

Infrastructure Repair Program

Public Questions & Responses



Q: Are school districts eligible for this grant opportunity?

A: The following entities are eligible for the Rebuild Florida Infrastructure Repair funding: county governments, city governments, water management districts and water authorities.

Q: As Unit of General Local Government (UGLC) is limited to a single project application, may this single application include multiple sub-projects, at multiple sites, within the jurisdiction of the UGLC?

A: DEO will only accept one project application for the Rebuild Florida Infrastructure Repair Program. The project application may consist of one infrastructure project that may have multiple service areas for example, if an entity would like to work on a sewer system which may have a few different work locations but would be the same project.

Q: If a UGLG can only submit one project application, but we have multiple IRMA eligible projects, whether or not we can submit that all as one combined project/application; or

A: DEO will only accept one project application per eligible entity.

Q: Can a UGLG actually submit multiple projects on separate applications?

A: DEO will only accept one project application per eligible entity, eligible entities are encouraged to submit their best most ready project for possible funding.

Q: A L/M income neighborhood often floods during heavy rainfall events because the existing system of swales does not provide adequate drainage capacity. The system was not actually damaged by Irma, but the County would propose to construct a system of drainage inlets, catch basins, pipes, etc. to provide greater drainage capacity to prevent flooding.

A: Eligible projects must show a clear tie back to damage created by Hurricane Irma.

Q: A L/M income neighborhood is served by an aging sanitary sewer system which fails during heavy rainfall events. The system was not actually damaged by Irma, but the County would propose to rehabilitate lift stations and manholes and reline leaking pipes to prevent future system failure.

A: DEO will only consider projects that are able to demonstrate damage caused by Hurricane Irma. DEO will not provide funds for projects that are damaged due to deferred maintenance.

Q: Our town got your email regarding the Request for Applications: \$85 Million Rebuild Florida Infrastructure Repair Program. We are very much wanting to see if we qualify for this program regarding rebuilding a bridge and roadway project we have. We are a very small town in Brevard County, which is one of the counties with the most hard hit by Hurricane Irma. Our town has only two entrances. One of the entrances has a bridge and roadway over



the M-1 Canal. Brevard County owns the Canal. Our town owns the bridge and roadway. (2 lane road over a 12 ft. diameter pipe culvert). During Hurricane Irma we had increased flow which caused degradation in the bridge and roadway as well as a pit forming underwater next to our bridge which undermines the pipe culvert bridge itself. This pit was formed by massive swirling water from the storm. Our town went to Brevard County for help this spring and the County agreed to replace our bridge and roadway with a box culvert bridge. They agreed to do the work and the permitting, but we have to incur all costs for the work, permitting, engineering, and materials. The engineering costs for this are \$74,950, and the replacement costs for the bridge and roadway are estimated at between \$245,000 and \$295,000. The difference in estimation dollars. Additionally, the St. Johns water management has told us they intend to build a weir on the M-1 canal very close to our town city limits which will reverse the current flow of the water in this canal westward towards the St. Johns River. It will also raise the mean water level. In storm conditions, they will open the weir and reverse the flow eastward to the Indian River. This additional change they plan for this coming year (building the weir) cause us to want to replace our bridge roadway as soon as possible. Our Mayor and town commissioners are volunteers. We do not have a town manager. We only have a town clerk. We are small, but this need is great for us. We are a low to moderate income town. Our population is approximately 725. We used money from our reserve funds for paying the initial engineering costs. We have approx. \$110,000 in reserves named for roadway repair, but it would need to be reallocated to be used for this project and would deplete our road repair funds which we still need. We are a very small town and we do not have money set aside for this and we need help finding grants or funding. Would you consider our project to be one that could fit in with your funding opportunity?

A: Eligible projects must meet the U.S. Department of Housing and Urban Development National Objectives and if scored and chosen to receive funds the project would need to meet all required federal procurement and environmental procedures.

Q: Are the other cities and the unincorporated Sarasota County eligible or is only The City of North Port?

A: Zip code 34266 has been designated by HUD as one of the Most Impacted and Distressed areas in Hurricane Irma. Sarasota County as a whole is designated by the State of Florida. HUD requires that at least 80% of our funds in the Rebuild Florida Infrastructure Repair Program must be spent in HUD designated Most Impacted and Distressed areas. The rest of Sarasota County and other state designates areas are still eligible to apply for the remaining 20%.

Q: Does this need to be a specific resolution for this grant or a general resolution that defines the authority of the Executive Director?

A: If the applying entity has an already existing document that explicitly gives the Executive Director the authority to apply for grant funding that may be submitted to DEO in the application packet.



Q: On the Application Form, is the Total CDBG-DR Request the amount of the project or the portion that we are requesting (i.e. 75%)

A: On the Application Information form please state the dollar amount of the CDBG-DR funds that you are requesting. Under section IV of the Proposal Information form please list any and all other sources of funding in the box labeled Leveraged and Committed Additional Sources. If you have other sources of funding committed for the project, please include applicable documentation as an attachment to the application.

Q: Even though we are submitting one application, can we have multiple projects in the application?

A: DEO will only accept one project application for the Rebuild Florida Infrastructure Repair program. The project application may consist of one infrastructure project that may have multiple service areas for example, if an entity would like to work on a sewer system which may have a few different work locations but would be the same project.

Q: On the Proposal Form, can we check both boxes for the National Objective (Low/Mod Income and Urgent need)

A: Yes, if your proposed project meets both objectives please check both boxes.

Q: Are we able to apply for CDBG-DR infrastructure funds on a project that is currently under construction but not solicited with federal guidelines?

A: Any project would need to meet federal procurement guidelines.

Q: The FAQs state that each Unit of Local Government can submit only one application. Can our one application contain multiple projects as long as all are eligible per the guidance?

A: DEO will only accept one project application per eligible entity.

Q: And if so, do multiple projects under the one application have to be related to one another?

A: DEO will only accept one project application for the Rebuild Florida Infrastructure Repair Program. The project application may consist of one infrastructure project that may have multiple service areas for example, if an entity would like to work on a sewer system which may have a few different work locations but would be the same project.

Q: Within the guidelines it is stated that “only” “one” application per municipality, could you please explain exactly what is meant by that statement? Is it one packet with application from departments that have projects that were created from Hurricane Irma. We have several projects in LMI areas that were affected by Irma that we plan to apply for funding; however, the statement is confusing when it addresses only “one” application and the guidelines address the types of projects that qualify (e.g., infrastructure, bridges, roads, etc.)



In addition, the application itself doesn't allow for but one project; therefore, we would have to use more than one application to apply for the projects that qualify IAW DEO guidelines.

A: DEO will only accept one project application per eligible entity.

Q: I am trying to calculate the LMI population served and I was wondering if you could provide data by zip code or service area of the LMI population.

A: Please follow the below link to the U.S. Department of Housing and Urban Development website for valid ways to determine your LMI data.

<https://www.hudexchange.info/programs/cdbg/cdbg-low-moderate-income-data/>

Q: We have a meeting with our Commission Chair on July 30. Can school districts apply for the Infrastructure Repair project?

A: The eligible entities for the Rebuild Florida Infrastructure Repair Program are counties, cities, water management districts and water authorities that are located in the [eligible areas](#) affected by Hurricane Irma.

Q: Do all infrastructure projects have to support LMI housing?

A: All infrastructure projects must demonstrate how they support LMI housing.

Q: Will the funds be allocated from the state to the counties, so Town and Cities would have to apply to the County? For example, we are a Town located in Broward County, would we have to apply to the County for this funding?

A: The Rebuild Florida Infrastructure Repair Program will be available for units of General Local Government (UGLG) including counties, municipalities, water management districts and water authorities that are located in the [eligible areas](#) affected by Hurricane Irma. Individual cities or towns may apply for projects as long as it is located in the eligible counties and zip codes that experienced storm damage.

Q: Does the Infrastructure Repair program apply to our vehicle and truck shops where we service our county vehicles?

A: HUD does not allow the use of funds for facilities that are meant for general conduct of government.

Q: And if so how do we apply for 19 shop locations and 29 fueling sites?

A: See the previous response.

Q: The FAQs section question 2 states only 1 application can be submitted by a local government.

- a. **How would this work if there are several public infrastructure projects that qualify for CDBG-DR funding?**

A: DEO will only accept one project application per eligible entity.

- b. **Should a UGLG bundle projects together with other similar projects?**

A: DEO will only accept one project application for the Infrastructure Repair program. The project application may consist of one infrastructure project that may have multiple service areas. For example, an entity may work on a sewer system, which could have a few different work locations but would be considered the same project.

- c. **What about multiple department requests?**

A: DEO will only accept one project application per eligible entity.

- d. **How would this impact multiple city requests within a county?**

A: Both counties and cities within the Irma impacted areas are eligible to submit one project application.

Q: Project Readiness: There are several projects that have not received final approval by FEMA for Public Assistance reimbursement.

- a. **Will the delay on FEMA's behalf cost a UGLG 20 points during the grant application review process for something not in the UGLG's control?**

A: Each project will be scored on the criteria made available in the application guidebook.

Q: As an example, Duval County was listed as a Most Impacted and Distressed County per FEMA and the CDBG-DR Action Plan. St. John's County was not, but a zip code for St. John's County 32084 is listed as a MID Zip Code.

- a. **Was this in error on page 9? The data seems to differ from what was published two years ago.**

A: The entirety of St. Johns County was not labeled as Most Impacted and Distressed, only zip codes 32084 and 32145.

- b. **Please confirm discrepancies?**

A: The entirety of St. Johns County was not labeled as Most Impacted and Distressed, only zip codes 32084 and 32145.

Q: Per the scoring criteria on pg 7 Element #6: Special Designation: The listed State Statutes were codified prior to Hurricane Irma in 2017. In fact, the last update was 2016 according to www.leg.state.fl.us. As such, the special designated areas had no bearing on the counties declared by Hurricane Irma and there does not appear to be any correlation between the two statutes cited.

- a. **Can you tell us why there are two references to state statutes created prior to Hurricane Matthew or Hurricane Irma?**

A: The statutes cited speak to the definitions that govern Rural Community and Area of State Critical Concern.

b. What hurricane IRMA data and/or reports does DEO have to substantiate stormwater, wastewater, and sewer projects are a priority over other types of public infrastructure projects?

A: The Federal Register does not require DEO to provide data on stormwater, wastewater and sewer damage in determining project priorities.

c. Why are concessions and points being made for areas not hardest hit by IRMA as referenced in data from previous CDBG-DR action plans and documentation specific to damage estimates in more populous counties; which also have higher LMI populations?

A: The Most Impacted and Distressed Counties and zip codes are determined by HUD and are eligible for at least 80% of the total funds. The remaining state designated areas are eligible for up to 20% of the total funds.

Q: Will scoring for CDBG-DR be based on the overall project costs, or the portion of the project funded by CDBG-DR funds? For example, if CDBG-DR funds are used as part of a match on a mitigation project, where the CDBG-DR funds will be used for maintenance (or resilience) – will the project be evaluated based on the overall project scope or the portion that is to be funded by CDBG-DR, in this instance ongoing maintenance costs?

A: All projects will be evaluated on the criteria set forth in the guidelines. Each entity must demonstrate that it has the ability and capacity to provide required maintenance.

Q: Why are project for water and sewer facilities being provided preferential points per DEO's guidelines?

A: The critical nature of these services.

a. Is this authority provided by HUD to provide preferential points for specific types of projects eligible under CDBG-DR? If so, please cite the federal regulation.

A: HUD allows DEO the flexibility to fund projects that meet their national objectives and eligible activities.

Q: Citizen Participation Requirements listed on page 12 differs from the CATF requirements on pg 7 for scoring criteria.

a. Why are these requirements in conflict?

A: The Citizen Participation Requirement is a requirement for funding.

b. Does DEO want two public meetings held in less than 30 days?

A: All projects must meet all federal, state and local public meeting requirements.

c. Why would a CATF requirement receive points, but the Citizen Participation Requirements do not?

A: The Citizen Participation Requirement is a requirement for funding.

- d. Why is the IRMA application different from Hurricane Matthew with regards to citizen participation?**

A: Funding for Hurricane Matthew is under a different Federal Register.

- e. Will DEO require a CATF and Citizen Participation meeting moving forward when more CDBG-DR funds are obligated, or for Hurricane Michael?**

A: This program only applies to Hurricane Irma.

- f. The language used to describe the membership of a CATF states that members should be “appointed.” Did anyone from DEO speak to the counties identified, as most distressed, to determine the legality of that statement? Appointments typically are codified in a city/county charter and must be approved by a governing body process which takes longer than 30 days in most communities. Did anyone in DEO consider that the creation of a task force, in less than 30 days will not be feasible for the counties who are designated to receive Hurricane Irma funding? Additionally, most counties utilize their local mitigation strategy committees to discuss prioritization of projects per State regulations, in order to receive federal reimbursement during disasters. These meetings are open to the public for comment and minutes are recorded. What is the difference between the regulations of DEO, FDEM, FEMA, and HUD in regards to project prioritization, utilizing CDBG-DR as a match for other federal funds and citizen participation?**

A: Citizen Advisory Task Force or (CATF) are already established under the CDBG program.

Q: Related to project readiness-

- a. If a project has already broken ground or is under way thus implying funding is in place, is it the intent of DEO to approve projects that utilize CDBG-DR funds to enhance a project site versus utilizing CDBG-DR funds to supplant the total project budget that has been approved by the local jurisdiction? How would this work for projects already underway and funded by other sources?**

A: CDBG-DR funds can be used as a local match requirement for projects underway. Projects will be required to meet all applicable HUD guidelines.

Q: Will DEO consider CDBG-DR for routine maintenance?

A: All projects must demonstrate damage tied back to Hurricane Irma.

Q: Does DEO have any Hurricane Irma records of statewide damage caused and directly related to Hurricane Irma for drinking water, storm water and sewer systems impacted by the disaster in the counties that were impacted by IRMA?

A: Table 31 on pages 81-82 in the 2018 State of Florida Action Plan for Disaster Recovery- Substantial Amendment 1 shows the infrastructure unmet needs broken down by categories, including water control facilities.



Q: How did DEO determine the greatest area of need for prioritization of CDBG-DR funding related to Hurricane Irma damage?

A: HUD determines the Most Impacted and Distressed (MID) areas, which are cited in Federal Register Volume 83 Number 28 and Federal Register Volume 83 Number 157.

Q: The City of St. Augustine has a project that is under design that is a FEMA Hazard Mitigation Grant Program (HMGP) project that was approved for \$1M in design and \$10.5 M for construction. We are partnering with St. Johns County on the construction phase of this project to use \$2M of CDBG-DR funding from Hurricane Matthew to go towards our construction costs. We recently received 30% design cost estimates for the project. The project costs will be increasing from \$11.5M to \$17.5 M (\$6M increase). This project area was also impacted from Hurricane Irma. From reviewing the criteria for the Rebuild Florida Infrastructure Program, it seems that is project could also qualify. We wanted to see if this project would be eligible for the CDBG-DR Irma funding to go towards the cost increase (\$6M)?

Here is the scope of work for the project:

The project will serve approximately 200 acres situated within the City's downtown Historic core. This area suffered damages from Hurricane's Matthew and Irma. As a result, the City is undertaking measures to repair and improve the existing infrastructure to provide flood protection from nuisance flooding and improved stormwater drainage. The City shall install backflow prevention or a similar functioning type of system at the existing stormwater outfalls, as well as the outlet of Lake Maria Sanchez, to prevent coastal surge, high tides, and sea level rise from flooding low-lying areas. The City will install a bulkhead around the low-lying area at the south end of the Project to prevent coastal waters from flowing over the roadway and into the project area. Finally, the City will install conveyance improvements along Cordova Street (between King Street and Lake Maria Sanchez), along Granada Street (between King Street and Bridge Street), and along Bridge Street between Granada Street and Cordova Street, as well as a stormwater pump station at Lake Maria Sanchez to discharge collected stormwater and minimize storm-related flooding within the project area.

Please find attached the Duplication of Benefits reviewed under the CDBG-DR Matthew program.

A: An applicant must clearly show damage tied back to Hurricane Irma, otherwise it may be interpreted as a duplication of benefits.

Q: Can a County lump multiple federal funded projects together in a single CDBG-DR grant application to receive CDBG-DR Infrastructure match funds for projects being funded under the Hazard Mitigation Grant Program or the FEMA's Public Assistance Program?

A: Each eligible entity can submit one project application with one project.

Q: Assuming other criteria are met, can the County combine two geographically dispersed projects for a Storm Water Management Pilot Program together for a single application since

they are being designed and developed under a single contract for both locations? This pilot program will serve to maintain access to residential areas by providing flood relief on residential access roads in low lying areas. It would mitigate against future disasters and also provide evidence on how to redesign roads and storm-water management system in the Florida Keys facing the impact of sea level rise.

A: Eligible projects must show a clear tie back to damage created by Hurricane Irma.

Q: Could multiple jurisdictions within the County seek funding as a regional project to benefit a vital private, non-profit hospital which was destroyed by Hurricane Irma?

A: Yes, multiple communities can apply for funds, however, that serves as the one project application for each entity.

Q: The City identified many important needs emanating from Hurricane Irma. I am hoping that feedback can be provided on potential projects as to their eligibility.

Is there a process by which potential projects can be pre-vetted by the Grantor prior to application to avoid expending resources on projects that are not eligible?

For example, the City experienced flooding in certain low income residential neighborhoods due to dilapidated drainage culverts. Could these culverts be replaced to repair to current elevations and maintainable condition thus reducing flood threats in the future?

As another example, the dirt road leading to the City's water plant was inaccessible and experienced loss of road material as a result of the hurricane. Can this road and associated drainage be improved to avoid restricted access to the water plant?

A: There is no pre-vetting process in place. All projects must demonstrate damage caused by Hurricane Irma and meet the HUD national objectives.

Q: Will the funds be allocated from the state to the counties, so Town and Cities would have to apply to the County? For example, we are a Town located in Broward County, would we apply to the County for this funding?

A: No, counties as well as cities are each eligible to apply directly to DEO for funding.

Q: Can a municipality submit for more than more project as they are in different Eligible Categories, like Restoration and Demolition?

A: Each eligible entity can submit one project application.

Q: The Clay County Animal Control facility is a repetitive loss facility located on the Black Creek. Would this be an eligible project as we would like to:

- **Demo the current facility,**
- **Return the existing land to green space and**
- **Rebuild the facility outside of the floodway.**

This facility support animal control for all of Clay County and its municipalities, which will be in support of the LMI community and is an Urgent Need.



A: A potential project must be able to show clear damage from Hurricane Irma and meet all the HUD and DEO guidelines.

Q: Infrastructure Repair Program funding may be utilized as match towards the FEMA Public Assistance grant program as reflected in the program guide and action plan. Therefore, is this grant activity ONLY eligible to local governments who cannot afford the mandatory match requirement?

A: DEO Disaster Recovery funds are to be used as the funds of last resort. Projects will be scored on the criteria laid out in the guidebook.

Q: Infrastructure Repair Program funds may be used to meet a match requirement towards the FEMA Public Assistance grant program. Is this only eligible to local governments who still have active/in progress Category C-G: permanent repair projects? Therefore, if all repairs have been completed and paid by the local government; we cannot seek funding for match?

A: Projects using funds as a local match would be required to make sure all HUD requirements and guidelines are met and followed. It would not be possible to verify all HUD standards were met.

Q: What general and specific guidance or direction can FDEM and DEO provide on the subject compliance with match related policies/rules? To date, all that I have been able to locate on the subject is FEMA's HMA Cost share guide. Source: <https://www.fema.gov/media-library-data/1463766664964-4e6dd22652cb7c8a6162904f3b1b2022/FinalHMACostShareGuide508.pdf>

A: Applicants have the option to apply for Irma Infrastructure funds as a local match for Hurricane Irma related projects, so long as all HUD guidelines are met.

Q: Can we apply for grant funds as a reimbursement to us for funds that we have already spent? For example, there are some activities related to Irma disaster recovery that FEMA would not reimburse us for.

A: Funds may be requested to reimburse HUD allowable activities if a city or county has used reserve funds for the project. Completed projects would need to follow all HUD and DEO guidelines including federal procurement and environmental regulations.

Q: Same question related to a canal restoration project that we just recently completed using our municipal funds. We did not apply to FEMA for reimbursement.

A: Completed projects would need to follow all HUD and DEO guidelines including federal procurement and environmental regulations.