/2017, via Planning Consultant: 2. “Many of the federal disaster grant programs funding levels identified in the document as indices of impact may have increased dramatically since the 3/27/17 data sets identified in the document – particularly the Public Assistance data for Hurricane Matthew – the document should reflect the most current data readily available.”

Response:

The Unmet Needs Assessment utilizes statewide data at a certain point in time to ensure consistency in comparison between jurisdictions. However additional impact supported by the data may inform the Unmet Need narrative and will be attached to the public record and submitted to HUD for review.

Comment:

On 4/21/2017, via Planning Consultant: 3. “The Planning and Coordination Section (Section 7) appearing on pages 83-84 [*now located on pages 62-63*] appears to confuse/combine Emergency Management planning terms. Florida has a state Comprehensive Emergency Management Plan (CEMP) adopted by Administrative Rule 27P-2, Florida Administrative Code. The 2014 state CEMP is the latest version adopted by rule. The draft CDBG-DR Action Plan document references an Emergency Management Action Plan, which is not referenced in Florida statutes or administrative rules. The acronym “EMAP” in Florida refers to the national Emergency Management Accreditation Program, which is a voluntary program for credentialing emergency management programs. This section needs to be re-written or significantly clarified with citations and access to the specific documents referenced. In addition, this section references a DEM Strategic Plan created in 2013 which references a Business Plan as a supporting document. The current Business Plan for DEM is not referenced or available on line and may not be current. Finally, the section references an Incident Action Plan (IAP) which, in general terms, is an Emergency Management term for the plan guiding “operational” activities for a specific time-period during Emergency Operations Center activations. There is no “IAP” for recovery planning activities.”

Response:

DEO reviewed the State of Florida Division of Emergency Management Recovery Plan, Recovery Annex to the state Comprehensive Emergency Management Plan, 2013 version. The language in the Action Plan has been clarified accordingly.

Comment:

On 4/21/2017, via Planning Consultant: 4. “Given the deficiencies of the Planning and Coordination Section, the statement “Due to the strength of the existing planning tools available, the state does not anticipate pursuing additional disaster recovery and response planning activities at this time.” – should be carefully re-evaluated. Additionally, planning activities at the local level should be included as an eligible activity. Although the Action Plan references Post Disaster Redevelopment Plans and related guidance documents, funding to pursue these planning initiatives has not been available to local governments for several years.”

Response:

Planning activities are eligible activities in the Action Plan.

Comment:

On 4/21/2017, via Planning Consultant: 5. “The draft Planning and Coordination section closes with a reference to 11 Regional Planning Councils (RPCs) in Florida – there are now 10 RPCs, not all of which serve the impact areas for Hurricanes Hermine and Matthew.”

Response:

DEO appreciates the feedback provided by the Emergency Management Planning Consultant and has updated the Unmet Needs Assessment where applicable.

PASCO COUNTY

Comment:

On 4/21/20217, via Pasco County: 1. “Pasco County is concerned that Docket FR-6012-N-01 references St. Johns County as the only “most impacted and distressed” area of Florida, allocating all of the 80% funding for this category to this one county when Pasco County should have been considered as one of the most impacted and distressed counties as well as it meets the criteria for CDBG better than St. Johns County. A large portion of Pasco County, especially the areas hardest impacted by Hurricane Hermine, fall into the category of Low and moderate income.

- a. Page 8 [*now located on page 7*] of the State of Florida Action Plan for Disaster recovery HUD/CDBG program for Hermine and Matthew, it states “in order to ensure that funds assist the most impacted areas, 80 percent of the combined total award to the state will go to the Most Impacted and Distressed counties.” I would like to point out that it states “counties”, as in plural or more than one county.
- b. Page 11 [*now located on page 9*] of the State of Florida Action Plan for Disaster recovery HUD/CDBG program for Hermine and Matthew, identifies Pasco County specifically as a highly impacted area stating “Flooding occurred on several rivers in northern Florida, although only the Anclote River reached major flood stage. The river crested at 25.08 feet in Elfers, which was about seven feet above flood stage and one foot above major flood stage.” Homes in this area often range from \$50,000 to \$100,000 and are owned by individuals of low to moderate income and in a defined blighted area. See attached Zillow estimates.
- c. Page 12 [*now located on page 11*] of the State of Florida Action Plan for Disaster recovery HUD/CDBG program for Hermine and Matthew, mentions St. Johns County impact of St. Augustine on Anastasia Island. Anastasia Island is a beach community with homes ranging in the \$200,000 to \$250,000. See attached Zillow estimates.
- d. Pasco County is concerned that St. Johns County was identified as the only “most impacted and distressed” area due to initial dollar value of damage, which would of course a show greater damage overall to St. Johns County, as they have a higher housing value as most of the beach front property would not fall into the low to moderate income.
- i. Pasco County is concerned we will have to inform our residents, that are of low to moderate income, with no other options but to live in their flooded out damaged property, we were not considered a “most impacted and distressed” county.”

Response:

DEO has reviewed and considered the comment submitted by Pasco County. As required by the Federal Registers, Vol. 81, No. 224, Monday, November 21, 2016, and Vol. 82, No.11, Wednesday, January 18, 2017, 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 is currently limited by HUD to St. Johns County and the jurisdictions within the county and has made the clarification between “county” and “counties” in the Action Plan.

The state may continue to review Unmet Needs data to assess whether additional county areas demonstrate sufficient need to warrant proposal to HUD for inclusion in the 80 percent MID allocation. DEO duly notes the County’s comments regarding local need and the County’s comment shall be made part of the public record submitted to HUD for review.

Comment:

On 4/21/2017, via Pasco County: 2. “The Florida CDBG – DR Action Plan Disaster Recover Stakeholder Session 1 PowerPoint, March 9, 2017 states 70% of the \$58.6 Million must benefit LMI Persons. When looking at the information in the US Census and information provided in the State of Florida Action Plan for Disaster recovery HUD/CDBG program for Hermine and Matthew, Pasco County fits this criteria better than St. Johns County.

- i. Page 20 [*now located on page 15*] of the State of Florida Action Plan for Disaster recovery HUD/CDBG program for Hermine and Matthew states “All projects supported by HUD Community Development Block Grant (CDBG) assistance must meet one of the program’s three National Objectives: (1) benefitting-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).”
 - 1. The residence in Pasco County fall into all three categories where Hurricane Hermine hit the hardest. They are low to moderate income, because of their financial situation, the areas they live are often seen as blighted, and due to Hurricane Hermine, they have a very urgent need to secure safe and sanitary housing that cannot be achieved without the assistance of CDBG. Pasco County does not believe the beach and coastal communities of St. Johns County impacts from Matthew are as impacted as Pasco County as they have the financial means to redevelop and typically are not blighted in the first place.
 - 2. This is further supported by the maps on page 21, 24, and 69 [*now located on page 16, 18, and 51*]. These maps are color coded by LMI rankings. It is clear to see, that Pasco County has many more areas that fall into the low to moderate income. Especially in the southwest corner where the Anclote River flow and Hermine hit hardest, than St. Johns County does in their hardest hit areas or even county wide.
 - 3. The chart on page 22 [*now located on page 17*] of the State of Florida Action Plan for Disaster recovery HUD/CDBG program for Hermine and Matthew, shows 35% of Pasco County’s population falling into the low to moderate income but only 21.97% of St. Johns County falls into this category.
 - 4. The US Census shows Pasco as having a greater population in need of assistance as there is a greater elderly population greater disabled population and a greater population in poverty than St. Johns County.
- a. This is further substantiated by the State of Florida Action Plan for Disaster recovery HUD/CDBG program for Hermine and Matthew maps on page 26 [*now located on page 19*] (shows Pasco County has a great percent of population that doesn’t speak English than St. Johns County), page 28 [*now located on page 21*] (shows Pasco County has a greater population under 5 and over 65, than St. Johns County), page 29 [*now located on page 21*] (shows Pasco County has a greater percentage of poverty (especially in the impacted coastline) than St. Johns County), page 30 [*now located on page 21*] (percent of population unemployed is greater in Pasco County than in St. Johns County), and page 43 [*now located on page 31*] (Pasco County seems to have a similar percentage of mobile homes as St. Johns County, but many of Pasco County’s are near the coast in the impacted area of Hermine, where St. Johns County’s are further from the coast.)”

Response:

DEO has reviewed and considered the comment submitted by Pasco County. As required by the Federal Registers, Vol. 81, No. 224, Monday, November 21, 2016, and Vol. 82, No.11, Wednesday, January 18, 2017, 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 is currently limited by HUD to St. Johns County and the jurisdictions within the county.

The state may continue to review Unmet Needs data to assess whether additional county areas demonstrate sufficient need to warrant proposal to HUD for inclusion in the 80 percent MID allocation. DEO duly notes the County’s comments regarding local need and the County’s comment shall be made part of the public record submitted to HUD for review.

Comment:

On 4/21/2017 via Pasco County: 3. "Pasco County was devastated and heavily impacted from Hurricane Hermine and should be considered one of the most impacted and distressed counties. Pasco County is concerned that CDBG money intended to assist low to moderate incomes will be used towards beach renourishment or the one county currently identified the most impacted and distressed will not be able to spend all funds currently allocated to them within the 6 year requirement on projects that meet one of the program's three National Objectives."

Response:

DEO has reviewed and considered the comment submitted by Pasco County. As required by the Federal Registers, Vol. 81, No. 224, Monday, November 21, 2016, and Vol. 82, No.11, Wednesday, January 18, 2017, 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 is currently limited by HUD to St. Johns County and the jurisdictions within the county.

The state may continue to review Unmet Needs data to assess whether additional county areas demonstrate sufficient need to warrant proposal to HUD for inclusion in the 80 percent MID allocation. DEO duly notes the County's comments regarding local need and the County's comment shall be made part of the public record submitted to HUD for review.

Comment:

On 4/21/2017, via Pasco County: 4. "I have included pictures from Pasco County's experience during Hurricane Hermine to the back of the attachment. Pasco County had flood waters for days, residents were so desperate for help, they gave their children to complete strangers to evacuate them from the flood waters, Pasco County Fire and rescue, Sheriff 's Office and Florida Wildlife Commission had to evacuate numerous homeowners from the floodwaters using boats and high vehicles, the areas of greatest impact were of low to moderate income which is why the County's damage in dollars was not as high as St. Johns County but the impact and distress has been much greater. Pasco County further has projects that can be ready to submit on a quick turnaround as we have such a large population impacted and in need of assistance."

Response:

DEO has reviewed and considered the comment submitted by Pasco County. As required by the Federal Registers, Vol. 81, No. 224, Monday, November 21, 2016, and Vol. 82, No.11, Wednesday, January 18, 2017, 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 is currently limited by HUD to St. Johns County and the jurisdictions within the county.

The state may continue to review Unmet Needs data to assess whether additional county areas demonstrate sufficient need to warrant proposal to HUD for inclusion in the 80 percent MID allocation. DEO duly notes the County's comments regarding local need and the County's comment shall be made part of the public record submitted to HUD for review.

APPENDIX 7: PUBLIC COMMENT SUPPORTING DOCUMENTATION

ST. JOHNS COUNTY
ATTACHMENT A

Section I Data Clarification

St. Johns County (SJC) has reviewed the Florida Department of Economic Opportunity’s (DEO’s) webinar “Florida CDBG-DR Action Plan Disaster Recovery Stakeholder Session 2 – Impact and Unmet Needs Assessment”, which was originally presented on March 21, 2017. DEO then revised the presentation to include updated PA data on March 28, 2017 and shared this version with the county on March 31, 2017. SJC compared the information in these two presentations to data it has been collecting following Hurricane Matthew and is pleased to assist DEO with data dissemination by respectfully sharing the updated data regarding, as shown below in Table 1.

Table 1. DEO March 28, 2017 Webinar Data and SJC Collected Data

DEO Presentation Slide# and Title	DEO Data Presented	SJC Data	Data Source(s)
Slide 22 Impacts to Agri-business	No Agricultural Impact to SJC	Agricultural Declaration naming SJC as a “Primary Natural Disaster Area” issued 11-14-17; Estimated Damage \$1.4M*	Ag Dec issued by USDA, release No. 0177.16, UF/IFAS Extension SJC *the \$1.4M is damage to four farms, 7 are assessing their dollar amounts and 6 more have not yet been successfully contacted

SJC also compared the information in the “State of Florida’s Action Plan for Disaster Recovery Draft Posted for Public Comment April 7, 2017” to data it has been collecting following Hurricane Matthew respectfully shares updated data, along with the sources of that data, regarding emergency shelters and number of data for FEMA’s Individual Assistance Program for Hurricane Matthew as shown below in Table 2.

Table 2. DRAFT Action Plan April 7, 2017 Data and SJC Collected Data

DEO DRAFT Action Plan April 7, 2017 Page #, Table #	DEO DRAFT Action Plan April 7, 2017 Data	SJC Data	Data Source(s)
33, Table 8	2 shelters in operation, 636 total sheltered, 87 max sheltered	Eight emergency shelters in operation from October 6, 2016 to 8:30 pm on October 9, 2016, 6:00am, 2,084 total sheltered plus 306 pets from Post Impact Shelter – Solomon Calhoun Shelter in operation from, 8pm October 9, 2016 to 8pm October 27, 2016, 125 sheltered	SJC EOC
37, Table 11	3,642 applications to IA program for Hermine and Matthew in SJC 17,740 # inspected for all counties for Hermine and Matthew	5,215 applications for SJC from Hurricane Matthew alone 22,276 # inspected for all declared Counties from Hurricane Matthew	FL DEM IA Branch Director, T. Hoover to SJC EOC FL DEM IA Branch Director, T. Hoover to SJC EOC

Section II— LMI DATA

The census tracts and block groups with LMI populations over 51% are shown below in Table 3 and in Attachments 01 and 02. The LMI data source is “Low Moderate Income (LMI) Area Data (FY '14) by Block Group from the HUD Office of Community Planning and Development”.

Table 3. SJC Census Tracts and Block Groups with greater than 51% LMI.

Census Tract#	Block Group	LMI %
202	2	61.06
203	1	71.1
203	2	67.42
204	1	53.85
204	2	58.45
205	1	52.46
210.02	1	89.15
210.02	2	51.32
210.03	2	64.52
211.01	2	55.30
212.06	2	51.20
212.13	2	62.79
214.05	3	61.31

Table 4 below provides a summary the estimated costs, FEMA or other funding amounts and the unmet need for Hurricane Matthew -related projects in the categories of housing, Economic Development and Infrastructure. The total unmet need in SJC is \$376M, with approximately \$289M or 78% of that being infrastructure projects.

Table 4 - St. Johns County Unmet Needs Table						
Category	Project Name	National Objective and Project Benefit Area	Direct impact from Hurricane Mathew	Estimated Total Cost(s)	FEMA or other funds	Unmet Need
Housing Projects	St. Francis House Replacement Facility	LMI	Construct new facility on site outside of flood zone to replace facility flooded by Hurricane Matthew	\$13,300,000	\$ -	\$13,300,000
	Housing Repair – mobile homes	LMI	Repair of 53 mobile homes damaged as a direct result of Hurricane Matthew.	\$3,000,000	\$ -	\$3,000,000
	Housing Repair - Single Family Homes (State Action)	LMI	3187 # homes rec'd damage, approx.31% of SJC is LMI = 988 homes are LMI homes Past studies approx. \$60K of CDBG-DR funding was needed to bring home to HQS Stds	\$88,800,000	\$29,600,000	\$59,200,000
Economic Development	Agribusiness	UN	Agricultural Declaration naming SJC as a "Primary Natural Disaster Area" issued 11-14-17; 1.4M is damage to four farms, 7 are assessing their dollar amounts and 6 more have not yet been	\$5,000,000	\$ -	\$5,000,000

Infrastructure Projects	Dune Restoration	LMI and UN	Protection of housing, business and roads, county wide. Average loss of about 10 cubic yards (cy) sand from the County line at Ponte Vedra south to the County line at Summer Haven due to Hurricane Matthew; approximately 32 miles of coastline. FEMA may provide up to 6 cubic yards (cy) of sand per ft. of shoreline.	\$80,000,000	\$48,000,000	\$32,000,000
	HMGP	LMI & UN	Use CDBG DR funds to cover the cost of HMGP Projects. If selected for funding from HMGP, the	\$175,000,000	\$ -	\$175,000,000
	Repair of Coastal Highway (A1A)	UN	This road is the primary evacuation/ re-entry route for SJC is Coastal Highway, a.k.a., A1A which experienced dune loss along the northern portion and southern portion was undermined by floodwaters. Road must be accessible prior to, during &	\$24,000,000	\$18,000,000	\$3,000,000

Town of Hastings Sewer Lines	LMI (Tract 211.01, BG 2, 55.3%)	The town has ongoing water and sewer needs due to use of aging water and waste water treatment plants and septic systems vs. municipal sewer system. septic systems overflow and release raw sewage into the surrounding area(s) during	\$15,000,000	\$ -	\$15,000,000
West St. Augustine Sewer Lines	LMI (Tract 211.03 BG1, 210.02 BG 2, and BG 1, 213.01 BG 2, 210.03 BG 1, and 203 BG1 and BG2)	Their water system would have to be connected to the County's water system at the same time the sewer system is hooked up as well. Ongoing water and sewer needs due to use of septic systems vs. municipal sewer system. septic systems overflow and release raw sewage into the surrounding area(s) during flood events	\$14,500,000	\$ -	\$14,500,000
Cat A	LMI and UN	FEMA Cat A in accordance w/ Table 24 of State of Florida's Action Plan for Disaster Recovery Draft Posted for Public Comment	\$25,400,000	\$19,100,000	\$6,300,000
Cat B	LMI and UN	FEMA Cat B in accordance w/ Table 24 of State of Florida's Action Plan for Disaster Recovery	\$12,120,000	\$9,090,000	\$3,030,000

			Draft Posted for Public Comment April 7, 2017			
	Cat C to Cat G	LMI and UN	FEMA Cat C to Cat G in accordance w/ Table 26 of State of Florida's Action Plan for Disaster Recovery	\$133,500,000	\$100,000,000	\$33,500,000
	Fire House Construction	UN	Fire Station #5 and Station #11, were originally designed as a base for volunteer fire services. Buildings were not intended for use 24 hours per day, 7 days per week & not designed to withstand hurricane force winds. Personnel from both stations were relocated to local high schools as their	\$7,180,000	\$ -	\$7,180,000
	Total St. Johns County Housing Unmet Need				20.4%	\$75,500,000
	Total St. Johns County Economic Development Unmet Need				1.4%	\$5,000,000
	Total St. Johns County Infrastructure Unmet Need				78.2%	\$289,510,000
	Totals			\$580,500,00	\$223,790,000	\$370,010,000

Housing

Homeless Population

St. Francis House – 70 Washington Street, St. Augustine, FL 32084; the area of King Street, in West St. Augustine, comprises one of the primary Low to Moderate Income (LMI) areas within St. Johns County.

This three-building shelter serving the area's homeless population is being demolished as it was damaged by Hurricane Matthew's flood waters. The contents of the buildings, e.g., refrigerators, stoves, beds, contents of food pantry, copier, etc., were destroyed by the flood waters.

As the building was unable to be used, the county was faced with the challenge of moving and caring for the homeless population in the same emergency shelter that is planned to shelter/care for the general population. Point In Time (PIT) counts from January 2016 confirm that 112 people were in emergency shelters, 143 were transitional sheltered and 809 people were unsheltered. January 2017 PIT data is in process but is anticipated to be similar to the 2016 PIT data.

Immediately following the storm the shelter accrued a few thousand in payroll expenses trying to staff two locations to serve the homeless population. The shelter also paid for hotel stays for a number of singles and families for three weeks.

Staff have been working outside in the courtyard since October 2016 due to the damage to the office spaces. The shelter is not expected to return to full operations until spring of 2018.

The SJC Continuum of Care (CoC) director applied for and was awarded \$200,000 in Emergency Shelter Grants (ESG) funds that can be used to help shelter the homeless population. Because the time between the identified need and contact with the potential applicants and the receipt of funding, the population has disbursed back into the county at large. An NPO has design plans to construct a new campus on a piece of county-owned land located outside of the flood zone, on Route 207 in St. Augustine.

The main building, i.e., the Unified Service Center, would have a cafeteria and would be used for respite beds/shelter in case of another emergency; estimated cost \$1.2M. Behind the main building, approximately 40 to 60 units of mix use of Extremely Low Income (ELI) Housing and Permanent Supportive Housing would be constructed; estimated cost \$12M.

The project has continually experienced funding challenges. Allocating CDBG-DR funds to this project would enable the construction and design to include resiliency measures such as on-site generators, windows and roofing designed to withstand hurricane force winds, and space set aside to emergency shelter in-place versus moving the population during future storm events.

Per the information on page 39692, paragraph 7 of the June 17, 2016 Federal Register (No. 117, Vol. 81), CDBG-DR funding can be used to reconstruct a homeless shelter:

“each grantee must include a description of how it will identify and address rehabilitation and reconstruction of the following types of housing affected by the disaster: Public housing, HUD- assisted housing McKinney-Vento Homeless Assistance Act-funded shelters and housing for homeless-including emergency shelters and transitional and permanent housing for homeless...”

Housing Repair

Additionally, Housing Partnership has received calls from 53 mobile home households seeking assistance since Hurricane Matthew. These requests are all from Low, Very Low, or Extremely Low income households. The estimated cost to repair or replace these mobile homes is estimated to be \$60, 000 each and \$3.0M total.

SJC has 3,187 single family homes directly damaged by Hurricane Matthew. Per the “Low Moderate Income (LMI) Area Data (FY '14) by Block Group from the HUD Office of Community Planning and Development”, approximately 31% of SJC is LMI; that equals 988 LMI homes. Studies from past disasters indicate that approx. \$60K of CDBG-DR funding was needed to bring homes to Housing Quality Standards (HQS) Standards. Total estimate is \$88.8M, with 75% or \$29.6 covered by FEMA and \$59.2M in unmet needs.

Economic Development

Agribusiness

The USDA issued an agricultural declaration on November 14, 2016 naming SJC as a “Primary Natural Disaster Area” (Attachment #01). In a report, dated October 12, 2016, provided by UF/IFAS Extension St. Johns County (Attachment #02), 17 farms had crop damage as a result of Hurricane Matthew. As of the date of the report, four farms had reported \$1.4M in damage, 7 were assessing their dollar amounts and 6 more had not yet been successfully contacted.

Infrastructure - Serving LMI

Dune Restoration

The dune system is the primary measure of protection for the residences, businesses, and roads of the entire county from storm surge.

Data collected by SJC shows an average loss of about 10 cubic yards (cy) sand from the County line at Ponte Vedra south to the County line at Summer Haven; approximately 42 miles of coastline. FEMA's regulations allow for the county to be reimbursed for up to 6 cubic yards (cy) of sand per foot of shoreline. Therefore, the unmet need to which CDBG-DR funding would be applied is 4 cy/ft of sand. Note: the 42 miles includes: 1) the 2.5-mile beach that is part of a federally funded restoration project, and 2) park land. Removing such lands leaves about 32 miles of shoreline where the additional 4 cy/ft of sand can be placed. The dollar amount of the replacement sand to be purchased using CDBG-DR funding, i.e., 4 cy/ft, ranges from \$40 to \$50 per cy, or about \$25 to \$32M. The range of the dune restoration project and its proximity to the 13 block groups that populations over 51% are shown in GIS Figure St. Johns County Dune Restoration contain LMI (Attachment #03). The dune restoration funded using CDBG-DR monies would not duplicate efforts currently under USACE scope, e.g., St. Augustine Inlet.

HMGP Projects

SJC would also like to use CDBG-DR funding to cover the match for other federal funding sources such as HMGP. The estimated match for HMGP is \$2.65M, which is 25% of \$10.6M Attachment #04 lists HMGP projects to reduce future losses in SJC. These are projects being ranked in consideration to apply for HMGP funding. Since HMGP is a competitive process, SJC is not yet sure which projects in the list will be funded, so the dollar amounts above are based on all projects \$33.5M.

Roadway(s)

The main road that serves as the daily travel corridor and is the primary evacuation and re-entry route for SJC is Coastal Highway, a.k.a., A1A. The northern portion of this roadway experienced dune loss, while Hurricane Matthew's floodwaters undermined the roadway's integrity along the southern portion. Maintaining the structural integrity and ensuring that this road is accessible prior to, during and following storm events is critical to the resiliency, economic stability and protection of natural resources endemic to SJC.

Infrastructure – Within LMI

Town of Hastings

An LMI area within SJC is the Town of Hastings (Tract 211.01, BG 2, 55.3% LMI) which has ongoing water and sewer needs, as they currently use their own outdated water and waste water treatment plants and have areas still using septic systems versus a being incorporated into the municipal system. During flood events the septic systems overflow and release raw sewage into the surrounding area(s). The estimated cost to bring the existing WTP and WWTP up to county standards, construct a pump station, and remedy systemic problems such as Infiltration and Inflow as well as connecting the unsewered areas to the county's system is \$15M.

West St. Augustine

Another LMI area within SJC is West St. Augustine, which contains the following census tracts and block groups: 211.03 BG1, 210.02 BG 2, and BG 1, 213.01 BG 2, 210.03 BG 1, and 203 BG1 and BG2, has its own water system but is on septic systems which are largely outdated, substandard to current codes, and degraded. During flood events the septic systems overflow and release raw sewage into the surrounding area(s). The water and sewer system would be connected to the county's infrastructure and lift station(s) and a force main to connect the two systems. The estimated cost to construct the lift station and connect the two systems is \$14.5M.

FEMA DR-4283

Category A - in accordance with Table 24 of the "State of Florida's Action Plan for Disaster Recovery Draft Posted for Public Comment April 7, 2017" SJC has 10 projects that total \$25.5M. The corresponding unmet need is \$6.3M.

Category B - in accordance with Table 24 of the "State of Florida's Action Plan for Disaster Recovery Draft Posted for Public Comment April 7, 2017", SJC has 16 projects that total \$12.3M. The corresponding unmet need is \$3.03

Category C to Category G - In accordance with Table 26 of the "State of Florida's Action Plan for Disaster Recovery Draft Posted for Public Comment April 7, 2017", SJC has projects that total \$134M. The corresponding unmet need is

Critical Infrastructure

SJC Fire Rescue Station #5, which is located at 200 St. Augustine South Drive, and Station #11, which is located at 448 Shores Blvd., are buildings that were originally designed for use by local communities as a base for volunteer fire services. The buildings were not intended for use 24 hours per day, 7 days per week, and they were not designed to withstand hurricane force winds. The personnel from Station #5 were relocated to Pedro Menendez High School and personnel from Station #11 were relocated to First Coastal Technical High School during Hurricane Matthew as the buildings were unsafe for use during the height of the storm. SJC FR acquired the buildings and their contents in 2001 to 2002. SJC is considering using CDBG- DR funding to construct a building that would combine the services of both stations to a single location. Estimated project cost is \$7.18M.

As shown in “Census Tract and Fire Station Service Zone” GIS figure (Attachment 04), Station #5 covers census tract 213.01 BG 2, in which 62.79% of the population is LMI and Station #11 covers census tract 212.06 BG 2, in which 51.2% of the population is LMI.

Additionally, Station #6, which services Crescent Beach, and Station #7, which services St. Augustine Beach, are both located within the flood zone. As such, during Hurricane Matthew personnel from these stations were relocated to stations outside of the flood zone. The respective relocations were First Coastal Technical High School and to Station #4.

Relocation of Station #7 during Hurricane Matthew impacted the LMI population of West St. Augustine as Station #7 provides back-up to Station #14, which services West St. Augustine. Back-up services provided includes residential response to structural fires and medical rescue response efforts as needed. Station #14 services part of tract 210.02, BG 2, which has an LMI of 51.32% (see also Census Tract and Fire Station Service Zone GIS figure, Attachment #05).

Ideally, SJC would like to replace the structures from which Station #6 and #7 currently operate by rebuilding more resilient structures on the same sites and providing optimal service from the improved and safer structures. This is the most cost effective and reasonable option as a land outside of the flood zone is unavailable. The cost to replace each building is estimated to be \$5M, or \$10M total.


ST. JOHNS COUNTY
ATTACHMENT B



(<http://www.usda.gov/>)

United States Department of Agriculture

(<http://www.usda.gov/>) **Farm Service Agency** (<http://www.fsa.usda.gov/>)



[\(\) MENU](#)

[Home \(/index\)](#) / [Newsroom \(/news-room/index\)](#) / [Emergency Designations](#)

USDA Designates 4 Counties in Florida as Primary Natural Disaster Areas

Release No. 0177.16

Latawnya Dia
202-720-7962

Latawnya.Dia@wdc.usda.gov (<mailto:Latawnya.Dia@wdc.usda.gov>)

WASHINGTON, Nov. 14, 2016 — The U.S. Department of Agriculture (USDA) has designated Flagler, Putnam, St. Johns and Volusia counties in Florida as primary natural disaster areas due to damage and losses caused by Hurricane Matthew that occurred from Oct. 6, 2016, through Oct. 8, 2016.

“Our hearts go out to those Florida farmers and ranchers affected by recent natural disasters,” said Agriculture Secretary Tom Vilsack. “President Obama and I are committed to ensuring that agriculture remains a bright spot in our nation’s economy by sustaining the successes of America’s farmers, ranchers, and rural communities through these difficult times. We’re also telling Florida producers that USDA stands with you and your communities when severe weather and natural disasters threaten to disrupt your livelihood.”

Farmers and ranchers in the following counties in **Florida** also qualify for natural disaster assistance because their counties are contiguous. Those counties are:

Alachua	Clay	Marion
Bradford	Duval	Orange
Brevard	Lake	Seminole

All counties listed above were designated natural disaster areas on Nov. 9, 2016, making all qualified farm operators in the designated areas eligible for low interest emergency (EM) loans from USDA’s Farm Service Agency (FSA), provided eligibility requirements are met. Farmers in eligible counties have eight months from the date of the declaration to apply for loans to help cover part of their actual losses. FSA will consider each loan application on its own merits, taking into account the extent of losses, security available and repayment ability. FSA has a variety of programs, in addition to the EM loan program, to help eligible farmers recover from adversity.

Other FSA programs that can provide assistance, but do not require a disaster declaration, include the Emergency Conservation Program (/Assets/USDA-FSA-Public/usdfiles/FactSheets/2015/ecp_2015.pdf); Livestock Forage Disaster Program (/Assets/USDA-FSA-Public/usdfiles/FactSheets/2016/2016_livestock_forage_disaster_program.pdf); Livestock Indemnity Program (/Assets/USDA-FSA-Public/usdfiles/FactSheets/archived-fact-sheets/lip_fact_sheet_2016.pdf); Emergency Assistance for Livestock, Honeybees, and Farm-Raised Fish Program (</Assets/USDA-FSA-Public/usdfiles/FactSheets/2016/ELAP%20Fact%20Sheet.pdf>); and the Tree Assistance Program (/Assets/USDA-FSA-Public/usdfiles/FactSheets/2015/tap_fact_sheet_oct_2015.pdf). Interested farmers may contact their local USDA Service Centers for further information on eligibility requirements and application procedures for these and other programs. Additional information is also available online at [http://disaster.fsa.usda.gov \(/programs-and-services/disaster-assistance-program/index\)](http://disaster.fsa.usda.gov (/programs-and-services/disaster-assistance-program/index))

FSA news releases are available on FSA’s website at www.fsa.usda.gov (/index) via the “Newsroom” link.

USDA is an equal opportunity lender, provider and employer.



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(<http://www.twitter.com/usdafsa>)



(<https://public.govdelivery.com/accounts/USFSA/subscriber/new/>)



(<http://dts.fsa.usda.gov/feeds/rss/USDA-FSA-Public/news-releases/?hostname=www.fsa.usda.gov>)

FSA Home (/index) USDA.gov (<http://www.usda.gov>) Common Questions (<http://askfsa.custhelp.com/>)
 Site Map (/help/site-map) USA.gov (<http://www.usa.gov>) White House (<http://www.whitehouse.gov>)
 FOIA (/news-room/efoia/index) Privacy Policy (/help/privacy-policy) Policies and Links (/help/policies-and-links)
 Accessibility Statement (/help/accessibility-statement) Nondiscrimination Statement (/help/nondiscrimination-statement)
 Information Quality (/help/information-quality)

ST. JOHNS COUNTY
ATTACHMENT C

1

October 12, 2016

**Preliminary Report on Crop Losses Due to Hurricane Matthew in St.
Johns County**

**Bonnie Wells, Commercial Agriculture Agent, UF/IFAS Extension St.
Johns County**

Hurricane Matthew caused major damage to crops in St. Johns County as it blasted its way up the east coast of Florida last Friday with damaging winds and an abundance of rainfall. More than 1000 acres of crops were impacted by the damaging winds and inundating rainfall in St. Johns County. Asian vegetables and snap beans were the most severely affected, along with cabbage, cauliflower, broccoli, squash, mustard greens, beets, sweet corn and sweet potatoes. Losses are estimated at least \$1.4 million for Asian vegetables and snap beans alone (Table 1). Structural damage to greenhouses and other farm structures resulted, and the soggy grounds have delayed planting of much of the area's fall crops. On average, St. Johns County farmers have reported 30 to 60% losses of their planted acreage (Table 1), while several have experienced a 100% or total loss for the crops they had in the ground before the storm. Preliminary reported numbers of acres that were lost are 860. However, the full impact will be known in time as damage assessments are ongoing. In addition to crop losses, producers are also facing costs involved with labor to clean up and replant damaged acres.

Table 1. Farms with planted acreage in St. Johns County before Hurricane Matthew: Reported crop acreages, estimated acreage losses, reported inputs, and calculated monetary losses

Farm	Acreage Planted	Percent Acreag	Crop	Reported Inputs	Losses/\$(dollars)
Sykes and Cooper Farms	75	100	Asian Vegetables	\$10,000/acre	\$750,000
	245	100	Asian Vegetables	\$1600/acre	\$392,000
Wells Bros Farms	10	100	Mixed Vegetables (cucurbits, beets, mustard greens, sweet	Unknown	Unknown
Picolata Farms	175	100	Snap Beans	\$1000/acre	\$175,000
Riverdale Farms	100	100	Snap Beans	\$1000/acre	\$100,000
Middleton Farms	15	100	Cabbage	Unknown	Unknown
Ricky Mitchell	175	100	Cabbage	Unknown	Unknown
Smith Farms	150	30-50%	Broccoli	Unknown	Unknown
Tater Farms	60	30-40%	Cauliflower	Unknown	Unknown
MK Farms (Korean)	60	1-2%	Napa Cabbage, Green	Unknown	Unknown
Cheshire Farm	20	100%	Napa Cabbage	Unknown	Unknown
Surveyed but had no damage/losses to report to date					
Blue Sky Farms	50	Unknown	Mixed vegetables,	Unknown	Unknown
Byrnes Farms (St. Johns land	0	0	-----	-----	0
Jeffrey Brubaker	10	0	Brussel Sprouts	0	0
Barnes Farm	200+	unknown	Cabbage	Unknown	Unknown
L and M (St. Johns land	0	0	-----	-----	0
Fresh Start Hydroponics	-----	0	Lettuce, herbs	-----	-----

*Other farms with possible acreage planted before the storm but no successful contact made to date: Spuds Farm, Larry Byrd Farms, Tater Farms (Hjort), Versaggi Farms, Yuan Farms, First Farms



Figure 1. Zucchini plants destroyed at Wells Bros Farm



Figure 2. Rotting pattypan squash at Wells Bros Farm



Figure 3. Rotting sweet potato at Wells Bros Farm (low incidence)

6



Figure 4. Damaged, trellised Asian Vegetables at Sykes and Cooper Farms. Inputs for trellised crops are \$10,000/acre



Figure 5. Damaged luffa fruit at Sykes and Cooper Farms



Figure 6. Damaged luffa fruit at Sykes and Cooper Farms



Figure 7. Damaged yard long bean trellises at Sykes and Cooper Farms



Figure 8. Rotting (Blackening) yard long bean at Sykes and Cooper Farms



Figure 9. Field alleys showing water markings and weathered soils at Sykes and Cooper Farms



Figure 10. Dirty and destroyed greens at Sykes and Cooper Farms

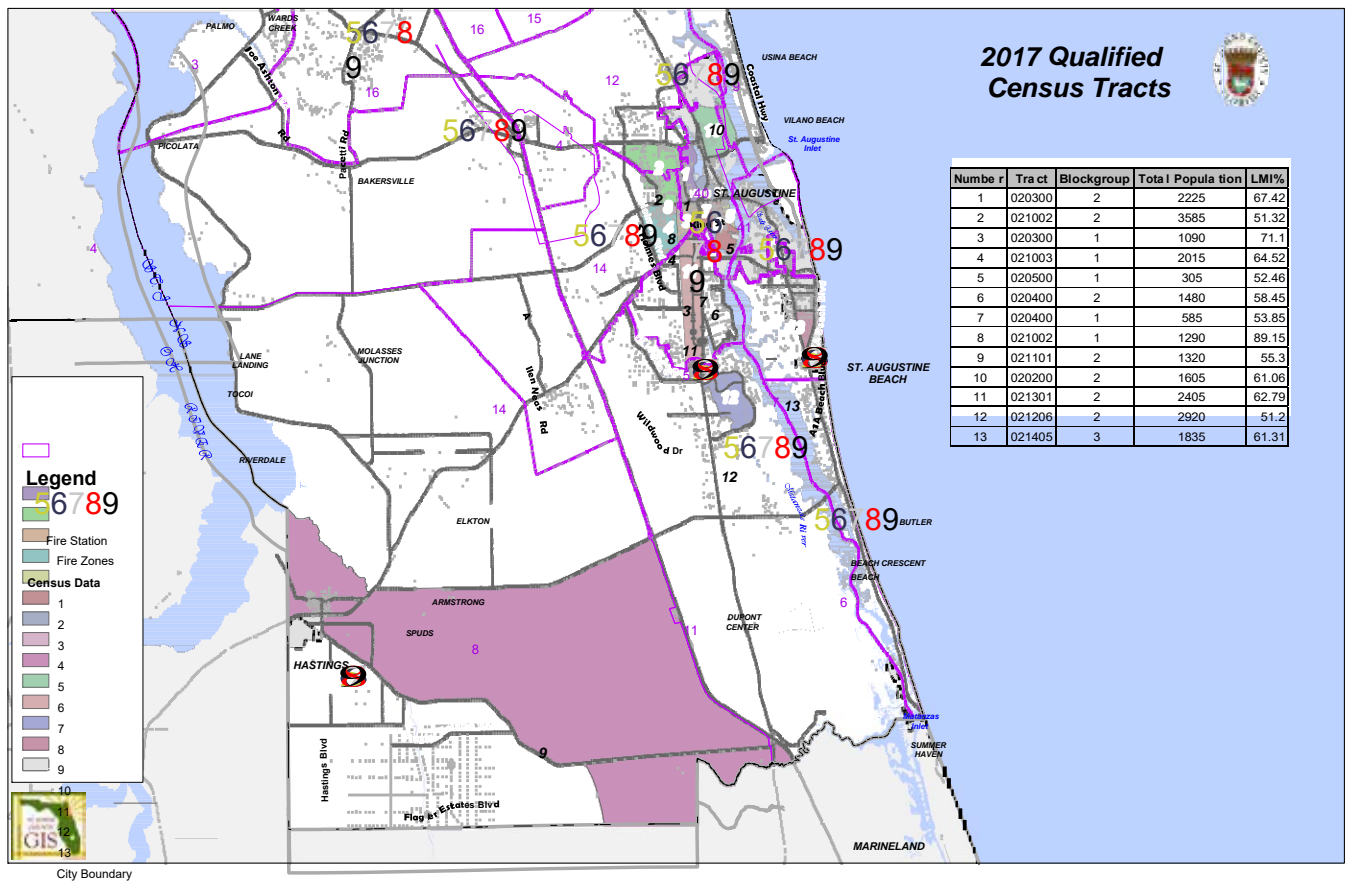


Figure 11. Destroyed daikon radish at Sykes and Cooper Farms (stems snapped at soil line)



Figure 12. Heavily damaged and dying snap beans at Picolata Farms

ST. JOHNS COUNTY ATTACHMENT D



**2017 Qualified
Census Tracts**



Number	Tract	Blockgroup	Total Population	LMI%
1	020300	2	2225	67.42
2	021002	2	3585	51.32
3	020300	1	1090	71.1
4	021003	1	2015	64.52
5	020500	1	305	52.46
6	020400	2	1480	58.45
7	020400	1	585	53.85
8	021002	1	1290	89.15
9	021101	2	1320	55.3
10	020200	2	1605	61.06
11	021301	2	2405	62.79
12	021206	2	2920	51.2
13	021405	3	1835	61.31

Legend

- 6789
- Fire Station
- Fire Zones

Census Data

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9

DISCLAIMER
This map is for reference use only. Data provided are derived from multiple sources with varying levels of accuracy. The St. Johns County GIS Division disclaims all responsibility for the accuracy or completeness of the data shown herein.
Map Prepared: 4/11/2017 J17238

FLAGLER COUNTY

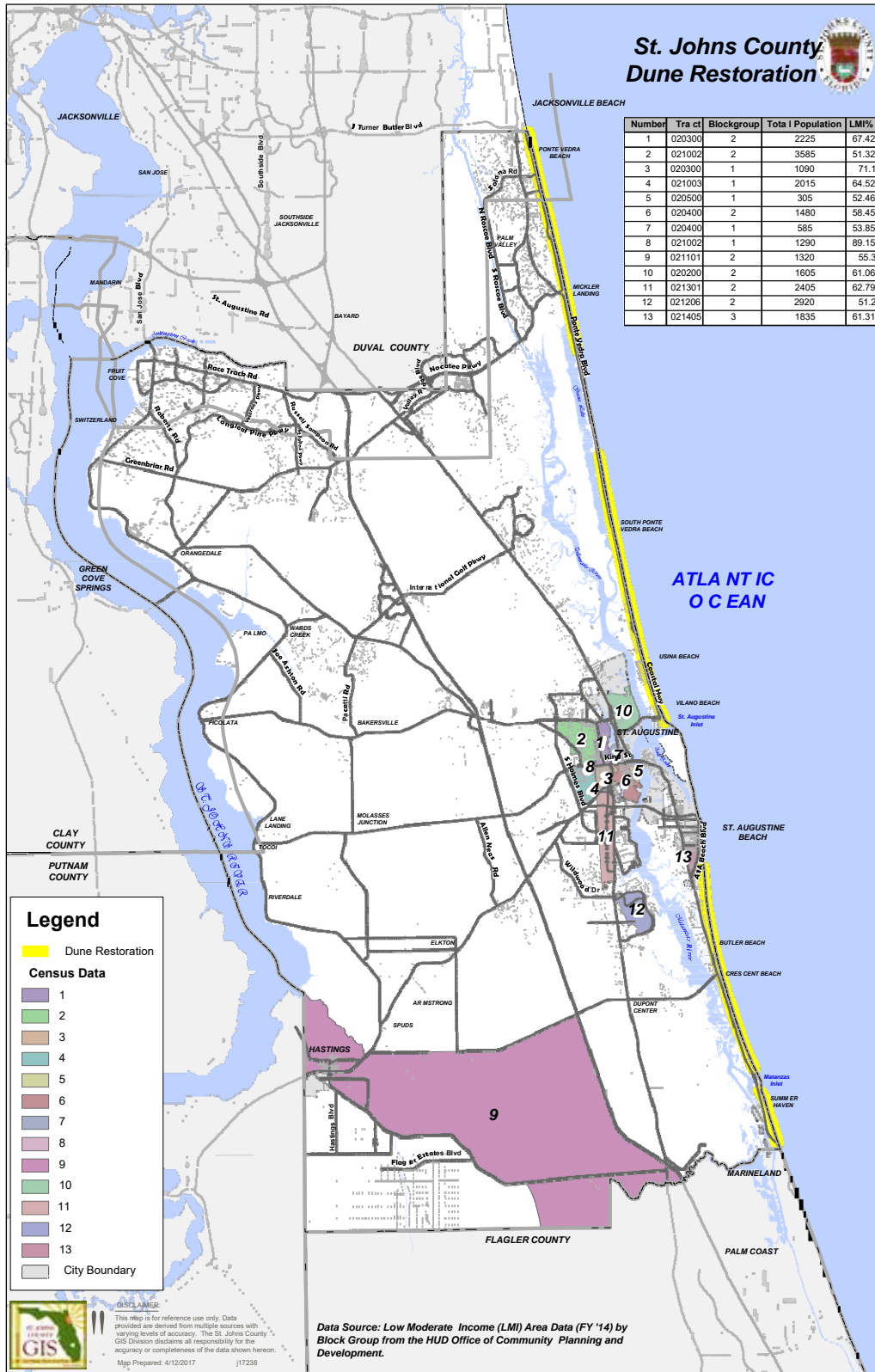
PALM COAST

Data Source: Low Moderate Income (LMI) Area Data (FY '14) by Block Group from the HUD Office of Community Planning and Development.

ST. JOHNS COUNTY
ATTACHMENT E

Hurricane Matthew HMGP Ranked Project List - 2017						
Project Rank	Score	Project	Jurisdiction	Hazard**	Cost	Running Total
1	76 (SA Priority)	Lake Maria Sanchez Flood Mitigation Project	City of St. Augustine	H, SS, F, SLR	\$6,500,000	\$6,500,000
2	74 (SAB Priority)	Master Stormwater Pump Station Improvements	City of St. Augustine Beach	H, SS, F, SLR	\$500,000	\$7,000,000
3	74 (ToH Priority)	Rehabilitation of Existing Sewer System in the Town of Hastings 3 Service Areas	Town of Hastings	F	\$371,000	\$7,371,000
4	68 (SJC Priority)	Manhole Lid Inserts - Infiltration & Inflow Prevention - St. Johns County Main System - Sewer Collection System	St. Johns County	H, SS, F	\$1,160,000	\$8,531,000
5	68 (SJSJ Priority)	Emergency Standby Generators at Primary Hurricane Shelters: Osceola Elem. School, Otis A. Mason Elem. School, Mill Creek Elem. School	St. Johns County	ALL	\$750,000	\$9,281,000
6	72	Upgrade Signalization at US1 @ County Road 210	St. Johns County	H, HW	\$500,000	\$9,781,000
7	72	Upgrade Signalization at US 1 @ Lewis Point Rd.	St. Johns County	H, HW	\$500,000	\$10,281,000
8	72	Upgrade Signalization at US 1 @ Shore Dr.	St. Johns County	H, HW	\$500,000	\$10,781,000
9	72	Increase Primary Stormwater Outfall Capacity	City of St. Augustine Beach	H, SS, F, SLR	\$350,000	\$11,131,000
10	70	Drainage Improvements at Old Moultrie Road	St. Johns County	F	\$750,000	\$11,881,000
11	70	Drainage Improvements at Kings Estate	St. Johns County	F	\$400,000	\$12,281,000
12	68	Manhole Lid Inserts - Infiltration & Inflow Prevention - Ponte Vedra System - Sewer Collection System	St. Johns County	H, SS, F	\$1,100,000	\$13,381,000
13	68	Install hurricane shutters and emergency standby generator at the St. Johns County Pet Center	St. Johns County	H, HW	\$125,000	\$13,506,000
Projects Below this line will be Tier 2 Funding						
14	66	Flood Mitigation Improvements on South Whitney and West King St.	City of St. Augustine/St. Johns County	H, SS, F, SLR	\$800,000	\$14,306,000
15	66	Drainage Improvements on Masters Drive	St. Johns County	F	\$150,000	\$14,456,000
16	66	Bartram Oaks Wastewater Treatment Plant Standby Generator	St. Johns County	H, HW, T, TR, D, FR	\$163,000	\$14,619,000
17	66	Drainage Improvements on Kings Road	St. Johns County	F	\$400,000	\$15,019,000
18	66	Fruit Cove Wastewater Treatment Plant Standby Generator	St. Johns County	H, HW, T, TR, D, FR	\$163,000	\$15,182,000
19	66	Drainage Improvements on International Golf Parkway	St. Johns County	F	\$2,030,000	\$17,212,000
20	66	Sawgrass Water Treatment Plant Standby Generator	St. Johns County	H, HW, T, TR, D, FR	\$310,800	\$17,522,800
21	66	Drainage Improvements at North Beach	St. Johns County	H, SS, F, SLR	\$2,000,000	\$19,522,800
22	66	South Ground Storage Tank & Pumping Facility Standby Generator	St. Johns County	H, HW, T, TR, D, FR	\$253,260	\$19,776,060
23	66	Shores Unit 2 Ground Storage Tank & Pumping Facility Standby Generator	St. Johns County	H, HW, T, TR, D, FR	\$212,160	\$19,988,220
Total					\$19,988,220	

ST. JOHNS COUNTY
ATTACHMENT F



ST. JOHNS COUNTY
ATTACHMENT G



St. Johns County Florida
Recommendation For Funding
To the
Department Economic Opportunity, Florida
For The Use Of
CDBG-Disaster Funds



General Subgrantee Information	2
Applicant Contact Information: Name: Address: Phone: Email: Fax: Dunn's Number: SAM CAGE Code Number:	
Subgrantee Consultant Information	
Applicant Contact Information: Name: Address: Phone: Email: Fax:	
Project	
General Project Description	
Tie to the Disaster (explain how this project has a direct or indirect tie to the disaster)	
National Objective (Explain how the project meets the required CDBG DR National Objective)	
<input type="checkbox"/> LMI If LMI, Describe the benefit area determination and attached backup documentation.	

<input type="checkbox"/> Urgent Need			
Race and Ethnicity			
Race and Ethnicity	Total Population	Percent	
White			
Black or African American			
American Indian/Alaskan Native			
Asian			
Hawaiian or other Pacific Islander			
Other			
Hispanic or Latino			
Eligible Activity (Explain how this project meets a CDBG eligible activity)			
Proposed Project Budget			
Cost by Activity	CDBG DR Funds	Other Funds	Status (and source) Other Funds
	\$	\$	
	\$	\$	
	\$	\$	
	\$	\$	
	\$	\$	
Total	\$	\$	
Attached Additional Back Up As Necessary			

3

ST. JOHNS COUNTY
ATTACHMENT H



St. Johns County Board of County Commissioners

Office of Management & Budget

April 20, 2017

Ms. Julie Dennis
State of Florida - Department of Economic Opportunity
Director of Community Development
107 East Madison St.
Tallahassee, FL 32399-4120

Dear Ms. Dennis,

Per the requirements for public comment on the State of Florida 2017 Action Plan for Community Development Block Grant Disaster Recovery (CDBG-DR) Program, attached are St. Johns County response. Additionally, St. Johns County would like to include "Attachment A", a document we provided at our Thursday, April 13, 2017 meeting. Within that document are data updates, as well as an overview of unmet needs St. Johns County has identified related to Hurricane Matthew.

St Johns County has several unmet needs projects eligible under this program, including housing needs and homelessness exacerbated from the storm events, as well as infrastructure both within and serving crucial LMI areas.

Once again, thank you for your time last week and explanation as to your approach with the CDBG-DR program.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jesse Dunn", is written over a circular stamp or seal.

Jesse Dunn
Director, Office of Management & Budget
St. Johns County Board of County Commissioners
(904) 209-0568
jdunn@sjcfl.us

St. Johns
County
Public Comments relative to the Department of
Economic Opportunity Action Plan for HUD
Allocation as listed in Federal Registers
Vol. 81, No. 224; Vol. 82, No. 11
Submission of Comments: April 19,
2017

St. Johns County respectfully submits the comments and questions below for consideration and inclusion to the State of Florida Department of Economic Opportunity Action Plan for Disaster Recovery Drafted for Public Comment April 7, 2017.

Comment 1

On page 88 of the State Action Plan it states;

“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.”

Question 1: If all projects that can benefit LMI have been funded and the 70% cannot be met, will the State consider a waiver to HUD to lower the LMI to 50.01%?

Comment 2

The State Action Plan says that the Minimum Award for a single project will be \$750,000.

Question 2: Is the \$750,000 the minimum amount that the State will provide any one sub-recipient or is that the minimum amount for a single project requested for funding. For example, if St. Johns County has a particular project that is consistent with the priorities of this allocation and benefits the LMI population but costs less than \$750,000, can the project be considered as a special request or coupled with other projects that are less than \$750,000 to meet the minimum dollar requirement?

Comment 3

On page 91 of the States Action Plan, it states:

“The county designated by HUD to be the Most Impacted and Distressed will be allocated 80 percent of Florida’s CDBG-DR Allocation from HUD. If more than one county is designated as being Most Impacted and Distressed, the 80 percent will be further allocated in equal portions to those determined by HUD to be designated counties.”

Question 3: With this data support, will DEO recommend the original direction stated in the applicable Federal Register by HUD be followed? In accordance to the Federal Register Volume 82, Number 11 dated January 18, 2017, St. Johns County was the only County listed as meeting HUD criteria as the most impacted county. This designation provided a specific set-aside for St. Johns County of \$46,881,600. While the State has received damage reports from many counties, at this time St. Johns County strongly supports moving forward as documented in the existing Federal Register. The County would not want the process to be slowed and recovery delayed by such a shift when data supports the original assessment as accurate in its intent. The County has projects that are shovel-ready to be moved forward as soon as the CDBG DR funds are made available to the County.

Comment 4

On page 101 of DEO's Action Plan, it discusses the eligibility of the reimbursement of pre-award costs in accordance to the Federal Regulation. It then further clarifies by stating: *"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."*

Question 4: Because St. Johns County has incurred costs to be ready to implement this program, will the DEO consider the addition of language to include "Florida's Department of Economic Opportunity (DEO) **and St. Johns County** incurred.....?"

Attachment A

Background:

St. Johns County CDBG Entitlement Community

St Johns County met eligibility requirements to become a HUD CDBG Entitlement Community in 2015 for fiscal year 2016. A February 16, 2016 letter from the US Department of Housing and Urban Development to St. Johns County, informed St. Johns County of their initial allocation to provide funding for housing, community and economic development activities, and assistance for low and moderate-income persons and special populations across the country. Within that letter, “HUD urges grantees to consider using CDBG funds, to the extent possible, to support investments in predevelopment activities for infrastructure and public facilities activities that can provide multiple benefits for communities.”

In keeping in line with the U.S. Department of Housing and Urban Development’s mission to create strong, sustainable, inclusive communities and quality affordable homes for all and ensuring national objectives are met, St. Johns County has set forth goals in the FY 2016-2020 Consolidated Plan. On August 2, 2016, the St. Johns County Board of County Commission approved, by Resolution 2016-239, the FY 2016-2017 Annual Action Plan to HUD on behalf of the County, identifying housing, homeless and low to moderate-income infrastructure as the priority needs:

The lack of affordable housing units contributes to the most prevalent housing problem faced by County residents - housing cost burden (paying more than 30% of income on housing costs). Of the 68,277 households in St. Johns County, 19% are cost burdened greater than 30%, paying 30-50% of income on housing costs. Sixteen percent (11,192) of county households experience severe cost burden by paying 50% or more of their income on housing costs. The housing cost burden affects the very low and low income households at a higher rate, placing them at risk of becoming homeless. The County will leverage CDBG funds with other state, federal, and local funds to address the lack of affordable housing issue by increasing the supply of affordable housing, by providing rental assistance to low income households, and by funding home repair programs to preserve affordable housing units.

The County will address homelessness by funding supportive services/programs and homeless facilities, and by providing rapid re-housing financial assistance for rents and utilities. The County plans to improve and expand public services and facilities predominately in areas of low income persons, specifically by improving water and sewer lines, streets and sidewalks. Economic development will be addressed by providing job training programs, afterschool programs, and childcare programs in low to moderate income areas.

Hurricane Matthew

Hurricane Matthew made its closest point approach to St. Johns County when the center of the eye was just 31 statute miles from Summer Haven at 2:00pm October 7, then began drifting east. A peak surge of 9.88 feet above normal was measured at a tide gauge near Fernandina Beach, in Nassau County on October 7th. Storm surge flooding affected the St. Augustine area, including major flooding on Anastasia Island where water was reported to be 3 to 4 feet above ground level. A new inlet was created on Summer Haven Island.

During Matthew more than 2 million people were ordered to evacuate in the United States, 1.5 million were from Florida, 148,500 from St. Johns County. Effective 6:00 a.m. on October 6th St. Johns County residents were ordered to evacuate “Evacuation Zone A, both on the Atlantic Coast and St. Johns River, Zone B, and all of the City of St. Augustine and Town of Hastings”. According to the 2013 Hurricane Evacuation Study this included 148,500 residents, with an operational clearance time of 14 hours.

There was major to extreme beach erosion along the coast including dune erosion as much as 30 to 40 feet by the wave action and onshore winds from Hurricane Matthew. This extreme erosion undermines numerous structures including roadways along the coastline. The erosion also caused major sand washout in Marineland, Summer Haven, Vilano Beach, and South Ponte Vedra Beach.

St. Johns County’s preliminary damage assessment for public assistance, as reported to FEMA on March 9, 2017, reflected approximately \$174.8 million as follows:

Table 1: St. Johns County Preliminary Damage Assessment

FEMA Category	Cost
Category A	\$19,065,000
Category B	3,615,000
Category C	26,200,000
Category D	3,650,000
Category E	98,850
Category F	1,180,671
Category G	121,010,000
TOTAL	\$174,819,521

CDBG-DR Allocation through Federal Register Vol. 82 No. 11

On Wednesday, January 18, 2017 HUD published Federal Register Vol. 82 No. 11, allocating \$1,805,976,000 of Community Development Block Grant Disaster Dollars which included \$58,602,000 for the State of Florida. Of those Florida allocations, \$46,881,600 (80%) is allocated to be used in St. Johns County.

CDBG-DR and St. Johns County’s Continued Unmet Needs

Consistent with the St. Johns County Adopted FY 2016-2017 Annual Action Plan, and in accordance with Federal Register Vol 81 No. 224 (November 21, 2016), St. Johns County will leverage CDBG-DR funds to respond to our prevalent issues of housing, homelessness, and identified low and moderate-income community infrastructure. In keeping in line with the U.S. Department of Housing and Urban Development’s mission to create strong, sustainable, inclusive communities and quality affordable homes for all and ensuring national objectives are met, St. Johns County has set forth goals in the FY 2016-2020 Consolidated Plan.

Data Clarification

St. Johns County (SJC) has reviewed the Florida Department of Economic Opportunity’s (DEO’s) webinar “Florida CDBG-DR Action Plan Disaster Recovery Stakeholder Session 2 – Impact and Unmet Needs Assessment”, which was originally presented on March 21, 2017. DEO then revised the presentation to include updated PA data on March 28, 2017 and shared this version with the county on March 31, 2017. SJC compared the information in these two presentations to data it has been collecting following Hurricane Matthew and is pleased to assist DEO with data dissemination by respectfully sharing the updated data regarding, as shown below in Table 1.

Table 1. DEO March 28, 2017 Webinar Data and SJC Collected Data

DEO Presentation Data Source(s)	DEO Data Slide# and Title	SJC Data
Slide 22 Impacts to Agri-business	No Agricultural Impact to SJC	Agricultural Declaration naming SJC as a “Primary Natural Disaster Area” issued 11-14-17; Estimated Damage \$1.4M*
		Ag Dec issued by USDA, No. 0177.16, UF/IFAS Extension SJC *the \$1.4M is damage to four farms, 7 are assessing their dollar amounts and 6 more have not yet been successfully contacted

SJC also compared the information in the “State of Florida’s Action Plan for Disaster Recovery Draft Posted for Public Comment April 7, 2017” to data it has been collecting following Hurricane Matthew respectfully shares updated data, along with the sources of that data, regarding emergency shelters and number of data for FEMA’s Individual Assistance Program for Hurricane Matthew as shown below in Table 2.

Table 2. DRAFT Action Plan April 7, 2017 Data and SJC Collected Data

DEO DRAFT Action Data 7, 2017 Page #, Table #	Data Source(s) Plan Data	DEO DRAFT Action April 7, 2017	SJC Plan April
33, Table 8	2 shelters in operation, 636 total sheltered, 87 max sheltered	Eight emergency shelters in operation from October 6, 2016 to 8:30 pm on October 9, 2016, 6:00am, 2,084 total sheltered plus 306 pets from Post Impact Shelter – Solomon Calhoun Shelter in operation from, 8pm October 9, 2016 to 8pm October 27, 2016, 125 sheltered	SJC EOC
37, Table 11	3,642 applications to IA program for Hermine and Matthew in SJC 17,740 # inspected for all counties for Hermine and Matthew	5,215 applications for SJC from Hurricane Matthew alone 22,276 # inspected for all declared Counties from Hurricane Matthew	FL DEM IA Branch Director, T. Hoover to SJC EOC FL DEM IA Branch Director, T. Hoover to SJC EOC

Section II— LMI DATA

The census tracts and block groups with LMI populations over 51% are shown below in Table 3 and in Attachments 01 and 02. The LMI data source is “Low Moderate Income (LMI) Area Data (FY '14) by Block Group from the HUD Office of Community Planning and Development”.

Table 3. SJC Census Tracts and Block Groups with greater than 51% LMI.

Census Tract#	Block Group	LMI %
202	2	61.06
203	1	71.1
203	2	67.42
204	1	53.85
204	2	58.45
205	1	52.46
210.02	1	89.15
210.02	2	51.32
210.03	2	64.52
211.01	2	55.30
212.06	2	51.20
212.13	2	62.79
214.05	3	61.31

Table 4 below provides a summary the estimated costs, FEMA or other funding amounts and the unmet need for Hurricane Matthew -related projects in the categories of housing, Economic Development and Infrastructure. The total unmet need in SJC is \$376M, with approximately \$289M or 78% of that being infrastructure projects.

Table 4 - St. Johns County Unmet Needs Table						
Category	Project Name	National Objective and Project Benefit Area	Direct impact from Hurricane Mathew	Estimated Total Cost(s)	FEMA or other funds	Unmet Need
Housing Projects	St. Francis House Replacement Facility	LMI	Construct new facility on site outside of flood zone to replace facility flooded by Hurricane Matthew	\$13,300,000	\$ -	\$13,300,000
	Housing Repair – mobile homes	LMI	Repair of 53 mobile homes damaged as a direct result of Hurricane Matthew.	\$3,000,000	\$ -	\$3,000,000
	Housing Repair - Single Family Homes (State Action Plan)	LMI	3187 # homes rec'd damage, approx.31% of SJC is LMI = 988 homes are LMI homes Past studies approx. \$60K of CDBG-DR funding was needed to bring home to HQS Stds	\$88,800,000	\$29,600,000	\$59,200,000
Economic Development	Agribusiness	UN	Agricultural Declaration naming SJC as a "Primary Natural Disaster Area" issued 11-14-17; 1.4M is damage to four farms, 7 are assessing their dollar amounts and 6 more have not yet been	\$5,000,000	\$ -	\$5,000,000

Infrastructure Projects	Roadway and Infrastructure Protection through Dune Restoration	LMI and UN	Protection of housing, business and roads, county wide. Average loss of about 10 cubic yards (cy) sand from the County line at Ponte Vedra south to the County line at Summer Haven due to Hurricane Matthew; approximately 32 miles of coastline. FEMA may provide up to 6 cubic yards (cy) of sand per ft. of shoreline. Replacement sand cost: \$40 to \$50 per cy, or about	\$80,000,000	\$48,000,000	\$32,000,000
	HMGP	LMI & UN	Use CDBG DR funds to cover the cost of HMGP Projects. If selected for funding from HMGP, the unmet need will be reduced. (see attached project list)	\$175,000,000	\$ -	\$175,000,000
	Repair of Coastal Highway (A1A)	UN	This road is the primary evacuation/ re-entry route for SJC is Coastal Highway, a.k.a., A1A which experienced dune loss along the northern portion and southern portion was undermined by floodwaters. Road must be accessible prior to, during & following storm events to ensure resiliency, economic stability and protect natural resources	\$24,000,000	\$18,000,000	\$3,000,000

Town of Hastings Sewer Lines	LMI (Tract 211.01, BG 2, 55.3%)	The town has ongoing water and sewer needs due to use of aging water and waste water treatment plants and septic systems vs. municipal sewer system. septic systems overflow and release raw sewage into the surrounding area(s) during flood events	\$15,000,000	\$ -	\$15,000,000
West St. Augustine Sewer Lines	LMI (Tract 211.03 BG1, 210.02 BG 2, and BG 1, 213.01 BG 2, 210.03 BG 1, and 203 BG1 and BG2)	Their water system would have to be connected to the County's water system at the same time the sewer system is hooked up as well. Ongoing water and sewer needs due to use of septic systems vs. municipal sewer system. septic systems overflow and release raw sewage into the surrounding area(s) during flood events	\$14,500,000	\$ -	\$14,500,000
Cat A	LMI and UN	FEMA Cat A in accordance w/ Table 24 of State of Florida's Action Plan for Disaster Recovery Draft	\$25,400,000	\$19,100,000	\$6,300,000
Cat B	LMI and UN	FEMA Cat B in accordance w/ Table 24 of State of Florida's Action Plan for Disaster Recovery Draft	\$12,120,000	\$9,090,000	\$3,030,000

	Cat C to Cat G	LMI and UN	FEMA Cat C to Cat G in accordance w/ Table 26 of State of Florida's Action Plan for Disaster Recovery Draft Posted for Public Comment April 7, 2017	\$133,500,000	\$100,000,000	\$33,500,000
	Fire House Construction	UN	Fire Station #5 and Station #11, were originally designed as a base for volunteer fire services. Buildings were not intended for use 24 hours per day, 7 days per week & not designed to withstand hurricane force winds. Personnel from both stations were relocated to local high schools as their regular location(s) were unsafe to inhabit. during the height of the storm.	\$7,180,000	\$ -	\$7,180,000
	Total St. Johns County Housing Unmet Need				20.4%	\$75,500,000
	Total St. Johns County Economic Development Unmet Need				1.4%	\$5,000,000
	Total St. Johns County Infrastructure Unmet Need				78.2%	\$289,510,000
	Totals			\$580,500,000	\$223,790,000	\$370,010,000

Housing

Homelessness

St. Francis House – 70 Washington Street, St. Augustine, FL 32084; the area of King Street, in West St. Augustine, comprises one of the primary Low to Moderate Income (LMI) areas within St. Johns County.

This three-building shelter serving the area's homeless population is being demolished as it was damaged by Hurricane Matthew's flood waters. The contents of the buildings, e.g., refrigerators, stoves, beds, contents of food pantry, copier, etc., were destroyed by the flood waters.

As the building was unable to be used, the county was faced with the challenge of moving and caring for the homeless population in the same emergency shelter that is planned to shelter/care for the general population. Point In Time (PIT) counts from January 2016 confirm that 112 people were in emergency shelters, 143 were transitional sheltered and 809 people were unsheltered. January 2017 PIT data is in process but is anticipated to be similar to the 2016 PIT data.

Immediately following the storm the shelter accrued a few thousand in payroll expenses trying to staff two locations to serve the homeless population. The shelter also paid for hotel stays for a number of singles and families for three weeks.

Staff have been working outside in the courtyard since October 2016 due to the damage to the office spaces. The shelter is not expected to return to full operations until spring of 2018.

The SJC Continuum of Care (CoC) director applied for and was awarded \$200,000 in Emergency Shelter Grants (ESG) funds that can be used to help shelter the homeless population. Because the time between the identified need and contact with the potential applicants and the receipt of funding, the population has disbursed back into the county at large. An NPO has design plans to construct a new campus on a piece of county-owned land located outside of the flood zone, on Route 207 in St. Augustine.

The main building, i.e., the Unified Service Center, would have a cafeteria and would be used for respite beds/shelter in case of another emergency; estimated cost \$1.2M. Behind the main building, approximately 40 to 60 units of mix use of Extremely Low Income (ELI) Housing and Permanent Supportive Housing would be constructed; estimated cost \$12M.

The project has continually experienced funding challenges. Allocating CDBG-DR funds to this project would enable the construction and design to include resiliency measures such as on-site generators, widows and roofing designed to withstand hurricane force winds, and space set aside to emergency shelter in-place versus moving the population during future storm events.

Per the information on page 39692, paragraph 7 of the June 17, 2016 Federal Register (No. 117, Vol. 81), CDBG-DR funding can be used to reconstruct a homeless shelter:

“each grantee must include a description of how it will identify and address rehabilitation and reconstruction of the following types of housing affected by the disaster: Public housing, HUD-

assisted housing McKinney-Vento Homeless Assistance Act-funded shelters and housing for homeless-including emergency shelters and transitional and permanent housing for homeless...”

Housing Repair

Additionally, Housing Partnership has received calls from 53 mobile home households seeking assistance since Hurricane Matthew. These requests are all from Low, Very Low, or Extremely Low income households. The estimated cost to repair or replace these mobile homes is estimated to be \$60, 000 each and \$3.0M total.

SJC has 3,187 single family homes directly damaged by Hurricane Matthew. Per the “Low Moderate Income (LMI) Area Data (FY '14) by Block Group from the HUD Office of Community Planning and Development”, approximately 31% of SJC is LMI; that equals 988 LMI homes. Studies from past disasters indicate that approx. \$60K of CDBG-DR funding was needed to bring homes to Housing Quality Standards (HQS) Standards. Total estimate is \$88.8M, with 75% or \$29.6 covered by FEMA and \$59.2M in unmet needs.

Economic Development

Agribusiness: The USDA issued an agricultural declaration on November 14, 2016 naming SJC as a “Primary Natural Disaster Area” (Attachment #01). In a report, dated October 12, 2016, provided by UF/IFAS Extension St. Johns County (Attachment #02), 17 farms had crop damage as a result of Hurricane Matthew. As of the date of the report, four farms had reported \$1.4M in damage, 7 were assessing their dollar amounts and 6 more had not yet been successfully contacted.

Infrastructure - Serving LMI

1. HMGP Projects

SJC would also like to use CDBG-DR funding to cover the match for other federal funding sources such as HMGP. The estimated match for HMGP is \$2.65M, which is 25% of

\$10.6M Attachment #04 lists HMGP projects to reduce future losses in SJC. These are projects being ranked in consideration to apply for HMGP funding. Since HMGP is a competitive process, SJC is not yet sure which projects in the list will be funded, so the dollar amounts above are based on all projects \$33.5M.

2. Roadway(s)

The main road that serves as the daily travel corridor and is the primary evacuation and re- entry route for SJC is Coastal Highway, a.k.a., A1A. The northern portion of this roadway experienced dune loss, while Hurricane Matthew’s floodwaters undermined the roadway’s integrity along the southern portion. Maintaining the structural integrity and ensuring that this road is accessible prior to, during and following storm events is critical to the resiliency, economic stability and protection of natural resources endemic to SJC.

3. Public Safety Operations

St. Johns County has numerous public safety operations serving LMI communities that were comprised, necessitating evacuation and routing operations from other areas that may not optimally serve the County. St. Johns County has to consider rebuilding or building resiliency into these facilities to ensure proper coverage. Fire Stations 5, 6, and 11 were relocated to other facilities during and after that storm.

4. Roadway and Infrastructure Protection Through Dune Restoration

The dune system is the primary measure of protection for the residences, businesses, and roads of the entire county from storm surge.

Data collected by SJC shows an average loss of about 10 cubic yards (cy) sand from the County line at Ponte Vedra south to the County line at Summer Haven; approximately 42 miles of coastline. FEMA's regulations allow for the county to be reimbursed for up to 6 cubic yards (cy) of sand per foot of shoreline. Therefore, the unmet need to which CDBG-DR funding would be applied is 4 cy/ft of sand. Note: the 42 miles includes: 1) the 2.5-mile beach that is part of a federally funded restoration project, and 2) park land. Removing such lands leaves about 32 miles of shoreline where the additional 4 cy/ft of sand can be placed. The dollar amount of the replacement sand to be purchased using CDBG-DR funding, i.e., 4 cy/ft, ranges from \$40 to \$50 per cy, or about \$25 to \$32M. The range of the dune restoration project and its proximity to the 13 block groups that populations over 51% are shown in GIS Figure St. Johns County Dune Restoration contain LMI (Attachment #03). The dune restoration funded using CDBG-DR monies would not duplicate efforts currently under USACE scope, e.g., St. Augustine Inlet.

Infrastructure – Within LMI

1. Town of Hastings

An LMI area within SJC is the Town of Hastings (Tract 211.01, BG 2, 55.3% LMI) which has ongoing water and sewer needs, as they currently use their own outdated water and waste water treatment plants and have areas still using septic systems versus a being incorporated into the municipal system. During flood events the septic systems overflow and release raw sewage into the surrounding area(s).

2. West St. Augustine

Another LMI area within SJC is West St. Augustine, which contains the following census tracts and block groups: 211.03 BG1, 210.02 BG 2, and BG 1, 213.01 BG 2, 210.03 BG 1, and 203 BG1 and BG2, has its own water system but is on septic systems which are largely outdated, substandard to current codes, and degraded. The water and sewer system would be connected to the county's infrastructure and lift station(s) and a force main to connect the two systems.

CITY OF ST. AUGUSTINE
ATTACHMENT I



CITY OF ST. AUGUSTINE
CAPITAL IMPROVEMENT PLAN
FY 2017 - 2021



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**CITY OF ST. AUGUSTINE
FY 2017 - 2021
CAPITAL IMPROVEMENT PROJECT REQUEST FORM**

PROJECT SUMMARY			DESCRIPTION AND JUSTIFICATION		
Project Category:	Transportation		(Project # KSDJ) Multi-facet project partnering with FDOT drainage project. Utility relocations in conflict with the drainage. Project limits from Malaga Street to Avenida Menendez. Project includes undergrounding overhead electric, new street lights (assessment) and various street scape improvements, crosswalks, and connection to City drainage system at Cordova Street. (#3 priority project from stormwater master plan. Designs funded via UWHC agreement with FDOT. No funding source identified yet for undergrounding electric and streetlighting, assuming partial assessment.		
Department:	Public Works				
Project Title:	King Street Drainage (KSDJ)				
Fiscal Year of CIP Request:	2020				
Requested Project Start/Completion:	5/1/2014	9/30/2020			
Funded Project Start/Completion:	5/1/2014	9/30/2020			
State Grant Funds:					
Federal Grant Funds:					
Other Grant Funds:					
Current CIP Ranking:					
Location:	King Street				
ANNUAL IMPACT ON OPERATING BUDGET			PROJECT COSTS		
Are Operating Impacts Anticipated?	Yes			Original	Current
If Yes, Complete Information Below			Planning & Design	\$170,290	\$170,290
Fund That Will Be Impacted	General		Land		
Revenue Generated From Project			Buildings		
Additional FTE's Needed for the Project			Building Improvements		
Salaries and Benefits for Additional FTEs			Improvements o/t Buildings	\$2,888,558	\$3,017,391
Additional/(Decreased) Operating Expenses	\$5,000		Equipment		
Debt Service (Principal and Interest)			Contingency	\$13,833	\$15,000
Fiscal Year the Impacts are Anticipated to Begin	2019/2020		TOTAL	\$3,072,681	\$3,202,681

* Note: If Other Funding is used please indicate the intended funding sources in the Description and Justification section of this form.

FISCAL YEAR	GENERAL FUND	UTILITY FUND	STORMWATER FUND	SOLIDWASTE FUND	MARINA FUND	V.I.C. FUND	GRANTS/ CONTRIBUTIONS	DEBT PROCEEDS	OTHER*	TOTAL
Previous Years	\$26,519	\$130,000								\$156,519
2016										\$0
2017										\$0
2018										\$0
2019	\$679,000									\$679,000
2020	\$809,514	\$1,300,000	\$257,648							\$2,367,162
2021										\$0
Total	\$1,515,033	\$1,430,000	\$257,648	\$0	\$0	\$0	\$0	\$0	\$0	\$3,202,681

**CITY OF ST. AUGUSTINE
FY 2017 - 2021
CAPITAL IMPROVEMENT PROJECT REQUEST FORM**

PROJECT SUMMARY		DESCRIPTION AND JUSTIFICATION	
Project Category:	Water Distribution	Construct new subaqueous crossing under the San Sebastian along King Street. FDOT plans to reconstruct bridge in future and existing watermain is co-located on side of the bridge. Pipeline replacement is necessary to replace aging infrastructure plus locate pipeline so relocation will not be required. Junior Loan #2 SRF in 2020	
Department:	Public Works		
Project Title:	King St. 16-inch SubAqueous		
Fiscal Year of CIP Request:	2019/2020		
Requested Project Start/Completion:	10/1/2019 9/30/2021		
Funded Project Start/Completion:	10/1/2019 9/30/2021		
State Grant Funds:			
Federal Grant Funds:			
Other Grant Funds:			
Current CIP Ranking:			
Location:	King St/San Sebastian		
ANNUAL IMPACT ON OPERATING BUDGET		PROJECT COSTS	
Are Operating Impacts Anticipated?	No		Original Current
If Yes, Complete Information Below		Planning & Design	\$40,000 \$40,000
Fund That Will Be Impacted		Land	
Revenue Generated From Project		Buildings	
Additional FTE's Needed for the Project		Building Improvements	
Salaries and Benefits for Additional FTEs		Improvements o/t Buildings	\$560,000 \$560,000
Additional/(Decreased) Operating Expenses		Equipment	
Debt Service (Principal and Interest)		Contingency	
Fiscal Year the Impacts are Anticipated to Begin		TOTAL	\$600,000 \$600,000

* Note: If Other Funding is used please indicate the intended funding sources in the Description and Justification section of this form.

FISCAL YEAR	GENERAL FUND	UTILITY FUND	STORMWATER FUND	SOLIDWASTE FUND	MARINA FUND	V.I.C. FUND	GRANTS/ CONTRIBUTIONS	DEBT PROCEEDS	OTHER*	TOTAL
Previous Years										\$0
2016										\$0
2017										\$0
2018										\$0
2019										\$0
2020		\$600,000								\$600,000
2021										\$0
Total	\$0	\$600,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$600,000

**CITY OF ST. AUGUSTINE
FY 2017 - 2021
CAPITAL IMPROVEMENT PROJECT REQUEST FORM**

PROJECT SUMMARY		DESCRIPTION AND JUSTIFICATION	
Project Category:	Sewer Collection	Commitment to West Augustine for Sewer projects \$250,000 annual. City and CRA Steering Committee to work together to establish priorities. FY 15/16 and FY 16/17 are combined with W. King Street sewer improvements for a combined \$250,000.	
Department:	Public Works		
Project Title:	W. Augustine Sewer		
Fiscal Year of CIP Request:	2014/2015		
Requested Project Start/Completion:	10/1/2014 9/30/2022		
Funded Project Start/Completion:	10/1/2014 9/30/2022		
State Grant Funds:			
Federal Grant Funds:			
Other Grant Funds:			
Current CIP Ranking:			
Location:	Various		
ANNUAL IMPACT ON OPERATING BUDGET		PROJECT COSTS	
Are Operating Impacts Anticipated?	No		Original Current
If Yes, Complete Information Below		Planning & Design	
Fund That Will Be Impacted		Land	
Revenue Generated From Project		Buildings	
Additional FTE's Needed for the Project		Building Improvements	
Salaries and Benefits for Additional FTEs		Improvements o/t Buildings	\$775,000 \$1,275,000
Additional/(Decreased) Operating Expenses		Equipment	
Debt Service (Principal and Interest)		Contingency	
Fiscal Year the Impacts are Anticipated to Begin		TOTAL	\$775,000 \$1,275,000

* Note: If Other Funding is used please indicate the intended funding sources in the Description and Justification section of this form.

FISCAL YEAR	GENERAL FUND	UTILITY FUND	STORMWATER FUND	SOLIDWASTE FUND	MARINA FUND	V.I.C. FUND	GRANTS/ CONTRIBUTIONS	DEBT PROCEEDS	OTHER*	TOTAL
Previous Years		\$12,500								\$12,500
2016		\$12,500								\$12,500
2017		\$250,000								\$250,000
2018		\$250,000								\$250,000
2019		\$250,000								\$250,000
2020		\$250,000								\$250,000
2021		\$250,000								\$250,000
Total	\$0	\$1,275,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,275,000

**CITY OF ST. AUGUSTINE
FY 2017 - 2021
CAPITAL IMPROVEMENT PROJECT REQUEST FORM**

PROJECT SUMMARY		DESCRIPTION AND JUSTIFICATION	
Project Category:	Stormwater Collection System	This project is the #3 priority capital project from the Stormwater Master Plan 2014. Includes stormwater improvements to Lake Maria Sanchez and within the Maria Sanchez stormwater basin. Includes reconstruction of the storm collection system, and extending storm collection from King Street, north on Cordova to Carrera. Plan is to re-route collection from three downtown area basins to the King Street outfall. This will improve Cordova drainage, as well as remove load from the downtown historic district system. Project planning to begin in 2017. Delay start to follow vulnerability assessment. Need to compute water and sewer budget impacts.	
Department:	Public Works		
Project Title:	Downtown Drainage Imp.		
Fiscal Year of CIP Request:	2016/2017		
Requested Project Start/Completion:	10/1/2016 9/30/2019		
Funded Project Start/Completion:	10/1/2016 9/30/2019		
State Grant Funds:			
Federal Grant Funds:			
Other Grant Funds:			
Current CIP Ranking:			
Location:	Downtown		
ANNUAL IMPACT ON OPERATING BUDGET		PROJECT COSTS	
Are Operating Impacts Anticipated?	Yes		Original
If Yes, Complete Information Below		Planning & Design	\$525,000
Fund That Will Be Impacted	Stormwater	Land	\$525,000
Revenue Generated From Project		Buildings	
Additional FTE's Needed for the Project		Building Improvements	
Salaries and Benefits for Additional FTEs		Improvements o/t Buildings	\$4,000,000
Additional/(Decreased) Operating Expenses	TBD	Equipment	\$3,950,000
Debt Service (Principal and Interest)		Contingency	EDIT
Fiscal Year the Impacts are Anticipated to Begin	2016/2017	TOTAL	\$4,525,000
			\$4,475,081

* Note: If Other Funding is used please indicate the intended funding sources in the Description and Justification section of this form.

FISCAL YEAR	GENERAL FUND	UTILITY FUND	STORMWATER FUND	SOLIDWASTE FUND	MARINA FUND	V.I.C. FUND	GRANTS/ CONTRIBUTIONS	DEBT PROCEEDS	OTHER*	TOTAL
Previous Years										\$0
2016										\$0
2017			\$75,000							\$75,000
2018			\$400,000							\$400,000
2019			\$4,000,000							\$4,000,000
2020										\$0
2021										\$0
Total	\$0	\$0	\$4,475,000	\$0	\$0	\$0	\$0	\$0	\$0	\$4,475,000

**CITY OF ST. AUGUSTINE
FY 2017 - 2021
CAPITAL IMPROVEMENT PROJECT REQUEST FORM**

PROJECT SUMMARY		DESCRIPTION AND JUSTIFICATION	
Project Category:	Stormwater Collection System	Retrofit outfalls with backflow prevention valves to prevent tidal flooding.	
Department:	Public Works		
Project Title:	Davis Shores Backflow Prev.		
Fiscal Year of CIP Request:	2016/2017		
Requested Project Start/Completion:	10/1/2017 9/30/2019		
Funded Project Start/Completion:	10/2/2017 9/30/2019		
State Grant Funds:			
Federal Grant Funds:			
Other Grant Funds:			
Current CIP Ranking:			
Location:	Davis Shores		
ANNUAL IMPACT ON OPERATING BUDGET		PROJECT COSTS	
Are Operating Impacts Anticipated?	No		Original Current
If Yes, Complete Information Below		Planning & Design	\$100,000 \$100,000
Fund That Will Be Impacted		Land	
Revenue Generated From Project		Buildings	
Additional FTE's Needed for the Project		Building Improvements	
Salaries and Benefits for Additional FTEs		Improvements o/t Buildings	\$580,000 \$580,000
Additional/(Decreased) Operating Expenses		Equipment	
Debt Service (Principal and Interest)		Contingency	
Fiscal Year the Impacts are Anticipated to Begin		TOTAL	\$680,000 \$680,000

*** Note: If Other Funding is used please indicate the intended funding sources in the Description and Justification section of this form.**

FISCAL YEAR	GENERAL FUND	UTILITY FUND	STORMWATER FUND	SOLIDWASTE FUND	MARINA FUND	V.I.C. FUND	GRANTS/ CONTRIBUTIONS	DEBT PROCEEDS	OTHER*	TOTAL
Previous Years										\$0
2016										\$0
2017			\$100,000							\$100,000
2018			\$280,000							\$280,000
2019			\$300,000							\$300,000
2020										\$0
2021										\$0
Total	\$0	\$0	\$680,000	\$0	\$0	\$0	\$0	\$0	\$0	\$680,000

**CITY OF ST. AUGUSTINE
FY 2017 - 2021
CAPITAL IMPROVEMENT PROJECT REQUEST FORM**

PROJECT SUMMARY		DESCRIPTION AND JUSTIFICATION	
Project Category:	Stormwater Collection System	This project is for annual neighborhood drainage improvements program as identified in 2012 Stormwater Master Plan. Project is on-going. Projecting \$200,000 per year for small drainage improvements in residential neighborhoods. Some examples are: - Alerto/Davis Shore Improvements - Helen Street Improvements - Atlantic/Althea Drainage Improvements - Isla Drive Improvements FROM 2022 - 2027 THERE IS ANOTHER \$1,200,000 (\$200,000 EACH YEAR) THAT THIS FORM DOES NOT ACCOUNT FOR.	
Department:	Public Works		
Project Title:	Neighborhood Drainage Imp		
Fiscal Year of CIP Request:	2013/2014		
Requested Project Start/Completion:	10/1/2013 9/30/2021		
Funded Project Start/Completion:	10/1/2013 9/30/2021		
State Grant Funds:			
Federal Grant Funds:			
Other Grant Funds:			
Current CIP Ranking:			
Location:	Various		
ANNUAL IMPACT ON OPERATING BUDGET		PROJECT COSTS	
Are Operating Impacts Anticipated?	No		Original Current
If Yes, Complete Information Below		Planning & Design	\$102,500 \$102,500
Fund That Will Be Impacted		Land	
Revenue Generated From Project		Buildings	
Additional FTE's Needed for the Project		Building Improvements	
Salaries and Benefits for Additional FTEs		Improvements o/t Buildings	\$922,500 \$1,012,500
Additional/(Decreased) Operating Expenses		Equipment	
Debt Service (Principal and Interest)		Contingency	
Fiscal Year the Impacts are Anticipated to Begin		TOTAL	\$1,025,000 \$1,115,000

* Note: If Other Funding is used please indicate the intended funding sources in the Description and Justification section of this form.

FISCAL YEAR	GENERAL FUND	UTILITY FUND	STORMWATER FUND	SOLIDWASTE FUND	MARINA FUND	V.I.C. FUND	GRANTS/ CONTRIBUTIONS	DEBT PROCEEDS	OTHER*	TOTAL
Previous Years			\$225,000							\$225,000
2016			\$200,000							\$200,000
2017										\$0
2018										\$0
2019		\$30,000	\$200,000							\$230,000
2020		\$30,000	\$200,000							\$230,000
2021		\$30,000	\$200,000							\$230,000
Total	\$0	\$90,000	\$1,025,000	\$0	\$0	\$0	\$0	\$0	\$0	\$1,115,000

PASCO COUNTY
ATTACHMENT J

What do these grants funds pay for?

- All funded activities must meet one of the three HUD National Objective:
 - Benefit persons of low and moderate income (LMI)
 - Aid in the prevention or elimination of slums or blight
 - Meet other urgent community development needs because of serious or immediate threat

*70% of these \$58.6 million must benefit LMI persons *

FOR FURTHER INFORMATION CONTACT: Stanley Gimont, Director, Office of Block Grant Assistance, Department of Housing and Urban Development, 451 7th Street SW., Room 7286, Washington, DC 20410, telephone number 202-708-3587. Persons with hearing or speech impairments may access this number via TTY by calling the Federal Relay Service at 800-877-8339. Facsimile inquiries may be sent to Mr. Gimont at 202-401-2044. (Except for the "800" number, these telephone numbers are not toll-free.) Email inquiries may be sent to: disaster_recovery@hud.gov.

SUPPLEMENTARY INFORMATION:

Table of Contents

- I. Allocations
- II. Use of Funds
- III. Grant Amendment Process
- IV. Applicable Rules, Statutes, Waivers, and Alternative Requirements
- V. Duration of Funding
- VI. Catalog of Federal Domestic Assistance
- VII. Finding of No Significant Impact
- Appendix A: Allocation Methodology

I. Allocations

Section 101 of the Further Continuing and Security Assistance Appropriations Act, 2017 (division A of Pub. L. 114-

254, approved December 10, 2016) amended the Continuing Appropriations Act, 2017 (division C of Pub. L. 114-223) by adding a new section 192 that makes available \$1,808,976,000 in Community Development Block Grant (CDBG) funds for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 *et seq.*) related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas resulting from a major disaster declared in 2016 and occurring prior to December 10, 2016. Qualifying major disasters are declared by the President pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 *et seq.*) (Stafford Act). The following allocations of funds appropriated by section 192 are in addition to the \$500 million appropriated by section 145(a) and allocated in the Prior Notice. Section 192 specifies that these additional funds are subject to the same authority and conditions as those in section 145(a),

except the major disaster must have occurred prior to December 10, 2016.

Section 145(a) provides that grants shall be awarded directly to a State or unit of general local government at the discretion of the Secretary. The Secretary has elected to award funds only to States in this notice. Unless noted otherwise, the term "grantee" refers to the State receiving an award from HUD under this notice. To comply with the statutory requirement that funds be used for disaster-related expenses in the most impacted and distressed areas, HUD allocates funds using the best available data that cover all of the eligible affected areas.

Section 192(b) permits HUD to use up to \$3,000,000 of the appropriated amount for necessary costs, including information technology costs, of administering and overseeing the obligation and expenditure of amounts made available by sections 145(a) and 192. The Department is deducting the full \$3,000,000, resulting in a total of \$1,805,976,000 available for allocation.

Based on further review of the impacts from the eligible disasters, and estimates of unmet need, HUD is making the following allocations:

TABLE 1—ALLOCATIONS UNDER PUBLIC LAW 114-245

Disaster No.	Grantee	Allocation	Minimum amount that must be expended for recovery in the HUD-identified "most impacted and distressed" areas
4263, 4277	State of Louisiana	\$1,219,172,000	(\$975,337,600) East Baton Rouge, Livingston, Ascension, Tangipahoa, Ouachita, Lafayette, Vermilion, Acadia, Washington, and St. Tammany Parishes.
4266, 4269, 4272	State of Texas	177,064,000	(\$141,651,200) Harris, Newton, Montgomery, Fort Bend, and Brazoria Counties.
4273	State of West Virginia	87,280,000	(\$69,824,000) Kanawha and Greenbrier Counties.
4285	State of North Carolina	198,553,000	(\$158,842,400) Robeson, Cumberland, Edgecombe, and Wayne Counties.
4286	State of South Carolina	65,305,000	(\$52,244,000) Marion County.
4280, 4283	State of Florida	58,602,000	(\$46,881,600) St. Johns County.
Total		1,805,976,000	

Use of funds for all grantees is limited to unmet recovery needs from the major disasters identified in Table 1. Please note that in addition to the FEMA disaster numbers listed in the Prior Notice for the State of Texas, the State may also expend its allocation of funds from the Prior Notice on FEMA disaster number DR-4272.

Table 1 also shows the HUD-identified "most impacted and distressed" areas impacted by the disasters. At least 80 percent of the total funds provided to each State under this notice must address unmet needs within the HUD-identified "most impacted and distressed" areas, as identified in the last column in Table 1. For grantees that received an allocation under the Prior

Notice, 80 percent of both allocations may be used to address unmet needs within the HUD-identified "most impacted and distressed" areas that are identified in Table 1 of this notice. Grantees may determine where the remaining 20 percent may be spent by identifying areas it determines to be "most impacted and distressed." A detailed explanation of HUD's allocation methodology is provided at Appendix A.

II. Use of Funds

Funds allocated under this notice and funds allocated pursuant to the Prior Notice are subject to the requirements of the Prior Notice, including the provisions of the Prior Notice as

amended herein. As a reminder, section 145(a) requires that prior to the obligation of CDBG-DR funds, a grantee shall submit a plan to HUD for approval 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. This action plan for disaster recovery must describe uses and activities that: (1) Are authorized under title I of the Housing and Community Development Act of 1974 (HCD Act) or allowed by a waiver or alternative requirement (see section IV., below); and (2) respond to disaster-

General Action Plan Requirements

1. Unmet Needs Assessment

Introduction

This unmet needs assessment covers Florida's housing, infrastructure, and business damage and recovery efforts for both Hurricane Hermine (September 2016) and Hurricane Matthew (October 2016).

In September 2016 and October 2016, Florida was impacted by two hurricanes, resulting in storm surge and high winds. Hurricane Hermine made landfall along the Big Bend area of the state. Hurricane Matthew traveled up the entire eastern coastline, eventually making landfall about 30 miles north of Charleston, South Carolina. Matthew's proximity to the coast of the United States is historic in that it is the only storm within the recent period of record to skirt the entire southeastern seaboard requiring evacuations in Florida, Georgia, and South Carolina. More than 2.5 million people across these three states were asked to evacuate, making Matthew the second largest mass evacuation in U.S. history.¹ Fortunately, Florida was well rehearsed for a massive hurricane evacuation and most people were able to get out of harm's way. Although many lives were spared because of proper planning and execution of hurricane plans, the state still saw large storm surge and high winds, which caused damage to infrastructure, homes, and businesses.

Hurricane Matthew's significant storm surge was also historic in some parts of Florida. Tide levels on the east coast from Cape Canaveral north to the state border peaked as Matthew passed and storm surge flooding was widespread. On October 7, a peak surge of 9.88 feet above normal was measured at a National Ocean Service tide gauge at Fernandina Beach, Florida. Matthew pummeled more than half the state with heavy rainfall and strong winds, each causing damage to homes in the Northeastern counties. Storm surge from Hurricane Hermine, although not as pronounced as Matthew, still resulted in 7.5 feet of additional flood waters in some coastal areas.

Both Hermine and Matthew caused beach erosion. Hermine damaged coastlines from Pinellas County north to Wakulla County while Matthew eroded beaches in coastal counties from Martin County north to Nassau County. Matthew overtopped an estimated 40 miles worth of dunes and other coastal structures, according to the United States Geological Survey.² Additionally, agricultural operations in 16 counties were affected mainly due to power outages and wind damage. Although damaged businesses faced a 4-6 week disruption, many stepped up to give back to their communities. Free meals were prepared and given out to flood victims by volunteers. First responders, as well as many residents, were given discounts on needed services to ease financial hardship.

As the state continues its long term recovery efforts from these two storms, a focus on identifying impacts and addressing unmet needs is key. State and local government agencies, as well as civic

¹ https://www.washingtonpost.com/news/post-nation/wp/2016/10/07/hurricane-matthew-rumbles-along-floridas-coast-as-governor-warns-this-is-not-over/?utm_term=.5eb3105407ff

² <https://www.usgs.gov/news/and-after-photos-se-beach-dunes-lost-hurricane-matthew>

Background

The Disaster Relief Appropriations Act (Public Laws 114-223 and 114-254) (Appropriations Act) appropriated federal funds to states or units of general local government (UGLGs) for disaster recovery efforts. Public Law 114-223 appropriated \$500 million and Public Law 114-254 appropriated \$1.8 billion in Community Development Block Grant Disaster Recovery (CDBG-DR) funds to be distributed to the various states that received a presidential disaster declaration in 2016. 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 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 \$58,602,000 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, 80 percent of the combined total awarded to the State will go to the Most Impacted and Distressed counties. 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. It 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.

Hermine produced heavy rainfall across much of western and northern Florida (Figure 3). The maximum reported storm-total rainfall was near Tarpon Springs, Florida, in Pinellas County, where 22.36 inches was measured between August 30 and September 2, 2016. More than 10 inches of rain were reported at other sites along the west coast of Florida, particularly in Pinellas, Pasco, Manatee, and Charlotte Counties. The heavy rainfall caused flooding of streets and low-lying areas near the west coast of Florida, especially in Pinellas County where the rain was heaviest. Flooding occurred on several rivers in northern Florida, although only the Anclote River reached major flood stage. The river crested at 25.08 feet in Elfers, which was about seven feet above flood stage and one foot above major flood stage. Moderate flooding occurred on the Steinhatchee River near Steinhatchee, where the river crested almost four feet above flood stage at a level of 23.24 feet.

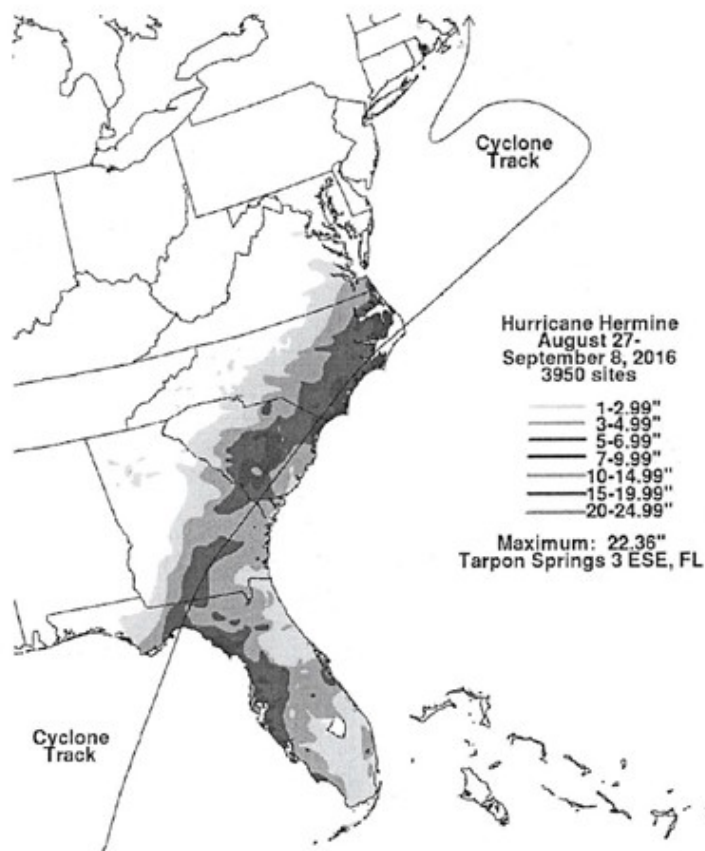


Figure 3: Hurricane Hermine Track and Rainfall Estimates

Hurricane Matthew

Hurricane Matthew (Figure 4) brought storm surge up to eight feet in some areas, damaging winds (Figure 5), and rainfall (Figure 6) across most of the presidentially declared impact areas. In some places these three hazards created a compound threat damaging homes and infrastructure.

In addition to flooding, many homes were damaged by the combination of wind and rainfall. This has complicated the recovery process in that wind and rain damages can only be accessed on a case by case basis where areal flooding impacts are more easily ascertained for larger areas at once. Portions of the state saw high amounts of rainfall with several areas receiving more than 10 inches of rain in a 24 hour period.⁴ Figure 6 below illustrates the extent and severity of the hurricane event and associated rainfall amounts. Inland areas, rather than the immediate coastline, experienced the largest amounts of rain. Orlando received nearly nine inches of rain, Jacksonville nearly seven inches, and Daytona Beach received almost six inches.

Storm surge flooding affected the St. Augustine area, including major flooding on Anastasia Island where water was reported to be 2.5 feet above ground level. To the south in nearby Flagler Beach, Florida, parts of Highway A1A were washed out by the storm surge. Some of the highest inundation occurred farther inland away from the immediate coast on smaller back bays and inland waterways. The St. Johns River in northeast Florida reached its highest level on record at Shands Bridge, along with 3 to 4.3 feet of storm surge inundation reported at the Racy Point, Red Bay Point and I-295 bridge tide gauges. The National Weather Service in Jacksonville conducted a storm survey and found that Matthew's force had carved a new inlet between Marineland and Matanzas Inlet, between Palm Coast and St. Augustine Beach, Florida.

A detailed accounting of post-storm impacts by counties can be found in the National Weather Service Post Tropical Cyclone Report. Included here are many references to wind, flooding, rain, and surge damages.⁵

⁴ <https://weather.com/storms/hurricane/news/hurricane-matthew-bahamas-florida-georgia-carolinas-forecast>

⁵ <https://www.weather.gov/media/chs/MatthewPSH.pdf>

The screenshot shows the Zillow website interface. At the top, there are navigation links: Buy, Rent, Sell, Mortgages, Agent finder, Home design, and More. The Zillow logo is on the left. Below the navigation is a search bar with the text 'Elfers New Port Richey' and a search icon. To the right of the search bar are filters: Listing Type, Up To \$250K, 3+ Beds, Home Type (1), and More (1). There are also buttons for 'Save Search' and 'Saved Homes (28)'. The main content area is split into two parts. On the left is a satellite map showing a residential area with several property listings overlaid, each with a price tag (e.g., \$102K, \$110K, \$113K, \$115K, \$116K, \$117K, \$118K, \$119K, \$120K, \$121K, \$122K, \$123K, \$124K, \$125K, \$126K, \$127K, \$128K, \$129K, \$130K, \$131K, \$132K, \$133K, \$134K, \$135K, \$136K, \$137K, \$138K, \$139K, \$140K, \$141K, \$142K, \$143K, \$144K, \$145K, \$146K, \$147K, \$148K, \$149K, \$150K, \$151K, \$152K, \$153K, \$154K, \$155K, \$156K, \$157K, \$158K, \$159K, \$160K, \$161K, \$162K, \$163K, \$164K, \$165K, \$166K, \$167K, \$168K, \$169K, \$170K, \$171K, \$172K, \$173K, \$174K, \$175K, \$176K, \$177K, \$178K, \$179K, \$180K, \$181K, \$182K, \$183K, \$184K, \$185K, \$186K, \$187K, \$188K, \$189K, \$190K, \$191K, \$192K, \$193K, \$194K, \$195K, \$196K, \$197K, \$198K, \$199K, \$200K). On the right is a search results panel. The title is 'Elfers New Port Richey Single Family Homes'. Below the title, it says 'No Results'. There are three tabs: 'Homes for You', 'Newest', and 'More'. A yellow box contains the text: 'No matching results... Try zooming out to include more results. Or, change your search criteria.' Below this is a circular profile picture of a woman, with the text 'Agent Finder' and 'Search by location, specialty and more to find the right agent for you.' There is a 'Get Started' button next to the profile picture. At the bottom of the search results panel, it says 'Similar results nearby' and 'Within 2 miles and similar in price'. The bottom of the screenshot shows the Windows taskbar with various application icons and the system clock showing 1:03 PM on 4/22/2021.

The screenshot displays the Zillow website interface for real estate listings in Anastasia Island, Saint Augustine. The top navigation bar includes options for Buy, Rent, Sell, Mortgages, Agent finder, Home design, and More. The search bar shows the location "Anastasia Island" and filters for "Listing Type", "Up To \$250K", "3+ Beds", and "Home Type (1)".

The main content area is split into two sections. On the left is a map of the area with numerous red and blue markers representing property listings, each labeled with a price (e.g., \$164K, \$250K, \$172K, \$190K, \$200K, \$155K, \$110K, \$97K, \$127K, \$82K, \$189K, \$154K, \$150K, \$205K). On the right is a detailed listing for "Anastasia Island Saint Augustine Single Family Homes" with "108 homes for sale". Below this, there are two featured property cards. The top card shows a house for sale at \$239,900, described as a 3-bedroom, 2-bathroom, 1,049 sq ft property, listed 2 days on Zillow. The bottom card shows a "FOR SALE BY OWNER" property at \$275,000.

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).⁷

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:⁸

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

For the purpose of CDBG-DR programs, Grantee’s apply the above terminology consistent with the original language of the Housing Act and reporting designations in the HUD Disaster Recovery Grant Reporting (DRGR) system.⁹

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

⁷ These National Objective definitions and corresponding language are set by HUD regulation.

⁸ 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.

⁹ 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>

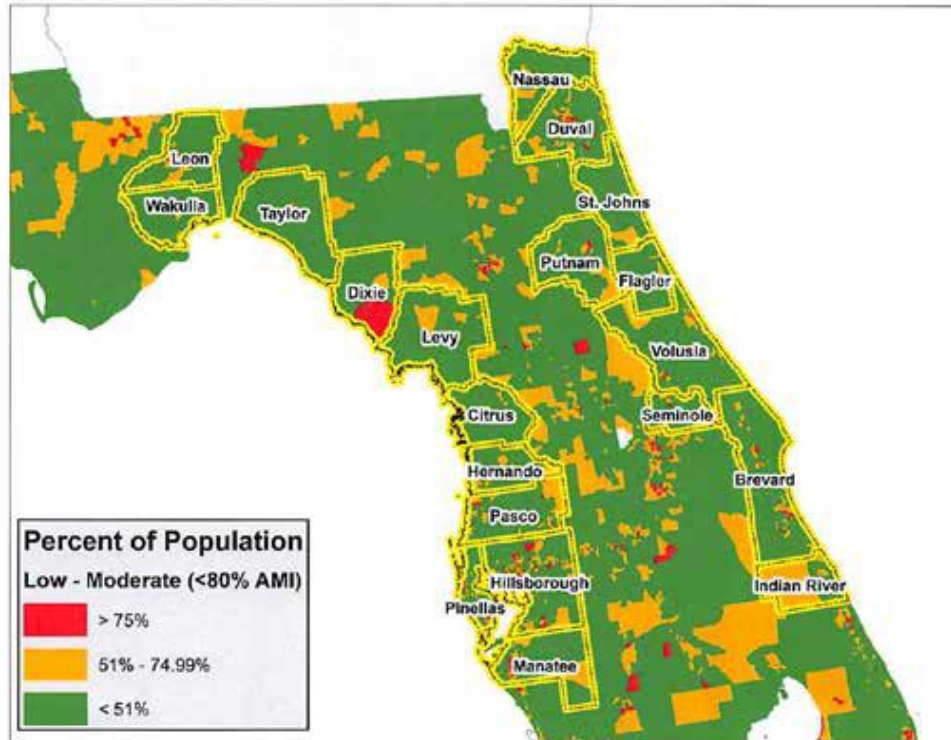


Figure 8: Low to Moderate Income by Block Group

Every impacted county has areas meeting HUD’s 51 percent LMI threshold criteria, but some counties have much larger LMI populations than others (Figure 8). Table 4 below illustrates the count of block groups and sum of populations by low-moderate income levels within impacted counties. What becomes clear when looking at the number of people who are 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 - Figure 13 below.

Appendix 2: LMI Maps for Individual Assistance Designated Counties - details block group level LMI information for every presidentially declared county.

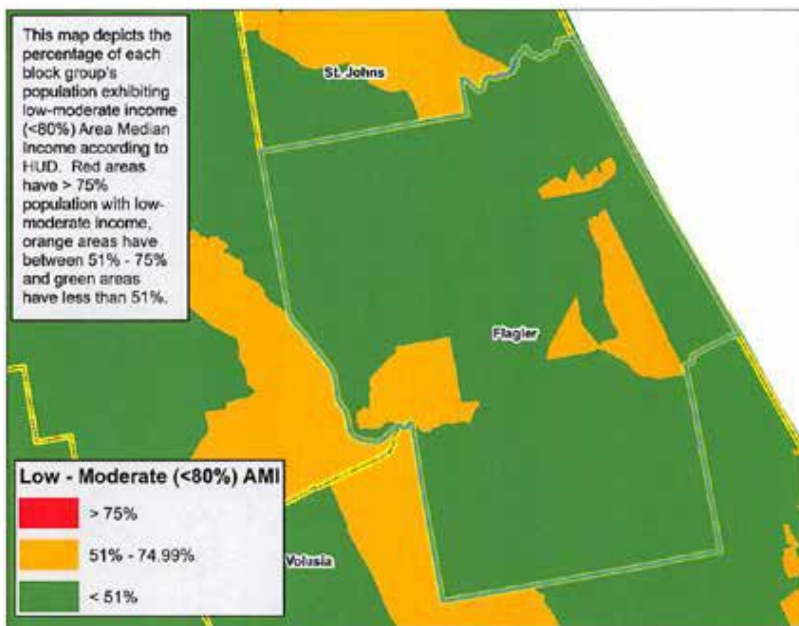


Figure 11: Low to Moderate Income by Block Group - Flagler County

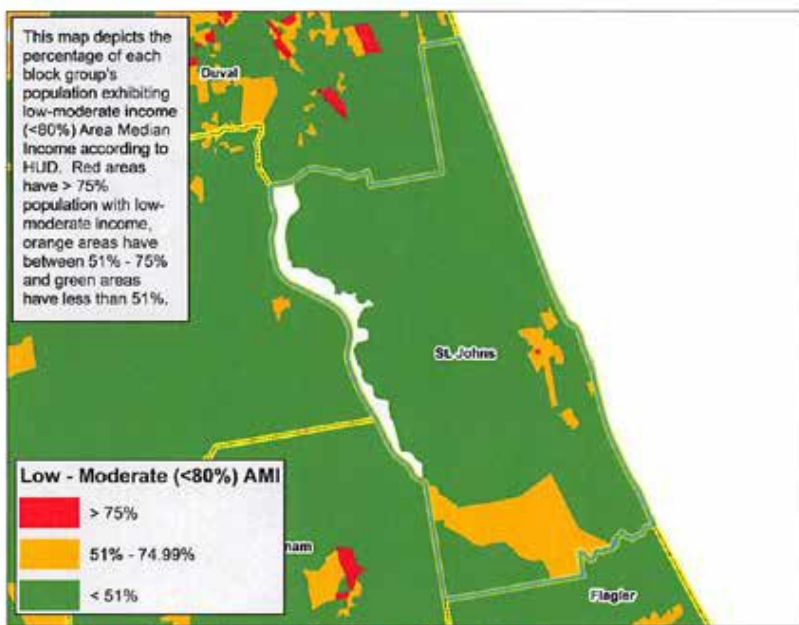


Figure 12: Low to Moderate Income by Block Group - St. Johns County

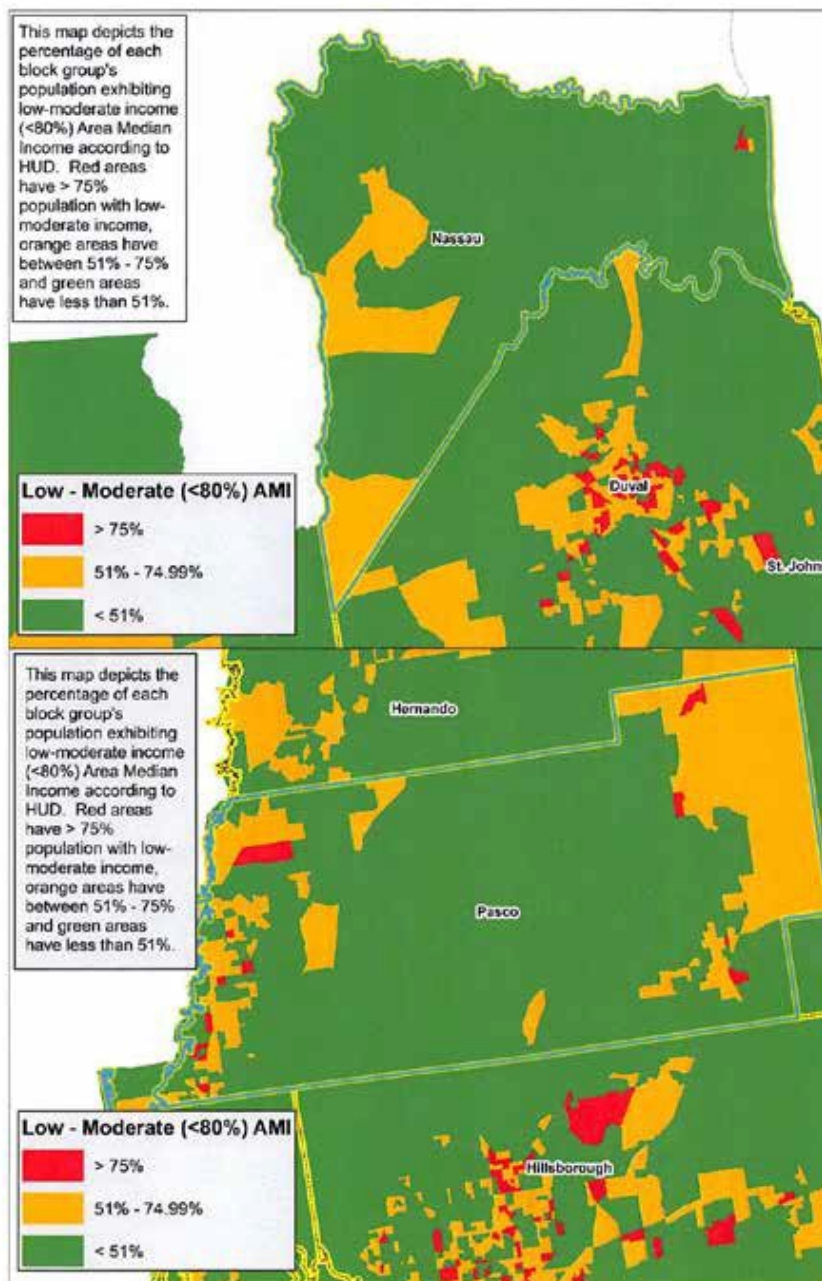


Table 4: LMI Population Counts by Block Group and County for Matthew Impacted Counties¹⁰

County	Block Groups Counts and Populations by LMI Category					
	< 51% Count	< 51% Population	51% - 75% Count	51% - 75% Population	> 75% Count	>75% Population
Brevard	239	124,655	66	55,205	13	12,430
Citrus	78	39,680	9	8,495	1	740
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		
Hernando	74	43,545	31	24,500	2	1,050
Hillsborough	590	220,115	223	162,995	68	62,740
Indian River	69	31,560	19	16,970	5	4,665
Leon	108	38,115	38	31,230	31	40,790
Levy	23	12,800	6	4,050		
Manatee	126	62,360	54	41,050	28	36,835
Nassau	34	19,940	5	3,775	1	470
Pasco	204	96,330	89	67,870	15	14,245
Pinellas	533	206,415	152	104,430	36	27,130
Putnam	42	17,685	17	12,460	2	2,120
Seminole	194	93,675	31	29,800	10	9,850
St. Johns	69	36,065	12	12,595	1	1,150
Taylor	15	5,590	4	1,760	1	500
Volusia	204	114,020	68	60,830	17	12,625
Wakulla	13	8,090	2	2,050		
Total	2,960	1,362,290	970	771,340	282	274,285

Pasco < 51% 96,330
 51% - 75% 67,870
 > 75% 14,245
178,445

2015 census pop. 497,909
35.83%

St. John's < 51% 36,065
 51-75% 12,595
 > 75% 1,150
49,810

2015 census pop. 226,640
21.97%

¹⁰ <https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-block-groups-places/>

United States Census Bureau | U.S. Department of Commerce (www.commerce.gov) | Blogs (www.census.gov/bout/located-us/social_media.html) | Index A-Z (www.census.gov/bout/index.html) | Glossary (www.census.gov/glossary/) | FAQs (ask.census.gov)

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U.S. Census Quick Facts

QuickFacts

Pasco County, Florida


QuickFacts provides statistics for all states and counties, and for cities and towns with a population of 5,000 or more.

ALL TOPICS	PASCO COUNTY, FLORIDA
People	
Population	
Population estimates, July 1, 2015, (V2015)	512,368
Population estimates, July 1, 2015, (V2015)	497,900
Population estimates base, April 1, 2010, (V2015)	464,703
Population estimates base, April 1, 2010, (V2015)	464,703
Population, percent change - April 1, 2010 (estimates base) to July 1, 2015, (V2015)	10.3%
Population, percent change - April 1, 2010 (estimates base) to July 1, 2015, (V2015)	7.1%
Population, Census, April 1, 2010	464,697
Age and Sex	
Persons under 5 years, percent, July 1, 2015, (V2015)	5.0%
Persons under 5 years, percent, April 1, 2010	5.5%
Persons under 18 years, percent, July 1, 2015, (V2015)	20.4%
Persons under 18 years, percent, April 1, 2010	21.2%
Persons 65 years and over, percent, July 1, 2015, (V2015)	22.7% 113,025
Persons 65 years and over, percent, April 1, 2010	20.7%
Female persons, percent, July 1, 2015, (V2015)	51.5%
Female persons, percent, April 1, 2010	51.6%
Race and Hispanic Origin	
White alone, percent, July 1, 2015, (V2015) (a)	69.1%
White alone, percent, April 1, 2010 (a)	68.2%
Black or African American alone, percent, July 1, 2015, (V2015) (a)	6.8%
Black or African American alone, percent, April 1, 2010 (a)	4.5%
American Indian and Alaska Native alone, percent, July 1, 2015, (V2015) (a)	0.4%
American Indian and Alaska Native alone, percent, April 1, 2010 (a)	0.4%
Asian alone, percent, July 1, 2015, (V2015) (a)	2.5%
Asian alone, percent, April 1, 2010 (a)	2.1%
Native Hawaiian and Other Pacific Islander alone, percent, July 1, 2015, (V2015) (a)	0.1%
Native Hawaiian and Other Pacific Islander alone, percent, April 1, 2010 (a)	0.1%
Two or More Races, percent, July 1, 2015, (V2015)	2.1%
Two or More Races, percent, April 1, 2010	2.2%
Hispanic or Latino, percent, July 1, 2015, (V2015) (b)	14.0%
Hispanic or Latino, percent, April 1, 2010 (b)	11.7%
White alone, not Hispanic or Latino, percent, July 1, 2015, (V2015)	76.5%
White alone, not Hispanic or Latino, percent, April 1, 2010	60.1%
Population Characteristics	
Veterans, 2011-2015	47,713
Foreign born persons, percent, 2011-2015	9.4%
Housing	
Housing units, July 1, 2015, (V2015)	234,450
Housing units, April 1, 2010	228,008
Owner-occupied housing unit rate, 2011-2015	73.8%
Median value of owner-occupied housing units, 2011-2015	\$117,800
Median selected monthly owner costs -with a mortgage, 2011-2015	\$1,234
Median selected monthly owner costs -without a mortgage, 2011-2015	\$367
Median gross rent, 2011-2015	\$930
Building permits, 2015	2,639
Families and Living Arrangements	
Households, 2011-2015	166,318
Persons per household, 2011-2015	2.53
Living in same house 1 year ago, percent of persons age 1 years+, 2011-2015	88.0%
Language other than English spoken at home, percent of persons age 5 years+, 2011-2015	14.4%
Education	
High school graduates or higher, percent of persons age 25 years+, 2011-2015	88.0%
Bachelor's degree or higher, percent of persons age 25 years+, 2011-2015	21.4%
Health	
With a disability, under age 65 years, percent, 2011-2015	11.1% 55,267
Persons without health insurance, under age 65 years, percent	26.14% 69,707
Economy	
In civilian labor force, total, percent of population age 16 years+, 2011-2015	52.7%

Pasco County, Florida

In civilian labor force, female, percent of population age 16 years+, 2011-2015	48.9%
Total accommodation and food services sales, 2012 (\$1,000) (c)	503,399
Total health care and social assistance receipts/revenue, 2012 (\$1,000) (c)	2,142,457
Total manufacturers shipments, 2012 (\$1,000) (c)	743,921
Total merchant wholesaler sales, 2012 (\$1,000) (c)	709,154
Total retail sales, 2012 (\$1,000) (c)	5,278,200
Total retail sales per capita, 2012 (c)	\$11,221
Transportation	
Mean travel time to work (minutes), workers age 16 years+, 2011-2015	30.5
Income and Poverty	
Median household income (in 2015 dollars), 2011-2015	\$45,054
Per capita income in past 12 months (in 2015 dollars), 2011-2015	\$24,455
Persons in poverty, percent	14.6% 72,694
Businesses	
Total employer establishments, 2014	8,884
Total employment, 2014	87,322
Total annual payroll, 2014 (\$1,000)	2,674,595
Total employment, percent change, 2013-2014	2.8%
Total nonemployer establishments, 2014	33,127
All firms, 2012	30,209
Men-owned firms, 2012	10,260
Women-owned firms, 2012	12,706
Minority-owned firms, 2012	7,663
Nonminority-owned firms, 2012	27,396
Veteran-owned firms, 2012	4,369
Nonveteran-owned firms, 2012	30,299
Geography	
Population per square mile, 2010	622.2
Land area in square miles, 2010	746.89
FIPS Code	12101

A This geographic level of poverty and health estimates are not comparable to other geographic levels of these estimates

Some estimates presented here come from sample data, and thus have sampling errors that may render some apparent differences between geographies statistically indistinguishable. Click the Quick Info  icon to the left of each row in TABLE view to learn about sampling error.

The vintage year (e.g., V2015) refers to the final year of the series (2010 thru 2015). Different vintage years of estimates are not comparable.

- (a) Includes persons reporting only one race
- (b) Hispanics may be of any race, so also are included in applicable race categories
- (c) Economic Census - Puerto Rico data are not comparable to U.S. Economic Census data

- D Suppressed to avoid disclosure of confidential information
- F Fewer than 25 firms
- FN Footnote on this item in place of data
- NA Not available
- S Suppressed, does not meet publication standards
- X Not applicable
- Z Value greater than zero but less than half unit of measure shown

QuickFacts data are derived from: Population Estimates, American Community Survey, Census of Population and Housing, Current Population Survey, Small Area Health Insurance Estimates, Small Area Income and Poverty Estimates, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits.

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U.S. Census Quick Facts

QuickFacts
St. Johns County, Florida

QuickFacts provides statistics for all states and counties, and for cities and towns with a population of 5,000 or more.

ALL TOPICS	ST. JOHNS COUNTY, FLORIDA
People	
Population	
Population estimates, July 1, 2016, (V2016)	235,087
Population estimates, July 1, 2015, (V2015)	226,640
Population estimates base, April 1, 2010, (V2016)	190,038
Population estimates base, April 1, 2010, (V2015)	190,039
Population, percent change - April 1, 2010 (estimates base) to July 1, 2016, (V2016)	23.7%
Population, percent change - April 1, 2010 (estimates base) to July 1, 2015, (V2015)	19.3%
Population, Census, April 1, 2010	190,039
Age and Sex	
Persons under 5 years, percent, July 1, 2015, (V2015)	4.0%
Persons under 5 years, percent, April 1, 2010	5.3%
Persons under 18 years, percent, July 1, 2015, (V2015)	21.9%
Persons under 18 years, percent, April 1, 2010	23.1%
Persons 65 years and over, percent, July 1, 2015, (V2015)	18.5% <i>42,155</i>
Persons 65 years and over, percent, April 1, 2010	15.7%
Female persons, percent, July 1, 2015, (V2015)	51.2%
Female persons, percent, April 1, 2010	51.4%
Race and Hispanic Origin	
White alone, percent, July 1, 2015, (V2015) (a)	80.3%
White alone, percent, April 1, 2010 (a)	80.3%
Black or African American alone, percent, July 1, 2015, (V2015) (a)	5.0%
Black or African American alone, percent, April 1, 2010 (a)	5.9%
American Indian and Alaska Native alone, percent, July 1, 2015, (V2015) (a)	0.3%
American Indian and Alaska Native alone, percent, April 1, 2010 (a)	0.3%
Asian alone, percent, July 1, 2015, (V2015) (a)	2.0%
Asian alone, percent, April 1, 2010 (a)	2.1%
Native Hawaiian and Other Pacific Islander alone, percent, July 1, 2015, (V2015) (a)	0.1%
Native Hawaiian and Other Pacific Islander alone, percent, April 1, 2010 (a)	0.1%
Two or More Races, percent, July 1, 2015, (V2015)	1.9%
Two or More Races, percent, April 1, 2010	1.8%
Hispanic or Latino, percent, July 1, 2015, (V2015) (b)	6.4%
Hispanic or Latino, percent, April 1, 2010 (b)	5.2%
White alone, not Hispanic or Latino, percent, July 1, 2015, (V2015)	83.6%
White alone, not Hispanic or Latino, percent, April 1, 2010	85.3%
Population Characteristics	
Veterans, 2011-2015	15,710
Foreign born persons, percent, 2011-2015	6.8%
Housing	
Housing units, July 1, 2015, (V2015)	99,489
Housing units, April 1, 2010	89,800
Owner-occupied housing unit rate, 2011-2015	75.5%
Median value of owner-occupied housing units, 2011-2015	\$244,400
Median selected monthly owner costs -with a mortgage, 2011-2015	\$1,756
Median selected monthly owner costs -without a mortgage, 2011-2015	\$484
Median gross rent, 2011-2015	\$1,119
Building permits, 2015	3,026
Families and Living Arrangements	
Households, 2011-2015	79,242
Persons per household, 2011-2015	2.62
Living in same house 1 year ago, percent of persons age 1 years+, 2011-2015	82.5%
Language other than English spoken at home, percent of persons age 5 years+, 2011-2015	9.4%
Education	
High school graduate or higher, percent of persons age 25 years+, 2011-2015	93.9%
Bachelor's degree or higher, percent of persons age 25 years+, 2011-2015	42.1%
Health	
With a disability, under age 65 years, percent, 2011-2015	7.1% <i>16,091</i>
Persons without health insurance, under age 65 years, percent	20.1% <i>22,890</i>
Economy	
In civilian labor force, total, percent of population age 16 years+, 2011-2015	69.9%

St. Johns County, Florida

In civilian labor force, female, percent of population age 16 years+, 2011-2015	54.3%
Total accommodation and food services sales, 2012 (\$1,000) (c)	517,853
Total health care and social assistance receipts/revenue, 2012 (\$1,000) (c)	745,456
Total manufacturers shipments, 2012 (\$1,000) (c)	409,766
Total merchant wholesaler sales, 2012 (\$1,000) (c)	1,420,290
Total retail sales, 2012 (\$1,000) (c)	2,502,633
Total retail sales per capita, 2012 (c)	\$12,378
Transportation	
Mean travel time to work (minutes), workers age 16 years+, 2011-2015	25.0
Income and Poverty	
Median household income (in 2015 dollars), 2011-2015	\$66,194
Per capita income in past 12 months (in 2015 dollars), 2011-2015	\$37,581
Persons in poverty, percent	▲ 9.8% 22,210
Businesses	
Total employer establishments, 2014	5,409
Total employment, 2014	51,542
Total annual payroll, 2014 (\$1,000)	1,866,954
Total employment, percent change, 2013-2014	5.8%
Total nonemployer establishments, 2014	19,164
All firms, 2012	18,723
Men-owned firms, 2012	9,513
Women-owned firms, 2012	6,712
Minority-owned firms, 2012	2,500
Nonminority-owned firms, 2012	15,512
Veteran-owned firms, 2012	2,068
Nonveteran-owned firms, 2012	15,394
Geography	
Population per square mile, 2010	316.4
Land area in square miles, 2010	600.66
FIPS Code	12109

▲ This geographic level of poverty and health estimates are not comparable to other geographic levels of these estimates

Some estimates presented here come from sample data, and thus have sampling errors that may render some apparent differences between geographies statistically indistinguishable. Click the Quick Info icon to the left of each row in TABLE view to learn about sampling error.

The vintage year (e.g., '2015) refers to the final year of the series (2010 thru 2015). Different vintage years of estimates are not comparable.

- (a) Includes persons reporting only one race
- (b) Hispanics may be of any race, so are included in applicable race categories
- (c) Economic Census - Puerto Rico data are not comparable to U.S. Economic Census data

- D Suppressed to avoid disclosure of confidential information
- F Fewer than 25 firms
- FN Footnote on this item in place of data
- NA Not available
- S Suppressed, does not meet publication standards
- X Not applicable
- Z Value greater than zero but less than half unit of measure shown

QuickFacts data are derived from: Population Estimates, American Community Survey, Census of Population and Housing, Current Population Survey, Small Area Health Insurance Estimates, Small Area Income and Poverty Estimates, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits.

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different languages and not understanding English well.¹² 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 14), followed by Table 5 that shows the number of residents who speak only English or who speak Spanish or other languages, by county.

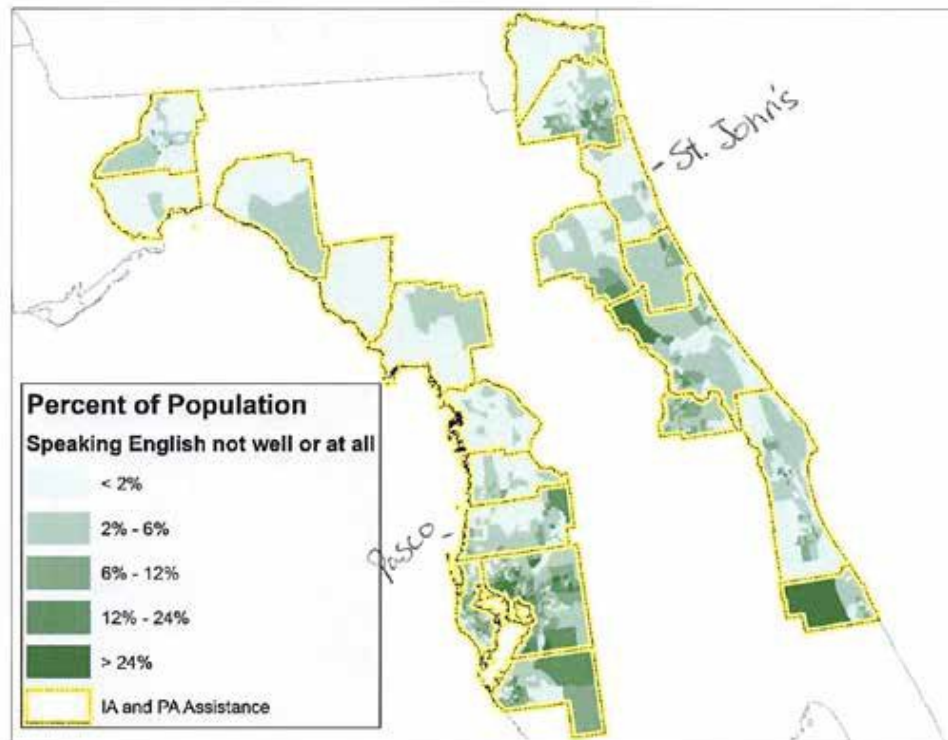


Figure 14: Percent of Tract Population Speaking English Not Well or Not At All

¹² Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Table 16001. County-level percent calculations by the Florida Department of Revenue and Fiscal Affairs - Health and Demographics Section.

Populations over the age of 65 or households with children under the age of five increases vulnerability. The map below (Figure 15) shows concentrations of households with these 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.

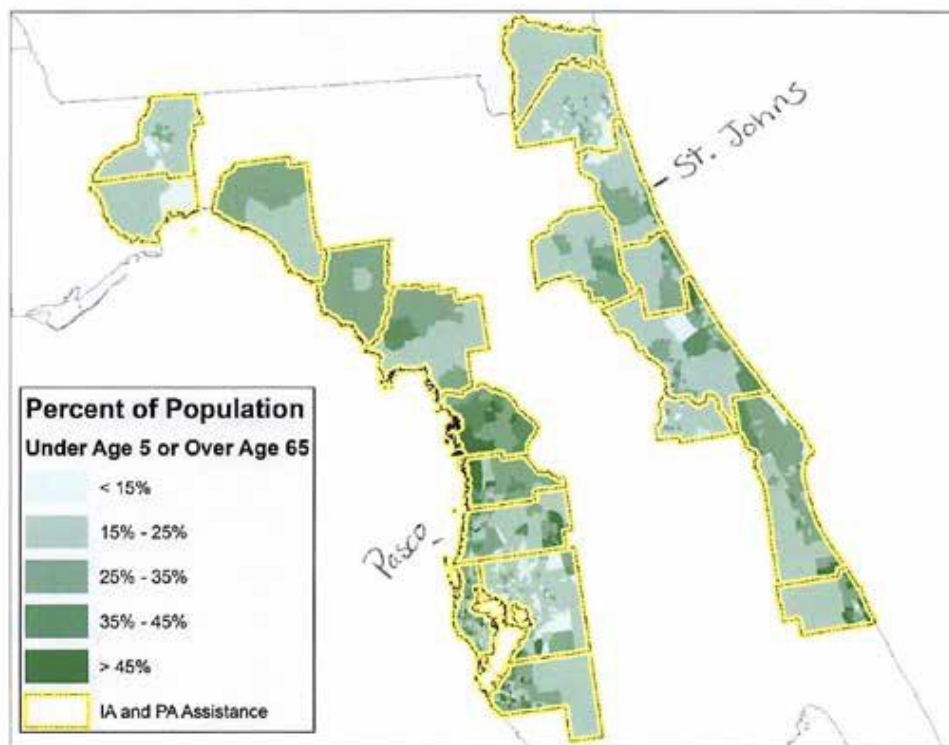


Figure 15: Age Dependent (< 5 Years or > 65 Years) Population by Tract

Additionally, the map below (Figure 16) shows relative concentrations of poverty in Duval, Hillsborough, Levy, and Putnam counties, followed by a map of larger concentrations of unemployment across the region (Figure 17).

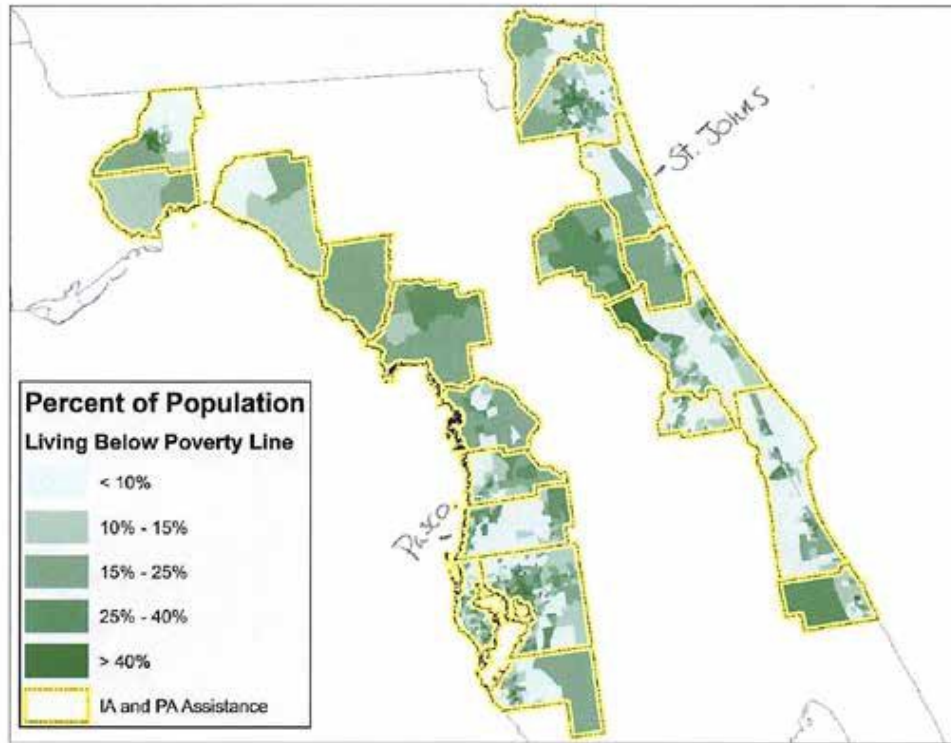


Figure 16: Percent of Population Living Below Poverty Line by Tract

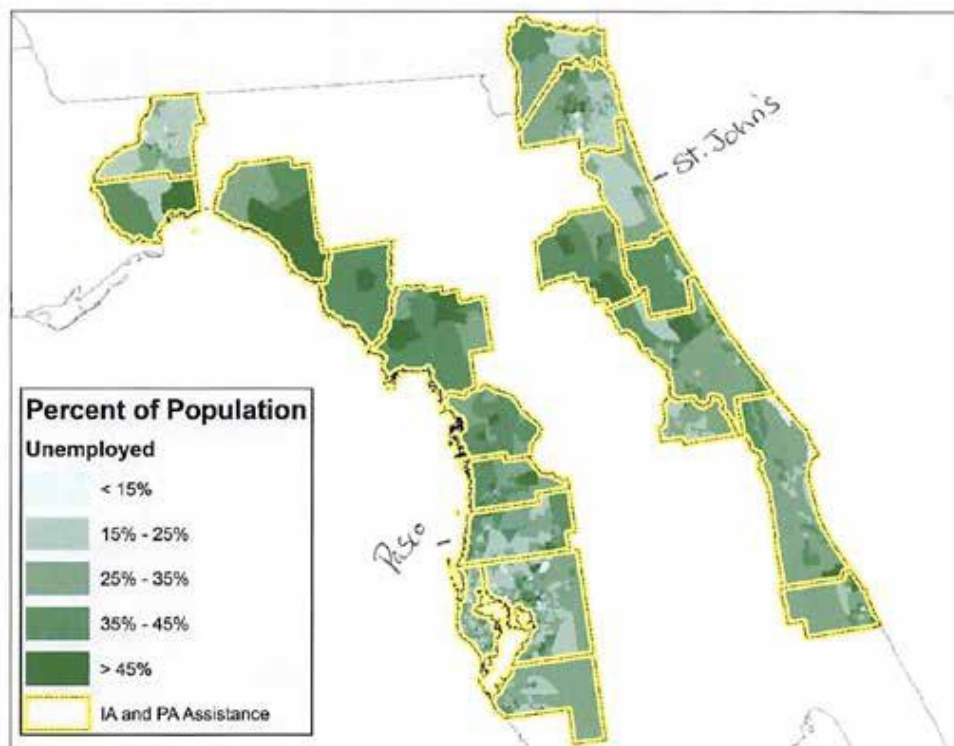


Figure 17: Percent Unemployment by Tract

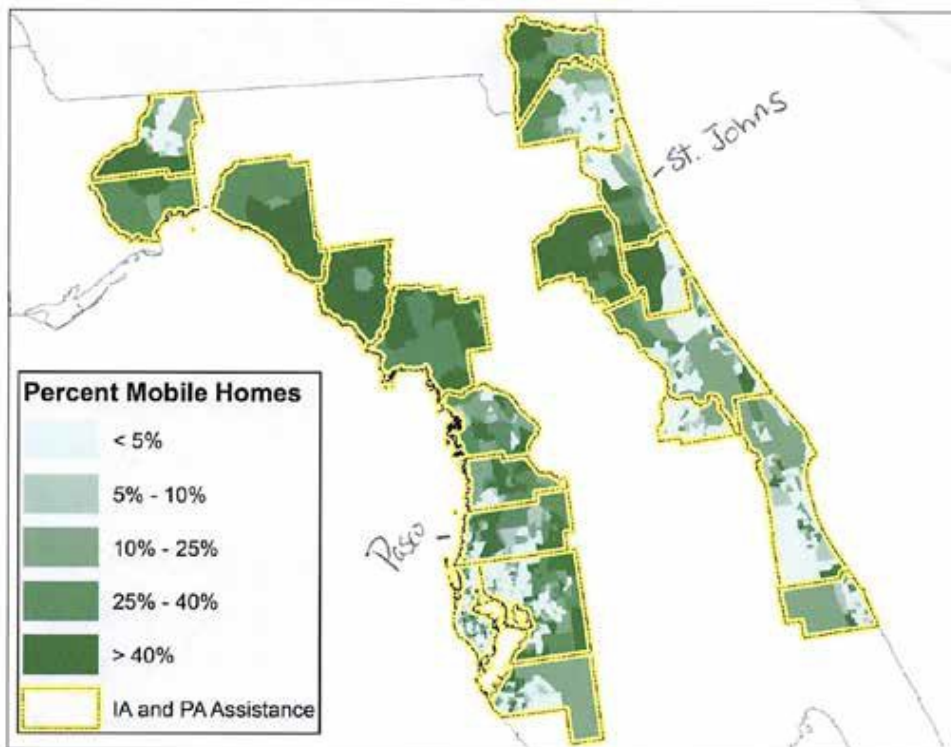
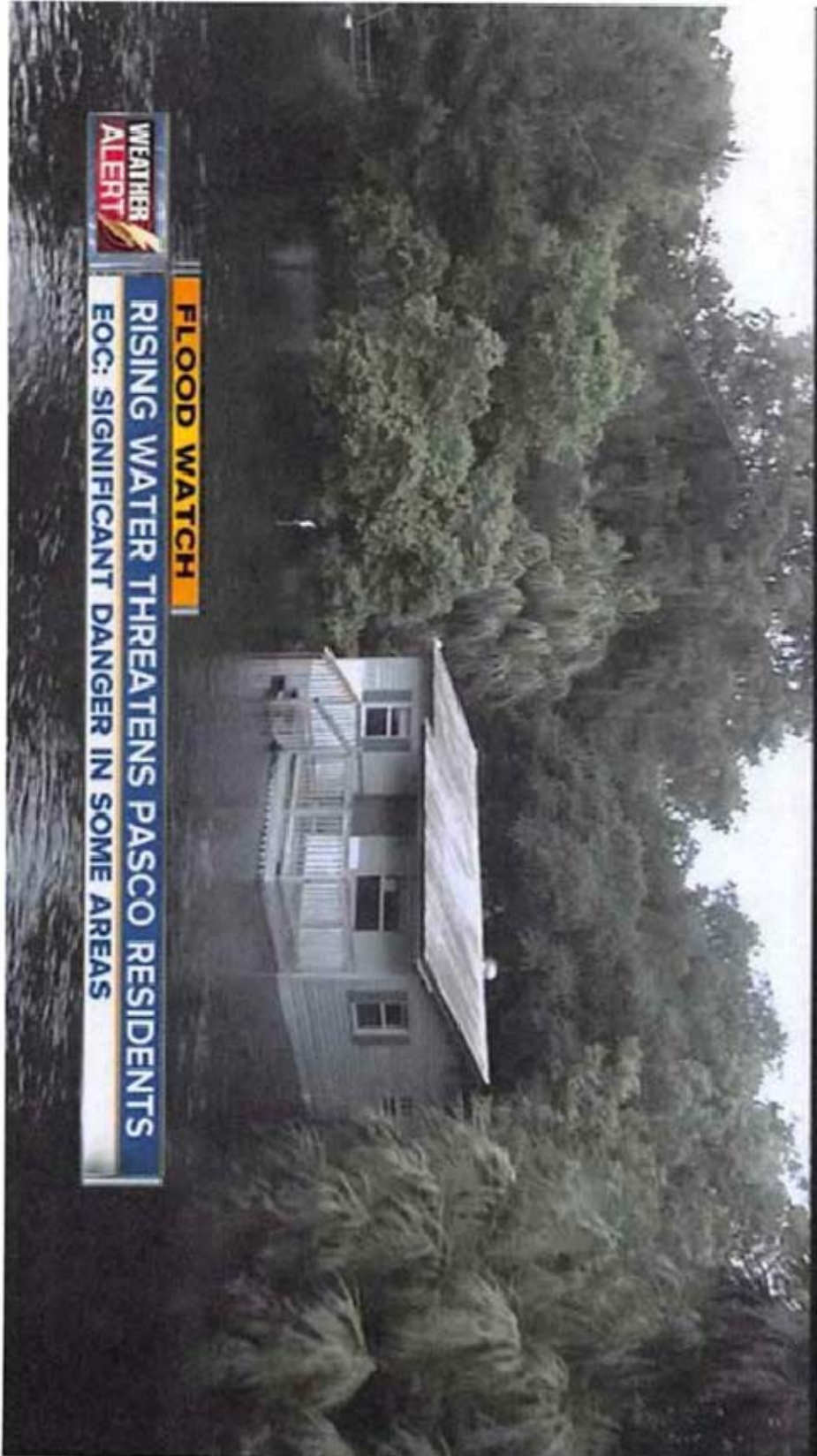


Figure 22: Mobile Home Populations

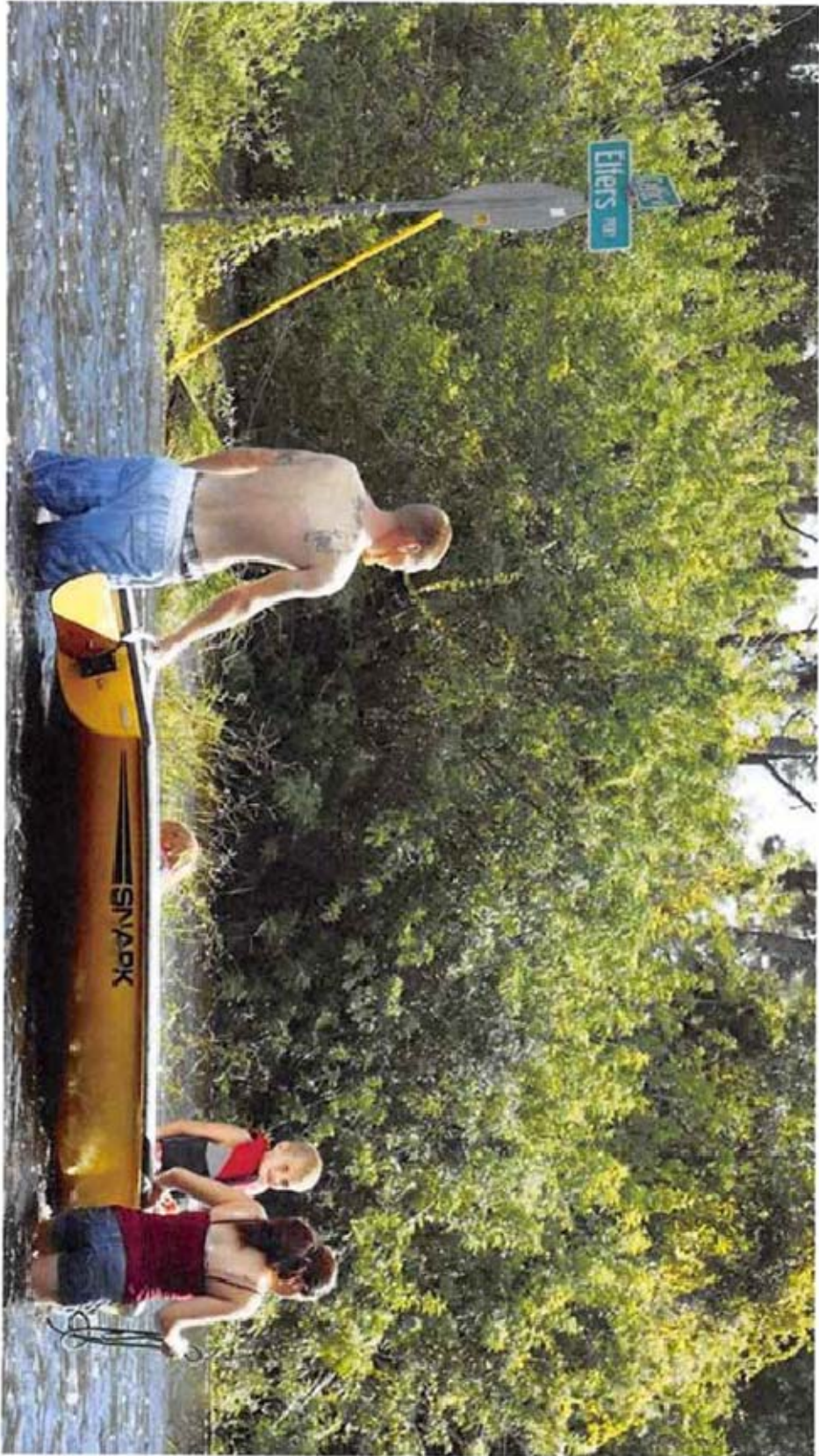
Mobile home damage was also concentrated in certain areas, as illustrated in the map above. These areas include Volusia, St. Johns, Putnam, and Brevard Counties with either greater than 500 mobile homes damaged or more than \$500,000 in damage to mobile homes as the most impacted counties in terms of simple count of the number of homes with documented FEMA verified loss.

In total across the state, there were 5,111 mobile homes with FEMA Real Property Verified Losses, or losses identified by FEMA inspectors. Table 15 shows the number of mobile homes and FEMA verified property losses by county.







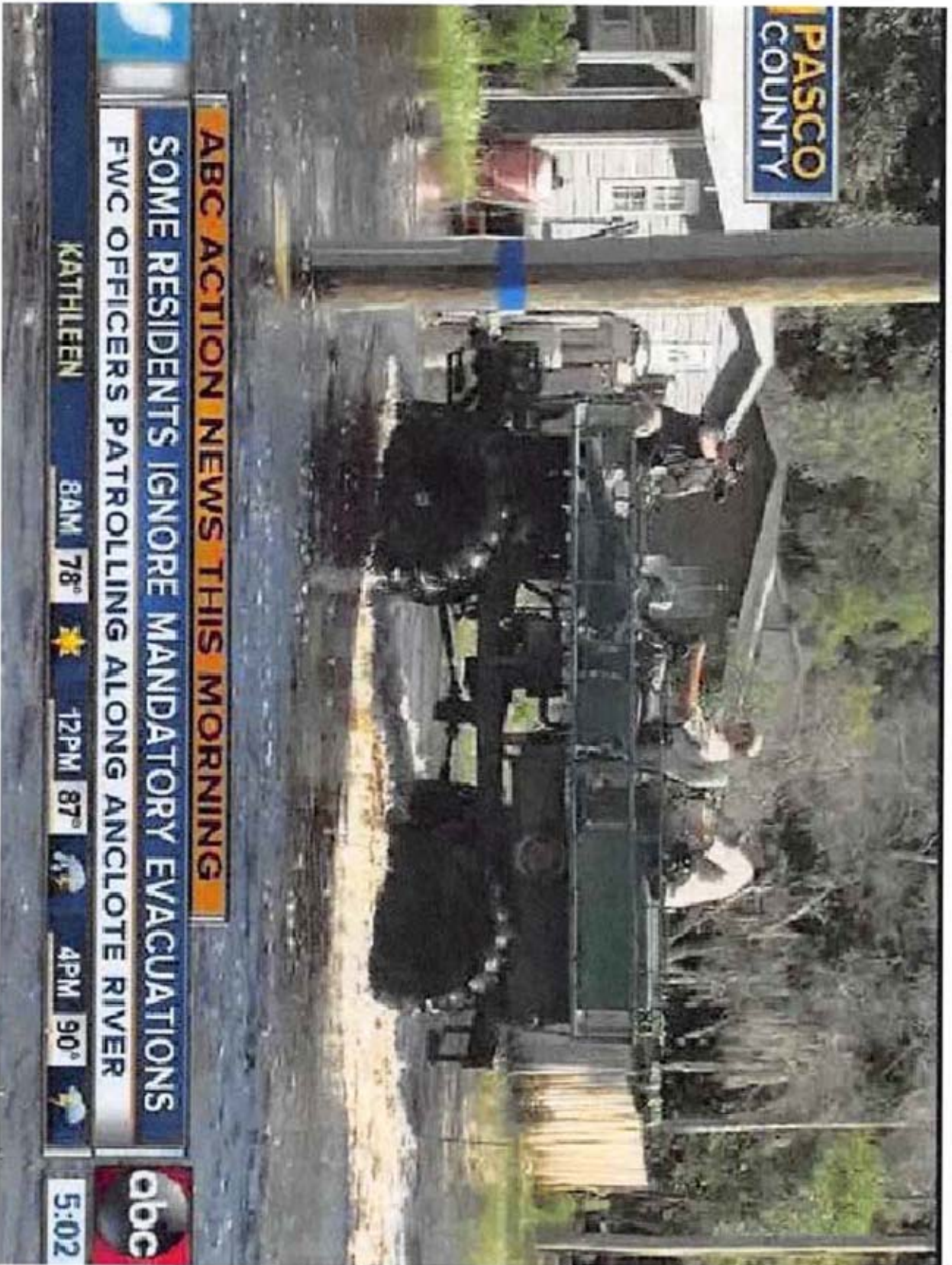


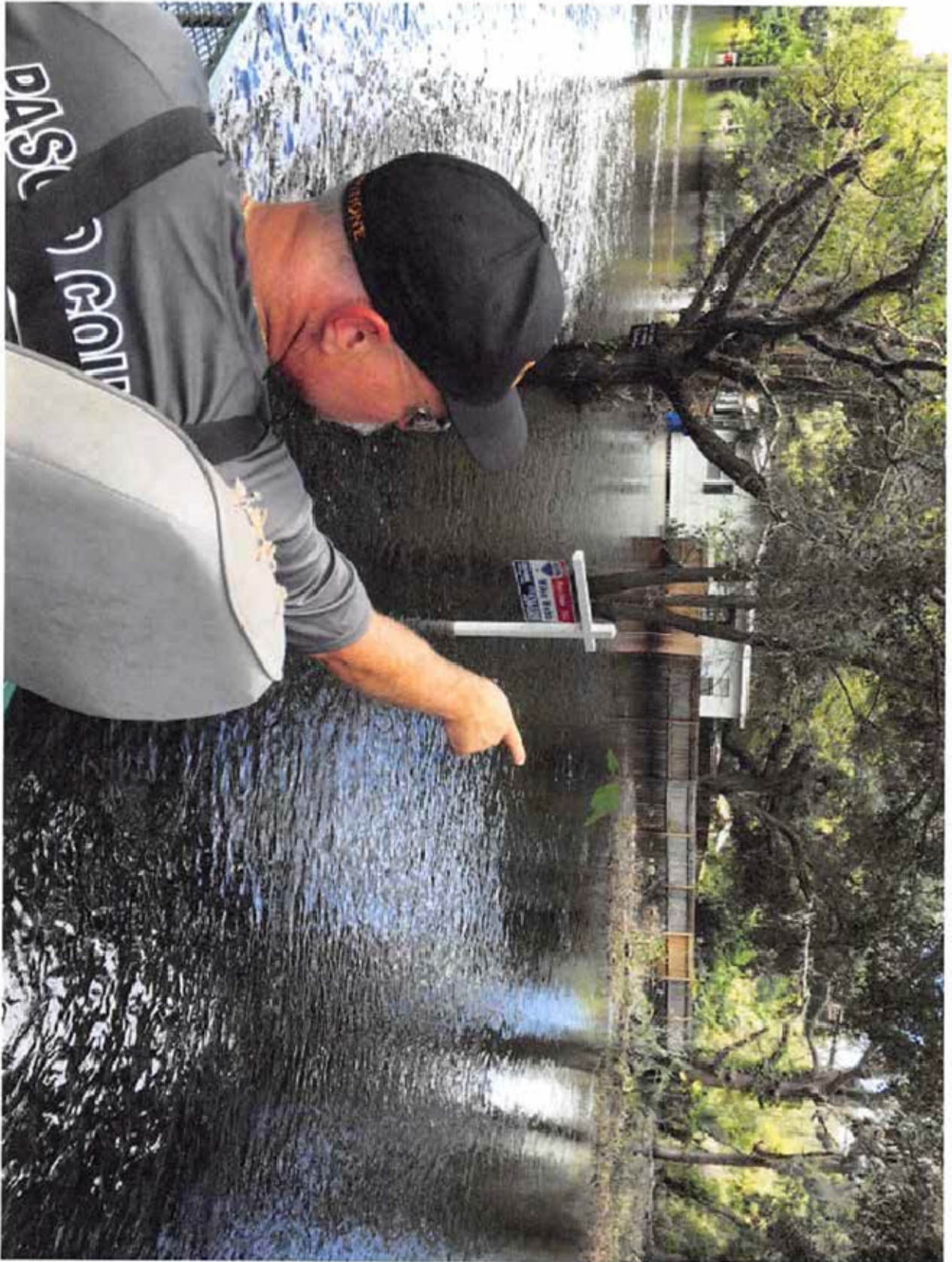


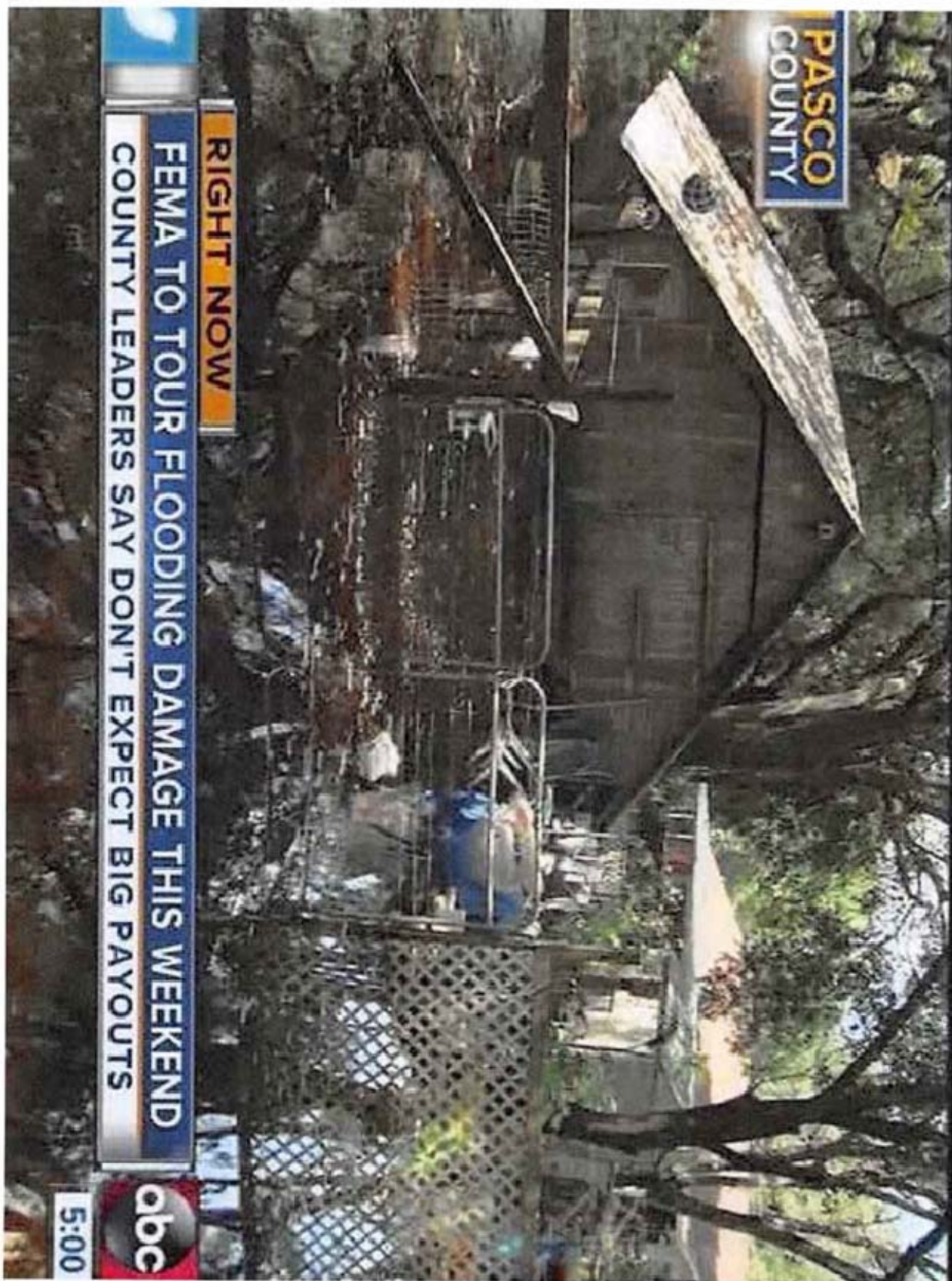














PASCO
COUNTY



**PASCO NEIGHBORHOOD NOT CONSIDERED A FLOOD ZONE
OWNERS SAY THEY EXPERIENCE FLOODING ALMOST YEARLY**

abc

6:15



APPENDIX 8: EXPENDITURE PROJECTIONS – ALL CATEGORIES



● PROJECTED EXPENDITURES ● QUARTERLY PROJECTION

Summary of Public Comments Received During the Action Plan Substantial Amendment 1 Comment Period

1. Received on November 8, 2017 from Brevard County:

I went and reviewed the Substantial Amendment (SA) and I am a little confused about the unmet need number for Brevard County. When we spoke I was under the impression that you had a figure of almost \$28 million for Brevard's unmet need (based upon data/documents from FEMA), but if I am reading the SA correctly it is notated at about \$780K. Which is it? I didn't provide more information regarding specific projects because you said you had the data. Any information or clarification would be appreciated.

DEO Response: DEO apologizes for any confusion on the unmet need number for Brevard County and cannot find any documentation to support a figure of almost \$28 million in the original action plan or substantial amendment. DEO continues to be willing to consider any additional data related to unmet needs in Brevard County.

2. Received on October 31, 2017 from Monroe County:

I am a Senior Administrator in Monroe County's (FL) Floodplain Program, and I have been tasked with researching what steps the County, on its own, can take to 1) help bolster the case for, and the amount of, CDBG Funds prioritized for Florida as a result of Hurricane Irma, and 2) begin preparing the required documents/plans that will ultimately be required to receive those funds (assuming they are approved).

Are there any resources you can direct our way so that we can begin this important task?

DEO Response: The Monroe County comment was sent to DEO Senior Staff for response since it was related to Hurricane Irma.

3. Received on October 25, 2017 from a citizen in Fernandina Beach, Nassau County:

I was referred to your agency for possible assistance. We sustained quite a bit of damage to our home and lost our only vehicle as the effects of the storm. Due to personal reasons out of our control there was no insurance in the property. I have exhausted my resources as far as refinancing, home equity loans, personal loans as my credit has dropped substantially as I own my own business and lost everything.

I am sure this is probably another strike out but it can't hurt to ask for help before myself and my family end up homeless. I am desperate I just found temporary work but we do not have public transportation here and I cannot afford a taxi. I will hope to hear back from you with some guidance on how to get assistance in our desperate time of need.

DEO Response: DEO staff referred them to the Florida Department of Emergency Management (FDEM) hurricane-related assistance website and also provided contact information for the director's office of Nassau County Emergency Management, copying the director. His assistant replied to the email and said she would contact the citizen and also give them information for financial assistance from Catholic Charities in Yulee/Nassau County.

4. Received on October 25, 2017 from a citizen in Volusia County:

Email inquiry in Spanish was received from a Volusia County resident asking where to apply or call for assistance with a damaged roof.

DEO Response: DEO staff sent her a reply in Spanish directing her to FDEM hurricane-related assistance website and also provided contact information for the director's office of Volusia County Emergency Management, copying the director.

DEFINITIONS AND ACRONYMS

Action Plan

A description of a grantee's intended use for CDBG-DR funds that contain information on the following topics: the areas of greatest need for funding, the distribution and use of funds, program activity descriptions, low income targeting, and public comment.

Activity/Project/Program

The housing, infrastructure, economic development, or planning endeavor undertaken by the subrecipient.

AFFH

Affirmatively Furthering Fair Housing

Award (Federal)

The financial assistance that a non-Federal entity receives either directly from a Federal awarding agency or indirectly from a pass-through entity; or the cost-reimbursement contract under the Federal Acquisition Regulation that a non-Federal entity receives directly from a Federal awarding agency or indirectly from a pass-through entity.

CDBG-DR

The Community Development Block Grant – Disaster Recovery program

CFR

Code of Federal Regulations

DEO

Florida Department of Economic Opportunity

DOB

Duplication of Benefit - Funding received from two sources for the same item of work.

DRGR

Disaster Recovery Grant Reporting System, HUD's web-based reporting and grants management system

Federal Register

The official journal of the federal government of the United States that contains government agency rules, proposed rules, and public notices issued by federal administrative agencies.

FEMA

Federal Emergency Management Agency

Grantee

As used in this Action Plan, the State of Florida, Department of Economic Opportunity, as recipient of CDBG-DR from HUD.

HUD

U.S. Department of Housing and Urban Development

IA

FEMA Individual Assistance; Assistance to individuals and households.

Local government

A county, municipality, city, town, township, local public authority, school district, special district, intrastate district, council of governments (regardless of whether the council of governments is incorporated as a nonprofit corporation under state law), regional or interstate government entity, or agency or instrumentality of a local government; an Indian Tribe or authorized tribal organization, or Alaska Native village or organization that does not meet the definition of Indian Tribal Government; or a rural community, unincorporated town or village, or other public entity, for which an application for assistance is made by a state or political subdivision of a state.

Low income Household/Family

A household with an annual income at 31 percent to 50 percent of the area median income as determined by HUD.

Method of Distribution

Administrative guidelines

Moderate income Household/Family

A household with an annual income at 51 percent to 80 percent of the area median income as determined by HUD.

National Objective

The authorizing statute of the CDBG program requires that each activity funded, except for program administration and planning activities, must meet one of three national objectives: benefit to low- and moderate- income (LMI) persons; aid in the prevention or elimination of slums or blight; and meet a need having a particular urgency (referred to as urgent need).

NFIP

FEMA's National Flood Insurance Program

Non-Federal Entity

An institution of higher education, nonprofit organization, local government, Indian Tribe, or state that carries out a Federal award as a Recipient or Subrecipient.

PA

FEMA Public Assistance; Assistance to State, Local, Tribal and Territorial governments and certain private-non-profit organization for emergency work and the repair or replacement of disaster-damaged facilities.

Pass-through Entity

A non-Federal entity that provides a subaward to a Subrecipient to carry out part of a Federal program.

PHA

Public Housing Authorities

Program Income

Gross income received by a state, unit of general local government or subrecipient directly generated from the use of CDBG-DR funds.

QPR

HUD Quarterly Performance Report

Recipient

A non-Federal entity that receives a Federal award directly from a Federal awarding agency to carry out an activity under a Federal program.

Reasonable Cost

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. In other words, a reasonable cost is a cost that is both fair and equitable for the type of work being performed.

SBA

Small Business Administration

Section 3

Section 3 of the Housing and Urban Development Act of 1968, as amended, that helps foster local economic development, neighborhood economic improvement, and individual self-sufficiency.

Substantial Amendment

A change in program benefit or eligibility criteria, the addition or deletion of an activity, or the allocation or reallocation of a monetary threshold specified by the grantee in their action plan.

Subaward

An award provided by a pass-through entity to a Subrecipient for the Subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program.

Subrecipient

A non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program. It does not include an individual that is a beneficiary of such program. A Subrecipient may also be a Recipient of other Federal awards directly from a Federal awarding agency.

Subrecipient Agreement

An agreement between the grantee and the subrecipient identifying activities the subrecipient will undertake using CDBG funds.

UGLG

Unit of General Local Government

Unmet Needs Assessment

A process for identifying and prioritizing critical unmet needs for a community's long-term disaster recovery.

URA

The Uniform Act, passed by Congress in 1970, is a federal law that establishes minimum standards for federally funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms.

USACE

U.S. Army Corps of Engineers

Very low income Household/Family

A household with an annual income at 30 percent or below the area median income as determined by HUD.

Vulnerable Populations

HUD defines vulnerable populations as the working poor, minorities, Native Americans, people with disabilities, people with AIDS, the elderly, and the homeless.

Waiver

A revision to the standard CDBG regulations, requirements, and activities, granted by HUD.

WAP

Florida Weatherization Assistance Program



**FLORIDA DEPARTMENT *of*
ECONOMIC OPPORTUNITY**