

Public Action Plan

Community Development Block Grant – Disaster Recovery

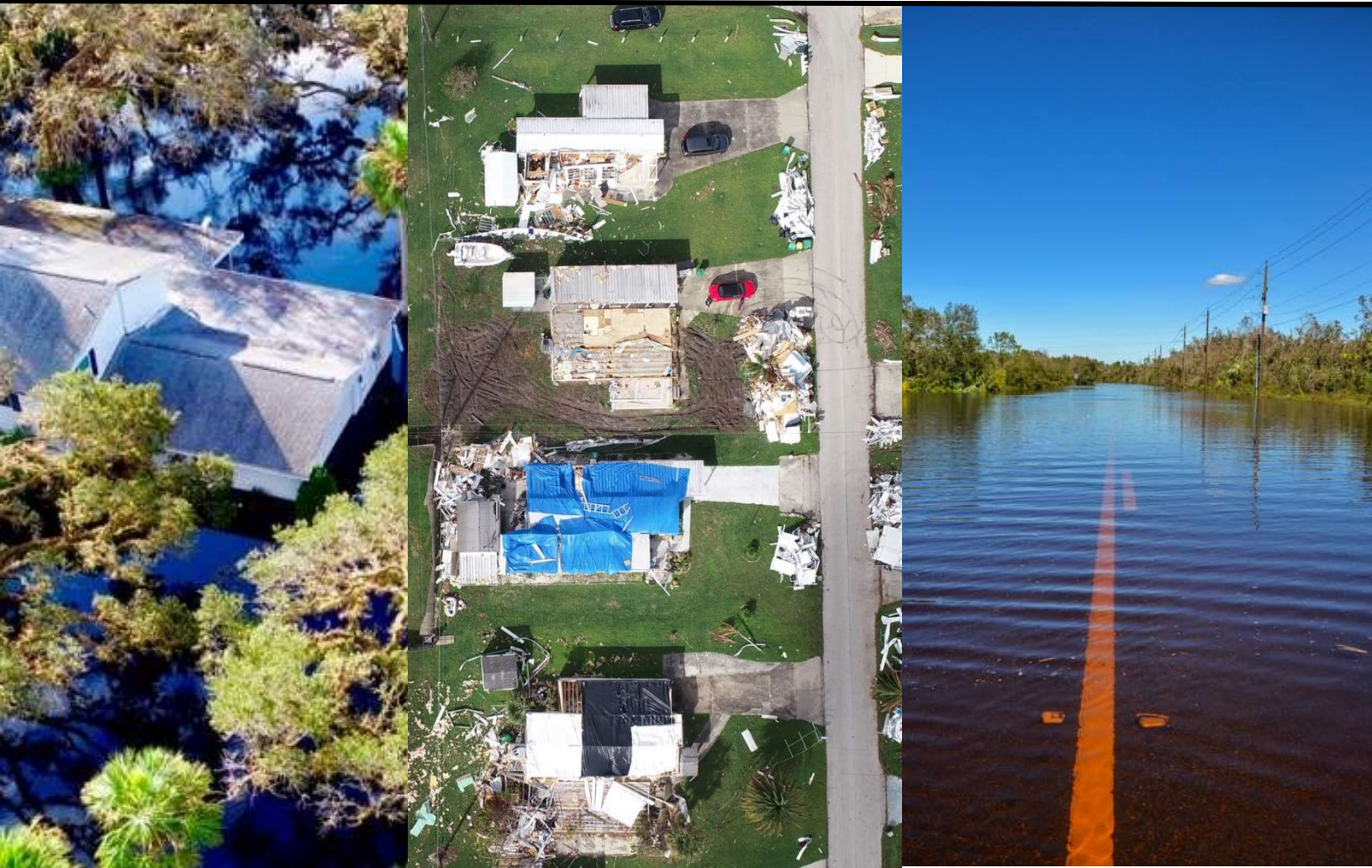


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Action Plan Amendments and Version History

Date	Description of Change	Substantial/Non-Substantial
July 26, 2023	Original draft published for public comment through August 25, 2023.	Original draft published
Sept 5, 2023	Draft 2.0 published for the Sept 12, 2023, BCC Meeting. Non substantive edits made throughout for clarity.	Second draft published
Sept, 22, 2023	Minor edits made throughout for clarity Adjusted housing rehabilitation and reconstruction program caps. Submitted to HUD for review in DRGR.	Original version sent to HUD

1. Executive Summary



1.1. OVERVIEW

The U.S. Department of Housing and Urban Development (HUD) announced that Sarasota County will receive \$201,535,000 in funding to support long-term recovery efforts following impacts from Hurricane Ian in 2022 through the Continuing Appropriations Act, 2023 (Pub. L. 117–180, Division A) approved September 30, 2022, and the Department of Housing and Urban Development Appropriations Act, 2023 (Pub. L. 117–328, Division L, Title II) approved December 29, 2022, for major disasters occurring in 2022. Community Development Block Grant - Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address the remaining unmet need in Sarasota County, Florida.

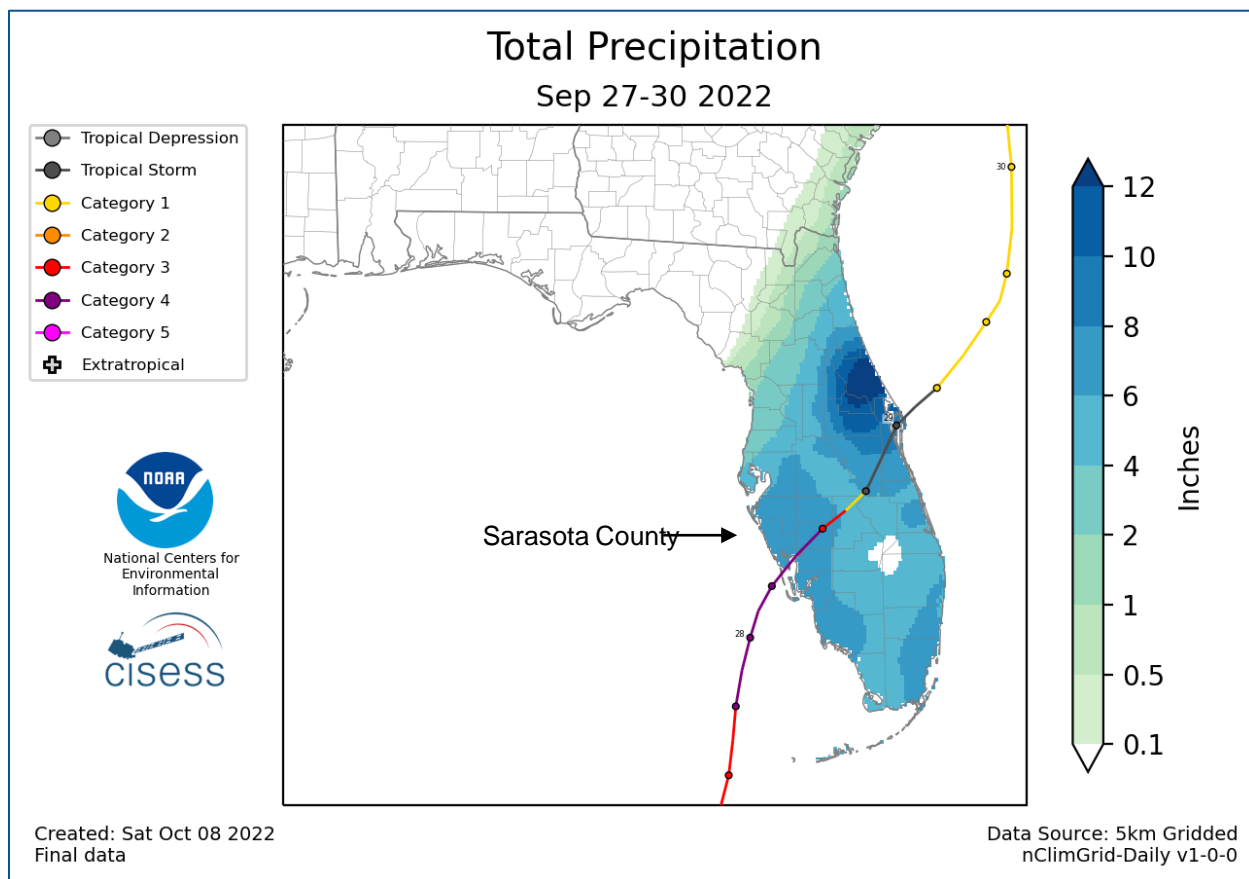
To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated *\$201,535,000 in CDBG-DR funds to Sarasota County in response to Hurricane Ian*, DR-4673-FL, through the publication of the Federal Register, 88 Fed. Reg. 32,046 (May 18, 2023) <https://www.govinfo.gov/content/pkg/FR-2023-05-18/pdf/2023-10598.pdf>. This allocation was made available through Title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.)

1.2. DISASTER-SPECIFIC OVERVIEW

On September 28, 2022, Hurricane Ian made landfall in the State of Florida, resulting in significant damage and casualties. The Category 5 hurricane's 200-mile wind field caused winds exceeding 85 miles per hour within Sarasota County. As a result, the State of Florida experienced a total of 144 deaths, with 10 of those fatalities occurring within Sarasota County.¹ This death toll ranked Sarasota County second in terms of the highest number of fatalities, following Lee County. Furthermore, the hurricane brought widespread devastation from over 21 inches of rainfall, causing significant flooding.

¹ Florida Department of Law Enforcement Medical Examiner's Commission. "Hurricane Ian Deaths Report." December 9, 2022. [https://www.fdle.state.fl.us/News/2022/December/Update-Florida-Medical-Examiners-Commission-Hu-\(1\)](https://www.fdle.state.fl.us/News/2022/December/Update-Florida-Medical-Examiners-Commission-Hu-(1)).

Figure 1-1. Hurricane Ian Track²



While Sarasota County did not suffer a direct hit from Hurricane Ian, the southern region of the County experienced catastrophic damage. The Holiday Park mobile home community in the City of North Port was nearly destroyed, impacting numerous low-to-moderate income (LMI) households who resided there.

² U.S. Department of Commerce. "Hurricane Ian: September 30, 2022." April 7, 2023. National Weather Service. Accessed July 18, 2023. <https://www.ncei.noaa.gov/access/monitoring/monthly-report/national/202209/supplemental/page-5>.

Figure 1-2. Hurricane Ian Damage in Sarasota County³



Figure 1-3. Hurricane Ian Damage in City of North Port, Sarasota County⁴



³ Sarasota County Government. Hurricane Ian damage at Harbor Isles Mobile Home Park, October 2022

⁴ Sarasota County Government. Hurricane Ian flooding in City of North Port, September 2022

Additionally, the excessive rainfall caused severe flooding throughout Sarasota County for several days following the hurricane. High winds damaged buildings, including the historic Venice Theatre building, the Salvation Army of Sarasota County’s North Port facility, and the Boys & Girls Club of Sarasota and DeSoto Counties’ North Port club (Gene Matthews Club).

The hurricane's impact was felt across the entire region, resulting in downed trees, power outages, property damage, and widespread flooding and debris. The disaster caused damages to infrastructure, communication systems, businesses, and other services. Several communities within the County remained without functioning electricity and water months after the hurricane as the process of cleanup and restoration continued.

1.3. SUMMARY

The aftermath of Hurricane Ian left a substantial number of households in Sarasota County grappling with flood and wind damage to their home and personal property. Thousands of residents applied for Federal Emergency Management Agency (FEMA) and Small Business Administration (SBA) disaster assistance. Sarasota County, local municipalities, and nonprofit organizations identified over \$135 million in infrastructure and public facilities damage. The disaster also exacerbated the vulnerabilities and risks associated with scarce affordable housing and a limited labor force in trades.

1.3.1. Data Analysis

Immediately following Hurricane Ian, Sarasota County and local municipalities began collecting disaster impact data in partnership with the Florida Division of Emergency Management (FDEM), FEMA, and SBA. Disaster impact data was collected and compiled through the following programs:

- FEMA Individual Assistance (IA) – Data is self-reported by residents into a publicly available portal detailing the impacts to their homes and property.
- FEMA Public Assistance (PA) – Data is collected by the County, municipalities, nonprofits, and other public agencies detailing the impacts to infrastructure and public facilities through Project Worksheets.
- SBA Disaster Assistance – Data is self-reported by homeowners, nonprofits, and businesses using a loan application.

These data sets provide the most comprehensive data available on the impacts to public facilities, infrastructure, and property within the impacted area.

The County compiled and analyzed this data and information to identify the remaining needs of the disaster-impacted community that were not addressed with insurance, FEMA, and SBA program assistance along with other methods of support (i.e., fundraising and state grants). The table below provides the results of the analysis and the County’s remaining unmet need in the categories of housing, infrastructure and public facilities, and economic recovery.

Table 1-1. Sarasota County Unmet Need Summary

Category	Unmet Need	% of Unmet Need
Housing	\$524,503,312	66%
Infrastructure and Public Facilities	\$219,812,998	28%
Economic Recovery	\$48,207,968	6%
TOTAL	\$792,524,278	100%

1.3.1.1. Housing Impacts

57,377 households in Sarasota County applied for FEMA IA for Hurricane Ian, and of those applicants, 7,497 homeowners reported real property damage and 1,277 renters reported personal property damage. Reviewing the eligible housing units in the FEMA IA database, 1,904 households experienced substantial damage with flooding over 12 inches of water and are expected to apply for CDBG-DR assistance. Over 70 percent of these substantially damaged homes reported incomes below 80 percent of the area median income (AMI) by household size. Additionally, Southwest Florida had limited affordable housing prior to the storm. The depletion of available housing stock impacts the whole community. When analyzing survey data from both individuals and organizations within the County, there was a resounding need for new affordable housing. To make a more resilient community, Sarasota County must find ways to increase the capacity of affordable housing, especially for LMI households. The County analyzed FEMA IA and SBA data and determined the remaining unmet housing need is **\$524,503,312**.

Figure 1-4. Hurricane Ian Housing Damage in Sarasota County⁵



1.3.1.2. Infrastructure and Public Facilities Impacts

County and municipal infrastructure and public facilities experienced severe damage and disruptions from Hurricane Ian, cutting off access to critical services for the community’s most vulnerable residents. Many neighborhood streets throughout Sarasota County, including the City of North Port and City of Venice, were completely impassable, making it impossible for residents to leave their flooded homes and extremely dangerous for emergency services to reach these areas.

⁵ Sarasota County Government. Hurricane Ian Operation Blue Roof, October 2022

Figure 1-5. Hurricane Ian Damage to the Salvation Army of Sarasota County North Port Facility⁶



⁶ Salvation Army of Sarasota. Hurricane Ian damage to facility. City of North Port, September 2022

Figure 1-6. Hurricane Ian Interior Damage to the Boys & Girls Club in City of North Port ⁷



South River Road, a critical evacuation route that serves the community of Englewood flooded. This forced some residents to backtrack through hazardous conditions while others returned to their homes, unable to evacuate. The City of North Port and the Englewood area have some of the highest concentrations of LMI households in the County. The County analyzed several data sets to determine infrastructure and public facilities unmet needs, including FEMA PA projects, Resilient Florida Program projects, Hazard Mitigation Grant Program (HMGP) projects, and unmet needs from nonprofit organizations. Based on the data analysis, the County has identified a total infrastructure and public facilities unmet need of **\$219,812,998**.

⁷ Boys & Girls Club of Sarasota and Desoto Counties. Hurricane Ian damage to facility. City of North Port, September 2022.

Figure 1-7. Hurricane Ian Flooding in City of North Port, Sarasota County⁸



Figure 1-8. Hurricane Damage to Venice Theatre Building in City of Venice⁹



⁸ Sarasota County Government. Hurricane Ian flooding in City of North Port, September 2022

⁹ Sarasota County Government. Hurricane Ian damage to Venice Theater building in City of Venice, September 2022

1.3.1.3. Economic Impacts

To determine the unmet need for economic recovery, the County analyzed SBA data compiled to determine the amount of verified loss incurred by businesses compared with the amount of assistance provided by SBA. The SBA data was filtered based on loan type and excluded all home loans, individual loans, loans to nonprofits, and COVID stimulus loans. This process provided the list of businesses that applied to SBA for Hurricane Ian-related disaster assistance and the amount of assistance they received. The assistance provided by SBA was deducted from the verified loss, leaving the unmet need for economic recovery of **\$48,207,968**.

Figure 1-9. Hurricane Damage to Business in Sarasota County¹⁰



1.3.2. Citizen Engagement

The County also conducted targeted outreach to gather disaster impact data, identify unmet needs, and obtain feedback on the community's priority recovery initiatives. To assist in its engagement efforts due to the community's unfamiliarity of CDBG-DR, the County rapidly established a recognizable brand for its CDBG-DR funds and program: Resilient SRQ.

¹⁰ Sarasota County Government. Hurricane Ian damage to local businesses in south Sarasota County, September 2022

Sarasota County

Resilient SRQ

Community Development Block Grant-Disaster Recovery

The County administered an individual and an organization survey to allow the community to provide their unmet needs and identify project and program priorities. The responses included 896 individual completed surveys and 175 completed organization surveys. In addition, information was gathered from Sarasota County departments along with the City of North Port, City of Sarasota, City of Venice, and Town of Longboat Key.

The County held three public meetings across the community, which provided an overview of the CDBG-DR program and allowed the public to ask questions and provide comments.

Figure 1-10. Resilient SRQ Public Meeting at Betty J Johnson Public Library¹¹



¹¹ Sarasota County Government. Resilient SRQ public meeting held June 22, 2023, in Sarasota County.

Over 80 community members attended these meetings. Sarasota County presented CDBG-DR information and shared the surveys with many community organizations. These organizations included the Homeless Continuum of Care, the Community Alliance of Sarasota County, the Council of Governments, the South County Tiger Bay Club, Community Organizations Active in Disaster, the Affordable Housing Advisory Committee, and the Sarasota County Long-Term Recovery Group. Approximately 100 community groups are represented in these organizations.

Figure 1-11. Resilient SRQ Public Meeting Citizen Engagement¹²



UNMET NEEDS AND PROPOSED ALLOCATION

Once the unmet needs were identified, Sarasota County staff recommended to the Board of County Commissioners a program budget to allocate the available grant funds to eligible program activities. The budget development process considered the data analysis findings as well as input from community members, nonprofits, private businesses, and municipal leaders. The budget is designed to meet the requirements of CDBG-DR grants funds and best serve the whole community through its long-term disaster recovery efforts.

The data in the following table represents a comprehensive assessment of the remaining needs from Hurricane Ian after federal and state resources have been exhausted and the proposed allocation of CDBG-DR grant funds for disaster recovery activities. It outlines the different categories of unmet needs resulting from the disaster and presents a breakdown of how the available funds will be allocated to address these needs. The information in the "Unmet Needs and Proposed Allocation" table serves as a vital resource for policymakers, decision-makers, and community stakeholders to understand the scope of the remaining needs and the planned distribution of resources. It helps ensure that the available funds are allocated strategically and efficiently to address the most critical areas of recovery and support the long-term resilience of the affected communities.

¹² Sarasota County Government. Citizen providing input at Resilient SRQ public meeting held June 22, 2023, in Sarasota County.

Table 1-2. Unmet Need and Proposed Allocation^{13 14 15}

Category	Remaining Unmet Need	% of Unmet Need	Program Allocation	% of Program Funds
Administration	\$0	N/A	\$10,076,750	5.0%
Planning	\$0	N/A	\$5,000,000	2.5%
Housing	\$524,503,312	66.2%	\$101,458,250	50.3%
Infrastructure & Public Facilities	\$219,812,998	27.7%	\$70,000,000	34.7%
Economic Revitalization	\$48,207,968	6.1%	\$0	0.0%
Public Services (to address economic recovery)	\$0	N/A	\$15,000,000	7.5%
Mitigation	\$0	N/A	\$0	0.0%
TOTAL	\$792,524,278	100.0%	\$201,535,000	100.0%

To address the unmet economic recovery needs from the impacts of Hurricane Ian, the County has identified program activities in career services and training opportunities. These types of activities are categorized by HUD as “public services.” The unmet economic recovery needs are detailed in Section 2.5 of this Action Plan. The proposed programs to address economic recovery unmet needs is in Section 4.3.3 of this Action Plan.

Table 1-2 summarizes the unmet need estimates by recovery category and the associated CDBG-DR funding allocation. The recovery categories include housing, infrastructure/public facilities, and economic revitalization (public services). As depicted in the table above, the funding percent by recovery category is roughly proportional to the recovery categories percentage of unmet need, with a significant portion dedicated to housing recovery.

1.3.3. Plan Objectives

The primary objectives of Sarasota County’s CDBG-DR Action Plan are to:

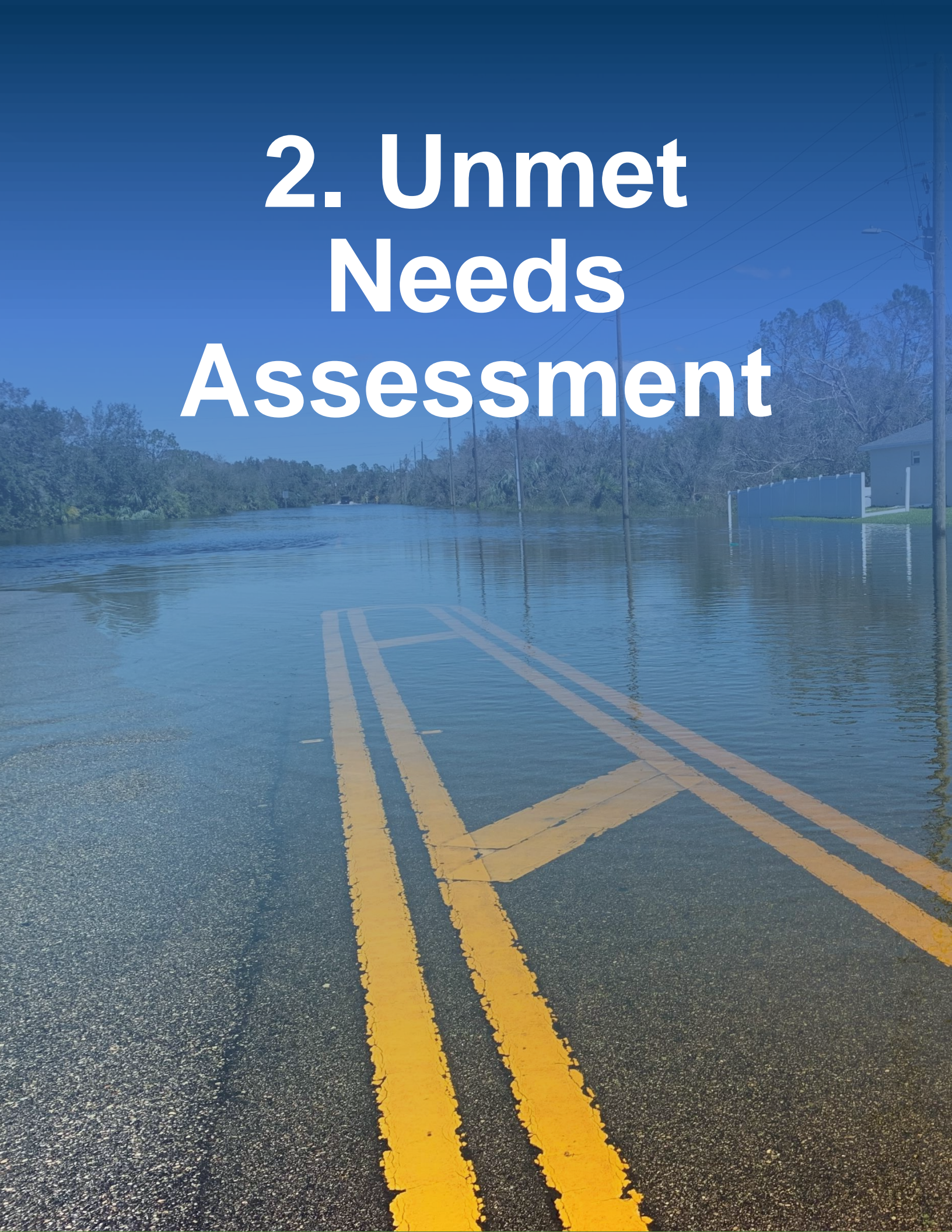
- Provide resilient and sustainable solutions for households with homes damaged or destroyed by Hurricane Ian;
- Support a more resilient community with safe and affordable housing;
- Strengthen LMI neighborhoods impacted by the disaster by investing in infrastructure and public facilities;
- Enhance economic stability and prosperity by increasing tradesmanship and career opportunities; and
- Mitigate the impacts of flooding in LMI areas throughout the County.

¹³ OpenFEMA. "Data Sets: Individual Assistance Applicant Data." Last modified 2023. FEMA.gov. Accessed May 15, 2023. <https://www.fema.gov/about/openfema/data-sets/>.

¹⁴ Small Business Administration. "SBA Disaster Assistance Applicant Data." Last modified 2023. SBA Open Data. Accessed June 13, 2023. <https://data.sba.gov/>.

¹⁵ Sarasota County and Local Municipality FEMA PA Disaster Damage Estimates

2. Unmet Needs Assessment



2.1. OVERVIEW

The County implemented a comprehensive approach to compiling and analyzing the disaster impacts of Hurricane Ian and the community's remaining unmet needs. The unmet needs assessment includes a detailed analysis of the disaster impacts on housing, infrastructure and public facilities, and the local economy.

2.1.1. HUD-Identified Most Impacted and Distress Area

As determined by HUD and conveyed in the allocating Federal Register Notice ([88 Fed. Reg. 32,046 \(May 18, 2023\)](#)), the Most Impacted and Distressed (MID) area for this funding allocation is the entirety of Sarasota County. The allocation Federal Register Notice states:

“To comply with requirements that all funds are expended in MID areas, . . . Sarasota County, Florida; . . . must use 100 percent of the total funds allocated to address unmet disaster needs or mitigation activities within the HUD-identified MID areas” 88 Fed. Reg. 32,046 (May 18, 2023).

As such, the County assessed disaster damage within the County and local municipalities to identify unmet needs throughout the MID.

2.1.2. Specific Factors That Cause Damage

The County analyzed several sources for qualitative and quantitative data related to the impacts of Hurricane Ian. The analysis included a review of disaster damage, demographic, and socioeconomic data sets from the following sources:

- Hurricane Ian disaster impact reports from Sarasota County Emergency Management, FDEM, and the National Hurricane Center
- Affordable housing impacts and analysis from United Way Suncoast
- Disaster impact data from nonprofits
- FEMA IA data for Hurricane Ian
- FEMA PA data for Hurricane Ian from:
 - Sarasota County
 - City of North Port
 - City of Sarasota
 - City of Venice
 - Town of Longboat Key
- Resilient Florida Project data
- HMGP project analysis
- SBA disaster assistance data for Hurricane Ian
- U.S. Census American Community Survey
- HUD block group data
- Sarasota County Hurricane Ian Unmet Need Analysis developed by the HUD CDBG-DR Regional Office
- Resilient SRQ Individual and Organization Survey data
- Local Business Impact Survey data
- Building permit data prior to and following Hurricane Ian
- Public Housing Authority (PHA) program data and disaster impact data
- Continuum of Care point-in-time count data and disaster impact data
- Consultations with community groups that serve vulnerable and marginalized populations

When a major disaster strikes, those struggling to recover tend to be disproportionately minority, elderly, aging in place, persons with disabilities, families with children, and households with limited English proficiency.¹⁶ To better identify the disaster impacts of the whole community, the County analyzed the above-mentioned data sets to determine the following:

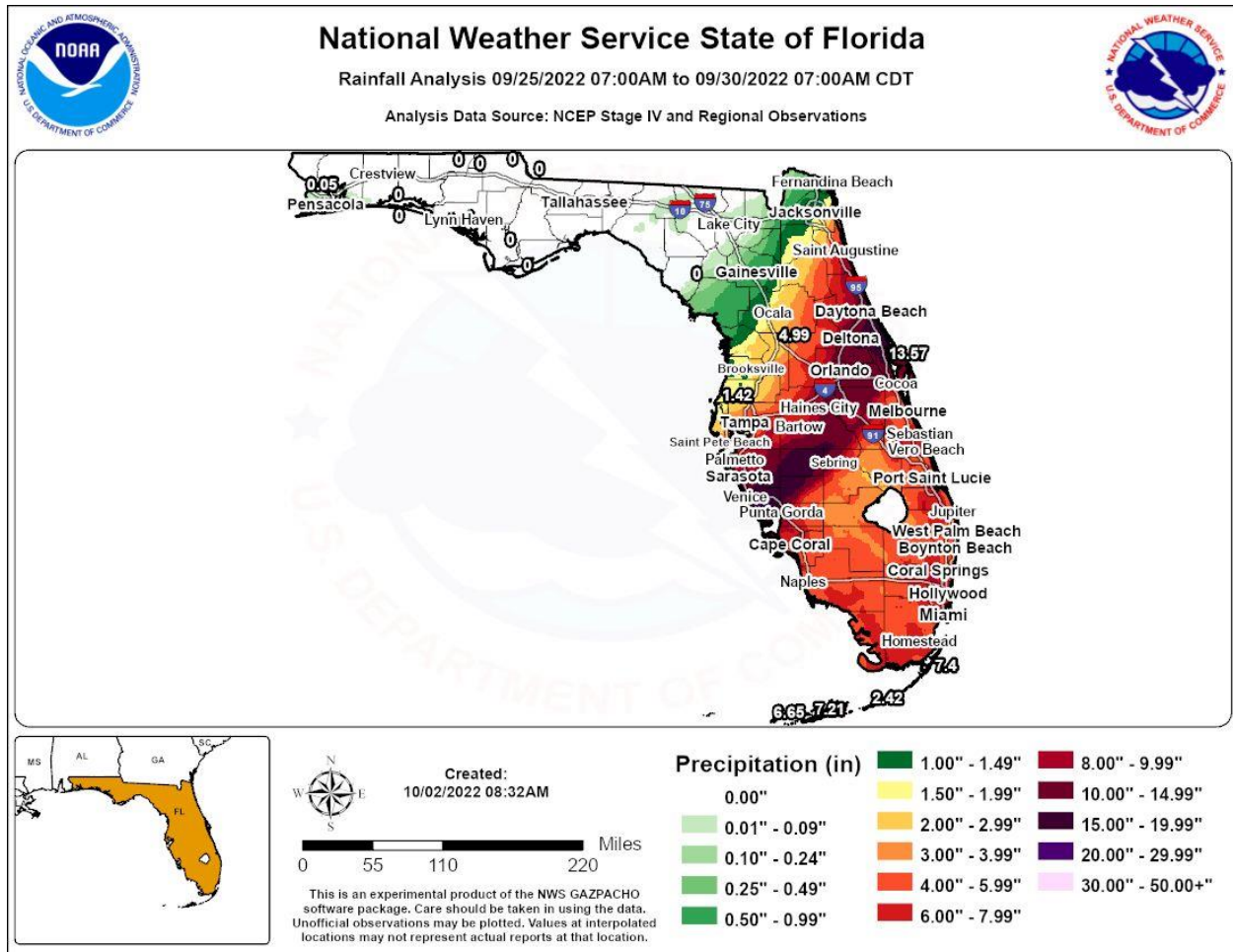
- The number FEMA IA applicants who are homeowners and renters
- The remaining unmet housing need after receiving FEMA, SBA, and other available assistance
- The location of the damaged properties
- Damaged properties located in LMI neighborhoods
- Damaged properties located in areas that are historically underserved
- Damaged infrastructure and public facilities that benefit LMI areas
- Damaged nonprofit facilities and service disruptions
- Households in the impacted area that have limited English proficiency
- Homeless population point-in-time count before and after the disaster
- Pre-disaster inventory of public and affordable housing
- Disaster impacts to public and affordable housing

The analysis of data and information demonstrated that the disaster damage from Hurricane Ian was caused by a combination of high winds, excessive rain, and flooding. Among these factors, inland flooding stood out as especially destructive throughout the County. Over the course of four days, reports indicated over 21 inches of rain which exacerbated the storm's impacts.¹⁷ The figure below shows the reported rainfall along Hurricane Ian's path showing 15 to 19.99 inches of rain north of landfall in the southwest portion of Sarasota County.

¹⁶ U.S. Department of Housing and Urban Development. "Citizen Participation & Equitable Engagement Toolkit: Introduction." HUD Exchange. [Citizen Participation & Equitable Engagement Toolkit: Introduction - HUD Exchange](#).

¹⁷ U.S. Department of Commerce. "Hurricane Ian: September 30, 2022." Last modified April 7, 2023. National Weather Service. Accessed July 18, 2023.

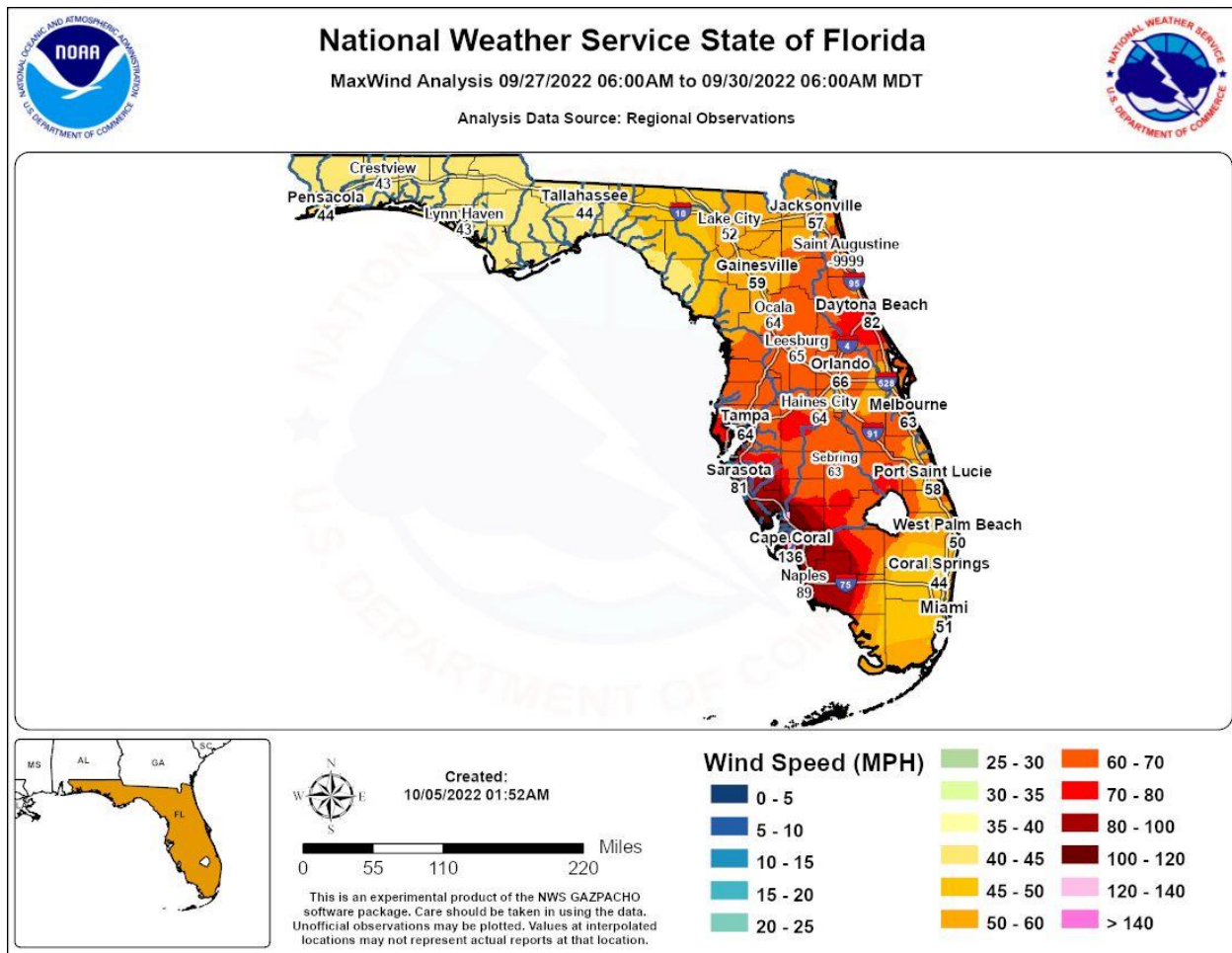
Figure 2-1. Hurricane Ian Rainfall Report¹⁸



Likewise, the following graphic provides the reported wind speeds along Hurricane Ian’s path showing 80–100 mile per hour winds in Sarasota County.

¹⁸ National Hurricane Center. "Tropical Cyclone Report, Hurricane Ian." Last modified April 2023. National Oceanic and Atmospheric Administration. Accessed July 13, 2023. https://www.nhc.noaa.gov/data/tcr/AL092022_Ian.pdf.

Figure 2-2. Hurricane Ian Wind Analysis Report¹⁹



2.1.3. National Objectives

Expenditures of all CDBG-DR funds must meet one of three national objectives: 1) benefit to low-to-moderate income persons or households, 2) elimination or prevention of slums and blight, and 3) urgent need. As required by HUD, this action plan is submitted to outline our assessment of unmet needs in the areas of housing, infrastructure, and economic development. Under the assessment of unmet need and consideration and development of resulting recovery activities are all reviewed and analyzed with these National Objectives in mind. Additional details regarding these National Objectives are provided below.

1) Benefit to low-to-moderate income persons or households (LMI)

Under this National Objective, funds must primarily benefit LMI qualified individuals or households. Individuals or households are considered LMI if their annual income is 80 percent or less than the area median income based on household size (AMI). An area, typically defined as a “service area”, can also be qualified as meeting LMI National Objective when 51 percent or more of the population in the defined service area earns 80 percent or less AMI.

¹⁹ National Hurricane Center. "Tropical Cyclone Report, Hurricane Ian." Last modified April 2023. National Oceanic and Atmospheric Administration. Accessed July 13, 2023. https://www.nhc.noaa.gov/data/tcr/AL092022_Ian.pdf.

Sarasota County is one of several counties and municipalities which is identified by HUD as an Exception Grantee. These grantees have modified area benefit percentages due to local economic factors. In the case of Sarasota County, the area benefit is 48.33 percent rather than the 51 percent previously indicated. There are also certain populations who are presumed by HUD to be LMI and are identified as limited clientele. These populations include:

- Abused children
- Elderly persons
- Battered spouses
- Homeless persons
- Adults meeting Bureau of Census' definition of severely disabled persons
- Illiterate adults
- Persons living with AIDS
- Migrant farm workers

Requirement established under 88 Fed. Reg. 32046 (May 18, 2023) require that 70 percent of the total CDBG-DR allocation must be used towards the LMI National Objective. Further details regarding the LMI National Objective are defined under 24 CFR 570.208(a).

2) Elimination or prevention of slums and blight

The elimination of slum and blight can qualify under either area or spot basis. Details regarding the specifications, requirements and limitations of this National Objective are defined under 24 CFR 570.208(b). The County does not intend to qualify any activities under this National Objective.

3) Urgent Need

While the Urgent Need National Objective is defined under 24 CFR 570.208(c), Appendix B (Consolidated Notice) of 88 Fed. Reg. 32046 (May 18, 2023) provides a specific waiver applicable to this National Objective. This waiver explained:

“any CDBG–DR grantee using the urgent need national objective for a period of 36 months after the applicability date of the grantee’s Allocation Announcement Notice. Pursuant to this alternative requirement, grantees that use the urgent need national objective must:

- (1) describe in the impact and unmet needs assessment why specific needs have a particular urgency, including how the existing conditions pose a serious and immediate threat to the health or welfare of the community;
- (2) identify each program or activity in the action plan that will use the urgent need national objective—either through its initial action plan submission or through a substantial amendment submitted by the grantee within 36 months of the applicability date of the grantee’s Allocation Announcement Notice; and
- (3) document how each program and/or activity funded under the urgent need national objective in the action plan responds to the urgency, type, scale, and location of the disaster-related impact as described in the grantee’s impact and unmet needs assessment.

The grantee’s action plan must address all three criteria described above to use the alternative urgent need national objective for the program and/or

activity. This alternative urgent need national objective is in effect for a period of 36 months following the applicability date of the grantee's Allocation Announcement Notice. After 36 months, the grantee will be required to follow the criteria established in section 104(b)(3) of the HCDA and its implementing regulations in 24 CFR part 570 . . . "

2.2. HOUSING UNMET NEEDS

HUD determines the extent of unmet housing needs by multiplying the number of housing units in need of repairs by the estimated repair cost per unit. Then, any funds that have already been allocated for repairs are subtracted from this total. However, because complete data on impacts after major disaster events are difficult to obtain or do not exist comprehensively across a disaster area, HUD has stated that empirically justified calculations may be used to determine the average cost to fully repair a home.

The County assessed the disaster impacts to housing caused by Hurricane Ian by analyzing FEMA IA applicant data, SBA applicant data, and historical data from similar disasters. Relying on FEMA-verified loss data alone does not provide a comprehensive assessment of the true unmet housing need in the impact area. FEMA-verified loss estimates are typically much lower than the actual costs to rehabilitate and reconstruct damaged homes, and the data set often under-represents the population due to ineligible applicants. To determine the estimated amount of unmet housing need, the County conducted an analysis using the FEMA IA application portal data,²⁰ SBA disaster assistance applicant data,²¹ and historical data from previous disasters.²² The analysis was conducted using empirically justified calculations detailed below.

First, the County analyzed the FEMA IA application data and found that 57,377 Sarasota County residents applied for disaster assistance. The address level data was verified to ensure the applicant provided a primary residence with an address located within the boundaries of the County, including the local municipalities.

To assess the unmet needs for homeowners, the County isolated applicants who reported real property damage to their owned primary residence with flooding recorded on the first floor. This was done to eliminate damage reported on units that are not owner-occupied and to isolate real property damage from personal property damage. The County found that FEMA recorded 7,497 properties with FEMA verified real property loss to owner-occupied units.

To assess the unmet need for tenants, the County isolated applicants who reported personal property damage to their rented primary residence. This was done to eliminate secondary residences from the analysis and to eliminate real property damage to a rental unit. The County also established a minimum of \$2,000 in reported property damage so that the sample size would not overinflate the estimated unmet need in this analysis. The County found that FEMA recorded 1,277 rental properties with greater than \$2,000 in FEMA verified personal property loss.

The County then analyzed the average amount of CDBG-DR assistance that has been awarded to homeowners and tenants in previous similar disasters. A complete list of data sets used for this analysis can be found in Appendix D. The County found that homeowners receive, on average,

²⁰ OpenFEMA. "Data Sets: Individual Assistance Applicant Data." Last modified 2023. FEMA.gov. Accessed May 15, 2023. <https://www.fema.gov/about/openfema/data-sets/>.

²¹ U.S. Small Business Administration. "SBA Disaster Assistance Applicant Data." Last modified 2023. SBA Open Data. Accessed June 13, 2023. <https://data.sba.gov/>.

²² See Appendix D for a complete list of data sets used to develop the historical analysis of housing assistance estimates.

\$78,100 of assistance for home rehabilitation and reconstruction of their primary residence. Tenants receive approximately \$25,000 of assistance for personal property damage.

By applying the average award for homeowners and renters to the isolated applicants in the FEMA IA data set, the County found that the estimated damages/need for homeowners is approximately \$585,515,700, and the estimated damages/need for tenants is \$31,925,000, for a total of \$617,440,700. The County reduced the total amount of damages/need by the assistance already provided by FEMA and SBA to these applicants which totaled \$92,759,144.54. This leaves an unmet housing need of \$524,681,555.49. The table below provides a summary of this analysis.

Table 2-1. Housing Impact Table

Eligible Unit Type	Properties with FEMA Verified Loss	Average Unmet Need Per Household (multiplier)	Total Estimated Damages	Estimated Damages
Owner-occupied, primary residence (real property)	7,497	\$78,100	\$585,515,700	\$617,440,700
Tenant-occupied, primary residence (personal property)	1,277	\$25,000	\$31,925,000	

Table 2-2. Housing Unmet Needs Analysis of FEMA and SBA Data

Eligible Unit Type	Total Estimated Damages	FEMA Assistance Deduction	SBA Assistance Deduction	Estimated Unmet Housing Need
Owner-occupied, primary residence (real property)	\$585,515,700	(\$45,656,855.95)	(\$44,721,600)	\$524,503,312.42
Tenant-occupied, primary residence (personal property)	\$31,925,000	(\$2,558,931.63)	NA	

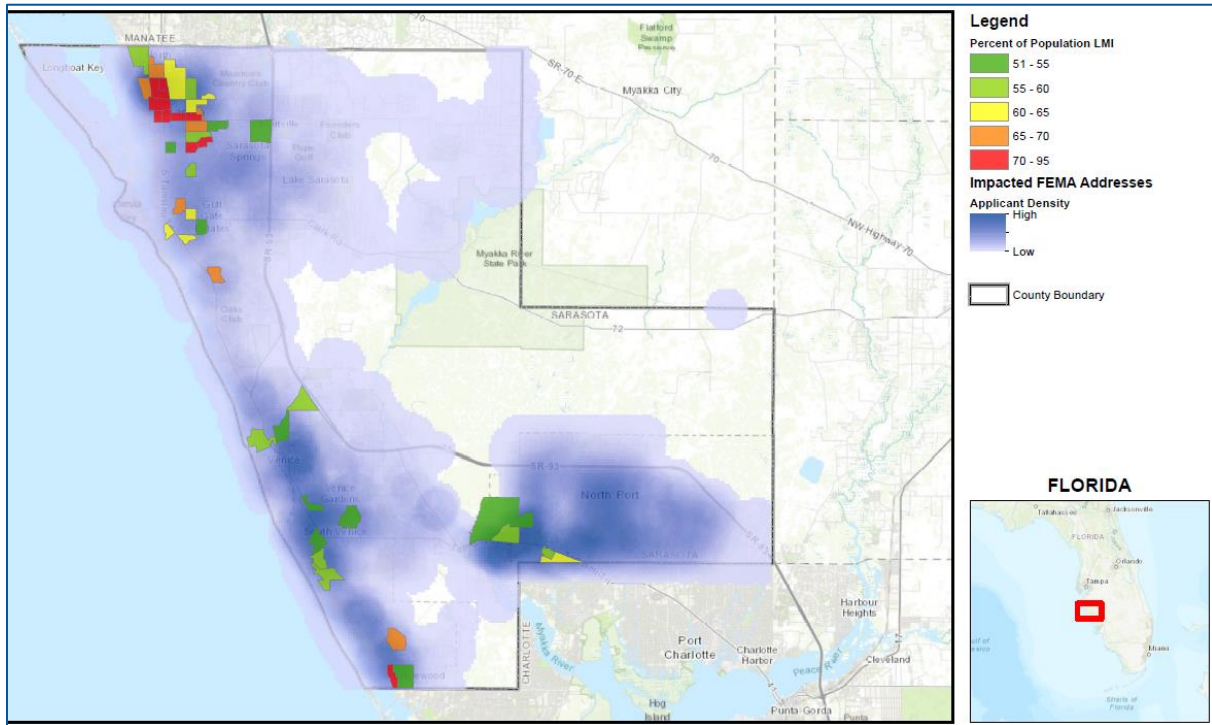
2.2.1. Disaster Damage and Impacts

The analysis of FEMA IA data showed that 57,377 households in the County applied for disaster-related assistance. Among those applicants, an estimated 37,551 households, accounting for approximately 65.4 percent of the total, reported an annual income below 80 percent of area median income (AMI) by household size. The financial circumstances of these households make it a challenge to address disaster impacts even minimally, let alone recover to make their homes more resilient to future disasters.

“I haven’t been able to regain any financial stability since Hurricane Ian. As a single mother of 4, working 2 jobs and still facing eviction right now causes mental health issues and a strain on my family.” – Resilient SRQ Survey Respondent

Using Geographic Information System (GIS) to layer FEMA IA applicant address data over LMI areas, some of the hardest hit areas of the County were also LMI communities, as shown in the map below.

Map 2-1. LMI Populations and FEMA IA Applicant Households



2.2.2. Pre-Disaster Conditions

Sarasota County is located on the Gulf Coast of Florida between the cities of Fort Myers and Tampa. Most of the County's development is located west of Interstate 75, along the coast and the southern boundary of the County.²³ Much of the County, heading east into central Florida, is rural or undeveloped and dominated by Myakka River State Park. According to Census 2021 American Community Survey (ACS) 5-Year data, Sarasota County includes 249,418 total housing units consisting of 193,923 occupied housing units. Many of the residential units are single-family structures; 63 percent are detached units, and 10 percent are attached units. A characteristic of housing in the County is that 10 percent of the occupied housing units are in structures containing 10 or more residential units.

In 2022, Sarasota County issued over 7,000 building permits. During that year, the total number of single-family dwelling unit permits decreased by 38 percent, and the number of multifamily permits increased by 35 percent.²⁴ Recognizing the growing need for housing in the community, the Sarasota Housing Authority (SHA) opened two new facilities in 2022. An 84-unit community designed to serve the elderly and a 128-unit affordable and workforce housing community-focused development were added to the SHA-managed housing inventory, bringing its capacity up to 2,200 housing units.

²³ Sarasota County Property Appraiser. "Parcel Search v2.21 Interactive GIS Map." Accessed July 18, 2023. <https://ags3.scgov.net/scpa/>.

²⁴ Sarasota County Government. "2023 Strategic Plan." Accessed July 18, 2023. <https://www.scgov.net/home/showpublisheddocument/59282/638113619962470000>.

2.2.3. Single-Family v. Multifamily; Owner-Occupied v. Tenant-Occupied

The following data tables provide a summary of impact data reported through the FEMA IA application portal. These tables include disaster impacts to owner-occupied applicants with real property damage and renter applicants with personal property damage.

Table 2-3. FEMA IA Owner-Occupied Applicants with Real Property Damages – Hurricane Ian

Total # of Applicants	# of Properties with FEMA Verified Real Property Loss	# of Applicants who Received Assistance for Real Property Loss	Average FEMA-Verified Loss
40,587	7,497	4,537	\$11,302.51

Table 2-4. FEMA IA Tenant-Occupied Applicants with Personal Property Damages >\$2,000 – Hurricane Ian

Total # of Applicants	# of Properties with FEMA Verified Personal Property Loss Over \$2,000	# of Applicants who Received Assistance for Personal Property Loss	Average FEMA-Verified Loss
16,656	1,277	575	\$4,428.08

The information provided in Tables 2-3 and 2-4 do not account for 134 applicants whose owner or renter status was unknown.

Table 2-5. FEMA IA Total Applicants by Housing Type – Hurricane Ian

Residence Type	# of Applicants	% Owner-Occupied	% Tenants	% Unknown	% Type
Apartment	4,378	0.01%	7.62%	0.23%	8%
Assisted Living	34	0.00%	0.06%		0%
Boat	33	0.05%	0.00%		0%
College Dorm	0	0.00%	0.00%		0%
Correctional Facility	1	0.00%	0.00%		0%
Houses/Duplex	41,629	54.76%	17.69%		73%
Mobile Home	7,326	11.69%	0.98%		13%
Townhouse	633	0.66%	0.44%		1%
Travel Trailer	190	0.22%	0.11%		0%
Other	3,153	3.35%	2.12%		5%
TOTAL	57,377	70.74%	29.03%		100%

Table 2-6. FEMA IA Real Property Damage Owner-Occupied Units – Hurricane Ian

Units with Minor-Low Damage	Units with Minor-High Damage	Units with Major-Low Damage	Units with Major-High Damage	Units with Severe Damage
2,104	2,517	841	1,684	351

Table 2-7. FEMA IA Personal Property Damage Rental Units – Hurricane Ian

Units with Minor-Low Damage	Units with Minor-High Damage	Units with Major-Low Damage	Units with Major-High Damage	Units with Severe Damage
0	0	767	496	14

Table 2-6 does not contain any properties with minor-low damage or minor-high damages since properties with less than \$2,000 in personal property FEMA verified loss were not included in the analysis.

2.2.4. Affordable Housing

Rental prices in Southwest Florida, especially in Sarasota County, are at an all-time high. More families are becoming rent-burdened or face eviction. According to the United Way Suncoast State of the Housing Crisis, rent prices increased by 24 percent in 2021 in the region, resulting in 1 in 2 families being rent cost-burdened. Similarly, according to Census 2021 ACS Five-Year estimates, 53 percent of occupied units paying rent are cost-burdened. In the last two years, the average percent of income spent on rent has increased from 38 percent to 58 percent for LMI households. The table below shows the increase in prices for the average 2-bedroom rental in Sarasota County, with the current average rate at \$1,970 for a 2-bedroom rental unit. Currently, the average rent in Sarasota County is over \$200 more per month than in neighboring counties. Over the last three years, rent prices in Sarasota County have remained the highest in the area, as shown in the below table when compared to the surrounding counties: Pinellas, Manatee, Hillsborough, and DeSoto.²⁵

Graph 2-1. Average 2-Bedroom Rent in Sarasota County



²⁵ United Way. "Eviction Mitigation Program – State of the Housing Crisis Dashboard." Accessed July 13, 2023. <https://unitedwaysuncoast.org/eviction-mitigation/>.

Housing affordability is a substantial factor in disaster recovery for many households, particularly LMI families. Because of the rising costs in rental housing, many families do not have the economic bandwidth to prepare for or recover from the impacts of disasters. When any amount of affordable housing is lost in an area with already scarce affordable housing, the impacts are far greater for low-income households. Affordable units decrease, demand increases, and prices continue to rise at a level that is not sustainable for the average family.

“North Port & Englewood repairs to homes are still outstanding. No affordable housing for people to relocate to from damaged homes.” – Resilient SRQ Survey Respondent

According to Census 2021 ACS Five-Year estimates, median rent in the North Port-Sarasota-Bradenton, FL MSA is \$1,415, and the median household income for the County is \$69,490. To assist LMI families under residential recovery programs using CDBG-DR funds, applicants (households) must be income-qualified to receive assistance. This income qualification for applicants is based on household size. HUD established income limits by family size to qualify families for projects involving the rehabilitation, reconstruction, or construction of housing using CDBG-DR funds. The income limits for the North Port-Sarasota-Bradenton, FL MSA are provided in the following table.

Table 2-8. Sarasota County FY 2023 Income Limits by Household Size

1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
\$51,200	\$58,500	\$65,800	\$73,100	\$78,950	\$84,800	\$90,650	\$96,500

The County will utilize the most current income rates set by HUD each year. At a minimum, 70 percent of program funds must meet the LMI National Objective. Households with an income higher than 120 percent of AMI will not be eligible for this program.

Projects undertaken with CDBG-DR funds that involve rehabilitation, reconstruction, or construction of residential rental units must have affordability criteria established that apply to the units receiving CDBG-DR assistance. This includes the provision of affordable rents throughout the affordability period of the project. According to HUD, “affordable rents” are often defined by Fair Market Rents (FMR) and Rent Limits which are developed by HUD. The table below provides the FMRs and rent limits for 2023 for the North Port-Sarasota-Bradenton, FL MSA.

Table 2-9. Fair Market Rents and Rent Limits by Unit Bedrooms

	Efficiency	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom	5-Bedroom	6-Bedroom
FY 2023 FMR	\$1,065	\$1,277	\$1,593	\$2,112	\$2,514	\$2,891	\$3,268
Low Rent Limit	\$800	\$857	\$1,028	\$1,188	\$1,326	\$1,463	\$1,599
High Rent Limit	\$1,020	\$1,094	\$1,316	\$1,511	\$1,666	\$1,820	\$1,973

Any potential housing projects undertaken by the County seeking to assist income-qualified families may also be subject to HUD-defined affordability periods based upon the type of project. Affordability periods are only applicable to owner-occupied housing when the project involves homeownership assistance. During affordability periods, rents charged to tenants or properties made available for homeownership that were assisted with CDBG-DR funds must meet affordability criteria in the following tables.

Table 2-10. Rental Housing Affordability Periods

Rental Housing Activity Amount Per Unit	Minimum Affordability Period (years)
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 housing	20

According to Census 2021 ACS Five-Year estimates, the median value of owner-occupied housing units is \$286,000 and the median monthly housing costs for properties with a mortgage is \$1,603. The data also indicates that nearly one in every three (32.5 percent) housing units with a mortgage is experiencing cost-burdening. This is especially impactful on LMI owner occupied households. Approximately 84 percent of households earning less than \$50,000/year, that also have a mortgage, are suffering from cost-burdening (13,078 households). This clearly indicates that homeownership is financially burdensome on a vast majority of LMI households with mortgages.

CDBG-DR funds used to assist in homeownership are also subject to affordability periods. The table below summarizes affordability periods for CDBG-DR funded homeownership activity.

Table 2-11. Homeownership Affordability Periods

Homeownership Activity Amount Per Unit	Minimum Affordability Period (years)
Under \$15,000	5
\$15,000 to \$40,000	10
Over \$40,000	15

All affordability periods that may be applicable under CDBG-DR funded programs will be secured through grant agreements, subrecipient agreements, restrictive covenants, or other legally binding documentation to help ensure maintenance of such requirements. Ongoing compliance review and monitoring of these requirements will be established in the Policies and Procedures document for the specific projects and programs.

2.2.5. Public Housing Disaster Impacts

Sarasota County has two public housing authorities (HA), the Sarasota Housing Authority (SHA) and the Venice Housing Authority. The SHA manages and operates 13 public housing facilities containing a total of 844 residential units, for over 2,000 low-income individuals and families, in the City of Sarasota. The facilities include:

- Janie’s Garden I – 86 units
- Janie’s Garden II – 68 units
- Janie’s Garden III – 72 units
- Diamond Oaks – 15 units
- King Stone – 28 units
- Single Family Scattered – 15 units
- Amaryllis Park – 84 units (senior)
- Lofts on Lemon – 128 units
- The Annex – 75 units (senior/disabled)
- McCown Tower – 100 units (senior preferred)
- Bertha Mitchell – 100 units
- Flint River – 9 units
- The Courts – 64 units

The Venice Housing Authority (VHA) manages and maintains two public housing facilities (Venetian Walk I and II) containing a total of 113 housing units. The County consulted with both HAs during the development of the Action Plan to obtain information on impacts and the current recovery status of public housing facilities, and housing choice vouchers properties. SHA indicated that there were 64 units which were damaged by the storm event, but that units either have been assisted or are in the process of being assisted. VHA indicated that none of the public housing units, or any other assisted housing facilities, received damage from the storm event.

The following section provides an overview of the assisted housing properties and units within the County. It also describes the disaster damage to PHA facilities, and public housing and affordable housing units reported by the SHA.²⁶

Table 2-12 provides a summary of the assisted housing properties and units in Sarasota County.

Table 2-12. Assisted Properties and Units by Funder, Summary²⁷

Funder	Properties	Total Units	Assisted Units	HUD/RD Rental Assistance Units
Florida Housing Finance Corporation	23	2,018	1,920	204
HUD Multifamily	10	686	684	523
USDA Rural Development	2	80	80	64
Local Housing Finance Authority	1	52	52	0
HUD Public Housing	4	408	333	0
TOTAL, All Funders	40	3,244	3,069	791

Table Notes: Many properties receive funding from more than one agency, so properties and units may appear in more than one row. "Assisted Units" refers to units with income and rent restrictions. "HUD/RD Rental Assistance Units" refers to units subsidized through project-based rental assistance contracts with HUD or USDA Rural Development. Additional data definitions and special notes available in [AHI User Guide](#). See also [AHI Map](#).

The table below provides a breakdown of disaster damage to assisted housing units by levels of damage severity, ranging from minor-low to severe. For each damage category, the table indicates the corresponding number of properties and the total number of housing units impacted. Additionally, the table captures the critical aspect of unmet needs by specifying the remaining unmet need in each damage category.

Table 2-13. Disaster Damaged Public and Affordable Housing Properties and Units

Type of Damage	# of Properties	# of Units Damaged	# of Units Assisted	# of Units Awaiting Assistance	Remaining Unmet Need
Minor-Low	0	0	0	0	0
Minor-High	1	18	0	0	0
Major-Low	1	46	0	0	0
Major-High	0	0	0	0	0
Severe	0	0	0	0	0
TOTAL	1	64	0	0	0

²⁶ Sarasota Housing Authority. "Damage to Facilities, Public Housing and Affordable Housing Units, and Section 8 Units." Last modified June 27, 2023.

²⁷ Assisted Housing Inventory. Florida Housing Data Clearinghouse. Retrieved from: <http://flhousingdata.shimberg.ufl.edu/assisted-housing-inventory/results?nid=5800> on 6/30/2023.

Information provided by SHA during the development of the Action Plan indicated that all units which were impacted by the storm event have either been addressed or are in the process of being repaired by the HA. SHA did not indicate any additional need or assistance to address the impacts to its units from Hurricane Ian.

Information provided by the PHAs provides a summary of the impact on public housing facilities in the affected County and municipalities. It shows the total number of PHAs and housing units damaged, along with the remaining unmet needs. This information helps assess the scale of damage, understand the needs of the PHAs, and allocate resources for the recovery and restoration of public housing in the affected communities.

The following table provides a summary of the disaster damage to assisted housing units by PHA facility.

Table 2-14. Public Housing Unmet Need

County/Municipalities	Total # of PHAs	Total PHAs Damaged	# of Units Damaged	Remaining Unmet Need
Sarasota County	2	1	64	0
TOTAL	2	1	64	0

The information provided shows that the PHA units damaged by Hurricane Ian do not have remaining unmet needs. This analysis demonstrates that the proposed use of CDBG-DR funds should address other unmet needs through housing reconstruction and rehabilitation, as well as new affordable housing activities, since there are currently no unmet needs related to the storm event impacting HA units.

2.2.6. Assisted Housing Impacted by the Disaster

Table 2-15 provides insights into the impact of a disaster event on assisted housing programs within a specific region. It offers an overview of how the disaster has affected housing assistance programs, such as public housing, Section 8 vouchers, and the Low-Income Housing Tax Credit (LIHTC) program. The table presents various indicators and metrics related to assisted housing impact, which may include the number of units affected, changes in occupancy rates, disruptions in housing operations, and other relevant factors. It aims to capture the scope and magnitude of the impact on assisted housing programs from the disaster event.

Table 2-15. Assisted Housing Impacted by the Disaster²⁸

Total Housing Choice Vouchers	Total Impacted Housing Choice Voucher Units	Total LIHTC Units	Total Impacted LIHTC Units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units	Total Project-Based Units	# of Units Awaiting Assistance
1,900	4	538	0	957	64	139	0

SHA manages all housing vouchers in Sarasota County while VHA manages no vouchers in the County. As can be seen in the table above, almost all the public housing, voucher assisted affordable rental housing, and other assisted affordable housing facilities, did not suffer physical impacts requiring repairs. Only 4 housing units which receive housing choice voucher assistance were impacted. These damages were minor, and the households were relocated to new Section 8 eligible properties while the owners of the impacted properties undertake repairs to the

²⁸ Sarasota Housing Authority. July 20, 2023.

properties. This data shows that the Hurricane Ian-related impacts to assisted housing units have been resolved, and there are no reports of units awaiting disaster recovery assistance.

2.2.7. Urgent Need

As required under Appendix B (Consolidated Notice) of 88 Fed. Reg. 32046 (May 18, 2023), the following factors are being provided to explain “why specific needs have a particular urgency” in order to justify utilization of the Urgent Need National Objective. The conditions impacting housing and its associated households which “pose a serious and immediate threat to the health or welfare of the community” include the following if not addressed:

- Health risks posed by harmful mold growth within water damaged structures.
- Risk of partial structural failure or collapse.
- The exacerbation of damages to compromised housing systems and components damaged during the storm event.
- Ongoing displacement costs posing financial strain on households.
- Risk of abandonment.
- Risk of or existence of code violations due to storm damages.
- Risk or presence of pest or vermin infestation due to damages or abandonment.
- Risk or presence of “squatters” or socially undesirable uses of abandoned properties, or properties at risk of abandonment.

2.3. FAIR HOUSING, CIVIL RIGHTS DATA, AND ADVANCING EQUITY

Sarasota County understands the responsibility to consider how the use of CDBG-DR funds and planning decisions will impact vulnerable populations, members of protected classes under fair housing and civil rights laws, racially and ethnically concentrated areas, concentrated areas of poverty, and historically underserved communities. As such, the County assessed program requirements for fair housing and civil rights data to advance equity and reduce barriers that individuals may face when enrolling in and accessing disaster recovery assistance. The County’s 5-Year Consolidated Plan describes actions the County takes to Affirmatively Further Fair Housing. Sarasota County is committed to building a CDBG-DR program that supports its existing initiatives for fair housing and strives to best serve LMI populations, underserved communities, and vulnerable populations.

Following major disasters like Hurricane Ian, those who are struggling to recover tend to disproportionately include minority populations, persons who are elderly or aging in place, people with disabilities, families with children, and households with limited English proficiency. The County will utilize its vast network of community groups and implement a targeted outreach campaign to encourage participation from vulnerable populations. The County’s communication and outreach strategy was successfully implemented in the development of the Action Plan and will be replicated and expanded as necessary to provide the whole community information about the programs and how to participate. The County’s strategy includes:

- Consulting with disaster-affected citizens, stakeholders, local governments, public housing authorities, and other affected parties in the surrounding geographic area to ensure comprehensive and inclusive communication about CDBG-DR program participation.

- Coordinating with a network of over 100 community groups that serve vulnerable populations, members of protected classes, and historically underserved communities, including the Homeless Continuum of Care, the Community Alliance of Sarasota County, the Council of Government, the South County Tiger Bay Club, the Public Housing Authorities, Community Organizations Active in Disaster, and the Sarasota County Long-Term Recovery Group.
- Providing information to the community in accessible formats through various local groups, including local Chambers of Commerce, Sarasota County Economic Development Corporation, the SHA, the Sarasota Ministerial Association (representing 80 congregations), the Venice Housing Authority, all Sarasota County municipalities, and the Behavioral Health Stakeholders Consortium (representing 236 organizations and providers).
- Advancing community engagement and input through program surveys, website portals, email, and mailings, social media engagements, and creating vital program materials in accessible formats, including languages most commonly spoken for communities most likely to be impacted by services of programs.
- Adhering to Sarasota County’s adopted Title II, Title VI, and LEP Policies, Procedures, and Notices in the delivery of the Resilient SRQ activities, programs, and services.
- When program applications are available for residents, providing support to those with access barriers with Resilient SRQ program ambassadors located in libraries, community centers, and local nonprofits to assist with applications and direct residents to other community resources.
- Engaging in ongoing coordination with public service providers that work with vulnerable populations to ensure that any remaining or ongoing storm-related impacts are brought to the County’s attention to enable a coordinated approach to recovery. In addition, any vulnerable populations or those with special supportive housing needs, brought to the County’s attention who are not served under current County recovery programs may be referred to specialized public service providers for assistance.

The Outreach and Communication section of this Action Plan provides a detailed description of the County’s successful implementation of this strategy during the development of the Action Plan. The County will use these best practices to continue to encourage participation from the whole community.

The County understands that there is limited funding and the needs of all people and populations cannot be served. The County attempted to balance projects and programs it can provide with those already being provided by other entities, such as local governments and non-profit public service providers. To have a substantial impact with any individual project, and the funding allocated, the County attempted to identify activities that wouldn’t or couldn’t be undertaken reasonably by these other entities.

2.3.1. Program Regulations

The Fair Housing Act prohibits discrimination because of race, color, national origin, religion, sex (including gender identity and sexual orientation), familial status, and disability. A variety of other federal civil rights laws, including Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act, prohibit discrimination in housing and community development programs and activities, particularly those that are assisted with HUD funding. These civil rights laws include obligations such as taking reasonable steps to ensure meaningful access to their programs and activities for persons with limited English proficiency (LEP) and taking appropriate steps to ensure effective communication with individuals with disabilities through the provision of appropriate auxiliary aids and services. Various federal fair housing and

civil rights laws require HUD and its program participants, including Sarasota County, to affirmatively further the purposes of the Fair Housing Act.²⁹

As a CDBG-DR grantee, Sarasota County will use its CDBG-DR funds in a manner that complies with fair housing and civil rights obligations, including Title VI of the Civil Rights Act of 1964, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act, and Section 109 of the Housing and Community Development Act. This Action Plan will guide Sarasota County’s planning decisions to support HUD’s objectives³⁰ to:

- Equitably benefit protected class groups in the County.
- Overcome prior disinvestment in infrastructure and public services for protected class groups and areas in which residents belonging to such groups are concentrated.
- Enhance for individuals with disabilities the accessibility of disaster preparedness, resilience, or recovery services, including the accessibility of evacuation services and shelters; the provision of critical disaster-related information in accessible formats; and/or the availability of integrated, accessible housing and supportive services.

2.3.2. Demographic and Socioeconomic Data Analysis

With more than 65 percent of the unmet need in the County identified as related to housing, Sarasota County will allocate funding to programming which addresses the unmet needs of its public housing authorities, renters, and individual homeowners. This will help support the long-term recovery of its residents and ensure a more resilient housing landscape in the future. Additionally, 65 percent of FEMA IA applicants reported income of less than 80 percent of the AMI by household size. In alignment with the National Objectives for HUD, Sarasota County will ensure at least 70 percent of CDBG-DR funding will be used to benefit LMI persons.

The following data analysis will inform the County of the social and economic disparities that may exist within the impacted community. It aids in identifying disparities in access to resources, services, and support systems among various demographic groups. This information allows for the development of strategies that promote equitable opportunities, inclusivity, and fairness in the recovery process.

Table 2-16. Grantee Demographics and Disaster-Impacted Populations³¹

Demographics	Area Wide Estimate	Area Wide Percent
Total Population	429,336	
Under 5 Years	14,754	3.4%
65 Years and Over	156,703	36.5%
Population with a Disability < age 65**	33,949	8.0%
White or Caucasian	377,600	87.9%
Black or African American	18,663	4.3%

²⁹ "Fair Housing Rights and Obligations." U.S. Department of Housing and Urban Development Fair Housing and Equal Opportunity. Accessed July 13, 2023. https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_rights_and_obligations.

³⁰ "Advancing Equity in Disaster Recovery." U.S. Department of Housing and Urban Development. Accessed July 13, 2023. https://www.hud.gov/sites/dfiles/CPD/documents/Advancing_Equity_in_CDBG-DR.pdf.

³¹ 2021 ACS Five-Year Demographic and Housing Estimates. United States Census Bureau. <https://data.census.gov/table?q=deomographics+in+Sarasota+County,+Florida&tid=ACSDP5Y2021.DP05>.

Demographics	Area Wide Estimate	Area Wide Percent
American Indian or Alaska Native	1,035	0.2%
Asian	7,642	1.8%
Native Hawaiian or Other Pacific Islander	125	0.03%
Hispanic or Latino	41,557	9.7%
Foreign Born	50,465	11.8%

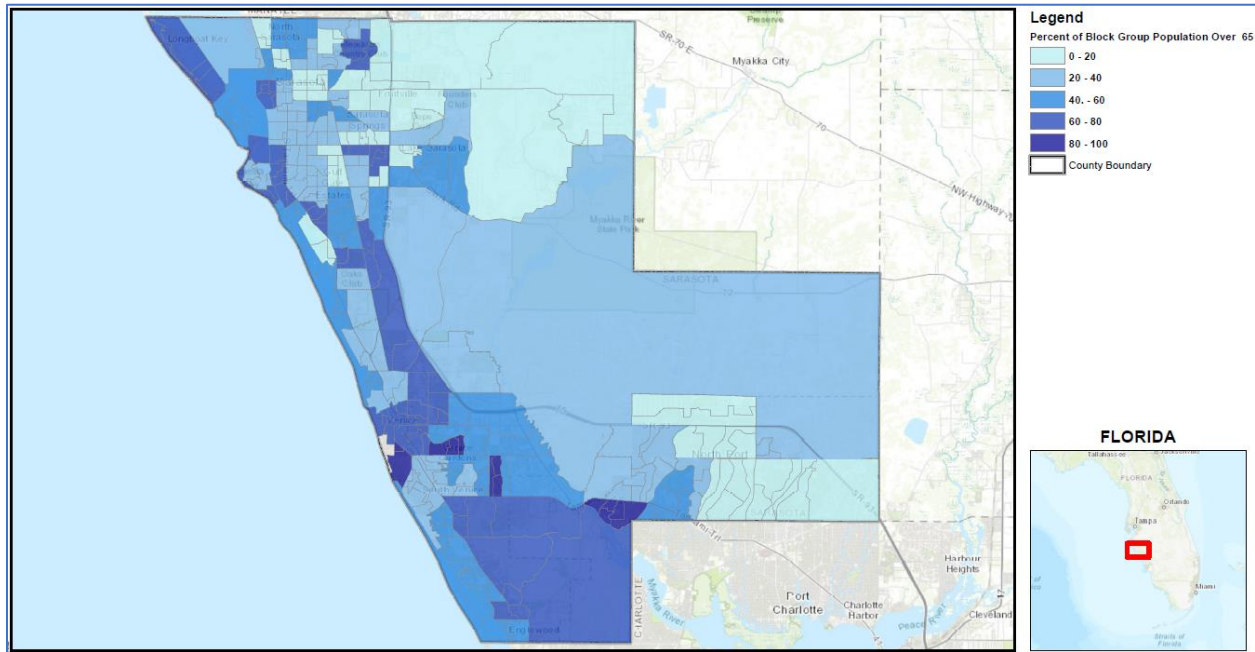
Table Notes: According to the Florida Department of Health, in 2021, the non-institutionalized civilian population of Sarasota County with a disability was 64,534 or 15.2 percent of the total population of Sarasota County. This is a much larger population than that reported by the 2021 Five-Year ACS Disability Estimates (33,949 or 8.0 percent) because the survey only includes the population of persons under age 65 with a disability in its data.

The White-Caucasian population vastly comprises the majority of the racial population in Sarasota County at 87.9 percent. The next largest racial population is Black or African American, which makes up only about 4 percent of the population. No other racial group makes up more than 2 percent of the total population in the County. While other racial groups are minimally represented, there is a substantial Hispanic population in the County with approximately 10 percent of the population identifying themselves as being of Hispanic origin.

The 2021 ACS Five-Year data indicates that approximately 12 percent of the Sarasota County population was born outside of the United States. The County has noted that this may contribute to some language barrier issues and therefore took steps to communicate with local service providers to help identify what those language needs may be (as detailed in Section 2.3.8). The County is aware that there is a significant portion of the foreign-born community that overlaps with the Hispanic community in the County. This is reinforced by Census data which indicates that 34.5 percent of the foreign-born population is identified by the Census as being of Hispanic origin. Asian, American Indian, Alaska Native, and Pacific Island Native persons combined comprise less than 5 percent of the County’s population. Approximately 4 percent of the County’s population is Black or African American, according to the ACS.

Despite the population of American Indian and Alaskan Natives representing less than 1 percent of the total population, and there being no formally recognized tribal land or reservations in the County, the County is aware of local tribal nations with historic and cultural interests in the area. The two tribal groups include Miccosukee and Muscogee. Both groups will be consulted with as projects are identified and confirmed for funding as part of the environmental review process.

Map 2-2. Sarasota County Population Over 65 by Block Group



2.3.3. Income Demographics

There are several demographic characteristics related to age associated with Sarasota County. While Florida's identity as a retirement destination does result in the state having a slightly larger elderly population (65+) than many states at 20.4 percent, Sarasota County has an even more substantial percentage of older adults. The County contains over 150,000 people aged 65 and above, making up more than one in every three people at 36.5 percent. While this data may seem to indicate that housing for the elderly, or other supportive housing, may be of need, the County's identity as retirement destination makes for a more unique situation when it comes to this population. There is a significant proportion of this population who used their financial resources to obtain housing in the County and live comfortably in retirement. While these individuals may live on fixed or semi-fixed incomes, they often have pre-established financial resources which allow greater financial flexibility than other similar 65+ populations. Just as there is a significantly higher elderly population, there is a correspondingly low child population. In Sarasota County children under 18 make up 14.3 percent of the population, and children under 5 constitute only 3.4 percent of the population. This differs significantly from the State's percentages of these same populations, which are 20 percent for those under 18 (a nearly 6 percentage point difference), and 5.2 percent for those under 5 years old.

Table 2-17 serves as a vital tool in understanding the economic vulnerability and resilience of the impacted population. It aids in identifying households that may require additional support or resources to recover and rebuild their lives.

Table 2-17. Household Income Summary Data^{32 33 34 35}

Income/Economics Demographic	Statewide	Sarasota County
Median Household Income	\$61,777	\$69,490
Per Capita Income	\$35,216	\$48,265

2.3.4. Income Demographics – Low-Income

The tables below provide an overview of income and economic demographics in the areas impacted by the disaster, specifically focusing on households with income levels below the poverty level. Table 2-18 compares the statewide income demographics with the income demographics in Sarasota County. It helps identify the proportion of households living below the poverty level in the affected areas, highlighting the vulnerability and economic challenges faced by these communities. This information is crucial for understanding the socioeconomic impact of the disaster and guiding the allocation of resources to support low-income households in their recovery and resiliency efforts.

Table 2-18. Income Demographics: Low-Income^{36 37}

Income/Economic Demographics	Statewide Population Below Poverty Level	Sarasota County Population Below Poverty Level
Income in the past 12 months below poverty level	2,744,612	34,486

³² 2021 ACS Five-Year Income in the Past 12 Months (in 2021 Inflation-Adjusted Dollars) in Florida. United States Census Bureau. <https://data.census.gov/table?q=Income+in+Sarasota+County,+Florida&tid=ACSST5Y2021.S1901&moe=false>.

³³ 2021 ACS Five-Year Income in the Past 12 Months (in 2021 Inflation-Adjusted Dollars) in Sarasota County, Florida. United States Census Bureau. <https://data.census.gov/table?q=Income+in+Sarasota+County,+Florida&tid=ACSST5Y2021.S1901&moe=false>

³⁴ 2021 ACS Five-Year Per Capita Income in Florida. United States Census Bureau. <https://data.census.gov/table?q=per+capita+income+in+Florida&tid=ACSDT5Y2021.B19301>.

³⁵ 2021 ACS Five-Year Per Capita Income in Sarasota County, Florida. United States Census Bureau. <https://data.census.gov/table?q=per+capita+income+in+Sarasota+County,+Florida&tid=ACSDT5Y2021.B19301&moe=false>.

³⁶ 2021 ACS Five-Year Poverty Status in the Past 12 Months in Florida. United States Census Bureau. <https://data.census.gov/table?q=Poverty+in+Florida&tid=ACSST5Y2021.S1701>.

³⁷ 2021 ACS Five-Year Poverty Status in the Past 12 Months in Sarasota County, Florida. United States Census Bureau. <https://data.census.gov/table?q=poverty+in+Sarasota+County,+Florida&tid=ACSST5Y2021.S1701&moe=false>.

Table 2-19. People Living in Poverty by Age³⁸

Age Group	Total Population	% of Total Population	Total # Below Poverty	% of the Total Population of Specific Age Group Living Below Poverty	Specific Age Group Living Below Poverty as % of Total Population Living Below Poverty
Total population for whom poverty status is determined	423,516		34,486	8.1%	
Under 18 years	60,373	14.3%	7,328	12.1%	21.2%
Under 5 years	14,228	3.4%	1,781	12.5%	5.2%
5 to 17 years	46,145	10.9%	5,547	12.0%	16.1%
Children related to householder	60,271	14.2%	7,226	12.0%	21.0%
18 to 64 years	208,889	49.3%	17,946	8.6%	52.0%
18 to 34 years	58,411	13.8%	5,042	8.6%	14.6%
35 to 64 years	150,478	35.5%	12,904	8.6%	37.4%
60 years and over	189,191	44.7%	12,265	6.5%	35.6%
65 years and over	154,254	36.4%	9,212	6.0%	26.7%

The poverty analysis by age data shows that children are overrepresented in the population living below poverty compared to the number of children in the total population. People under the age of 18 make up 14.3 percent of the total population and 21.2 percent of the population living below poverty. Children under the age of 18 also have higher rates of poverty within their age group than the other age categories.

³⁸ 2021 ACS Five-Year Poverty Status in the Past 12 Months in Sarasota County, Florida. United States Census Bureau. <https://data.census.gov/table?q=poverty+in+Sarasota+County,+Florida&tid=ACSST5Y2021.S1701&moe=false>.

Table 2-20. People Living in Poverty by Race/Ethnicity³⁹

Race/Ethnicity	Total Population	% of Total Population	Total Below Poverty	% of the Total Population of a Specific Race/ Ethnicity Living Below Poverty	Specific Race/Ethnicity Living Below Poverty as % of Total Population Living Below Poverty
Total population for whom poverty status is determined	423,516		34,486	8.1%	
White alone	372,995	88.1%	27,524	7.4%	79.8%
Black or African American alone	18,015	4.3%	3,963	22.0%	11.5%
American Indian and Alaska Native alone	1,013	0.2%	29	2.9%	0.1%
Asian alone	7,512	1.8%	1,157	15.4%	3.4%
Native Hawaiian and Other Pacific Islander alone	125	0.03%	20	16.0%	0.1%
Some other race alone	5,365	1.3%	658	12.3%	1.9%
Two or more races	18,491	4.4%	1,135	6.1%	3.3%
Hispanic or Latino origin (of any race)	41,157	9.7%	4,832	11.7%	14.0%

This data shows that poverty is more prevalent among minority (non-White) populations than among the White population. This means that while a specific minority population in poverty may only represent a small percentage of the total population, or the total population of those in poverty, they are disproportionately represented in their own race. This is evident by the following:

While people identified as White make up 79.8 percent of the total number of people in poverty, only 7.4 percent of people identified as White are in poverty. Conversely, while people who identify as Black or African American only make up 11.5 percent of those in poverty, 22 percent of those identified as Black or African American are in poverty. Therefore, the poverty rate in the Black or African American Black community is roughly three times higher than the poverty rate in the White community.

Similar disproportionate poverty rates by race/ethnicity can be seen among almost all non-White races and ethnicities in the County as indicated by the column titled “% of the Total Population of a Specific Race/ Ethnicity Living Below Poverty”.

³⁹ 2021 ACS Five-Year Poverty Status in the Past 12 Months in Sarasota County, Florida. United States Census Bureau. <https://data.census.gov/table?q=poverty+in+Sarasota+County,+Florida&tid=ACSST5Y2021.S1701&moe=false>.

2.3.5. LMI Analysis – Overall

Table 2-21 provides an analysis of LMI individuals and their proportion in relation to the total population. The table categorizes the data by different areas and presents the total number of LMI persons, the total population, and the percentage of LMI individuals within each area. This analysis allows for a comprehensive understanding of the LMI population's size and their representation within the broader community. It helps identify areas with a higher concentration of LMI individuals, enabling targeted resource allocation and interventions to address their specific needs.

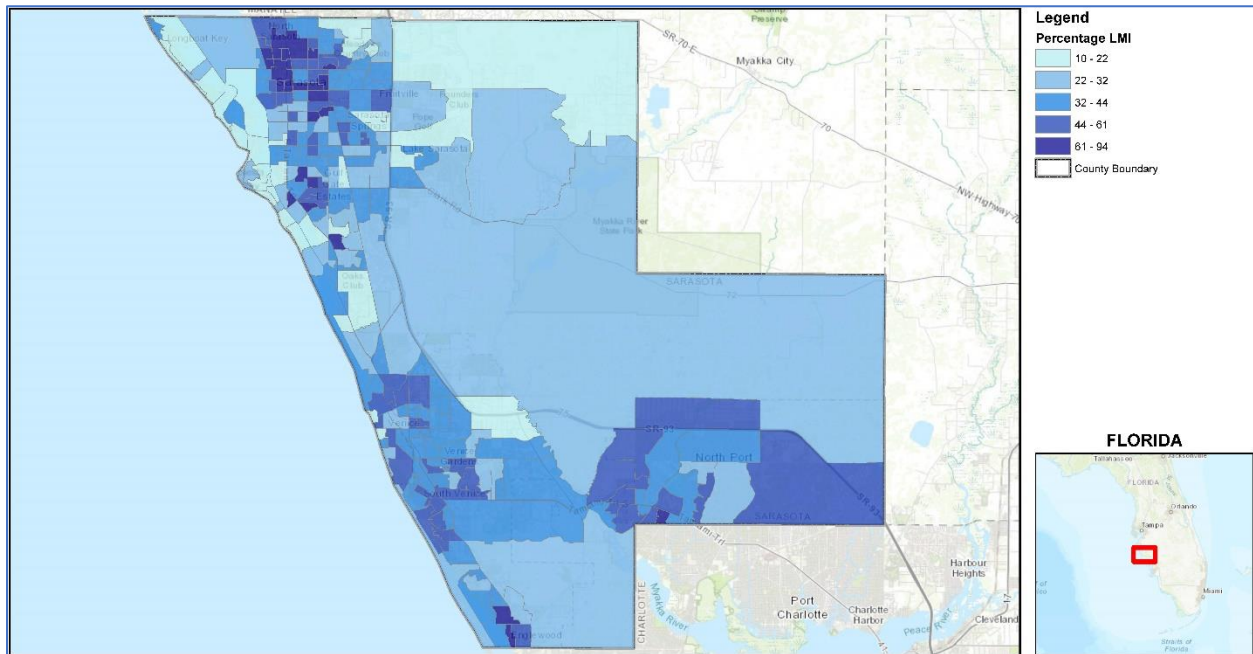
Table 2-21. Income Demographics: Overall⁴⁰

County/Municipality	Total LMI Persons	Total Population	Percent LMI
Sarasota County	149,210	386,450	38.6%

An LMI analysis for Sarasota County, FL refers to an assessment of the income levels and affordability of housing for low and moderate-income individuals and families in the County. This analysis helps identify the need for affordable housing, determine eligibility for various housing programs, and guide policy decisions related to housing and community development.

While Sarasota County has concentrations of high-income areas, there are several low- and very low-income areas throughout the County. The map below shows the LMI areas in the County by density.

Map 2-3. Sarasota County LMI Population Density



⁴⁰ ACS 2011-2015 Low-Mod All Mod All Local Governments. [LMISD by Local Governments, Based on 2011-2015 ACS - HUD Exchange.](#)

2.3.6. Racially and Ethnically Concentrated Areas of Poverty (RECAPS)

RECAPs are defined as census tracts that contain a concentration of both poverty and minority population. RECAP tracts are those which have:

- a) Poverty rates exceeding 40 percent **or** exceeding three times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower, and
- b) A non-White population of 50 percent or more

Sarasota County sought to identify any RECAP tracts in the jurisdiction by utilizing the information provided through the Florida Housing Finance Corporation (FHFC). The FHFC provides annual information on qualified RECAPs throughout the state. Sarasota County utilized information provided through the FHFC website⁴¹ to identify any qualified census tracts in the County for 2023. The data indicated that there are no such RECAP tracts located in Sarasota County.

2.3.7. Manufactured Housing Units Impacted by Disaster

Following disasters, manufactured homes typically suffer more damage than other home types. Additionally, manufactured home communities often have aging populations and LMI households that might have more challenges and fewer resources recovering from disasters than other types of homes. It is important to analyze the impacts to manufactured homes in the County to assess concentrations of unmet needs.

“The mobile home communities where a lot of people still live with plastic tarps and complete walls missing [are a priority]. The older people cannot afford to make needed repairs and all the help has been minimal. Insurance companies refuse to pay and taking out loans is totally unfair.” –Resilient SRQ Survey Respondent

Table 2-22 provides valuable insights into the effects of the disaster on the manufactured housing sector within the affected community. It helps stakeholders understand the magnitude of damage, the displacement of residents, and other related factors specific to manufactured homes. This information facilitates the development of targeted strategies, policies, and resources to address the challenges faced by the manufactured housing sector and promote effective recovery and rebuilding efforts.

Table 2-22. Manufactured Housing Units Impacted by Disaster^{42 43}

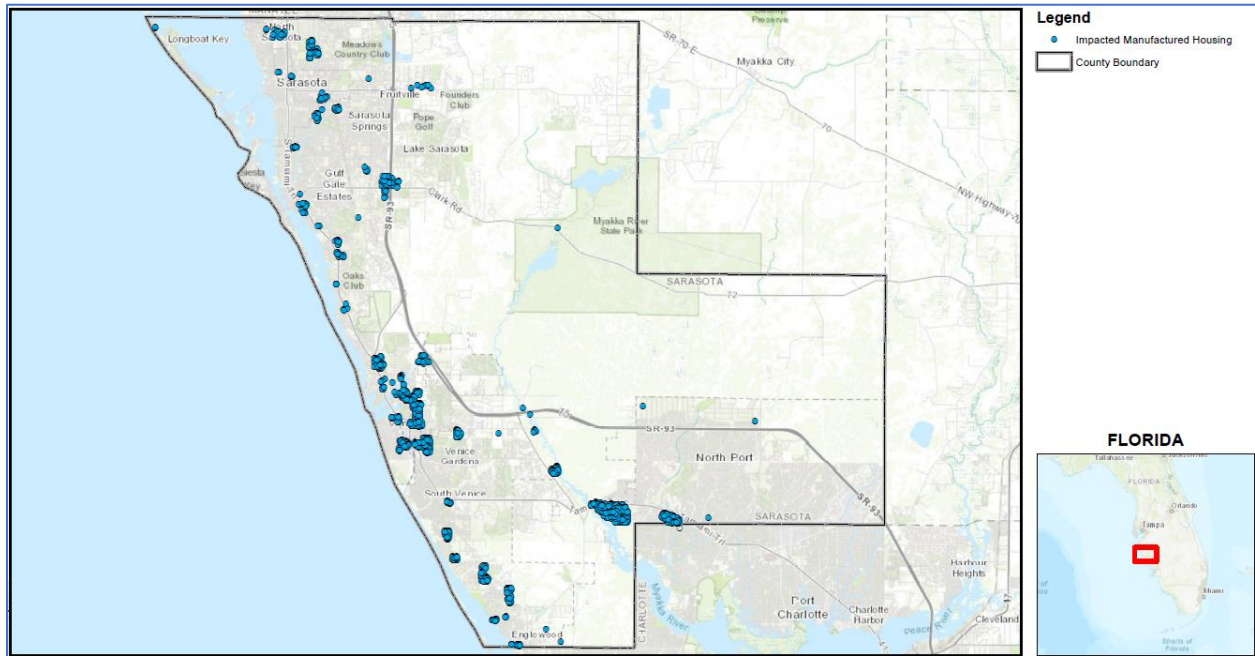
County/ Municipality	Total # of Housing Units	Total # of Manufactured Housing Units	% of Total Units in County	# of Disaster- Impacted Units	% of Manufactured Housing Units with Damage	Remaining Unmet Need
Sarasota County	249,418	20,777	8.3%	2,812	13.5%	\$189,796,162.95

⁴¹[https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/racially-and-ethnically-concentrated-areas-of-poverty-\(recap\)/2023-racially-and-ethnically-concentrated-areas-of-poverty-\(recap\)-information](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/racially-and-ethnically-concentrated-areas-of-poverty-(recap)/2023-racially-and-ethnically-concentrated-areas-of-poverty-(recap)-information)

⁴² 2021 ACS Five-Year Selected Housing Characteristics in Sarasota County, Florida. United States Census Bureau. [DP04: SELECTED HOUSING CHARACTERISTICS - Census Bureau Table.](#)

⁴³ OpenFEMA. "Data Sets: Individual Assistance Applicant Data." Last modified 2023. FEMA.gov. Accessed May 15, 2023. [https://www.fema.gov/about/openfema/data-sets/.](https://www.fema.gov/about/openfema/data-sets/)

Map 2-4. Manufactured Housing Units Impacted by Hurricane Ian



2.3.8. Limited English Proficiency Breakdown of Disaster-Related Areas

As required Under Title VI of the Civil Rights Act of 1964, recipients of Federal financial assistance are required to take reasonable steps to make their programs, services, and activities accessible by eligible persons with limited English proficiency. Additionally, the Department of Justice LEP guidance outlining the four-factor analysis must be applied to HUD funded programs and projects. To identify any potential population with limited English proficiency, as step one of the four-factor analysis, the County utilized 2021 ACS Five-Year data⁴⁴. The County then took steps to identify any populations that may trigger translation requirements which would include any population that makes up 5 percent or more of the eligible population or contains 1,000 or more people. Populations exceeding these limits would trigger the requirement to provide translated vital documents.

Table 2-23 provides important information about language proficiency for the population within Sarasota County, Florida. It presents data on the estimated number of individuals in the County who speak English less than "very well" and the corresponding percentage of the population. This data is valuable for understanding language challenges faced by a segment of the community during times of disaster. By identifying areas with a significant number of individuals who may have difficulty communicating in English, emergency management and relief efforts can prioritize language access services to ensure effective communication and equitable access to critical information and resources.

The total population of those evaluated was 414,582, with 19,926 (approximately 5 percent) speaking English less than "very well". Among the language categories there were three that did

⁴⁴2021 ACS 5-Year Language Spoken at Home, in Sarasota County, Florida. United States Census Bureau. <https://data.census.gov/table?q=Sarasota+County,+Florida+Languages+Spoken&tid=ACSST5Y2021.S1601&moe=false>.

exceed the 1,000 person criteria triggering translation requirements (bolded in Table 2-23). These language categories include:

- Spanish – 11,972 speak English less than “very well”
- Russian, Polish, or other Slavic languages – 2,369 speak English less than “very well”
- Other Indo-European languages – 1,507 speak English less than “very well”

While Spanish was an easily identifiable language requiring translation, the other two categories of Russian, Polish, or other Slavic languages and Other Indo-European languages, were not as specific. However, the County is aware of the substantial Russian and Ukrainian speaking populations and identified these as potential languages which may need translation services. The County has identified resources in case translation services are needed for either of these groups. Because these categories include a variety of unspecified languages, the County was unable to identify any additional specific translation services which may be needed. However, the County will notify the public on its website that additional translation services can be made available, if requested.

Table 2-23. Sarasota County LEP Breakdown ⁴⁵

Label	Estimate
Total:	414,582
Speak only English	360,362
Spanish:	28,995
<i>Speak English less than "very well"</i>	11,872
French, Haitian, or Cajun:	3,631
<i>Speak English less than "very well"</i>	800
German or other West Germanic languages:	4,442
<i>Speak English less than "very well"</i>	667
Russian, Polish, or other Slavic languages:	5,403
<i>Speak English less than "very well"</i>	2,369
Other Indo-European languages:	5,164
<i>Speak English less than "very well"</i>	1,507
Korean:	184
<i>Speak English less than "very well"</i>	119
Chinese (incl. Mandarin, Cantonese):	1,212
<i>Speak English less than "very well"</i>	640
Vietnamese:	916
<i>Speak English less than "very well"</i>	489
Tagalog (incl. Filipino):	725
<i>Speak English less than "very well"</i>	268

⁴⁵ 2021 ACS 5-Year Language Spoken at Home for Population 5 Years and Over in Sarasota County, Florida. United States Census Bureau. <https://data.census.gov/table?q=C16001&g=050XX00US12115&tid=ACSDT5Y2021.C16001>

Label	Estimate
Other Asian and Pacific Island languages:	1,503
<i>Speak English less than "very well"</i>	584
Arabic:	599
<i>Speak English less than "very well"</i>	107
Other and unspecified languages:	1,446
<i>Speak English less than "very well"</i>	504

To ensure the accessibility of programs and services developed in the Sarasota County Hurricane Ian Disaster Recovery Action Plan, the County will offer one or more of the following services to support persons with LEP:

- Notices to staff and recipients of the availability of LEP services
- Bilingual outreach and intake staff
- Oral interpretation for case management services
- Written translation of program materials such as outreach and marketing campaign materials, as well as program applications, forms, eligibility and award notices, contracts, and program guidelines
- Telephone service interpreter lines to accommodate persons speaking languages other than those of the bilingual staff
- Referrals to community liaisons proficient in the language of LEP persons

The County will provide accessible communication about the CDBG-DR programs to persons with LEP through the engagement of translation services. The Resilient SRQ website can translate program notifications, forms, and applications into over 60 languages. The format can also be adjusted into a more accessible format, including the ability for a screen reader and larger text for persons who are vision impaired.

2.3.9. Individuals and Families Experiencing Homelessness

Economic downturns and the cost of housing place families and individuals at risk of homelessness. People experiencing homelessness are especially vulnerable during disaster. They are more likely to experience aggravation of existing mental illness and withdrawal from substances, and many are unable to evacuate. Places they found to be safe before the disaster, might not be accessible⁴⁶. It is important for the County to assess its point-in-time count before and after a disaster to assess the impacts on those experiencing housing instability and homelessness.

2.3.9.1. Point-in-Time Count – Type of Shelter

The table below provides a breakdown of homelessness within the designated geography, specifically focusing on different types of shelter. The table presents information on the number

⁴⁶ U.S. Department of Health and Human Services. Planning for Individuals Experiencing Homelessness. March 3, 2023. <https://www.samhsa.gov/dtac/disaster-planners/homelessness#:~:text=In%20a%20disaster%2C%20people%20who,found%20safety%20before%20the%20disaster.>

of individuals impacted by homelessness across three categories: emergency shelter, transitional housing, and unsheltered homeless. It also includes the total count of known individuals experiencing homelessness.

Table 2-24. 2022 Sarasota County Point-in-Time Count⁴⁷

Area	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Sarasota, Bradenton/Manatee, Sarasota Counties Continuum of Care	410	214	514	1,138
Sarasota County	187	185	172	544

2.3.10. Point-in-Time Count – Impacted by Disaster

Table 2-25 provides an overview of homelessness within a specific geography following a disaster. It captures the number of individuals experiencing homelessness at a particular point-in-time, including those residing in emergency shelters, transitional housing, and those who are unsheltered. The table also presents the total count of known individuals experiencing homeless in the designated area. This information is essential for understanding the immediate impact of the disaster on homelessness rates and enables stakeholders to assess the magnitude of the issue and plan appropriate interventions.

Table 2-25. 2023 Sarasota County Point-in-Time Count Following Hurricane Ian⁴⁸

Area	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Sarasota, Bradenton/Manatee, Sarasota Counties Continuum of Care	393	237	520	1,150
Sarasota County	230	172	181	583

Immediately following Hurricane Ian, the Sarasota Youth Shelter experienced a spike in homeless children needing assistance. Many families were displaced from their homes with no resources for support. The Youth Shelter currently has a waiting list for available space to house homeless children largely due to the cascading impacts of Hurricane Ian. Additionally, both of Sarasota County’s family emergency shelters experienced surges in need immediately following Hurricane Ian and continue to have waiting lists for the first time since they began services in 2014. Sarasota County had experienced a 16 percent decline in homelessness since 2018. However, from 2022 to 2023, the Sarasota County point-in-time count for total known homeless persons had increased by almost 7 percent. There are more homeless people in 2023 than in 2022 and many people affected are under the age of 18 and families with children.

The County will seek to address the needs described here through the provision of funding to public service providers who manage and maintain facilities that support vulnerable populations and those people with special housing needs. Specific service provider needs are summarized in

⁴⁷ Suncoast Partnership Continuum of Care 2022 Point-in-Time Summary Detail Report. <https://www.suncoastpartnership.org/point-in-time>.

⁴⁸ Suncoast Partnership Continuum of Care 2023 Point-in-Time Summary Detail Report. <https://www.suncoastpartnership.org/point-in-time>.

2.4.7 and the County's efforts to address these needs utilizing CDBG-DR funds are provided in Section 4.3.2.1.

2.4. INFRASTRUCTURE UNMET NEEDS

2.4.1. Disaster Damage and Impacts-Infrastructure

This section highlights the losses and damage to infrastructure in Sarasota County as a result of Hurricane Ian. Calculating the unmet need is primarily focused on FEMA Public Assistance and Hazard Mitigation Program infrastructure cost data in addition to known infrastructure damage within the County. Further engineering analysis may add to the infrastructure unmet need as damage is addressed.

2.4.2. Data Analysis

The County analyzed several data sets to determine infrastructure and public facilities unmet needs:

- FEMA PA data from:
 - Sarasota County
 - City of North Port
 - City of Sarasota
 - City of Venice
 - Town of Longboat Key
- Resilient Florida Project data
- HMGP project analysis
- Consultations with nonprofit organizations
- Resilient SRQ Organization Survey data
- Resilient SRQ Individual Survey data

2.4.3. Disaster Conditions and Impact

Sarasota County, situated along the vulnerable Gulf Coast, has historically faced challenges posed by its coastal location, including the risk of hurricanes, erosion, and potential damage to its infrastructure. In the past, Sarasota County experienced several hurricanes, including Hurricane Hermine in 2016, which caused moderate damage and disruption. To prepare for hurricanes, the County has developed and implemented various plans, such as the Comprehensive Emergency Management Plan (CEMP) and the Post-Disaster Redevelopment Plan (PDRP). The County has also coordinated with other agencies and organizations to enhance its emergency management and recovery capabilities.

The County and municipal infrastructure and public facilities experienced severe damage and disruptions from Hurricane Ian, cutting off access to critical services for the community's most vulnerable residents. Many neighborhood streets throughout Sarasota County, including the City of North Port and the City of Venice, were completely impassable, making it impossible for residents to leave their flooded homes and extremely dangerous for emergency services to reach these areas. South River Road, a critical evacuation route that serves the community of Englewood flooded, forcing some residents to backtrack through hazardous conditions while

others returned to their homes, unable to evacuate. The City of North Port and the Englewood area have some of the highest concentrations of LMI households in the County.

Figure 2-3. Hurricane Ian Flooding in Sarasota County⁴⁹



Hurricane Ian had a devastating impact on the infrastructure of Sarasota County, affecting its systems, services, functions, assets, facilities, users, and providers. The storm damaged the County's transportation infrastructure, such as roads, bridges, sidewalks, bike lanes, trails, bus routes, municipal airport, seaports, and railroads. The storm ripped off part of the Venice Municipal Airport's roof, and water damaged the building; eroded parts of the seaport's shoreline and docks; and toppled trees and utility poles that blocked roads and bridges. The storm impaired transportation operations and services and significantly affected the safety and convenience of transportation users and providers, including the residents relying on evacuation routes.

Among the impacted evacuation routes, South River Road, a major hurricane evacuation route serving south Sarasota County, Englewood, and north Charlotte County, bore the brunt of the storm's wrath. The flooding of South River Road due to the rising waters of the Myakka River made the road impassable, cutting off crucial access for residents and rendering evacuation efforts challenging. The floodwaters not only isolated residents who were unable to evacuate or return to their homes but also damaged properties and infrastructure along the road. Unfortunately, the slow recession of the floodwaters further prolonged the road's inaccessibility as the river level dropped.

⁴⁹ Jesse Mendoza/Sarasota Herald Tribune. September 30, 2022. Retrieved on July 24, 2023 from <https://www.heraldtribune.com/story/weather/hurricane/2022/09/30/hurricane-ian-north-port-florida-damage-residents-rescued-flooding/8130563001/>

2.4.3.1. Mitigation Efforts

A portion of the allocated funds, approximately \$26,287,000, is proposed for mitigation efforts and further described in the Mitigation Only Activities Section of this Action Plan. These initiatives aim to reduce the impact of future disasters and enhance community resilience. The funds will be utilized for various proactive measures, such as infrastructure improvements, floodplain management, early warning systems, and community education programs. By investing in mitigation, Sarasota County aims to minimize the adverse effects of natural hazards and create a safer environment for the community.

Figure 2-4. Hurricane Ian South River Road Flooding in Sarasota County⁵⁰



⁵⁰ [Sarasota](#) County Government. South River Road Flooding.

Figure 2-5. Hurricane Ian South River Road Flooding in Sarasota County⁵¹



2.4.3.2. Coordination

The investments in infrastructure align with other planned state, local, and regional capital improvements and execute best practices. By coordinating with relevant agencies and organizations, Sarasota County aims to maximize the effectiveness of these investments. This coordinated approach will ensure a comprehensive and cohesive strategy for the County's overall development and resilience.

2.4.3.3. Evacuation Infrastructure Needs

Based on the review of the work by the Local Mitigation Strategy Working Group, the County has determined flooding poses the greatest threat among hazards, not only as a stand-alone event but also since flooding is associated with so many other hazards. During the analysis of the Local Mitigation Strategy, County staff noted several references to the risks posed to evacuation routes by flood events which contributed significantly to project review and consideration. This was particularly relevant since the South River Road evacuation corridor was inundated with flood water during Hurricane Ian, which also resulted in damage to the road and associated infrastructure.

“The best use of [CDBG-DR] funds would be to finally get South River Road upgraded. It's south county's most important evacuation route and central to thousands of new homes planned and under construction. South County has been promised this is the county's priority. Time to get it done!” –Resilient SRQ Respondent

⁵¹ Staff Report/Sarasota Herald Tribune. October 2, 2022. Retrieved on July 24, 2023 from <https://www.heraldtribune.com/story/weather/hurricane/2022/10/02/sunday-hurricane-ian-updates-sarasota-bradenton-north-port-venice-flooding-aftermath-recovery/8159200001/>

During Hurricane Ian, South River Road (Rt. 777) flooded, leaving evacuees stranded in their homes or being forced to backtrack in hazardous conditions to wait out the storm. Either option puts residents and first responders in high-risk situations. Mitigating flood risk for this road by elevating flood-prone sections will provide a safe passage for the Englewood community located in Evacuation Zone A. Englewood was included in the Governor’s mandatory evacuation order during Hurricane Ian and is often evacuated during severe storms and hurricanes. The accessibility and utilization of this evacuation route is critical to the life and safety of those mandated to evacuate from harm’s way. The Englewood community also has a large LMI population where the AMI is 20 percent lower than Sarasota County’s overall. This makes evacuation difficult for some residents because of the lack of key resources needed to evacuate (i.e., personal vehicle, income to travel out of the area, network of resources in a safer place).

South River Road is the only significant transportation corridor leading inland away from the coast for the Englewood community. It is the only inland route, with the only other substantial transportation corridor being Route 776 northbound and southbound. Route 776 northbound parallels the coast keeping residents at risk from coastal threats. The southbound corridor heads directly to the coast before turning inland and heading directly into the mouth of the Myakka River and Gasparilla Sound-Charlotte Harbor.

Additionally, the growth pattern for LMI households and working-class families has been in the southern part of the County toward more affordable housing, which may increase demand on the South River Road evacuation route during future storms.

After taking the Local Mitigation Strategy assessment into consideration, the County has identified the South River Road Flood Project as a critical infrastructure project. Due to the impacts from Hurricane Ian and the resulting threats it posed to residents, there is a critical need to repair and improve this evacuation corridor.

2.4.4. FEMA PA Program Needs

The FEMA Public Assistance program is funded by the Robert T. Stafford Disaster Relief and Emergency Act to provide repair of damaged facilities following a disaster (in addition to debris removal and other emergency response). Eligible applicants include local governments, states, and nonprofits. For Hurricane Ian, FEMA was authorized to reimburse up to 90 percent of eligible costs until December 7, 2022, and then 75 percent after that for response activities carried out by eligible applicants. For government entities, the State of Florida also provides recipients with 12.5 percent of the share of non-federal funds, leaving applicants to cover the remaining 12.5 percent.

To determine the unmet need of infrastructure and public facilities projects, FEMA PA data for the County and the municipalities within the County (Longboat Key, North Port, Sarasota, and Venice) was compiled. FEMA funds emergency work at 100 percent, so these costs were excluded from the analysis. The table below provides the local cost share for infrastructure and public facilities projects remaining after funds from FEMA and the State of Florida. Infrastructure and public facilities projects include restoration to roads, bridges, water control facilities, public buildings, parks, recreational facilities, and other public facilities.

Table 2-26. Hurricane Ian FEMA PA Local Cost Share

FEMA PA Applicant	Sarasota County	Venice	North Port	Longboat Key	Sarasota (City)	Total
Total Cost	\$35,754,528	\$8,114,179	\$8,500,000	\$33,217	\$1,905,062	\$54,306,986
Total Local Cost Share	\$4,469,316	\$1,014,272	\$1,062,500	\$4,152	\$238,132	\$6,788,373

The table below provides valuable insights into the cost and unmet needs associated with the FEMA Public Assistance program in response to the disaster event. It offers a comprehensive overview of the financial costs incurred and the projected needs for recovery and rebuilding efforts in the affected areas.

Table 2-27. Hurricane Ian FEMA PA Disaster Damage Estimates^{52 53 54 55 56}

PA Category	Estimated Federal Share	Non-Federal Share	Resiliency	Total Need (Match+ Resiliency)
C – Roads and Bridges	\$4,744,922	\$593,115	\$711,738	\$1,304,853
D – Water Control Facilities	\$9,055,000	\$1,131,875	\$1,358,250	\$2,490,125
E – Building and Equipment	\$15,890,936	\$1,986,367	\$2,383,640	\$4,370,007
F – Utilities	\$1,742,819	\$217,852	\$261,422	\$479,275
G – Other	\$22,873,308	\$2,859,163	\$3,430,996	\$6,290,159
TOTAL	\$54,306,985	\$6,788,372	\$8,146,046	\$14,934,419

2.4.5. FEMA Hazard Mitigation Program Needs

The Robert T. Stafford Act also funds the FEMA HMGP which provides 75 percent of funding for mitigation projects such as hardening of infrastructure utilities, safe rooms, elevation of buildings and roads, generator installation, and flood and drainage control. The remaining 25 percent non-federal share is the responsibility of the applicant.

The Florida Division of Emergency Management announced in February 2023 that Sarasota County was allocated an estimated \$55,658,953.45 in HMGP funds with a local contribution of **\$18,552,984.48**. As this figure is based on early estimates of FEMA PA data, it is anticipated that local contributions for HMGP related projects will only increase as a final HMGP lock-in amounts are determined and opportunities emerge for additional tiers of HMGP funding not directly allocated to Sarasota County.

The table below presents a list of proposed HMGP projects, each with its respective cost. It aims to capture the diverse range of initiatives and interventions necessary to reduce or eliminate the risks posed by various hazards, such as natural disasters or other threats, and enhance the resilience of the community.

Table 2-28. Proposed Hurricane Ian HMGP Projects⁵⁷

Proposed HMGP Projects	Estimated Costs
Carlton Wellfield Lightning Arrays	\$320,000
Carlton Water Treatment Facility Design & Replacement of 5 Electro Dialysis Reversal Units	\$2,940,000
Carlton Water Treatment Facility Replacement of 3 Electro Dialysis Reversal Units	\$1,640,000
Phillippi Dam Removal	\$3,013,227
TOTAL	\$7,913,227

⁵² Sarasota County FEMA PA Hurricane Ian Disaster Damage Estimates.

⁵³ City of North Port FEMA PA Hurricane Ian Disaster Damage Estimates.

⁵⁴ City of Sarasota FEMA PA Hurricane Ian Disaster Damage Estimates.

⁵⁵ City of Venice FEMA PA Hurricane Ian Disaster Damage Estimates

⁵⁶ Town of Longboat Key FEMA PA Hurricane Ian Disaster Damage Estimates

⁵⁷ Sarasota County HMGP Project Estimates

2.4.6. Resilient Florida Program Needs

The Resilient Florida Program is a competitive grant program administered by the State of Florida Department of Environmental Protection to effectively address the impacts of flooding and sea-level rise that the state faces. Sarasota County identified 19 infrastructure and public facilities projects that are critical to addressing the impacts of past and future disasters like Hurricane Ian and the widespread flooding caused by such disasters. These projects have not been funded and remain an unmet need totaling **\$132,050,000**.

Table 2-29. Sarasota County Proposed Resilient Florida Projects⁵⁸

Eligible Projects Identified	Estimated Costs
Spruce Street Project	\$250,000
Nokomis Beach Island Shoreline Restoration	\$1,500,000
Pump Station Hardening and Improvements	\$1,200,000
Venice Household Hazardous Waste Collection Center	\$4,000,000
Blackburn Point Bridge replacement	\$25,000,000
Solar power for traffic signals	\$1,000,000
River Road/Winchester Blvd. widening	\$85,000,000
Replace traffic signals with Roundabouts	\$3,000,000
Hardening of the North Port Library, North Port	\$4,000,000
Hardening of the Francis T. Bourne Jacaranda Library, Venice	\$4,000,000
Hardening of the Elsie Quirk Library, Englewood	\$2,500,000
Relocation of Historic Spanish Point building - Osprey Library	\$600,000
TOTAL	\$132,050,000

2.4.7. Nonprofit Unmet Needs

The County reached out to nonprofit organizations to identify remaining unmet needs following the hurricane and found several nonprofits that serve vulnerable populations whose facilities experienced catastrophic losses. The Salvation Army lost its entire North Port facility in Hurricane Ian, and the Boys & Girls Club's North Port facility (Gene Matthews Club) remains unusable following impacts from the storm. Additionally, the Sarasota Youth Shelter experienced a spike in homeless children needing assistance because of Hurricane Ian. Many families were displaced from their homes with no resources for support. The Youth Shelter currently has a waiting list for available space to house homeless children largely due to the cascading impacts of Hurricane Ian. The unmet need for nonprofit organizations is estimated below:

Table 2-30. Self-Reported Unmet Needs for Nonprofits from Hurricane Ian⁵⁹

Agency Name	Estimated Costs
All Faiths Food Bank	\$215,000
Big Brothers Big Sisters of the Sun Coast	\$26,000
Boys & Girls Clubs of Sarasota and DeSoto Counties	\$4,013,000
Gulf Coast Heritage Association (Historic Spanish Point)	\$1,820,000
North Port Area Chamber of Commerce	\$220,000
Oakwood Manor of Sarasota HOA, Inc.	\$25,000
Park Forest Owners Association	\$42,000
South Venice Civic Association	\$100,000
Suncoast Technical College	\$2,500,000

⁵⁸ Sarasota County Resilient Florida Proposed Project Estimates.

⁵⁹ Self-Reported Hurricane Ian Disaster Damage Unmet Need Estimates.

Agency Name	Estimated Costs
The Hermitage Artists' Retreat	\$667,000
The Salvation Army of Sarasota County	\$10,912,200
Venice Theatre	\$5,000,000
YMCA of Southwest Florida	\$2,000,000
TOTAL	\$27,540,200

2.4.8. Urgent Need

As required under Appendix B (Consolidated Notice) of 88 Fed. Reg. 32046 (May 18, 2023), the following factors are being provided to explain “why specific needs have a particular urgency” in order to justify utilization of the Urgent Need National Objective for potential infrastructure and public facility projects. The conditions impacting infrastructure and public facilities and the applicable residents served by those facilities which “pose a serious and immediate threat to the health or welfare of the community” include the following if not addressed:

- Health risks posed by harmful mold growth within water damaged structures.
- Risk of partial structural failure or collapse.
- The exacerbation of damages to compromised structural materials, systems and components damaged during the storm event.
- Risk of or existence of code violations due to storm damages.
- Risk or presence of pest or vermin infestation due to damages or abandonment.
- Risk of evacuees being unable to use evacuation routes due to lack of necessary improvements (this is an immediate threat since disasters can occur at any time).

2.5. ECONOMIC RECOVERY UNMET NEEDS

Despite Sarasota County's economy maintaining its strength and exhibiting positive performance, the occurrence of disasters has had a profound impact on local businesses, employees, and key industries. Particularly, the manufacturing, service, and hospitality sectors within the County have experienced the consequences of these disasters, and their recovery efforts are still ongoing. Furthermore, various industries are grappling with ongoing damage from the destructive nature of the disaster, especially in heavily affected areas. For example, local businesses in Sarasota County have reported an average SBA-verified loss of \$81,980.

The following section offers a high-level analysis of the economic impact caused by the disaster in Sarasota County. Other sections of this Action Plan address unfulfilled needs concerning housing and infrastructure recovery using data sources from FEMA and show significant needs. This section is focused on unmet needs regarding the requirements for economic recovery, which is an inherently difficult need to measure. The best data available to understand the effects of the hurricane come from the United States SBA, which provides assistance for business losses verified after disasters. Using this data, the County has found that there is an unmet need of approximately **\$48,207,968**.

2.5.1. Findings

Based on the FEMA PA, Resilient Florida Program, HMGP, and nonprofit data analysis, the County has identified a total economic recovery unmet need of **\$48,207,968**.

2.5.2. Employment/Economic Damages

In specific regions, particularly those affected by previous disasters, the task of securing skilled workers for repairs or home construction becomes more challenging. Sarasota County is interested in partnering with local organizations to establish or enhance career training programs for industries experiencing a worker shortage, such as construction-related trades that provide qualified workers to assist the reconstruction of damaged areas now and in the future.

After Hurricane Ian, the Florida Department of Economic Opportunity, with assistance from Sarasota County and the local Chambers of Commerce, administered a survey to the Sarasota County business community. When asked about the impact on jobs and employment, business leaders reported that the hurricane had a significant effect on employment. The table below shows this impact. In order to mitigate these layoffs, and as explained further in the Proposed Uses section of this document, Sarasota County plans to partner with a local organization to provide career training opportunities with a portion of the CDBG-DR funding.

Table 2-31. Estimated County Businesses Self-Reported Employee Layoffs from Hurricane Ian⁶⁰

Main Category Business	Total
Food & Dining	132
Other	113
Service	91
Merchants (Retail)	29
Construction & Contractors	22
Hospitality & Entertainment	21
Education	11
Health & Medicine	11
Manufacturing, Wholesale, Distribution	8
Real Estate	6
TOTAL	444

2.5.3. Physical Damages

In Florida, businesses often bear the brunt of physical damage caused by hurricanes. Powerful storms can wreak havoc on commercial establishments, leading to significant losses and long-term disruptions. One of the most common types of damage experienced by businesses is structural damage. High winds and flying debris can result in broken windows, collapsed roofs, and even complete building destruction. Such extensive damage not only renders the premises unsafe for employees and customers but also halts business operations indefinitely.

In addition to structural damage, and particularly with Hurricane Ian, flooding is another major concern. The heavy rainfall and flooding associated with these storms can cause rivers and waterways to overflow, leading to widespread inundation. As a result, businesses located in low-lying areas or near bodies of water are particularly vulnerable. Floodwaters can enter commercial buildings, damaging inventory, equipment, and electrical systems. The financial impact of flooding can be devastating, as businesses may face the cost of repairing or replacing damaged items and the loss of revenue during the recovery period.

⁶⁰ Self-Reported Hurricane Ian Related Layoffs. SBA Business Survey. October 2022.

Moreover, the aftermath of hurricanes often results in prolonged closure due to power outages, transportation difficulties, and market disruptions. These have severely impacted businesses in Sarasota County since many roads were impassable for weeks after Hurricane Ian. When the electrical grid is damaged, it can take days or even weeks for power to be fully restored, and businesses may experience product losses. During this time, businesses were unable to operate, leading to significant financial losses. Employees and customers are unable to access businesses when roads and transportation are unavailable. The prolonged downtime and loss of productivity can have a lasting impact on the viability of businesses in the area.

Table 2-32. Estimated County Businesses SBA Reported Damage from Hurricane Ian⁶¹

Organization Type	Total Amount Disbursed	Total Verified Loss	Remaining Unmet Need for Economic Revitalization
Corporation	\$4,104,200	\$17,622,959	\$13,518,759
Limited Partnership	\$0	\$1,553,329	\$1,553,329
LLE	\$4,617,100	\$32,632,282	\$28,015,182
Partnership	\$0	\$450,223	\$450,223
Trust	\$375,000	\$5,000,961	\$4,625,961
Not Specified	\$0	\$44,510	\$44,510
TOTAL	\$9,096,300	\$57,304,268	\$48,207,968

2.6. PUBLIC SERVICES UNMET NEEDS

To address the unmet economic recovery needs from the impacts of Hurricane Ian, the County has identified program activities in career services and training opportunities in trades and other industries. These types of activities are categorized by HUD as “public services.”

As noted above, employers have reported layoffs caused by Hurricane Ian across all industries. The County collected survey data from 175 organizations from the private, nonprofit, and public sectors to identify unmet needs in the community. Responses to those surveys revealed that the combination of disaster damage, lack of affordable housing, and lack of skilled workers is exacerbating disaster recovery needs.

“Finding affordable companies to repair damages to these houses [is a priority]. Prices have skyrocketed for air conditioners, roofs, contractors, etc. There are not enough companies for the repair demand, so prices are high and urgency from businesses to help get things done is low.” – Resilient SRQ Organization Survey Respondent

Through coordination meetings with local leaders in housing, construction, and career services agencies, the County heard first-hand the challenges the community is experiencing. Industries need more skilled workers in trades to support the demand for housing and infrastructure rehabilitation and reconstruction caused by Hurricane Ian. Working-age adults need more skills, better wages, and access to affordable housing to live and work in the County. The local economy needs more skilled workers to tamp down rising prices due to a scarce workforce.

⁶¹ SBA Disaster Loan database.

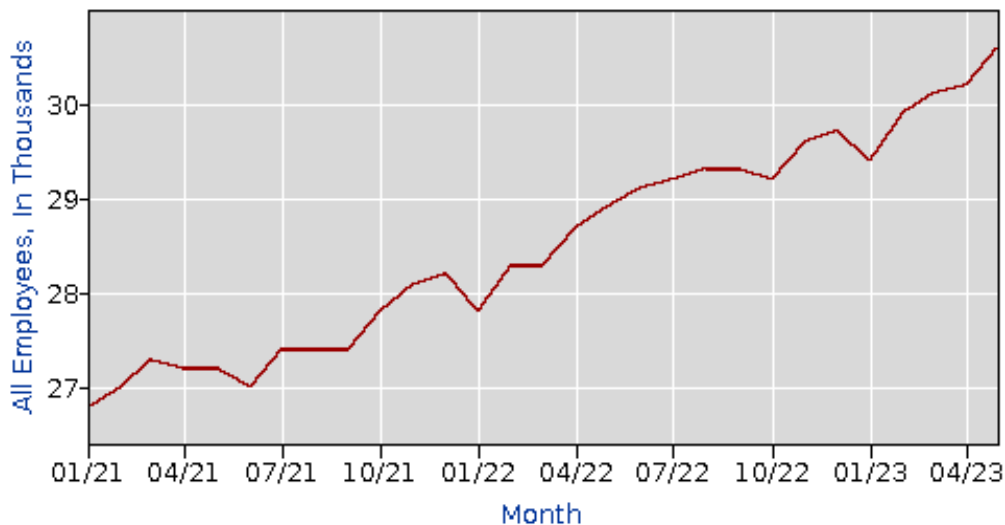
To mitigate the employment losses from Hurricane Ian and provide needed services to the community, Sarasota County plans to partner with local career services providers that work with job seekers to provide career training in needed construction trades. The effect of the hurricane on job numbers is difficult to identify because pre-existing labor market was tight. It is clear, however, that the Sarasota County labor market is in need of skilled workers to rebuild after Hurricane Ian and mitigate pre-existing conditions.

Data from the Bureau of Labor Statistics shows the increase in jobs in the construction sector since Hurricane Ian in September 2022 through early 2023 as continued reconstruction occurs. Since 2021 (and earlier), construction employment has been increasing, and the immediate aftermath of Hurricane Ian caused a quick drop in construction employment in January 2023, followed by an immediate uptick in May 2023 as reconstruction continued.

Table 2-33. State and Area Employment, Hours, and Earnings Report⁶²

State:	Florida						
Area:	North Port-Sarasota-Bradenton, FL						
Industry:	Mining, Logging, and Construction						
Data Type:	All Employees, In Thousands						
Years:	2021 to 2023						
Year	Jan	Mar	May	Jul	Sep	Nov	Annual
2021	26.8	27.3	27.2	27.4	27.4	28.1	27.4
2022	27.8	28.3	28.9	29.2	29.3	29.6	29.0
2023	29.4	30.1	30.6				

Graph 2-2. Mining, Logging, and Construction Employment Trend



⁶² "Bureau of Labor Statistics Data." Accessed on July 19, 2023. https://www.bls.gov/eag/eag.fl_sarasota_msa.htm.

2.7. MITIGATION ONLY ACTIVITIES

A critical component of this Action Plan, as required by the Federal Register, is a review of the local Hazard Mitigation Plan titled Sarasota County Unified Local Mitigation Strategy (LMS). The LMS was developed by the LMS Working Group which consists of the following members:

- City of North Port
- City of Sarasota
- City of Venice
- Town of Longboat Key
- Sarasota County
- Sarasota County Schools
- Sarasota Memorial Hospital
- Sarasota County Soil and Water Conservation District

In order to identify, develop and consider projects and to ultimately assist in informing the allocation of CDBG-DR funds, a mitigation needs assessment must be conducted. The development of this assessment requires that the County, “conduct a risk-based assessment to inform the use of its CDBG-DR mitigation set-aside considering identified current and future hazards” and “must, at a minimum, use the risks identified in the current FEMA-approved state or local Hazard Mitigation Plan (HMP).” To accomplish this the County conducted an analysis of the current LMS. It should also be noted that this LMS was developed before the impacts Hurricane Ian which qualified the County for the resulting CDBG-DR funds. Therefore, some of the impacts, particularly those involving infrastructure, were not accurately accounted for in the LMS as they relate to the utilization of the County’s CDBG-DR funds. The County has considered these impacts and factors in addition to the information obtained from the LMS analysis.

Since the entire County was designated as the MID Area, evaluation of the LMS also accounts for all factors impacting the MID Area.

2.7.1. Purpose of the Mitigation Needs Assessment

The purpose of this needs assessment is to examine current hazards as well as future risks as they relate to community lifelines. Community lifelines are “indispensable services that enable the continuous operation of government functions and critical business and is essential to human health and safety or economic security”. The key lifelines are identified below:

- Safety and security
- Food, water, sheltering
- Health and medical
- Energy (Power and Fuel)
- Communications
- Transportation
- Hazardous Material

The lifelines are designed to highlight priority areas and interdependencies. Each lifeline is comprised of multiple components and essential elements of information needed to stabilize an incident.

This needs assessment will be used to support the development of the Action Plan to identify activities designed to increase resilience to community lifelines and ensure they can continue to function despite the occurrence of future disasters. It is also intended that these activities will help reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters. The CDBG-DR action plan will also prioritize activities that benefit vulnerable and lower-income individuals and communities while also identifying projects that will benefit areas that have been impacted by disasters.

2.7.2. Mitigation Assessment Summary⁶³

As part of the development of this Action Plan, the County conducted a Mitigation Needs Assessment of the County’s LMS as required under federal guidelines. The existing hazard mitigation plan identified 19 hazards described in the tables below.

Table 2-34. Sarasota County Hazard Analysis

Hazard Type	Jurisdiction (1)	Extent (2)	Probability (3)
Avalanche	None	Unlikely	None
Coastal Erosion	2,3,4,7	Extensive	Annual
Coastal Storm	All	Extensive	Annual
Dam Failure	1,4	Low	Low
Drought	All	Low	Annual
Earthquake	All	Low	Unlikely
Expansive Soils	All	Unlikely	None
Levee Failure	1,4	Low	Unlikely
Flood	All	Catastrophic	Annual
Hailstorm	All	Low	Annual
Hurricane	All	Catastrophic	Annual
Land Subsidence	All	Low	Medium
Landslide	None	Unlikely	None
Seasonal Severe Weather Storm	All	Extensive	Annual
Tornado	All	Low	Annual
Tsunami	2,3,4,7	Unlikely	None
Volcano	None	Unlikely	None
Wildfire	All	Extensive	Annual
Windstorm	All	Extensive	Annual

The Jurisdictions, Extent, and Probability are defined in the tables below.

Table 2-35. Hazard Analysis Jurisdiction

Jurisdiction	Identification #
City of North Port	1
City of Sarasota	2
City of Venice	3
Sarasota County Government	4
Sarasota County Schools	5
Sarasota Memorial Hospital	6
Town of Longboat Key	7

⁶³ Sarasota County 2021 Local Mitigation Strategy.

Table 2-36. Hazard Analysis Population Affected

Population Affected	Extent
No data available	Unlikely
0 – 1,000	Low
1,001 – 5,000	Medium
5,001 – 10,000	High
10,001 – 25,000	Extensive
25,001 plus	Catastrophic

Table 2-37. Hazard Analysis by Frequency

Years Between Events	Classification
Annual	Annual
1 – 5	High
6 – 10	Medium
11 – 20	Low
20 plus	Unlikely
Occurrence on Record	None

Results from this analysis were utilized to assist in the identification and evaluation of projects. As can be seen in the previous table, four of the seven hazards with extensive or catastrophic extents of damage which occur annually, Coastal Storm, Flood, Hurricane, and Seasonal Severe Weather Storm, result in flood related disasters. These are also the types of hazards which have resulted in significant impacts, damages, and financial loss for the County in recent years. This includes Hurricane Ian and flood impacts that the County is still recovering from. This being the case, the County prioritized mitigation activities to address flood related hazards and impacts for its CDBG-DR allocation.

Table 2-38. Hazard Analysis by Hazard Type

Hazard Type	All Structures	Mobile Homes	Poorly Constructed Homes	Not Elevated Homes	Government Facilities	Telecommunications	Electrical Utilities	Sewage Systems	Potable Water	Roadways	Waterways	Airports	Agriculture	Livestock	Fisheries	Economic Disruptions	Environmental Damage	No Risk	
Avalanche																			X
Coastal Erosion	X				X	X	X	X	X	X	X					X	X		
Coastal Storm	X	X	X	X	X	X	X	X	X	X	X	X				X	X		
Dam Failure				X		X	X	X	X	X						X	X		
Drought									X				X	X		X	X		
Earthquake	X		X		X	X	X	X	X	X	X	X							
Expansive Soils																			X
Levee Failure			X	X		X	X	X	X										
Flood	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
Hailstorm	X	X	X		X	X	X	X	X			X							

Hazard Type	All Structures	Mobile Homes	Poorly Constructed Homes	Not Elevated Homes	Government Facilities	Telecommunications	Electrical Utilities	Sewage Systems	Potable Water	Roadways	Waterways	Airports	Agriculture	Livestock	Fisheries	Economic Disruptions	Environmental Damage	No Risk
Hurricane	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	
Land Subsidence	X	X	X		X	X	X	X	X	X		X				X	X	
Landslide																		X
Seasonal Severe Weather Storm	X	X	X		X	X	X	X	X	X		X				X	X	
Tornado	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	
Tsunami	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	
Volcano																		X
Wildfire	X	X	X		X	X	X	X	X	X		X	X	X		X	X	
Windstorm	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	

Sarasota County coordinated its project identification process with Sarasota County departments, the City of North Port, City of Sarasota, City of Venice, and Town of Longboat Key. These projects included, but were not limited to, the hardening or relocation of libraries, hardening of hospital facilities, pump station hardening, road improvements, stormwater management system improvements, evacuation route improvements, and development of a residential buyout program. This was deemed a most effective and prudent use of funds to address hazards related to hurricanes and flooding. To address continued issues and dangers posed by properties located in flood prone areas and subject to repetitive loss the County will continue its property buyout program to help continue to mitigate risk to properties located in these hazard areas.

2.7.3. Overview of the Sarasota County Unified Local Mitigation Strategy

The Sarasota County CDBG-DR Needs Assessment is informed primarily by the Sarasota County Unified Local Mitigation Strategy, 2021. The LMS is the most current hazard mitigation document available at the time of the development of this assessment. This Multi-Hazard Mitigation Plan identifies goals and measures for hazard mitigation and risk reduction to make communities less vulnerable and more disaster resistant and sustainable. Information in this plan should be used to help guide and coordinate mitigation activities and local policy decisions for future land use decisions. This Plan covers the jurisdiction of Sarasota County and the local communities contained therein.

This Plan follows Disaster Mitigation Act (DMA) planning requirements and associated guidance for developing Local Hazard Mitigation Plans. This guidance sets forth a generalized nine-task process:

- 1) Determine the Planning Area and Resources
- 2) Build the Planning Team
- 3) Create an Outreach Strategy
- 4) Review Community Capabilities

- 5) Conduct a Risk Assessment
- 6) Develop a Mitigation Strategy
- 7) Keep the Plan Current
- 8) Review and Adopt the Plan
- 9) Create a Safe and Resilient Community.

2.7.3.1. Coastal Erosion

Coastal erosion is the removal of land or beach or dune sediments by wave action, tidal currents, wave currents, or drainage. Coastal erosion is a substantial concern in Sarasota County due to its location on the Gulf Coast, its susceptibility to hurricanes and other severe storm activity, and sea level rise. This is such a significant concern that Sarasota County has taken the preemptive approach of creating the Coastal Resources Department within the Environmental Protection Division of the Planning and Development Services Department. The LMS indicated that the Coastal Resources Department functions for the following purposes:

“This organization focuses on numerous shoreline interests, from maintenance of navigable waterways to shoreline enhancement, habitat restoration, and the monitoring of coastal erosion through a series of benchmarks placed every 1000 feet along our shoreline. The extent of coastal erosion is measured by the linear mile of coastline impacted.”

Impacts, to both beaches and inland waterways, from coastal erosion are constant due to tidal and weather impacts. Because of this, coastal erosion will continue to be an identifiable hazard for the County. With 35 miles of Gulf shoreline, 31 miles of which extend along several barrier islands, the County remains vigilant and aware of increasing threats posed by ongoing coastal development. Most of the privately-owned properties have been developed, often resulting in increased density as multi-unit residential construction occurs along the coast. Publicly owned coastal land primarily functions as parks and public beaches. It was noted in the LMS that “According to the USGS, during the landfall of a category-1 storm, with wind speeds between 75 and 94 miles per hour, over wash is very likely for 70 percent of Gulf Coast beaches. Over wash occurs when waves and storm surge overtop dunes and transport sand landward.” These overwash events substantially contribute to coastal erosion impacts and not only cause significant impacts to local beaches but also ultimately result in the shoreline increasingly encroaching on more and more developed land.

The County has historically experienced significant impacts from storm related beach erosion events including \$3,000,000 in beach erosion impacts from Tropical Storm Fay (2008) and \$2,000,000 from Tropical Storm Debby (2012).

2.7.3.2. Coastal Storms

The LMS indicated that “Coastal storms are typically associated with hurricanes and/ or other tropical depressions and storms that may impact Sarasota County. The difference between the vulnerabilities and impacts of coastal storms and hurricanes is separated by the severity of the event. Coastal Storms will be profiled under the Hurricane natural hazard description”. Information pertaining to this hazard is therefore covered under the Hurricane hazard.

2.7.3.3. Levee Failure

The LMS indicated that there are no certified levees for Unincorporated Sarasota County but that there are two non-certified levees that may affect Sarasota County. The two levees include a private levee located in the Hidden River subdivision near the northeastern edge of the County and a public levee located in the Bahia Vista subdivision in the City of Sarasota. The levee in

Hidden River has breached on several occasions but there is an Emergency Services monitoring and response plan for this levee. The Bahia Vista levee is located in an urbanized area with well-maintained stormwater management infrastructure and risk of failure is deemed to be relatively low. Failure of either of these levees could result in significant structural damage to residential structures and road closures. It should be noted that impacts from a levee failure would result in flooding impacts which is the primary hazard concern for the County as described in this section.

A third levee, previously not identified in the LMS, was brought to the attention of the County by the public. The levee, officially recognized as a dike, is located partially in Myakka River State Park and Shep's Island Ranch LLC. The County is not aware of any breach history with the levee, but it appears to potentially protect approximately a dozen properties containing about 10 residential structures. Failure of this levee could potentially impact these 10 structures.

2.7.3.4. Flood

The LMS Working Group found flooding to be the most frequent hazard occurrence in Sarasota County over the past 100 years. The LMS identified two sources of flooding including coastal flooding and riverine flooding. Coastal flooding is typically the result of tropical storms and hurricanes while riverine flooding is the result of intense and abundant rainfall which overwhelms stormwater management systems. Floods are among the most frequent and costly natural disasters in terms of human hardship and economic loss. Sarasota County is particularly susceptible to flooding due to a variety of factors. The LMS describes the general Sarasota County geography as follows:

“Sarasota County’s generally flat topography is characterized by isolated swamps and marshes, which connect into sloughs and meandering streams that flow into the coastal estuaries. Elevation along the Gulf of Mexico coastline ranges from 1 to 18 feet above sea level with the highest natural elevation in the northeast portion of the County at 95 feet above sea level.”

The combination of factors such as the County’s location on the Gulf Coast, the typically low coastal topography, and the prevalence of swamps, marshes and other types of wetlands, places the entirety of the County at extreme risk of flooding.

The County has a substantial record of flooding with no less than 46 flood events occurring within Sarasota County since 1950. Flood events in the County typically result in an average floodwaters depth of 4 to 5 feet but have reached as high as 10 feet. Impacts from flood events are described in the LMS as follows:

“Major flooding occurring in the County would have a significant impact on population, property, and economy, along with the threat to human life. In addition, floodwaters could cause wastewater treatment facilities to shut down, contaminate local water supplies, and disrupt utilities. Major property losses could be expected in the communities previously mentioned. Floodwaters could also submerge portions of I-75, US41 and east west highways. The loss of these transportation networks would hinder evacuation and relief efforts, making it difficult to provide emergency response services.”

The specific identification of flood impacts submerging portions of east-west highways and hindering evacuation and relief efforts was experienced during the Hurricane Ian storm event. This specific impact, combined with it specifically being noted as an impact of concern within the LMS, strongly contributed to the County identifying the South River Road Flood Project as a potential high priority project for consideration.

2.7.3.5. Hailstorm

The LMS defines hail as, “a form of precipitation that occurs when updrafts in thunderstorms carry raindrops upward into extremely cold areas of the atmosphere where they freeze into balls of ice”.

Hailstorms are associated with thunderstorms and are experienced nationwide. Similarly, all of Sarasota County is susceptible to thunderstorms and resulting hailstorms. Hailstorms are not uncommon in Sarasota County with 48 hailstorm events occurring during the period from January 1, 1950, to January 31, 2020. These events usually contain hail of smaller proportions with the largest hail being recorded at 1.75”. Hail can result in damages to property including damage to roofs, skylights, windows, patio furniture, and automobiles. In some cases, this may result in the injury or death of some small pets or farm animals and can pose a risk to persons unable to find shelter during a storm event such as the homeless. However, seeking cover, even in public, semi-public or private facilities open to the public, can provide adequate protection from such events.

Due to the historically limited size of hail and its resulting damage, as well as the limited duration and frequency of hailstorm events, the County considered this event to be of low risk.

2.7.3.6. Hurricanes

Hurricanes are large cyclonic storms containing winds of 74 mph or greater. They are measured based on a wind scale known as Saffir-Simpson Hurricane Wind Scale.

Table 2-39. Saffir-Simpson Windscale

Category	Sustained Winds	Potential Damage
Tropical Storm	39-73 mph	Some
1	74-95 mph	Some
2	96-110 mph	Extensive
3	111-130 mph	Devastating
4	131-155 mph	Catastrophic
5	156 mph plus	Catastrophic

Hurricanes typically begin to lose strength once making landfall but can bring with them substantial damage. Hurricane damage is usually in the form of severe winds, tidal surge and associated flooding, riverine flooding associated with the exceptionally heavy rains, and can even spawn tornados. Hurricanes can result in widespread, catastrophic damage including loss of life, flooding, coastal erosion, structural failures, power failures, and utilities disruption and felled trees, as well as economic disruption. Hurricanes can be particularly dangerous and impactful due to the substantial scale and variety of impacts that may be suffered. High winds, coastal surge and flooding, torrential rain, and inland flooding can all simultaneously be impacting a region as a hurricane passes through a region. Additionally, unlike many other hazards which may occur over a few minutes or possibly hours, hurricanes can impact a region over the course of several hours and possibly extend into a day or more. This means that the potential for damage and risks to human safety and wellbeing can extend for prolonged periods of time, and that the ability to respond and address these impacts will most likely be hampered by the ongoing event. It was specifically noted in the LMS that, “Freshwater flooding associated with a hurricane may also inundate potential evacuation routes and prevent persons from evacuating areas vulnerable to storm surge”.

Florida’s location in the subtropics and in one of the most hurricane prone areas on Earth, in addition to the fact that Sarasota County is a coastal county within this region, makes it exceptionally susceptible to hurricanes. The LMS indicated that Sarasota County has experienced 3 hurricanes between 1950 and 2020, however, this does not include the event associated with the allocation of these funds, Hurricane Ian, which took place in 2022.

This hazard also references impacts to evacuation routes and the significant danger it imposes on a community or even a region. This was once again noted by the County and taken into consideration when identifying and considering mitigation projects.

2.7.3.7. Severe Weather Storms

Severe weather storms are complex and varied occurrences which include a variety of weather events. Individual severe weather hazards have their “own natural characteristics, areas, and seasons in which it may occur, duration, and associated risk”. These events can occur in isolation or in conjunction with other weather events increasing the intensity and complexity of the cumulative weather effects and impacts. These effects can include lightning, severe wind, freezing temperatures, and excessive or prolonged rainfall.

The LMS noted that central Florida is the most lightning prone area in the U.S. and suffers more lightning deaths than any other state. There have been 26 lightning events recorded in Sarasota County since 1950, however, the area or scale of impacts for such effects is extremely limited as

“Storm Ready”

“Hurricanes would cause the greatest impact to the jurisdictions of Sarasota County; thus, mitigation efforts are focused on hurricanes and include the mitigation efforts associated with coastal storms and wind events. This mitigation has resulted in Sarasota County and the City of North Port to be awarded the designation of “Storm Ready” from the National Weather Service. Sarasota County was among the first counties in Florida to achieve this distinction in 2001 and has updated it every 3 years since. North Port renewed its “Storm Ready” status in 2019 and is good until July 2023. North Port also became a Weather Ready Nation Ambassador (WRN) in 2019. The City of Sarasota achieved the Storm Ready Community Status in 2015 and the County’s other 2 municipalities plan to become ‘Storm Ready’”.

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lightning strikes only impact the area in their immediate proximity, rarely extending more than several feet from the strike area.

Despite being located in a subtropical region Florida is susceptible to freezing temperatures. Most freezing temperatures experienced in Florida, particularly central to southern Florida, are typically relatively short in duration lasting only a few hours and no more than 10 hours. The LMS indicated that most damage from freezing temperatures is typically associated with the agriculture industry. Impacts to structures is extremely minimal resulting in little more than burst water pipes. Threats to humans from the cold are minimal due to the short duration of the freeze events and the availability of public, semi-public or private facilities open to the public to provide shelter from the cold. While some vulnerable populations may be at risk from freezing temperatures Sarasota County has a process in place to open cold weather shelters for those vulnerable to impacts.

Similar to some of the impacts from hurricanes, severe weather storms can result in high winds. Winds can begin to cause damage when they reach 50 mph and Sarasota County has high wind events associated with thunderstorms 144 times since 1950. The high wind threat posed by hurricanes and thunderstorms has led to increased construction standards for many buildings in Florida both at the state and local level. Hardening structures against high winds has become fairly common practice for much of Florida, including Sarasota County.

2.7.3.8. Tornado/Waterspout

Information provided in the LMS explained that tornados are “One of the most frequent and unpredictable natural hazards that all communities face” and that due to their intensity, are one of the most destructive natural hazards. Tornados are measured based on a wind scale similar to hurricanes. This scale is known as the Enhanced Fujita Scale.

Table 2-40. Classification

Classification	MPH
EF0	65-85
EF1	86-110
EF2	111-135
EF3	136-165
EF4	166-200
EF5	Over 200

The United States experiences more tornados than anywhere else in the world and Florida is considered an “at risk” state. All jurisdictions within Sarasota County are at risk of tornados with those along the coast at risk of waterspouts (tornados which occur over water). Historically, most tornados experienced in Sarasota County are an EF0 or EF1 on the Fujita Scale. The structures that are at greatest risk are those which are pre-engineered such as manufactured housing, metal warehouses or shed style structures. Additionally, older housing or housing in poor condition is also typically more vulnerable to damage from high winds brought by tornados.

2.7.3.9. Wildfire

Wildfires were identified as a “major concern” for Sarasota County because over 75 percent of the County is vulnerable to wildfires. Sarasota County has experienced a multitude of wildfires historically with 256 fires recorded between 2017 and 2021 alone. It is anticipated that the occurrence of wildfires will continue to grow, particularly human-caused fires, as ongoing development and growth leads to increasing interaction between the urban and wildland environments. While there is substantial fire management under the Sarasota County Mitigation

Program, which has conducted hundreds of controlled burns since 2015, the encroachment of development on wildland where fire management does not take place increases the risk wildfires pose to the urban environment. While wildfires are a high threat they are typically confined to natural and undeveloped areas and are controlled before substantially impacting urban environments.

Wildfires can result in catastrophic physical damage and loss of life. Wildfires, unlike water damage left by rising flood waters, can result in the complete destruction of property and natural environment. Additionally, there are substantial health risks posed from smoke resulting from fires. These health risks are even greater for vulnerable populations such as elderly and those with preexisting health conditions. The City of North Port, in coordination with the Sarasota County Fire Department, has developed a Community Wildfire Protection Plan due to the substantial risk posed by wildfire/urban interface around the city.

2.7.3.10. Windstorm

As was discussed under the Severe Weather Storms, high winds can result in damages similar to those in a hurricane or tornado. High winds can be associated with thunderstorms or hurricanes and can begin to cause damage when they reach 50 mph. Wind gusts may reach as high as 73 mph with sustained winds between 30-73 mph. Sarasota County has recorded high wind events associated with thunderstorms 144 times since 1950. All jurisdictions in Sarasota County are at risk of windstorm events with older or poorly maintained structures at the highest risk along with utility lines as fallen trees and debris can damage these items. The high wind threat posed by hurricanes and thunderstorms has led to increased construction standards for many buildings in Florida both at the state and local level. Hardening structures against high winds has become fairly common practice for much of Florida, including Sarasota County. In addition to the risk posed by high winds is the impediments and challenges posed by debris and downed trees and powerlines resulting from high winds events.

2.7.3.11. Non-Threatening Hazards

The following hazards were found to pose little to no threat to people and property in Sarasota County based on analysis conducted by the LMS Working Group.

Avalanche

According to the LMS, due to the climate and topography of Sarasota County, avalanches are not a natural threat and therefore were not fully profiled. The County did not consider avalanche impacts or mitigation activities related to this hazard since it is not considered a threat identified in the LMS.

Dam Failure

The LMS indicated that the US Army Corps of Engineers (USACE) National Inventory of Dams identified only one dam exists in Sarasota County located at Hi Hat Ranch Pond. The LMS indicated that “Failure of this dam is not likely to have a major impact on the surroundings. The main vulnerability would be flooding of agricultural land resulting in little to no structural impacts”.

The LMS also identified the Peace River/Manasota Regional Water Supply Authority (PRMRWSA) Reservoir, located in neighboring DeSoto County, as a potential dam failure hazard. Failure of this dam, depending on the location and scale of the failure, could result in property damage to non-elevated homes, temporary impacts to critical facilities, and minimal impacts to the economy and major employers.

The LMS indicated that “The Reservoir is bounded by 4 miles of highly engineered earthen embankment. The embankment was designed to withstand a Category 5 hurricane and a simultaneous 48-hour, 60-inch rainfall event. The probability of a dam failure at the Reservoir is low”. Due to the low probability of hazard risk and the anticipated limited impacts, the County didn’t consider mitigation activities related to this hazard. It should be noted that impacts from a dam failure would result in flooding impacts which is the primary hazard concern for the County as described in this section.

Drought

Droughts are extended periods of abnormally dry weather typically resulting in significant hydrological imbalance. The LMS indicated that droughts are typically associated with impacts to the agriculture industry except in the most severe of circumstances. They are extremely difficult to predict as is their duration and severity. The hazard was deemed to be of low impact due to the limited population that would typically be impacted by a drought. This could possibly vary depending on the length and severity of the drought resulting in water restrictions, reduction in the water table, limits on freshwater recreation, severe crop/livestock loss, and potential increase in wildfires. According to the LMS, Sarasota County has not experienced a drought since at least January 1, 1950.

Due to the low probability of hazard risk and the anticipated limited impacts, the County didn’t consider mitigation activities related to this hazard.

Earthquake

The LMS defines an earthquake as, “a sudden and sometimes violent movement of the earth’s surface because of movement along a fault or by volcanic disturbance”. While earthquakes typically pose little threat to Sarasota County they have historically occurred in very small magnitudes. The County has experienced approximately 30 earthquakes since the late 1700’s none of which resulted in any recorded damages. The last earthquake occurred in 2006 and was located roughly 250 miles out into the Gulf of Mexico.

Rather than attempting to predict when an earthquake event may occur, the LMS Working Group instead provided an estimate of the time period in which there is a probability of an earthquake occurring. The LMS Working Group estimated that there is a 20 plus year period between event occurrences and that these events would measure level I on the Modified Mercalli Intensity Scale. Impacts from such an event would be limited to minor cracking in walls and the shaking of windows and items on shelves.

Table 2-41. Modified Mercalli Intensity Scale

Intensity	Detectability/Level Impact
I	Detected only by sensitive instruments
II	Felt by a few persons at rest, especially on upper floors
III	Felt noticeably indoors, but not always recognized as a quake
IV	Felt indoors by many, outdoors by a few
V	Felt by most people, damage to glass and plaster
VI	Felt by all, many frightened and run outdoors, damage small
VII	Everybody runs outdoors, damage to buildings varies
VIII	Panel walls thrown out of frames, fall of walls and chimneys
IX	Buildings shifted off foundations, cracked, thrown out of plumb
X	Most masonry and framed structures destroyed; ground cracked
XI	New structures still standing, bridges destroyed, ground fissures
XII	Damage total, waves seen on ground surface

Due to the low probability of hazard risk and the anticipated limited impacts, the County didn't consider mitigation activities related to this hazard.

Expansive Soils

The LMS indicated the following in regard to expansive soils:

"Expansive soils are soils that expand with the addition of water and contract as the soil dries out. This may cause foundations and walls of structures to shift or crack. The 1991 Soil Survey of Sarasota County, Florida conducted by the United States Department of Agriculture did not highlight or specifically identify expansive soils as a hazard to any of the areas within the county. There have been no historical references to an expansive soil incident taking place within Sarasota County. Expansive soils are not considered a risk and therefore it will not be fully profiled."

The County did not consider impacts from expansive soils or mitigation activities related to this hazard since it is not considered a threat identified in the LMS.

Land Subsidence/Sinkholes

The LMS defines land subsidence as, "the lowering of a portion of the earth's crust and can occur naturally or because of human activity. Natural subsidence may occur when limestone, which is easily eroded carved by water, collapses and forms sinkholes on the surface, or by earthquakes along fault lines . . . Sinkholes are a common feature of Florida's landscape due to land subsidence." The prevalence of karst terrain in Florida makes Sarasota County prone to subsidence/sinkhole events. These events can result in impacts to structures, roadways, or other infrastructure and impacts depend on the size and location of the event.

While all property is vulnerable to land subsidence there have only been seven sinkhole events recorded in Sarasota County since July of 1981 all of which were less than 10 feet in diameter and did not extend beyond a single property. The Florida Geologic Survey categorizes the probability of sinkholes in Sarasota County as "uncommon".

Landslide

According to the LMS, due to the topography of Sarasota County and the relative limited elevations and significant slopes in the County, landslides are not a natural threat and therefore were not fully profiled. The County did not consider landslide impacts or mitigation activities related to this hazard since it is not considered a threat identified in the LMS.

Tsunami

Florida has no record of experiencing any destructive tsunami events. In addition, the LMS indicated that "there are no significant earthquake sources within the Gulf of Mexico that are likely to generate tsunamis" and any earthquake sources outside of the Gulf would have the "wave amplitude greatly attenuated by the narrow and shallow passages into the gulf, and as a result, these tsunami sources do not constitute a tsunami hazard to the Gulf of Mexico coast".

Due to the minimal risk posed by tsunamis the County did not consider landslide impacts or mitigation activities related to this hazard.

Volcano

There are no historical records of volcanos ever taking place in Florida let alone Sarasota County. The LMS indicated that, "Due to the topography of Sarasota County, the jurisdictions within, and the absence of any known volcanoes, this natural hazard is not a natural threat . . . Volcanoes are not considered a risk and therefore it will not be fully profiled". The County did not consider

volcano impacts or mitigation activities related to this hazard since it is not considered a threat identified in the LMS.

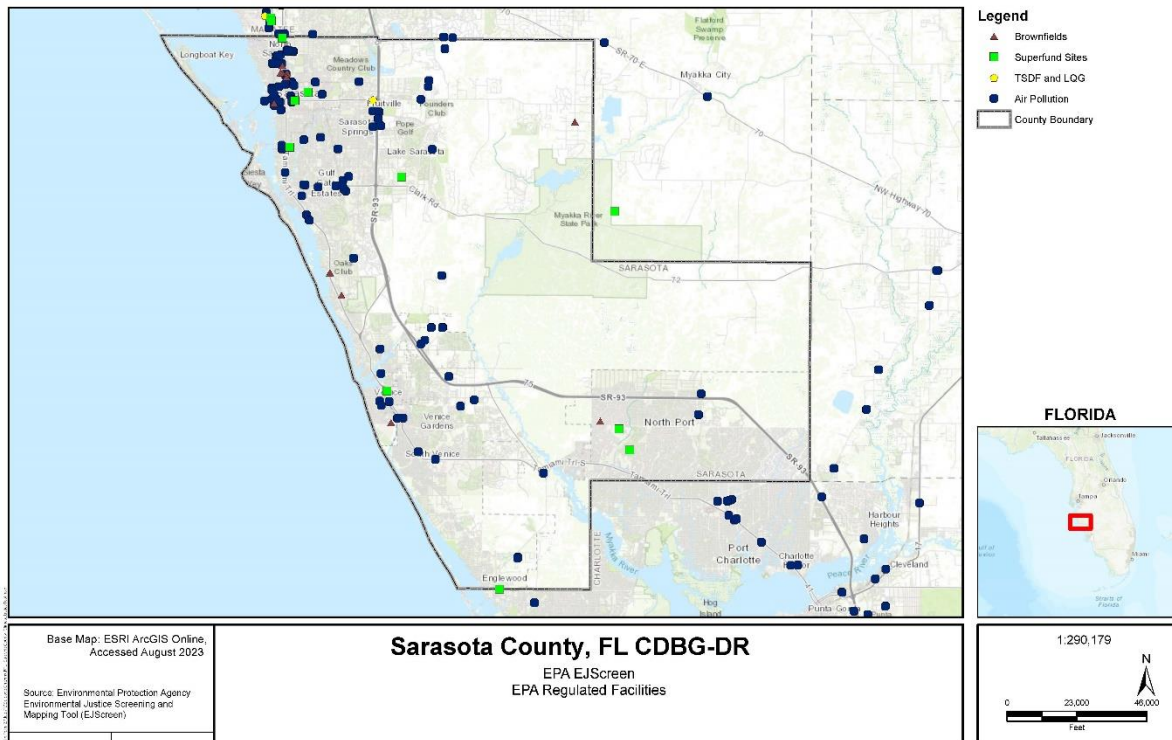
2.7.4. Natural and Environmental Hazards

Sarasota County took additional steps to identify other hazards which may pose health risks to residents in the County. This included consultation with the U.S. Environmental Protection Agency’s EJScreen: Environmental Justice Screening and Mapping Tool as well as the Climate and Economic Justice Screening Tool (CEJST). This would allow the County to identify the natural and environmental hazards that were potentially impactful to protected classes and vulnerable populations and determine those areas identified as disadvantaged under the Justice40 Initiative.

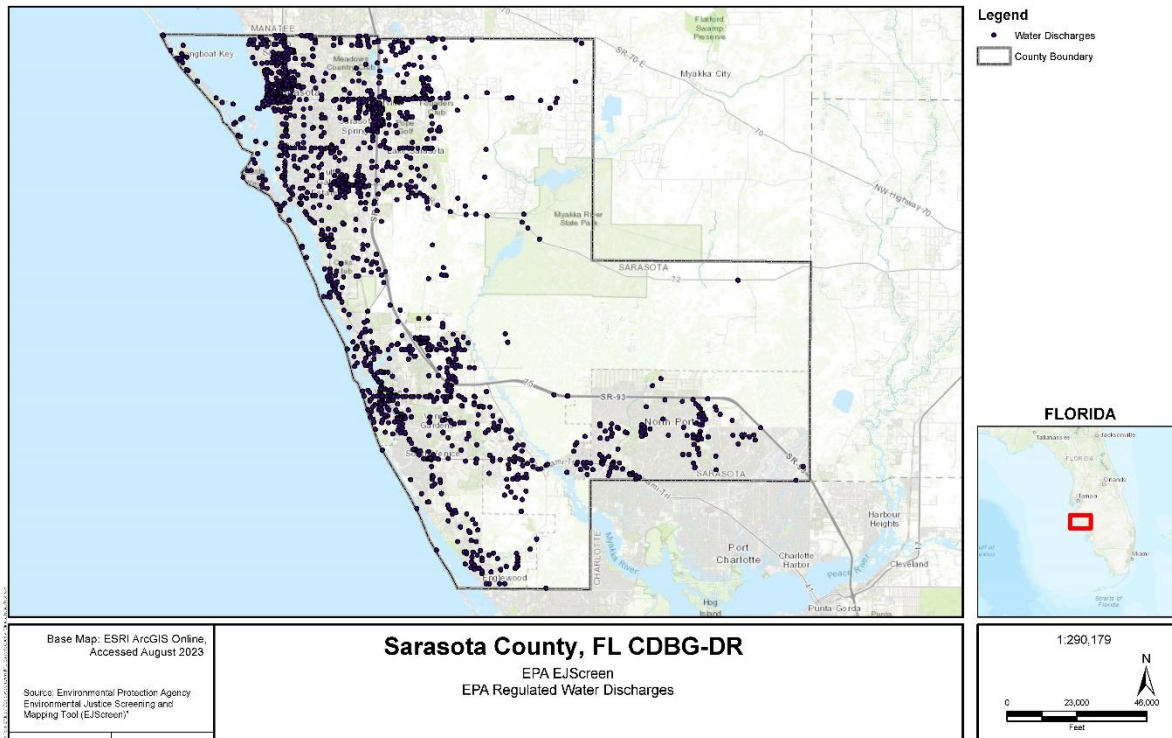
The EJ Screen Report for Sarasota County indicated the following EPA reporting sites in the County:

- Superfund – 0
- Hazardous Waste, Treatment, Storage, and Disposal Facilities - 0
- Water Dischargers – 2,216
- Air Pollution – 100
- Brownfields – 11
- Toxic Release Inventory – 33

Map 2-5. EPA EJScreen – EPA Regulated Facilities



Map 2-6. EPA EJScreen – Water Discharge Sites

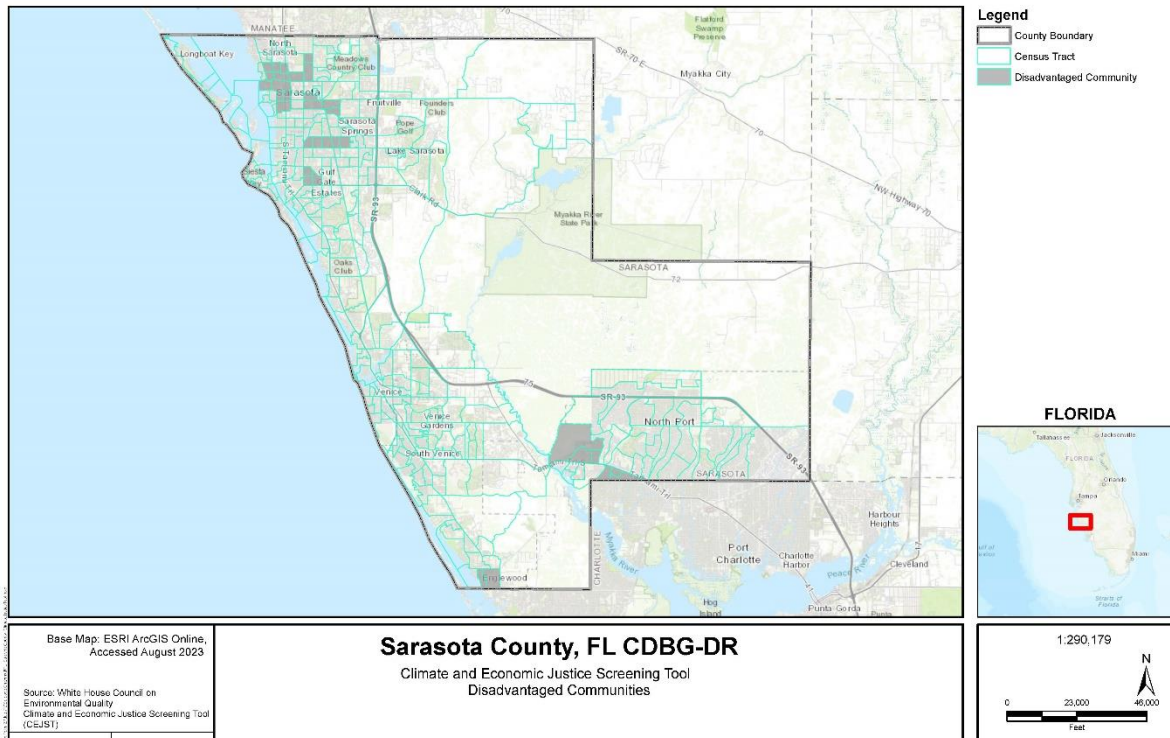


While many of the EPA reporting sites are scattered throughout the County there was a concentration of 4 of the 11 brownfield sites in Sarasota near the intersection of Dr. Martin Luther King Jr. Way and Route 301. Since the exact location of many projects is not yet determined a specific review of the proximity of such sites to specific populations impacted by CDBG-DR funded projects could not be conducted. However, the County will use the data collected here and available through the EJSscreen as it evaluates potential projects and will be thoroughly analyzed as part of the environmental review process for projects which may be undertaken. The full EJSscreen Community Report is available in Appendix G.

The County has also made note of the areas identified as containing disadvantaged communities that are marginalized, underserved, and overburdened by pollution through the Justice40 Initiative. Using the CEJST the County identified twelve Census Tracts identified as disadvantaged which met more than one of the seven burden thresholds **AND** the associated socioeconomic threshold. Census tracts identified as disadvantaged include:

- 102
- 200
- 300
- 405
- 406
- 1102
- 1504
- 1602
- 1703
- 2605
- 2721
- 2710

Map 2-7. CEJST Qualified Census Tracts

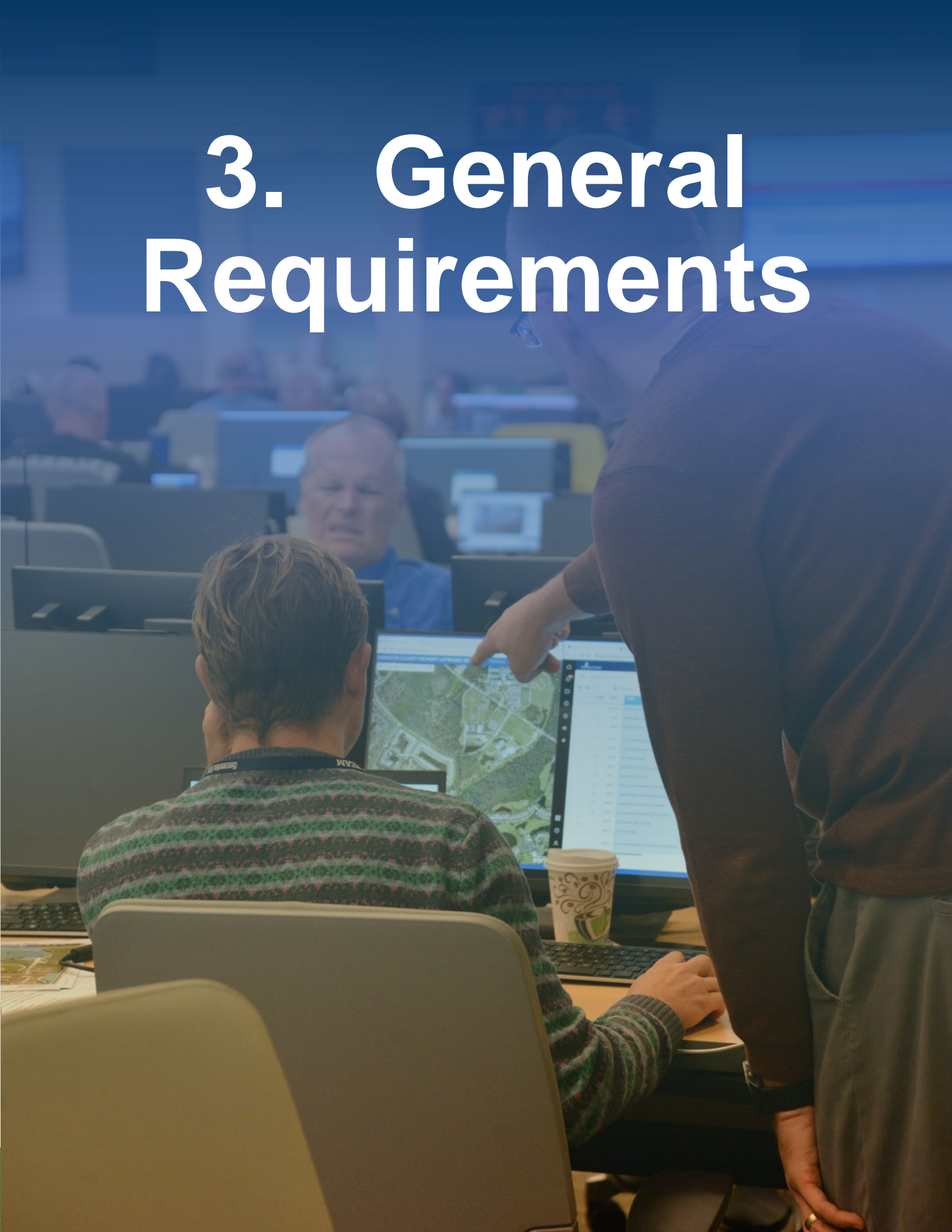


2.7.5. Mitigation Only Activity

The County will utilize mitigation features in housing and infrastructure activities. As required under the Federal Register the County will, “incorporate mitigation measures when carrying out activities to construct, reconstruct, or rehabilitate residential or nonresidential structures with CDBG–DR funds.” Additionally, infrastructure projects will seek to include items such as stormwater management features into their construction to address the threats posed by flood and hurricane related hazards, which are the most significant and consistent hazards posed in Sarasota County. Other mitigation features such as those incorporated into a public facility project, other than infrastructure, will be specifically described in the project descriptions.

The County will assess infrastructure projects identified in the Infrastructure Unmet Needs Assessment Section of this Action Plan based on several predefined criteria. The infrastructure project selection process is further defined in the Grantee Program Use of Funds Section of this Action Plan. During that selection process, the County will consider projects that do not have a tie-back to the disaster but support the local mitigation strategy. These projects may become “mitigation only activities.” The County will notify the public and HUD of any selections according to the Program Selection Process described in the Grantee Program Use of Funds Section of this Action Plan.

3. General Requirements



3.1. CITIZEN PARTICIPATION

3.1.1. Outreach and Engagement

In the development of this disaster recovery Action Plan, Sarasota County consulted with disaster-affected citizens, stakeholders, local governments, state and federal partners, the nonprofit and private sectors, public housing authorities, and other affected parties in the surrounding geographic area to ensure consistency of disaster impacts identified in the plan and that the plan and planning process was comprehensive and inclusive. Sarasota County also consulted with organizations that advocate on behalf of members of protected classes, vulnerable populations, and underserved communities impacted by the disaster.

Sarasota County presented CDBG-DR information in public meetings and shared public surveys with many community organizations to collect data about housing, infrastructure and public facilities, economic recovery, public services, and mitigation unmet needs.

Sarasota County recognizes that affected stakeholders are both the focus of this plan as well as partners in developing and implementing the plan. Opportunities for citizen input were provided throughout the planning process through the outreach and engagement efforts described below.

3.1.1.1. Engagement with Community Partners and Advocacy Groups

Upon initial notification from HUD of the County's CDBG-DR award, Sarasota County met with community partners to encourage participation from key stakeholders and community groups in the development of the Action Plan. The County met with many local organizations providing information and asking for Action Plan input. These groups include the Homeless Continuum of Care, the Community Alliance of Sarasota County, the Council of Government, the South County Tiger Bay Club, the SHA, Community Organizations Active in Disaster, the Affordable Housing Advisory Committee, and the Sarasota County Long-Term Recovery Group. Approximately 100 community groups are represented in these organizations.

In addition, information about the unmet needs surveys and public meetings was shared with the local Chambers of Commerce, Sarasota County Economic Development Corporation, the SHA, the Sarasota Ministerial Association (representing 80 congregations), the Venice Housing Authority, all Sarasota County municipalities, and the Behavioral Health Stakeholders Consortium (representing 236 organizations and providers). The responses from these outreach efforts were incorporated into the unmet needs analysis and proposed use of funds.

3.1.1.2. Publications and Postings

The County immediately established a communication team and developed a recognizable brand for the CDBG-DR program: Resilient SRQ. The County established a program name and logo, webpage (scgov.net/ResilientSRQ), email address (ResilientSRQ@scgov.net); published quick response codes; developed digital and printed media; and circulated social media content to inform community members and leaders about the CDBG-DR allocation and eligible uses of funding.

The County coordinated with Sarasota County Libraries and Sarasota County Parks, Recreation, and Natural Resources to provide hard copy program documents at many parks and library locations with information available in Spanish and English. The County provided flyers for the public meetings and placed paper copies of the survey in local libraries and many County buildings.

The County disseminated content via its social media channels and used paid media buys to expand its ability to target specific areas and demographics of the community. The table below provides the social media engagement analytics specifically for content related to Resilient SRQ.

Table 3-1. Resilient SRQ Web Page Engagement 2023

Month	Web Page	Breakdown by Location	Total Views
June	Resilient SRQ web page	<ul style="list-style-type: none"> • City of North Port: 227 • City of Sarasota: 811 • City of Venice: 209 • Town of Longboat Key: 13 	3,942
	Survey web page views	<ul style="list-style-type: none"> • City of North Port: 165 • City of Sarasota: 561 • City of Venice: 161 • Town of Longboat Key: 9 	2,571
July	Resilient SRQ web page	N/A	489
	Survey web page views	N/A	153
August	Resilient SRQ web page	N/A	3,399
	Survey web page views	N/A	2,446

Table 3-2. Resilient SRQ Outreach – Media Outreach and Engagement 2023

Month	Platform	Reach/Impressions	Engagements
June	Facebook	72,557	289
	Twitter	18,117	231
July	Facebook	14,834	108
	Twitter	5,553	58
August	Facebook	22,534	74
	Twitter	4,464	48

The County also provided two media pitches and three media releases to local and regional media outlets with content about Resilient SRQ. The table below provides a list of the Resilient SRQ news coverage.

Table 3-3. Resilient SRQ Outreach – Media Outreach and Engagement

News Agency	Article Name	Link
ABC7	Community invited to participate in development and funding uses survey	ABC7
ABC7	Sarasota County to receive HUD grant from Hurricane Ian recovery	ABC7

News Agency	Article Name	Link
ABC7	SRQ Resilient public meetings tonight to talk funds, Hurricane Ian recovery	ABC7
Florida Construction News	Survey, public meetings focus on Resilient SRQ program development and funding in Sarasota	Florida Construction News
Herald Tribune	Sarasota County seeks public input as it prepares for \$201.5 million hurricane recovery grant	Herald Tribune
Your Sun	Deadline nears on Resilient SRQ comment period	Yoursun.com
Herald Tribune	Sarasota County won't become stronger just by spending money	Herald Tribune
Herald Tribune	Venice, North Port send wish lists to County for federal funding	Herald Tribune
Herald Tribune	Sarasota County makes plans for \$202 million in Ian recovery money	Herald Tribune
News Break	Participate in Sarasota County's Resilient SRQ survey to support hurricane recovery efforts and public action plan	Florida Updates
Observer	County seeks public input to secure Hurricane Ian recovery funds	Your Observer
Observer	County poised for 201 million HUD grant	Your Observer
Sarasota News Leader	Public invited to participate in meetings this month as county staff works on Resilient SRQ program to meet remaining County needs in aftermath of Hurricane Ian	Sarasota News Leader
Siesta Sands	Potential new funding source emerges as panel addresses ongoing Midnight Pass debate	Siesta Sand
SRQ Magazine	Community Invited to Participate in Survey, Public Meetings for Resilient SRQ Program development and funding uses countywide	SRQ Magazine
Sun Newspapers	Millions available for unmet needs for hurricane survivors	Yoursun.com
The Daily Sun	Resilient SRQ money plan: River Road widening could get help	Yoursun.com
The Daily Sun	Plan in Place for Resilient SRQ	Yoursun.com

News Agency	Article Name	Link
The Daily Sun	Sarasota County to get \$201M in HUD block grants	Yoursun.com
Your Sun	Hurricane survivors sought for input on funding repairs	Yoursun.com
Your Sun	Deadline nears on Resilient SRQ Comment Period	Yoursun.com
Tampa Bay Newswire	Sarasota County to receive \$201.5 million for hurricane recovery mitigation	Tampa Bay Newswire
The Sarasota News Leader	Through August 25, public invited to comment on draft plan for use of 201.5 million to help County residents who suffered damage from Hurricane Ian	Sarasota News Leader
WENG	Sarasota County Government seeks your input on Ian disaster recovery funds	Weng Radio
WSTP	Public input deadline fastly approaching for drafting of Resilient SRQ program	WSTP
WUSF Public Media	Sarasota County is expecting big help from the federal government for Hurricane Ian damage	USF News
Yahoo News	Sarasota County to get \$201.5 million from federal gov as Hurricane Ian recovery continues	Yahoo
Yahoo News	Sarasota County releases plan for \$201.5 million hurricane recovery grant. What to know.	Yahoo

3.1.1.3. Surveys to Key Stakeholders

The County developed two surveys: one for individuals to provide information about their unmet needs and one for community organizations to communicate the unmet needs of the populations they serve. The surveys could be translated into over 60 languages on the program’s webpage and adjusted into a more accessible format, including the ability for a screen reader and larger text.

The County distributed the surveys in electronic and hard copy format to community organizations and groups to distribute to their members and clients. The responses included 896 completed individual surveys and 175 completed organizational surveys. In addition, information was presented, and data was gathered from Sarasota County departments along with the City of North Port, City of Sarasota, City of Venice, and Town of Longboat Key. The survey data provided valuable insight from disaster-impacted individuals, businesses, and community organizations within the County. The sections below provide a summary and key findings of the information

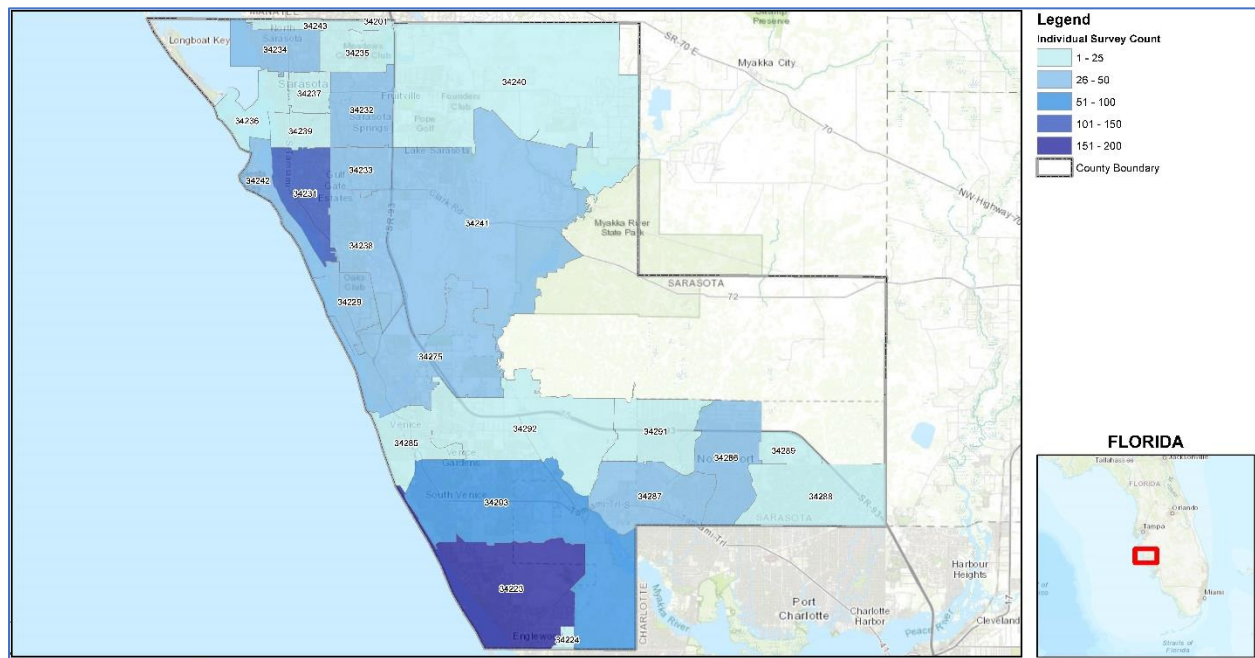
collected from individuals. This information is also available on the County’s website at www.scgov.net/ResilientSRQ.

3.1.1.3.1 Individual Survey Response Analysis

The County collected 896 survey responses from individuals who live in the impacted area. The County summarized and analyzed the data to identify where respondents live, what type of disaster damage they experienced, what type of assistance they received for disaster impacts (if any), and the types of programs they think would be most beneficial to the community. The maps, graphs, and tables below provide a summary of the data collected.

The following map shows individual surveys received by zip code.

Map 3-1. Resilient SRQ Individual Survey Responses by Zip Code



The County received the highest number of surveys from zip codes in LMI areas. These areas also experienced the most severe storm impacts.

The following tables provide a summary of survey responses to specific questions about housing, disaster damage, and the community’s priorities for disaster recovery activities.

Table 3-4. Resilient SRQ Individual Survey - Respondent Home Type

In what type of property do you reside?	Count of Responses	% of Total
Single-Family Home	641	71.5%
Condo	150	16.7%
Mobile Home - In Mobile Home Park	34	3.8%
Other	27	3.0%
Apartment	16	2.0%
Mobile Home - On Private Land or Co-Op	15	1.7%
Data not provided	11	1.2%
TOTAL	896	100%

The County found that the percentages of home types reported in the survey aligned with the percentages in the FEMA IA data used in the unmet needs analysis. This supports the assumption that the survey respondents are representative of the impacted community.

Table 3-5. Resilient SRQ Individual Survey – Homeowner or Renter

Are you a homeowner or renter?	Count of Responses	% of Total
Homeowner	787	87.8%
Renter	92	10.3%
Data not provided	16	1.8%
Homeowner; Renter	1	0.1%
TOTAL	896	100%

The County found that the percentages of homeowners and renters reported in the survey aligned with the percentages in the FEMA IA data used in the unmet needs analysis. This supports the assumption that survey respondents are representative of the impacted community.

Table 3-6. Resilient SRQ Individual Survey - Damage from Hurricane Ian

Did you experience any damage to your home or personal property following Hurricane Ian?	Count of Responses	% of Total
Yes	703	78%
No	179	20%
Data not provided	14	2%
TOTAL	896	100%

Nearly 80 percent of survey respondents reported impacts to their home or personal property. This supports the assumption that survey respondents are representative of the impacted community.

Table 3-7. Resilient SRQ Individual Survey - Assistance Received

Have you received assistance from any government or non-governmental organizations related to Hurricane Ian?	Count of Responses	% of Total
No	711	79.4%
Yes	166	18.5%
Data not provided	19	2.1%
TOTAL	896	100%

Nearly 80 percent of survey respondents reported that they had not received disaster recovery assistance from government organizations. This supports the assumption that FEMA IA and SBA disaster assistance alone does not provide a comprehensive solution to address the actual unmet need, as many applicants to those programs are deemed ineligible.

Table 3-8. Resilient SRQ Individual Survey - Safely Living in Home

Were you able to safely continue living in your home following Hurricane Ian?	Count of Responses	% of Total
Yes	785	88%

Were you able to safely continue living in your home following Hurricane Ian?	Count of Responses	% of Total
No	98	11%
Data not provided	13	1%
TOTAL	896	100%

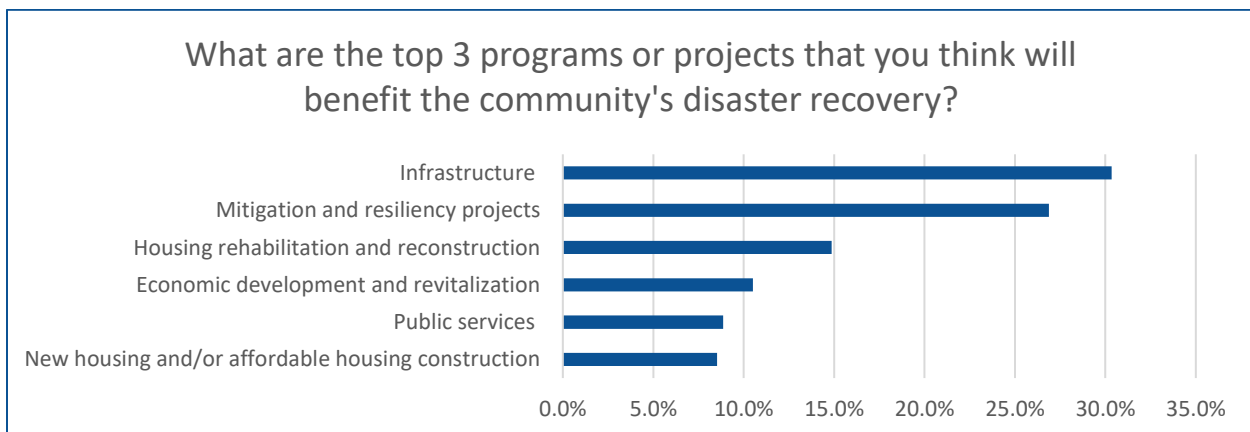
Over 80 percent of survey respondents reported that they have been able to live in their home safely after Hurricane Ian. However, 11 percent of respondents are either living in an unsafe home or have been displaced from their home. This is important for the County to consider when planning for housing rehabilitation and reconstruction programs as well as new affordable housing programs.

Table 3-9. Resilient SRQ Individual Survey - Top 3 Recovery Programs (shown by percent)

What are the top three (3) programs or projects you think would be most beneficial for your community to support disaster recovery?	Count of Responses	% of Total
Infrastructure (i.e., roads, bridges, evacuation corridors, water and sewer infrastructure, and other facilities that deliver a public service)	647	29.8%
Mitigation and resiliency projects to reduce future disaster impacts	573	26.4%
Housing rehabilitation and reconstruction	317	14.6%
Economic development and recovery	224	10.3%
Public services (e.g., healthcare, mental health, childcare, employment services, etc.)	189	8.7%
New housing and/or affordable housing construction	182	8.4%
Data not provided	36	1.7%
TOTAL	2,168	100%

Even with 80 percent of respondents reporting damage to their homes and personal property during Hurricane Ian, roughly 56 percent of survey respondents listed infrastructure and mitigation activities as their top priority programs for disaster recovery. This supports the assumption that repairs to critical infrastructure and mitigation activities to reduce impacts of future disasters are priorities for individuals in the community.

Graph 3-1. Resilient SRQ Individual Survey - Top 3 Recovery Programs (shown as graph)



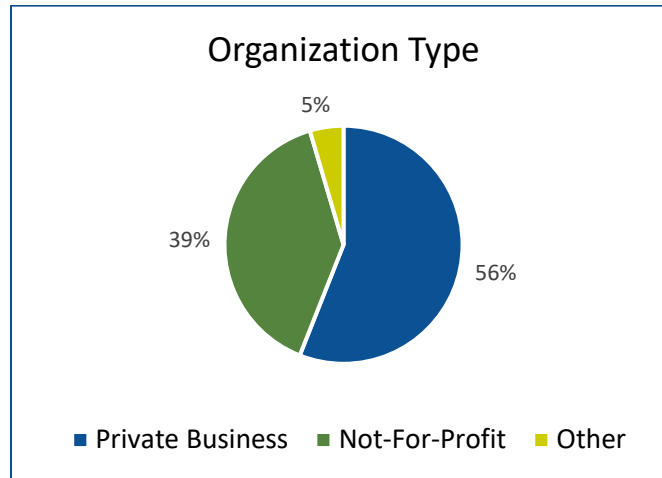
This graph further highlights the community's desire to prioritize infrastructure and mitigation activities to build a more resilient future. This was reinforced during public meetings where

individuals spoke about specific infrastructure projects that will help protect their homes and businesses from future disasters.

3.1.1.3.2 Organizational Survey Response Analysis

The County sent organizational surveys to its network of government agencies, businesses, and nonprofit organizations. Organizations were encouraged to send the survey to their member organizations. The County received 175 responses from the organizations. A summary of the survey results and analysis are provided below. This information is also available on the County’s website at www.scgov.net/ResilientSRQ.

Graph 3-2. Resilient SRQ Organizational Survey – Organization Type



The County received information and data back from a wide range of small and large businesses, government agencies, and nonprofit organizations. Almost 40 percent of the respondents were from nonprofit organizations that represent members of protected classes, vulnerable populations, and historically underserved communities. The following chart provides a list of nonprofit organizations and the population groups they serve.

Table 3-10. Nonprofit Engagement and Representative Stakeholders

Organization	Organization Description
All Faiths Food Bank	Human services organization providing food support services for children, seniors, veterans, and those in crisis
Beneva Christian Church	Christian church
Big Brothers Big Sisters of the Sun Coast	Human services organization providing youth counseling and support for at risk children ages 6-18 years
Boys & Girls Clubs of Sarasota and DeSoto Counties	Human services organization providing youth counseling and support for at risk children ages 6-18 years
CAN Community Health	Community health network providing HIV care, behavioral health, and case management
CareerSource Suncoast	Human services organization providing career services
Catholic Charities Diocese of Venice Inc.	Human services organization providing homelessness, emergency financial assistance, and disaster assistance services
Chalk Festival	Art community event
Charlotte County Homeless Coalition	Human services coalition for homelessness, shelter, and hunger
Community Assisted and Supported Living, Inc.	Human services organization providing permanent housing and mental health support

Organization	Organization Description
Community Coalition on Homelessness dba Turning Points	Human services organization providing support for homelessness, health and medical, hunger
Downtown Sarasota Condominium Association	Condominium association
Early Learning Coalition Sarasota County	Human services organization providing childcare scholarships and support
Education Foundation of Sarasota County	Education foundation providing support for teachers and students
Family Promise of Sarasota-Manatee	Human services organization providing support for children and families experiencing homelessness
Family Promise of South Sarasota County	Human services organization providing support for children and families experiencing homelessness in South Sarasota County.
FISH of North Port, Inc.	Human services organization providing transportation for vulnerable populations
Goodwill Manasota	Human services organization providing job training and employment placement for vulnerable populations
Gulf Coast Community Foundation	Local foundation providing funding and support for nonprofit organizations
Gulf Coast Heritage Association	Historic preservation organization
Gulfcoast Legal Services, Inc.	Legal services organization providing housing advocacy, family advocacy, financial stability advocacy, and immigration advocacy
Harvest House	Human services organization providing support for homelessness, addiction recovery, and housing
Helping Our Returning Neighbors	Human services organization providing support services for former inmates
Heritage Oaks Golf & Country Club	Golf course/country club
Kiwanis North Port	Civic organization providing support for children and vulnerable populations
Laurel Civic Association, Inc.	Human services organization providing support to children and families in vulnerable populations
Lighthouse Vision Loss Education Center	Human services organization providing support to vision impaired individuals
Manasota Solve, Inc. dba Solve Maternity Homes	Human services organization providing maternity support.
Marie Selby Botanical Gardens	Botanical gardens and environmental conservation
Mote Marine Laboratory, Inc.	Marine Laboratory and aquarium
Mothers Helping Mothers	Human services organization supporting youth, poverty, and providing hunger support
Myakka Pines Golf Club of Englewood, Inc.	Golf course
NAMI Sarasota and Manatee Counties	Human services organization providing mental health services
North Port Area Chamber of Commerce	Supports businesses in City of North Port
North Port Art Center	Art Center
North Port Meals on Wheels	Human services organization providing hunger and isolation support for seniors in City of North Port
North Port Moose Lodge #764	Membership Club
REALTOR Association of Sarasota and Manatee	Realtor association
Restore Global	Nonprofit support and resources

Organization	Organization Description
Safe Children Coalition, Inc.	Human services organization providing support for at-risk children in vulnerable populations
Safe Place and Rape Crisis Center, Inc	Human services organization providing support for domestic violence and sexual assault survivors
Sarasota Chamber of Commerce	Supports businesses in greater Sarasota area
Sarasota Emergency Radio Club, Inc. ("SERC") and Sarasota Amateur Radio Emergency Service (SRQARES)	Emergency Communication Support
SCORE Port Charlotte	Provides support for new and existing businesses
Senior Friendship Centers Inc	Human services providing isolation support for seniors
Siesta Key Chamber of Commerce	Supports businesses in Siesta Key
Suncoast Center for Independent Living	Human services organization providing services to people with disabilities
Suncoast Partnership to End Homelessness	Homeless Continuum of Care lead agency
The Environmental Conservancy of North Port, Inc.	Environmental conservancy
The Glasser/Schoenbaum Human Services Center	Organization providing support and resources for social services
The Hermitage Artist Retreat, Inc.	Art organization
The Loveland Center	Human services organization supporting people intellectual and developmental disabilities
The Salvation Army of Sarasota County	Human services organization providing resources for addiction, homelessness, and disaster assistance services
Venice Area Chamber of Commerce	Supports businesses in Venice
Ward Temple A M E	African Methodist Episcopal Church
WKDW 97.5 FM	Radio station serving City of North Port
Word of Life Church	Non-denominational multi-cultural Christian church
YMCA of Southwest Florida	Human services organization supporting youth development

Through this vast network of community organizations, the County received valuable input for the planning process to develop the Action Plan. These organizations will be involved in the implementation process to ensure all citizens have equal access to program information. The County also solicited feedback from organizations on the top recovery programs they think will be the most beneficial to the communities they serve. The table below shows the survey responses.

Table 3-11. Resilient SRQ Individual Survey - Top Recovery Programs (shown by percent)

What are the highest priority programs or projects you think would be most beneficial for your community to support disaster recovery?	% of Total
Housing rehabilitation and reconstruction	20.9%
Infrastructure (i.e., roads, bridges, evacuation corridors, water and sewer infrastructure, and other facilities that deliver a public service)	20.0%
New housing and/or affordable housing construction	19.2%
Economic development and recovery	15.0%
Mitigation and resiliency projects to reduce future disaster impacts	13.3%
Public services (e.g., healthcare, mental health, childcare, employment services, etc.)	11.5%

3.1.1.4. Public Meetings for Community Input

The County held three public meetings across the community in public libraries, which provided an overview of the CDBG-DR program and allowed the public to ask questions and provide comments. One meeting was held in a lower low-to-moderate income area (LMA) neighborhood, Newtown, located in Northern Sarasota County. Two were held in South County near LMAs and in areas that were significantly impacted by Hurricane Ian. Over 80 community members attended these meetings. The meetings included a short presentation to educate the public on the CDBG-DR grant program and eligible activities, followed by participant comments and questions. Attendees also had the opportunity to complete surveys in hard copy format or online.

Table 3-12. Public Meeting Dates, Times, and Locations

Meeting Date	Time	Meeting Location
Wednesday, June 21, 2023	5:30 p.m. to 7:30 p.m.	Frances T. Bourne Jacaranda Public Library 4143 Woodmere Park Blvd., Venice, FL 34293
Thursday, June 22, 2023	6:00 p.m. to 8:00 p.m.	Betty J. Johnson North Sarasota Public Library 2801 Newtown Blvd., Sarasota, FL 34234
Saturday, June 24, 2023	2:00 p.m. to 4:00 p.m.	Shannon Staub Public Library 4675 Career Ln., North Port, FL 34289

Information about CDBG-DR was shared at two Board of County Commissioners meetings throughout the planning stages. The Board meetings are open to the public, available via livestream or cable television, and allow residents to provide public comments.

3.1.1.4.1 Support for Individuals with Access Needs

Public input meetings were held either in the evening or on the weekend to allow maximum flexibility for residents to attend. In addition, all locations were ADA-accessible facilities, had hearing loops available for people who are hearing impaired, and were located along public bus routes.

The County also identified languages spoken in the community other than English. The following table provides data from the 2021 5-year ACS for languages spoken at home, where respondents reported that they speak English less than “very well.” The table includes languages with greater than 1,000 respondents who indicated their home language is not English.

Table 3-13. Languages Spoken at Home for Sarasota County⁶⁴

Home Language	# Who Speak English Less than “Very Well”	% of Total County Population
Spanish	11,872	2.9%
Russian, Polish, or other Slavic languages	2,369	0.6%
Other Indo-European languages	1,507	0.4%

To better determine the language services that may be needed as a result of the 2021 5-year ACS data, the County identified that the three most prevalent languages spoken at home other than English are Spanish, Russian, Polish, or other Slavic languages and Other Indo-European languages. The County also identified areas where Spanish speaking households are located in the community. For the public meeting held in an area with a high population of LEP individuals,

⁶⁴ 2021 ACS 5-Year Language Spoken at Home for Population 5 Years and Over in Sarasota County, Florida. United States Census Bureau. <https://data.census.gov/table?q=C16001&g=050XX00US12115&tid=ACSDT5Y2021.C16001>

a County staff member who could provide translation into Spanish attended the meeting to provide support as needed.

The surveys and flyers were available in both English and Spanish. The County also used tablets with translation software to assist attendees who spoke languages other than English, or were hearing or vision impaired, or had other communication barriers.

3.1.1.5. Key Stakeholder Interviews and Coordination Meetings

Table 3-14 provides a list County’s outreach and engagement efforts to develop the Action Plan. The list includes meetings with community organizations, state and federal agencies, and private sector partners.

Table 3-14. Resilient SRQ Outreach – Coordination Meetings and Presentations

Organization	Sector	Service/Focus	Date
U.S. Department of Housing and Urban Development	Federal government	Grantor	04/03/23 04/24/23 to 04/28/23 05/04/23 to 05/05/23
State of Florida Department of Commerce “FloridaCommerce”	State government	Promote economic opportunities for all Floridians	04/21/23 05/31/23 06/06/23
Sarasota County Board of County Commissioners	Local government	Whole community	05/24/23 07/11/23
Sarasota Council of Governments	Local government	Municipal leaders from the County, Cities of North Port, Sarasota, and Venice, and Town of Longboat Key representing the whole community	06/08/23
County leadership meeting	Local government	Whole community	06/15/23
Sarasota County Affordable Housing Advisory Committee	Members represent local government, private, and nonprofit sectors	Facilitate affordable housing while protecting the ability of the property to appreciate in value	07/14/23
Long Term Recovery Group (LTRG)	Nonprofit, government, business, and faith-based organizations	Individuals and families impacted by disasters, member organizations provide services to protected classes, underserved communities, and vulnerable populations	04/21/23 05/26/23 06/06/23

Organization	Sector	Service/Focus	Date
Community Organizations Active in Disaster (COAD)	Nonprofit, government, business, and faith-based organizations	Member organizations provide services to protected classes, underserved communities, and vulnerable populations	05/19/23 08/11/23
Continuum of Care	Nonprofit, government, and faith-based organizations	Individuals experiencing homelessness	04/19/23 06/21/23
Community Alliance of Sarasota County	Nonprofit, government, and faith-based organizations	Member organizations provide services to protected classes, underserved communities, and vulnerable populations	06/12/23
South Tiger Bay Club	Membership organization	Local government, private business, elected officials	06/23/23
CareerSource	Nonprofit	Career Training	07/13/23
CareerEdge	Nonprofit	Career Training	07/14/23
Community Outreach Network	Local Government	Internal County staff members	07/28/23
Affordable Housing Advisory Committee	Local government	Facilitate affordable housing in the community	06/13/23
Congressman Steube's Office	Federal Government	Sarasota County	08/16/23
North Port Chamber of Commerce	Membership organization	The City of North Port business community	08/17/23
Englewood Chamber of Commerce	Membership organization	Englewood business community	08/18/23
Sarasota Chamber of Commerce	Membership organization	Sarasota business community	08/18/23
Gulf Coast Builders Exchange	Membership organization	Sarasota County business community	08/22/23
Venice Chamber of Commerce	Membership organization	The City of Venice business community	08/22/23

3.1.1.6. Notice for Public Action Plan and Substantial Amendments

The County published this Action Plan on the CDBG-DR webpage, or “Resilient SRQ”, at www.scgov.net/ResilientSRQ for a 30-day public comment period from July 26, 2023 through August 25, 2023. Citizens were notified through four newspaper advertisements in local

newspapers. A summary of citizen comments on this Action Plan, along with Sarasota County responses, are captured in Appendix C of the final Action Plan.

For a substantial amendment, citizens will be given reasonable opportunity to review. The substantial amendment will be posted electronically at www.scgov.net/ResilientSRQ. Citizens may request a hard copy of the Plan by emailing ResilientSRQ@scgov.net. Summaries of the Action Plan or substantial amendment will be provided at the following locations:

- Public libraries
- Community Centers
- Other municipal government buildings
- One or more local newspapers

For more information, citizens can refer to Sarasota County citizen participation plan that can be found at www.scgov.net/ResilientSRQ.

3.1.1.6.1 Comment Period for Action Plan and Substantial Amendments

The notice to the public of the availability of the Action Plan for public review and comment was published on July 26, 2023 and concluded on August 25, 2023. Sarasota County will collect all comments made on the Action Plan or future substantial amendments.

The comments can be submitted in the following formats:

- Via email to ResilientSRQcomments@scgov.net;
- Using an online form available on the CDBG-DR website;
- Collected from public hearing; or
- Via mail to: Resilient SRQ, 3rd FL, 1660 Ringling Blvd, Sarasota, FL, 34236.

The Action Plan or substantial amendment will be made available for thirty days to allow for public comments unless the federal government specifies an alternative public comment period or waives the required public comment period. Sarasota County will inform affected citizens of the comment period through various methods including e-mails, press releases, media announcements, and contacts with neighborhood and community organizations. Sarasota County will consider all comments received both orally and in writing on the Action Plan or substantial amendment.

A summary of the responses and any consideration or resulting changes to the Action Plan will be noted in Appendix C.

3.1.1.6.2 Support for Individuals with Limited English Proficiency

Under the five-year estimates for 2021 of the ACS, Sarasota County is 2.9 percent Spanish speaking with limited English proficiency. Based upon this assessment, CDBG-DR notices, outreach materials, and other vital documents will be made available in both English and Spanish.

Additional language assistance to LEP persons, to include in Spanish and other languages, may include, but is not limited to:

- Oral interpretation services;
- Bilingual staff;
- Telephone service lines interpreter;
- Written translation services;
- Notices to staff and recipients of the availability of LEP services; or

- Referrals to community liaisons proficient in the language of LEP persons.

Request for any the above language assistance, outside of translation of notices, outreach materials, and vital documents into Spanish, may be submitted to ResilientSRQ@scgov.net and the County shall take reasonable steps to ensure that all citizens have equal access to program information, including persons with disabilities (vision and hearing impaired) and LEP individuals.

The County translated the Action Plan publication notice and other program documents in Spanish based on the data in the 2021 ACS survey and input from community groups that serve LEP populations. While Russian and Ukrainian were not specifically identified as triggering translation services in the 2021 5-year ACS data, the County is aware of these populations and has taken steps to identify translation resources if they are needed. As such, the County has secured resources that will translate versions of the Action Plan and program information into different languages as needed and upon request.

3.1.2. Public Hearings

One in-person public hearing was conducted on August 9, 2023 within a HUD-identified Most Impacted and Distressed (MID) area to provide comments on the Action Plan. The hearing was held at a facility that is physically accessible to persons with disabilities and that had appropriate auxiliary aids and services to ensure effective communication in accordance with 24 CFR 8.6. Staff chose a location that could be accessible via bus routes with a focus on areas that experienced significant damage from Hurricane Ian. The event was also held in the evening to maximize attendance.

For individuals with LEP, Sarasota County provided a translation of the summary documents in Spanish and took reasonable steps to provide additional language assistance as identified in the Citizen Participation Plan. In addition, there were staff members present at the Public Hearing who were fluent in Spanish. Comments from other languages were accepted and translated into English. For individuals with disabilities, Sarasota County followed the process listed in Section F. Accessibility for Persons with Disabilities of the Citizen Participation Plan.

A total of 74 residents attended the public hearing; 19 people spoke at the hearing to offer their thoughts and suggestions and an additional 6 people provided comments using the comment card provided.

For those who could not attend the event in person, a livestream of the event was arranged, which aired on television and YouTube. The recording is available on the Resilient SRQ webpage. Sarasota County residents also had multiple ways to provide public comments on the draft action plan which included using an online form on the webpage, emailing ResilientSRQComments@scgov.net, or mailing a letter.

A total of 992 comments were received during the public comment period. The responses were organized into categories and staff provided a response to these comments. Responses to comments were made available on the Resilient SRQ webpage on September 1, 2023, and are located in Appendix C.

Figure 3-1. CDBG-DR Action Plan Public Hearing



3.1.3. Complaints

Citizens may submit a complaint by emailing ResilientSRQ@scgov.net or calling 311. All complaints received shall be reviewed by Sarasota County CDBG-DR program staff for:

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

Sarasota County will provide a written response to every citizen’s complaint within 15 business days following the receipt of the complaint. If additional time is needed, Sarasota County will document the reason for needing additional time. Any complaints regarding fraud, waste, or abuse of government funds will be handled in accordance with Sarasota County’s CDBG-DR policies on fraud, waste, or abuse and substantiated complaints will be forwarded to the HUD OIG Fraud Hotline (phone: 1–800–347–3735 or email: hotline@hudoig.gov)

3.2. PUBLIC WEBSITE

Information related to CDBG-DR will be posted on a consolidated webpage, accessible at www.scgov.net/ResilientSRQ. The webpage will allow individuals and entities awaiting assistance to see how all grant funds are used and administered. Copies of the relevant documents will include at a minimum this citizen participation plan, the Action Plan including all substantial amendments, quarterly performance reports, procurement policies and procedures, information on each CDBG-DR program, any relevant notices or outreach information, and contact information.

3.3. AMENDMENTS

Over time, recovery needs will change. Sarasota County will amend the CDBG-DR Action Plan as often as necessary to best address our long-term recovery needs and goals. This plan

describes proposed programs and activities. Amendments to the Action Plan will be made to update the needs assessment, modify existing or create new activities, or reprogram funds, as necessary. Each amendment will be highlighted or otherwise identified within the plan.

3.3.1. Substantial Amendment

A change to this Action Plan is considered a substantial amendment if it meets the following criteria:

- a. Addition or deletion of a program benefit or eligibility criteria;
- b. Addition or deletion of an entire program or activity;
- c. Increase, decrease, or reallocation of funds amongst other approved activities, where alternation of funds constitutes at or above \$20 million of the total current award.

When Sarasota County pursues the substantial amendment process, the amendment will be posted at www.scgov.net/CDBG-DR for a 30-day public comment period. The amendment will be posted in adherence with Americans with Disabilities Act (ADA) and LEP requirements. Sarasota County will review and respond to all public comments received and submit to HUD for approval.

3.3.2. Non-Substantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the plan. The County will notify HUD of non-substantial amendments but is not required to post for public comment. The non-substantial amendment will become effective within five (5) business days after notification is provided to HUD.

All amendments will be numbered sequentially, posted to the website, and incorporated into this Action Plan.

3.4. DISPLACEMENT OF PERSONS AND OTHER ENTITIES

Prior to pursuing each activity, the County will consider the potential to trigger relocation or displacement and will minimize relocation or displacement of persons and entities when feasible. The County and its subrecipients will coordinate with applicable agencies and entities to ensure that programs are administered in accordance with the Uniform Relocation Assistance and Real Property Acquisition Act (URA) of 1970, as amended (49 CFR Part 24), and Section 104(d) of the Housing and Community Development Act of 1974, as amended, and implementing regulations at 24 CFR Part 570.496(a).

The County will provide detailed policies and procedures for proposed programs or projects that could potentially cause the displacement of people or other entities, and the County will develop a Residential Anti-displacement and Relocation Assistance Plan (RARAP) in accordance with URA requirements. CDBG-DR funds will not be used to support any federal, state, or local projects that seek to use the power of eminent domain unless eminent domain is employed only for public use.

The County will ensure that the assistance and protections afforded to persons or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and Section 104(d) of the Housing and Community Development Act of 1974 are available. The URA provides that a displaced person is eligible to receive a rental assistance payment that covers a period of

42 months. Given its priority to engage in voluntary buyouts and optional relocation activities to avoid repeated flood damage and improve floodplain management, the County will utilize the HUD waiver of Section 104(d) requirements, which assures uniform and equitable treatment by setting the URA and its implementation regulations, as the sole standard for relocation assistance. Efforts to conduct voluntary buyouts for destroyed and extensively damaged buildings in a floodplain may not be subject to all provisions of the URA requirements. All rental tenants that become displaced as a result of the homeowner participating in the Buyout Program will receive either relocation assistance or full URA benefits.

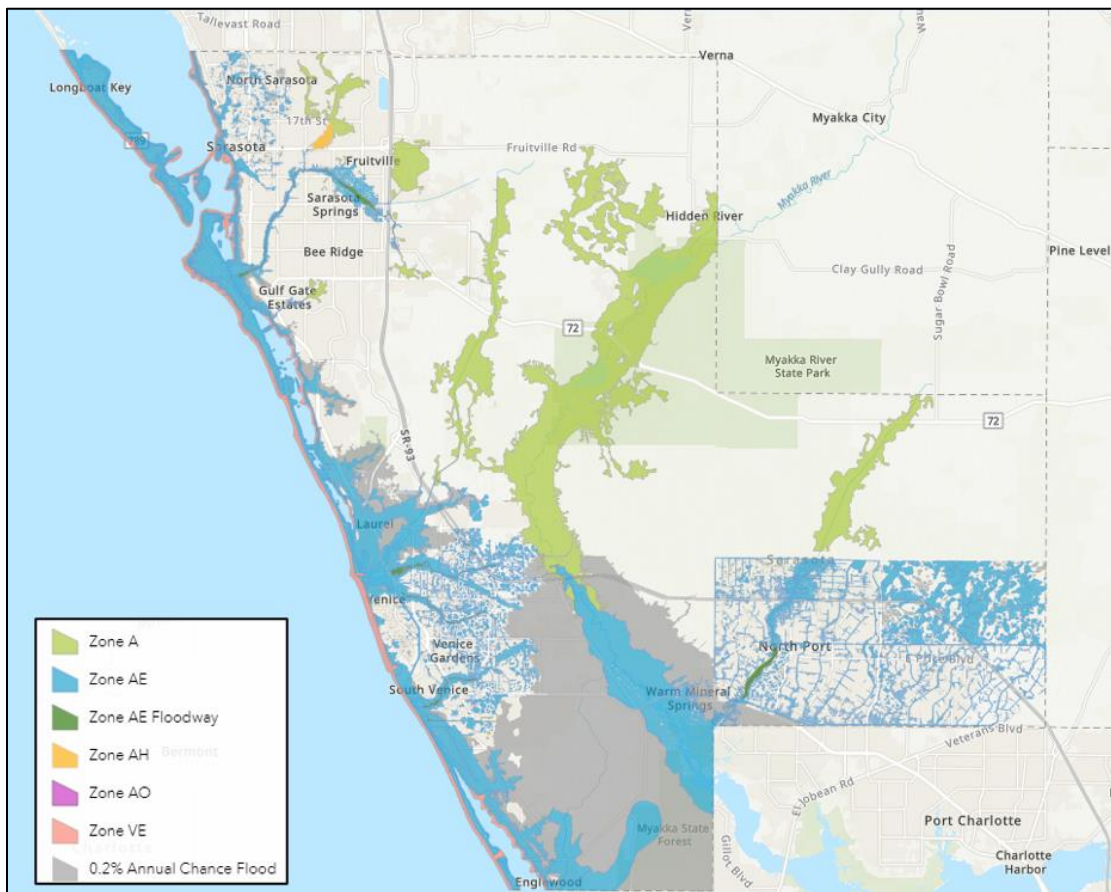
The proposed programs in this Action Plan will address displacement due to the disaster by providing new housing opportunities.

3.5. PROTECTION OF PEOPLE AND PROPERTY

As a coastal community susceptible to the destructive impacts of severe storms and hurricanes, Sarasota County has a long history of promoting disaster resilience through developing, implementing, and monitoring building codes and construction standards that improve the quality, durability, efficiency, and sustainability of housing and infrastructure. The County's low coastal topography, high water table, and outlying islands make it particularly susceptible to flooding, storm surge and high winds from hurricanes, and sea-level rise. Addressing and planning for these vulnerabilities is vital to maintain the resiliency of the County's coastal systems, County and municipal infrastructure, and the economic drivers in the community.

The County's 2021 Local Mitigation Strategy and the PDRP identified flooding as a prioritized risk affecting Sarasota County. In accordance with the Federal Register Notice requirement to support the adoption and enforcement of modern and resilient building codes and mitigation of hazard risk, Sarasota County has implemented building codes to remain in compliance with the Florida Statutes Chapter 162 and National Flood Insurance Program (NFIP) requirements. FEMA has issued new preliminary flood maps affecting Sarasota County property owners. The County will use the preliminary maps as the standard for the CDBG-DR program so that rehabilitation and reconstruction projects will meet the floodplain requirements into the future.

Map 3-2. Sarasota County Flood Zone Map⁶⁵



The County maintains a robust set of building and construction standards that follow the State of Florida's regulations to protect people and property from harm, including the Florida Building Code and the Sarasota County Code of Ordinances. These codes address resiliency, quality, durability, energy efficiency, sustainability, and mold resistance in rehabilitation and new construction of buildings. Sarasota County Planning and Development Services regulates the County's Code of Ordinances for the Building, Environmental, and Land Development Divisions within the County. The County has a staffed inspection hotline, website for online permitting, and convenient locations for permitting centers that will be used for the CDBG-DR rehabilitation and reconstruction projects. Planning and Development Services implements best practices and compliance by providing accessible methods for inspections and permitting as well as permitting and compliance with green building standards. The County also has a compliant hotline and email address with staff to address concerns from the community.

All subrecipients of the County's CDBG-DR funds will implement the County's ordinances, policies, and procedures, as applicable, in all program activities. A description of applicable ordinances, policies and procedures will be included in subrecipient agreements.

⁶⁵ "Sarasota County Flood Zone Locator GIS Interactive Map." Accessed July 11, 2023. <https://ags3.scgov.net/sarcoflood/>.

3.5.1. Green Building Standards

All CDBG-DR-funded projects must identify an industry-recognized green building standard and a minimum energy efficiency standard. These standards are further addressed in housing and infrastructure programs' policies and procedures.

HUD requires all rehabilitation, reconstruction, and new construction to be designed to incorporate principles of sustainability, including water and energy efficiency, resilience, and mitigating the impact of future disasters. Wherever feasible, the County follows best practices, such as those provided by the U.S. Department of Energy, Guidelines for Home Energy Professionals, including Standard Work Specifications for Home Energy Upgrades. For CDBG-DR-funded projects, HUD requires green building standards for replacement and new construction of residential housing. All rehabilitation projects will follow the policies and procedures specified in the HUD Community Planning and Development (CPD) Green Building Retrofit Checklist, to the extent applicable, for rehabilitation other than the rehabilitation of substantially damaged residential buildings.

Project files will include the requirements incorporated per project and the completed checklist/scorecard for the green building standard using the most recent version of the rating system. Qualifying standards include any of the green building and green development standards under the following programs:

- Florida Green Building Coalition
- U.S. Green Building Council Leadership in Emergency and Environmental Design (LEED)
- National Green Building Standard
- Green Gloves
- Living Building Challenge

3.5.2. Elevation Standards

The County will include the costs of elevation as part of the overall cost of rehabilitation of a property. Many homes in the impacted areas with substantial damage need updates to meet current federal, state, and local code requirements when repaired. If a home is within a 100-year floodplain, the County will complete a cost estimate using industry-standard cost estimation technology and certified technicians. The County will compare the cost estimate with local and national averages comparable to the home's size, number of feet required for elevation, and the geography of the location. The County will apply FEMA's 50 percent Rule for substantially damaged property in a Special Flood Hazard Area, where any building that has a total cost of repairs greater than 50 percent of the pre-disaster market value of the property is considered substantially damaged and will require the entire home to be brought into code compliance, including current floodplain management standards. The County determines the pre-disaster market value of a property by adding 20 percent to the property appraiser's property value.

Where a neighborhood or large tract of houses has substantial damage and requires elevation, the County will consider the overall impact of elevation on the long-term affordability and maintenance of the housing stock for the area to determine the best and most reasonable way forward to provide repairs.

3.5.3. Flood Insurance Requirements

Assisted property owners must comply with flood insurance requirements. HUD-assisted homeowners for a property located in a special flood hazard area must obtain and maintain flood insurance in the amount and duration prescribed by FEMA's National Flood Insurance Program.

The County may not provide disaster assistance for the repair, replacement, or restoration of a property to a person who has received federal flood disaster assistance that was conditioned on obtaining flood insurance but then that person failed to obtain it or allowed their flood insurance to lapse for the property. The County is prohibited by HUD from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if the following conditions are met:

- The combined household income is greater than 120 percent AMI or the national median,
- The property was located in a floodplain at the time of the disaster, and
- The property owner did not maintain flood insurance on the damaged property.

To ensure adequate recovery resources are available to LMI homeowners who reside in a floodplain but who are unlikely to be able to afford flood insurance, LMI homeowners may receive CDBG-DR assistance if:

- The homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs, or
- The household earns less than 120 percent AMI or the national median and has unmet recovery needs.

The County and its subrecipients will implement procedures and mechanisms to ensure that assisted property owners comply with all flood insurance requirements, including the purchase and notification requirements described below:

- Flood insurance purchase requirements for funds used to rehabilitate or reconstruct existing residential buildings in a special flood hazard area (or 100-year floodplain).
- Federal assistance to owners remaining in a floodplain.
- Prohibition on flood disaster assistance for failure to obtain and maintain flood insurance.
- Prohibition on flood disaster assistance for households above 120 percent of AMI for failure to obtain flood insurance.
- Responsibility to inform property owners to obtain and maintain flood insurance.

3.5.4. Construction Standards

Over the past 5 years, Sarasota County has seen an increase in residential and commercial growth, including several high-rise condominiums and hotels built in the downtown Sarasota area along the bayfront. Additional construction impacts the vulnerability of a community to hazards, primarily hurricanes, flooding, and other severe weather. However, as growth increases, some vulnerability is reduced according to the 2021 Sarasota County Unified Local Mitigation Strategy. To ensure the County is meeting the local mitigation objectives, the County implements, monitors, and enforces construction standards through the Sarasota County Code of Ordinances. Construction standards in the Standard Agreement and or construction agreements, executed as applicable for project type and beneficiary, must meet or exceed all applicable requirements for housing or building construction.

All new construction is required to pass quality inspections and code enforcement inspections over the development of the project, in addition to meeting accessibility requirements of the federal Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, and the ADA. All construction is expected, to the greatest extent feasible, to promote high quality, durable, energy-efficient, sustainable, and mold resistant construction and materials. Additional details regarding these standards will be included in the County's Policy and Procedures document.

The County will require a post-construction minimum warranty period of one year for all work performed, including any work completed by subcontractors. All work will be conducted using current, proven construction standards and materials. Previously used materials are not permissible for construction on CDBG-R funded County projects.

All rehabilitation, reconstruction, or new construction must meet an industry-recognized standard that has achieved certification under at least one of the following programs:

- Energy STAR (Certified Homes or Multifamily High-Risk)
- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance, or Neighborhood Development)
- ICC- 700 National Green Building Standards
- EPA Indoor AirPlus
- Any other equivalent comprehensive green building standard program acceptable to HUD

The County will use one or more of the above industry-recognized standards for the proposed programs or activities. Further details on these program requirements will be included in the program's relevant policies and procedures.

For rehabilitation of non-substantially damaged residential buildings, the County will follow the guidelines to the extent applicable as specified in the HUD CPD Green Building Retrofit Checklist. When older or obsolete products are replaced as part of rehabilitation work, the rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program (FEMP)-designed products and appliances.

For infrastructure projects, the County will encourage, to the extent practicable, implementation of current industry standards and best practices.

Sarasota County will coordinate with Sarasota County building division and municipalities to expedite the inspection and permitting process when possible.

3.5.4.1. Cost Controls

All construction activities that utilize CDBG-DR funds, including the mitigation set-aside, must be reasonable and consistent with market costs at the time and place of construction or procurement. To comply with this requirement, the County will complete and document independent cost estimates, cost or price analyses, and cost reasonableness determination within each of its procurements. Additionally, the County's contractors are required to use estimating software such as Xactimate and certified technicians for all estimating to ensure cost-reasonable industry standards. Specific parameters regarding cost reasonableness requirements will also be outlined within policies and procedures on a program-by-program basis.

3.5.5. Contractor Standards

Contractors selected under the County will make every effort to provide opportunities to low- and very-low-income persons by providing resources and information to notify Section 3 individuals and businesses of opportunities in the community. The County maintains a robust network of community organizations that serve low- and very-low-income persons. Through this network, the County will provide information about employment and training opportunities and support to facilitate access to these opportunities. The County will implement a cross-cutting approach to achieve the goals of public service activities in tandem with housing and infrastructure activities.

The County will report Section 3 accomplishments in the Disaster Recovery Grant Reporting (DRGR) system.

Construction contractors performing work in the County jurisdiction will follow the local procurement standards that align with 2 CFR 200.318, which includes regulation for Competition, Methods of Procurement, Socioeconomic Contracting, Procurement of Recovered Materials, Contract Cost and Price, Review of Procurements, Bonding Requirements, and Contract Provisions.

The County has a process in place for providing and receiving information from the community through printed materials, media and social media, website, call center hotline, and intake mailing and email address. The County will provide information in multiple languages and formats for individuals with access and functional needs to report fraud, poor quality work, and associated issues.

To provide quality assurance and cost controls, the County may conduct periodic audits of the quotes contracted within the jurisdiction and compare services to include but not limited to the following sources:

- Florida Division of Consumer Services;
- Florida Department of Business and Professional Regulation; and
- Division of Building Licensing and Enforcement expectations and standards.

The County may introduce caps on specific services provided by construction contractors. The County procurement process and agreement terms for construction contractors requires compliance with all applicable local, state, and federal regulations as well as a warranty period post-construction with a formal notification process.

3.5.6. Preparedness, Mitigation, and Resiliency

The County maintains a hazard mitigation plan that is updated every 5 years and submitted to the State of Florida Division of Emergency Management for compliance review and approval. This plan includes a detailed hazard, risk, and vulnerability analysis as well as initiatives for the County to mitigate the impacts of future disasters. The County also maintains a CEMP and PDRP that outlines initiatives to implement long-term housing, infrastructure, and economic recovery activities following major disasters.

The County conducts analyses and develops reports to better understand extreme weather events and climate change that impact the community. Recognizing that sea-level rise will affect housing, public facilities, and infrastructure, the County Administration established a Sea-Level Rise Working Group to conduct a vulnerability assessment of infrastructure and public facilities using a GIS tool. The working group developed the Sarasota County Sea-Level Rise Working Group Report (2021) and Baseline Coastal Analysis (2021), which identifies risks and locations of considerable vulnerability to the effects of sea-level rise. The reports included recommendations for County leadership to inform future policy decisions regarding development and post-disaster redevelopment.

The Sarasota County Local Mitigation Strategy provides the framework for community resilience and describes the County's initiatives to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks. To promote long-term recovery, the County has identified a Local Mitigation Strategy Working Group to implement the objectives in the mitigation plan and foster a more disaster-resilient community. The Local Mitigation Strategy Working Group has identified six overarching goals to protect people and property from harm.

1. Assess vulnerabilities and identify mitigation models for natural hazards relevant to Sarasota County.
2. Identify, prioritize, and achieve cost-effective mitigation projects for the prevention and protection of lives, property, and natural resources within Sarasota County.
3. Promote the continued participation in the NFIP and the community.
4. Maintain and develop effective public outreach activities.
5. Maintain and increase participation in the Sarasota County Local Mitigation Strategy Working Group.
6. Support mitigation activities and research projects within Sarasota County and the surrounding local, state, and federal jurisdictions.

Through these goals, the County will continue to develop vulnerability assessments and residential suitability testing resiliency planning process to establish baselines that inform methods for high-quality, durable, energy-efficient, and mold-resistant rehabilitation projects. The Sarasota County Code of Ordinances will reflect resilient building codes and the mitigation of natural hazard risk inclusive of the floodplain threat. The County Code Enforcement division will provide guidance, monitoring, regulation, and enforcement to maintain quality, consistency, and transparency. The County will collect and respond to resident complaints as authorized by Code of Ordinances Article II Section 22-37.

Through the Local Mitigation Strategy guidelines, the County will identify areas where households that experience repetitive loss due to flooding are provided opportunities to relocate from risk to a safe home. The County will make land-use decisions that reflect responsible and safe standards to reduce future natural hazard risks, including climate-related risks, and remove people and property out of harm's way. In addition to the Green Building Program, the County also promotes the SMART Program designed to increase opportunities for low-income persons and the Universal Design and Visibility Program designed to assist seniors and those with disabilities to live/age in place. The County will use its State and FEMA-approved Local Mitigation Strategy as a framework to design CDBG-DR program policies and procedures that promote sound, sustainable long-term recovery planning informed by a post-disaster evaluation of hazard risk, including climate-related natural hazards.

3.5.7. Broadband and Infrastructure in Housing

Broadband has been prioritized by HUD and is identified in the American Rescue Plan Act State and Local Fiscal Recovery Funds [Annual Recovery Plan Performance Report #1](#)⁶⁶ as a critical community need. In compliance with 24 CFR 570.202, the County will align the Action Plan with County objectives for broadband expansion and improvement projects to include housing rehabilitation considerations.

Any substantial rehabilitation or new construction of a building with more than four (4) rental units will include installation of broadband infrastructure, except when it is documented that:

- The location of the new construction or substantial rehabilitation makes the broadband infrastructure infeasible,
- The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden, or
- The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

⁶⁶"Annual Recovery Plan Performance Report." Accessed on July 19, 2023. <https://www.scgov.net/government/financial-management/coronavirus-local-fiscal-recovery-funds/annual-recovery-plan-performance-report-1#executivesummary>.

3.5.8. Cost-Effectiveness

Federal regulations require that funds are efficiently and effectively utilized and that costs are reasonable. The determination of necessary and reasonable costs will apply to any project or program receiving funding as well as administrative and planning funds. The County will utilize the cost principles described in 2 CFR Part 225 (OMB Circular A-87) to determine necessity and reasonableness.

According to 2 CFR part 225, “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.” The County will follow these principles and fund only project costs that are deemed necessary and reasonable. Therefore, projects will be evaluated to confirm whether the project is cost-reasonable, or cost-effective, when evaluated against alternatives that may serve the same or similar purpose. This can occur in situations such as residential rehabilitation and reconstruction when the amount required to provide necessary improvements to a property begins to exceed the actual value of the property. In such a case, the property may not be suitable for rehabilitation, and instead it may be more cost-effective to reconstruct the building or provide replacement housing for the property owner. The existing housing stock is not affordable for many residents, and reconstruction or new housing construction that meets current codes and HUD standards will also address resiliency to future disasters. A building will be considered “not suitable for rehabilitation” when:

- The cost to properly “rehabilitate” the unit, to bring it to livable standards under local code and HUD property and habitability standards, exceeds 50 percent of the total current value of the property or a comparable reconstruction;
- The property is located in an area where environmental or other hazards place residents in undue harm as identified through an environmental review or by other means as the County determines;
- The structure has been condemned under local code; or
- The building is identified as a repetitive loss structure.

All reconstruction projects will be evaluated on a case-by-case basis under the process defined in the County’s forthcoming Programmatic Policies and Procedures. The County may provide exceptions to award maximums, and the procedures will define the circumstances under which an exception may be granted and the assistance amount determined necessary and reasonable.

3.5.9. Duplication of Benefits

Federal law prohibits any person, business concern, or other entity from receiving federal funds for any part of such loss as to which they have already received financial assistance under any other program, private insurance, charitable assistance, or any other source. Such duplicative funding is called Duplication of Benefit (DOB), which is defined under the Robert T. Stafford Act (Stafford Act) and updated in Federal Register Notice published on June 2019, titled “Updates to Duplication of Benefits Requirements Under the Stafford Act for Community Development Block Grant (CDBG) Disaster Recovery Grantees” (84 FR 28836, commonly referred to as the “2019 DOB Notice”). Additionally, the County will comply with all DOB requirements described in section IV.A. of the Consolidated Notice as required under Federal Register Notice (88 Fed. Reg. 32,046 (May 18, 2023)).

The County has noted that the 2019 DOB Notice revised the DOB requirements that apply to CDBG-DR grants and implemented temporary changes to the treatment of loans made by the

Disaster Recovery Reform Act of 2018 (DRRA). This revision included the suspension of the DRRA loan exception; therefore, subsidized loans may be a duplication of benefits for CDBG-DR. Pursuant to the Stafford Act, the County will establish and follow policies and procedures to uphold the safeguards against DOB within its program guidelines for each eligible activity. Understanding that prevention of DOB is especially critical in the context of housing programs and in anticipation that some form of housing assistance will be identified to fulfill unmet disaster recovery needs at the conclusion of the County's Action Plan development process, the County has established a framework for identifying potentially duplicative sources of funds and reducing documented duplications from potential project awards prior to any award being made. Additional information and details on the County's DOB identification process is available in the County's Duplication of Benefits Policy located in the CDBG-DR Policy Manual.

4. Grantee Proposed Use of Funds



4.1. OVERVIEW

The Sarasota County Office of Financial Management (OFM) is the responsible entity for administering **\$201,535,000** in CDBG-DR funds allocated for disaster recovery activities in response to impacts from Hurricane Ian (DR-4673). The County intends to use the largest portion of funds for housing programs, including the rehabilitation and reconstruction of homes that were damaged or destroyed during the disaster, reimbursement to eligible applicants who repaired their homes on their own, potential buyouts of homes that are identified as repetitive loss properties, and new construction of affordable multifamily housing that is desperately needed for Sarasota County's workforce. The County also intends to implement infrastructure programs to address damage to the County, local municipal, and nonprofit facilities. The County has identified an infrastructure project serving the LMI community of Englewood which will address the severe flooding of an evacuation route that was impacted by Hurricane Ian. The County has allocated \$15,000,000 for public services associated with economic recovery dedicated to career training programs. There is \$5 million set-aside to conduct planning activities and 5 percent of the program funds for administration activities.

4.1.1. Program Budget

Sarasota County identified a program budget which was approved by the Board of County Commissioners which allocated the available grant funds to eligible program activities. The budget development process considered the data analysis findings in the unmet needs assessment as well as input from community members, nonprofits, private businesses, and municipal leaders. The budget is designed to meet the requirements of CDBG-DR grant funds and best serve the whole community through its long-term disaster recovery efforts. In addition, the mitigation activities to be undertaken have been considered in conjunction with potential threats to Community Lifelines. These combined factors were evaluated in determining reasonable and necessary amounts of assistance in programs to address unmet needs in Housing, Infrastructure and Public Facilities, and Public Services that will assist in the County's recovery and improve resilience to future disaster events.

The CDBG-DR Program Budget data shown below establishes a crucial link between the financial aspects of a program and the reporting obligations outlined in the FRN. This link between the program budget and the FRN ensures that financial information is accurately reported and made accessible to the public, contributing to an open and accountable governance framework.

The allocation of funding for these programs is proportionate to the anticipated need, accounting for necessary administrative costs, indirect costs, and planning expenses. The total CDBG-DR allocation is \$201,535,000. The County will set aside 5 percent of these funds (\$10,076,750) for administrative costs and 2.5 percent (\$5,000,000) for planning activities as permitted by the FRN.

The remaining \$186,458,250 will be allocated to housing and infrastructure recovery activities, economic recovery programs, and mitigation efforts. According to the unmet needs analysis, the largest proportion of available CDBG-DR program funding is needed for unmet housing recovery needs, and the second largest should be allocated to assist with infrastructure repair. These infrastructure repairs include a significant amount for mitigation activities. These activities will be designed to make a positive impact to the long-term safety, sustainability, and resiliency of the County.

Table 4-1. CDBG-DR Program Budget

Program	Estimated LMI Funding Goal Amount	Estimated LMI Funding Goal by Program	Total Allocation by Program
Housing			
Homeowner Rehabilitation/Reconstruction - owner-occupied	\$28,000,000	70%	\$40,000,000
New Affordable Multifamily Housing	\$40,000,000	100%	\$40,000,000
Homeowner Reimbursement - damage repair	\$10,500,000	70%	\$15,000,000
Voluntary Housing Buyouts	\$4,520,775	70%	\$6,458,250
TOTAL	\$87,020,775		\$101,458,250
Public Facilities & Infrastructure			
Sarasota County, municipalities, not-for-profit	\$31,500,000	70%	\$45,000,000
South River Road Evacuation Corridor	\$25,000,000	100%	\$25,000,000
TOTAL	\$61,500,000		\$70,000,000
Economic Recovery			
Workforce Development and Training	\$10,500,000	70%	\$15,000,000
TOTAL	\$15,000,000		\$15,000,000
Total Program Budget	\$150,020,775	80.4%	\$186,458,250
Planning Activities	N/A	N/A	\$5,000,000
Sarasota County Administration Activities	N/A	N/A	\$10,076,750
TOTAL GRANT BUDGET			\$201,535,000

4.1.2. Leveraging Funds

As part of the unmet needs assessment and Action Plan development process, the County has coordinated with agencies and organizations to gather data about other funding resources available following Hurricane Ian. The County will leverage CDBG-DR funds with funding sources such as FEMA, SBA, and other sources of state or local funding. CDBG-DR funds will address the remaining unmet needs in the County after these other sources of funding have been exhausted.

The County is committed to leveraging available funds and resources whenever possible to fully address recovery from Hurricane Ian. Throughout the grant lifecycle, the County will coordinate with stakeholders to ensure that the most recent available recovery data is shared and available for review. As potential resources or funds are identified, the County will further review their use to ensure that CDBG-DR funds are used appropriately and that the County is leveraging all potential sources.

4.1.3. Program Partners

When needed, Sarasota County will enter into vendor contracts, subrecipient agreements, interlocal agreements, or informal partnerships to administer CDBG-DR funds. Identified partners will be assessed to ensure that recipients of funds have the capacity and CDBG-DR expertise to carry out program activities within established program guidelines and timelines for completion. These agreements will also outline reporting and performance requirements that follow HUD's established reporting procedures.

Sarasota County will fund local governments and nonprofits within the County to administer local infrastructure and public facilities projects as subrecipients. The County will provide these partners with written guidelines and CDBG-DR training to guide their implementation of funded projects.

4.1.4. Program Income

Program income refers to earnings realized from CDBG-DR supported activities and may include items such as loan repayments, rent received, proceeds from sale of property, and lien repayments. The County does not anticipate earning any program income from this project. However, should program income be generated, the County will track the receipts within the County's financial records and report the receipts to HUD via the DRGR database as required in the regulations. As program designs are finalized and OFM determines the likelihood of generating program income, the guidance of the program income section in the Program Policies and Procedures will be updated to provide an accurate description of how such program income will be managed. All program income received prior to grant closeout shall be utilized for additional eligible CDBG-DR activities in accordance with the FRN. Any program income remaining after the CDBG-DR program closeout will be returned to HUD.

Program income may also be generated through the activities of subgrantees. The OFM will oversee the management of program income by implementing certain guidelines outlined in a subrecipient agreement. For subgrantees, in order to receive CDBG-DR funding from Sarasota County, subrecipients will be required to sign this agreement. Subgrantees must inform OFM about any program income they generate, and this income must be spent by the grantee before they can access additional grant funds.

Program income can only be used for eligible projects or administration costs that are directly related to the awarded project. Subgrantees are obligated to provide regular reports to OFM, detailing the program income they have generated and retained. At the end of each quarter, any remaining program income must be returned to the County. OFM will then report all program income to the HUD through the DRGR system on a quarterly basis.

If there is any program income remaining at the end of the subrecipient agreement, it will be returned to OFM during the closeout process. OFM will track any of this program income until it is allocated to a new subrecipient agreement or utilized by the County. The entire process will be recorded and monitored through the County's system of record.

4.1.5. Duplication of Benefits (DOB)

Federal law prohibits any person, business concern, or other entity from receiving federal funds for any part of such loss as to which they have already received financial assistance under any other program, private insurance, charitable assistance, or any other source. Such duplicative funding is called DOB, which is defined under the Robert T. Stafford Act (Stafford Act). These requirements apply to CDBG-DR-allocated funds for disaster recovery.

Pursuant to the Stafford Act, the County has established policies and procedures to uphold the safeguard against DOB within its program guidelines for each eligible activity. DOB analysis is especially critical in the context of housing programs and the County has established a framework for identifying potentially duplicative sources of funds and reducing documented duplications from potential project awards prior to any award being made. Additional information, including the County's specific DOB identification and calculation methodology, can be found in the County's CDBG-DR Policies and Procedures document for specific programs and activities.

4.1.6. Uniform Relocation

The County does not anticipate engaging in any activities qualifying as uniform relocation eligible activities. The County's CDBG-DR-funded activities will be designed to eliminate (or minimize) the occurrence of displacement. The County's strategy to minimize displacement is to only engage in projects that do not inherently result in the potential for displacement. If a project is identified that may involve displacement the County will seek to replace the project with another qualified, eligible project to minimize, or in this case, eliminate displacement. The only potential for displacement could lie in properties to be acquired which contain renters. While this is unlikely, as any residential buyout project will be designed as an owner-occupied program, there may be unique cases that involve renters. If this occurs, the County will follow all requirements and regulations pertaining to URA as they apply to such a scenario.

The County will ensure that the assistance and protections afforded to persons or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and Section 104(d) of the Housing and Community Development Act of 1974 are available.

4.1.7. Resale or Recapture

Funds spent on activities supported by the CDBG-DR program may be subject to recapture based on federal guidelines and regulations outlined in the applicable Federal Register. For housing projects that receive federal CDBG-DR funding, there is a requirement to maintain a minimum period of affordability. Failure to adhere to these requirements will result in recapture of the awarded funds. Therefore, the County will enforce applicable requirements which must ensure that, for the duration of the affordability period, housing that was purchased or developed using CDBG-DR funds is subsequently purchased only by a buyer who is income eligible to receive CDBG-DR funds and who will use the property as a principal residence.

Recapture requirements will also be enforced for any applicable programs so that the County recoups all or a portion of the CDBG-DR assistance to any homebuyers assisted with CDBG-DR funds if the housing is sold during the period of affordability. Sarasota County will monitor compliance with the deed restriction on an annual basis, and failure to comply will result in the recovery of grant funds. The County may consider relieving the deed restriction on a case-by-case basis under certain circumstances. The specific language and requirements of the deed restriction will be outlined in the program guidelines, which will be available for applicants to review prior to participating in the program.

4.1.8. Equal Access

In order to ensure these recovery efforts do not have an unjustified discriminatory effect and to ensure the participation of minority residents and those belonging to other protected class groups, the County will increase efforts in outreach and fair housing education within the County to ensure that vulnerable populations are made aware of housing opportunities. The combination of these efforts should address unmet recovery needs in impacted communities, reduce any unjustified discriminatory effects on vulnerable populations, and increase participation in the County's housing and infrastructure programs.

4.1.9. Elevation Standards

All structures, defined at 44 CFR 59.1, designed principally for residential use and located in the 100-year floodplain or equivalent FEMA data source, that receive assistance for new construction, reconstruction, rehabilitation of substantial damage, or rehabilitation that results in substantial

improvement, as defined at 24 CFR 55.2(b)(10), must be elevated with the lowest floor, including the basement, at least 2 feet above the 1 percent annual chance floodplain elevation (base flood elevation). Structures that are elevated will meet federal accessibility standards.

Mixed-use structures with no dwelling units and no residents below 2 feet above base flood elevation must be elevated or floodproofed in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or a successor standard up to at least 2 feet above base flood elevation.

Nonresidential structures, including infrastructure, will also be elevated to the standards described above.

4.2. CONNECTION TO UNMET NEEDS

The key focus in developing effective CDBG-DR programs for Sarasota County is addressing the remaining disaster recovery needs from Hurricane Ian identified in the unmet needs analysis. For a detailed review of the data and analysis behind the unmet needs information, please refer to Section II: Unmet Needs Assessment. Sarasota County's programs are designed to address the most severe unmet needs while fully complying with the guidelines outlined in the Federal Register Notice, Federal Register, 88 Fed. Reg. 32,046 (May 18, 2023) available at <https://www.govinfo.gov/content/pkg/FR-2023-05-18/pdf/2023-10598.pdf> (hereafter referred to as FRN).

The County's primary objectives in the Action Plan, as informed by the unmet needs analysis, are to address housing recovery, infrastructure rehabilitation and reconstruction, and economic recovery. Additionally, CDBG-DR-funded programs will conduct CDBG-eligible activities, align with HUD National Objectives, comply with regulatory guidance issued to Sarasota County, and incorporate best practices established through similar recovery initiatives.

Under the Appropriations Act, Continuing Appropriations Act, 2023 and the Department of Housing and Urban Development Appropriations Act, 2023 for major disasters occurring in 2022, including Hurricane Ian, grants are exclusively available for activities authorized under Title I of the Housing and Community Development Act of 1974. These activities encompass disaster relief, long-term recovery, infrastructure and housing restoration, and economic recovery within the MID areas affected by eligible disasters. In this appropriation, the MID is designated as the entirety of Sarasota County. It is important to note that CDBG-DR funds cannot be utilized for activities that are reimbursable or for which funds are provided by FEMA, SBA, the U.S. Army Corps of Engineers (USACE), or any other federal funding sources.

In May 2023, Sarasota County began the Action Plan development process, including seeking public input for potential funding allocations. Feedback received during public input meetings, surveys, stakeholder engagement, and during the public comment period has been considered in these proposed allocations and will continue to be considered as adjustments are made to the program allocations, if necessary, ensuring responsiveness to the needs of affected residents of the County.

The primary recovery needs encompass rehabilitation and reconstruction of owner-occupied housing, access to additional safe and affordable housing, infrastructure improvements, and career training programs. As guided by the FRN, the Action Plan addresses the unmet needs identified in Section II, with a primary focus on housing recovery needs. This includes allocating a portion of CDBG-DR funding to critical infrastructure projects to facilitate housing recovery in areas where inadequate infrastructure cannot ensure that residents of those areas have safe, secure public facilities and evacuation options in the event of future disasters.

As required by the FRN, Sarasota County must use 100 percent of the total funds allocated to address unmet disaster needs or mitigation activities within the HUD-identified MID area, which is Sarasota County.

- This Action Plan primarily considers and addresses the homes and infrastructure damaged by Hurricane Ian.
- At least 70 percent of all program funds will benefit LMI persons or households.

The County will prioritize identifying and developing projects that benefit LMI populations first. This includes designing projects such as housing rehabilitation so that applicants must meet income qualifications to participate and receive CDBG-DR funds. Infrastructure or public facilities projects will be evaluated based on their service areas, with priority given to areas that primarily benefit or provide service to LMI-qualified populations, allowing the County to meet or exceed the 70 percent threshold for benefiting LMI persons.

4.3. PROGRAM DETAILS

The County has identified the maximum assistance thresholds for each program (minimum amounts will be identified in program guidelines) and has established priorities for the programs with consideration of the guidelines set forth in the FRN. The County will not engage in any programs or projects that are deemed ineligible by HUD unless a waiver has been requested and granted by HUD.

4.3.1. Housing

Table 4-2. Housing Program Allocation

Category	Allocation Amount	% of Total Allocation
Housing	\$101,458,250	54%

The most significant impact experienced due to the disaster was damages to residential property as indicated in the Unmet Needs Analysis. The unmet needs analysis shows that housing is the area of most concern in Sarasota County; therefore, the County will implement four separate programs to address the housing impacts of Hurricane Ian. These include a housing rehabilitation/reconstruction program, a new affordable multifamily housing production program, a homeowner reimbursement program, and a voluntary home buyout program. The main goal of the housing efforts in Sarasota County is to provide decent, safe, and sanitary housing for residents affected by the disaster. The program also aims to address the housing needs of low-income, moderate-income, and vulnerable households as much as possible.

All housing programs will be designed and managed to allow for participation by individuals and households throughout the community without discrimination or prejudice. This includes designing housing programs that can provide specific housing accommodations, such as ADA improvements, for vulnerable populations including individuals with disabilities and the elderly. Additionally, programs designed to assist individual homeowners, such as rehab/rebuild or reimbursement, will be provided to residents County-wide without prejudice. This will allow for the inclusion of any historically underserved areas in all available housing recovery programs. Similarly, any new housing development will be subject to site review. While there are a variety of other factors that will influence potential site location, such as property cost, zoning restrictions, accessibility, environmental constraints, etc., the County will make efforts to evaluate historically underserved areas, as well as areas of greatest potential opportunities, during project development and site selection/approval.

Furthermore, the program seeks to not only address current damages caused by the disaster but also mitigate potential future damage and provide a more stable supply of resilient housing stock to reduce future disruptions in the likely event of another disaster. This will include steps taken during the previously mentioned site review process, to account for the long-term resilience of the facility. A variety of factors will need to be considered as part of site selection and/or will need to be accounted for after a site is located, especially if there are limited sites available, developable, or cost reasonable. Some of the factors requiring consideration in site location regarding long-term resiliency are:

- Geographic location of the site
- Location of local waterways
- Location relative to local floodplains
- Quality, capacity and condition of stormwater management systems
- Local topography
- Proximity to hazardous facilities

4.3.1.1. Program Maximums

Sarasota County has established programmatic “caps” on its housing recovery programs. To estimate potential project maximum awards, the County used Xactimate, an industry-standard construction cost estimating platform, to approximate the program “cap” for housing reconstruction. This base estimate was used to help establish caps for rehabilitation and reconstruction activities. When estimating costs, there are a variety of factors that can be included in the estimate which are noted in the Assistance Threshold section under the program description. It should be noted that these are preliminary estimates and that program “caps” may be adjusted based on economic conditions, local market factors, supply and material cost fluctuations, building contractor availability, elevation requirements, or other factors impacting program costs. The general program “caps” for the housing recovery programs are provided below, with details provided in the Assistance Threshold section under each specific program:

The County will set program maximums as:

- (1) Reconstruction cap - \$310,000
- (2) Rehabilitation cap - \$200,000
- (3) Reimbursement cap - \$50,000

After programs begin, new estimates may be created using the most current construction and real estate data available; these amounts can be amended if necessary.

4.3.1.2. Homeowner Rehabilitation/Reconstruction Program

Table 4-3. Homeowner Rehabilitation/Reconstruction Program Allocation

Program	Estimated LMI Funding Goal Amount	Estimated LMI Funding Goal	Program Allocation
Housing			
Homeowner Rehabilitation/ Reconstruction (owner-occupied)	\$28,000,000	70%	\$40,000,000

4.3.1.2.1 Program Description

Eligible applicants whose primary residences have been damaged will receive assistance for rehabilitation or reconstruction based on the extent of the damage. Reconstruction is allowed if the cost to “rehabilitate” the unit, to bring it to livable standards under local code and HUD property and habitability standards, exceeds 50 percent of the total current value of the property or a comparable reconstruction or if rehabilitation is technically infeasible. Reconstruction involves rebuilding a structure in a substantially similar manner on the same site. However, the number of dwellings on the property should not increase, although the number of rooms may change. All reconstruction or new construction will meet an industry-recognized standard that has achieved certification under at least one of the following programs:

- ENERGY STAR (Certified Homes or Multifamily High-Risk)
- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Building Operations, and Maintenance or Neighborhood Development)
- ICC-700 National Green Building Standards
- EPA Indoor AirPlus
- Any other equivalent comprehensive green building standard program acceptable to HUD

This program will be implemented and managed in conformity with the Fair Housing Act and no applicants will be discriminated against regardless of race, color, religion, sex, familial status, disability, and national origin.

Duplication of Benefits

Pursuant to the Stafford Act, the County will establish policies and procedures to safeguard against DOB within the program guidelines for this eligible activity. Additional information can be found in the County’s DOB policy and in Section 3.5.9 of this Action Plan.

URA

The County does not anticipate that this activity will qualify as a uniform relocation eligible activity. If this occurs, the County will ensure that the assistance and protections afforded to persons or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and Section 104(d) of the Housing and Community Development Act of 1974 are available.

Program Income

The County does not anticipate earning any program income from this activity. However, should program income be generated, the County will follow the policies and procedures in this document.

Resilience/Cost Reasonableness/Warranties

All rehabilitation, reconstruction, and new construction projects will be designed to embody sustainability principles, prioritizing aspects such as water and energy efficiency, resilience, and protection against future disasters. The County, as well as its applicants, will actively promote the inclusion of preparedness and mitigation measures during the construction process.

All projects are subject to cost reasonableness evaluation; therefore, all contractor bids and change orders will be reviewed for cost reasonableness as detailed in the program guidelines. The County will use commonly accepted pricing standards to review costs.

The County's recovery programs will integrate consistent and standardized construction practices for all construction contractors operating within its jurisdiction. All contractors must adhere to legal requirements and hold valid licenses and registrations. Moreover, they will be obligated to maintain the necessary licenses and insurance coverage for their work while also offering a warranty period for all completed projects. To ensure compliance with local, state, and federal regulations, the County will detail contractor obligations in the program guidelines. These guidelines will encompass procurement processes, bonding, wage rates, Section 3 requirements, and any other necessary stipulations to guarantee the successful completion of the work.

To protect the investment made through the CDBG-DR program, Sarasota County will require a deed restriction on properties funded under this program. The deed restriction will remain in effect, as noted below, from the date of project completion for the rehabilitated or reconstructed structure. During this period, the property cannot be sold, used as a second home, converted into a rental property, or have its use changed by the property owner. Sarasota County will monitor compliance with the deed restriction on an annual basis, and failure to comply will result in the recovery of grant funds, as noted in the Resale/Recapture section below. The County may consider relieving the deed restriction on a case-by-case basis under certain circumstances. The specific language and requirements of the deed restriction will be outlined in the program guidelines, which will be available for applicants to review prior to participating in the program.

Resale/Recapture Provisions

- (1) For rehabilitation projects: 2-year deed restriction with a 50 percent decrease after the first year.
- (2) For reconstruction: 3-year deed restriction with a 33 percent decrease after each year.

Program Estimated Beginning and End Date

- (1) Begin Date: The County expects to begin the program within a reasonable time frame from grant execution (90-120 days) to establish the program and prepare for application intake.
- (2) End Date: The County expects to complete program activities as quickly as possible to address the unmet housing need in the area. All program activities will be completed within the timeline requirements outlined in the FRN.

4.3.1.2.2 Eligible Activities

Housing activities allowed under CDBG-DR; HCDA Section 105(a)(1), 105(a)(3-4), 105(a)(8) 105(a)(11), 105(a)(18), and 105(a)(25), include but are not limited to:

- (1) Single-family owner-occupied rehabilitation, reconstruction, and/or new construction
- (2) Repair or replacement of manufactured housing units
- (3) Elevation
- (4) Relocation assistance
- (5) Demolition

- (6) Mitigation features
- (7) Lead-based paint testing and remediation
- (8) ADA improvements

4.3.1.2.3 Eligibility Criteria for Assistance

- (1) Home must have been owner-occupied at the time of the storm;
- (2) Home must have served as primary residence;
- (3) Home must be located in Sarasota County;
- (4) Home must have sustained damage from Hurricane Ian; and
- (5) Applicants that previously received federal disaster relief assistance which required the recipient to maintain flood insurance, but who did not maintain such insurance, are not eligible for assistance.

4.3.1.2.4 Assistance Thresholds

The maximum amount of assistance per damaged structure, after considering any DOBs, will be limited to \$310,000 for reconstruction and \$200,000 for rehabilitation. The reconstruction estimate is based on information provided by Xactimate, which provides an average cost for reconstruction of the County-average 1,782 square foot home at \$137.26 per square foot. This results in a reconstruction estimate of \$244,597. The County included an additional 2 percent (approximately) to account for possible inflation factors which brought the “cap” to \$250,000 (rounded) and included an additional \$60,000 for potential elevation and mitigation for reconstruction and an additional \$50,000 for rehabilitation. This cap includes all activities described under Eligible Activities in this section. The benefit will not exceed the overall cost of rehabilitation or reconstruction.

Exceptions

Exceptions to the maximum award may be considered on a case-by-case basis, particularly for applicants facing significant hardships or needing accessibility accommodations. Specific conditions will be evaluated to determine the appropriate course of action. The process for individual case review will be detailed in the Programmatic Policies and Procedures, as will an exception process and criteria.

Demonstrable hardship refers to a substantial and unexpected change in the applicant's situation after the disaster, which hinders their ability to meet basic needs such as food, housing, clothing, and transportation. Instances of demonstrable hardship will be reviewed individually by program staff, who will consider the circumstances and document the criteria for evaluating hardship in the program guidelines. Demonstrable hardships must be documented in the case file and approved by the Program Manager or their designee. Applicants with an approved demonstrable hardship may receive an increased award amount to complete the repair or reconstruction of their property.

4.3.1.2.5 Program Tie-Back

This program will address the unmet needs of LMI households who need repair or reconstruction of homes that were damaged by Hurricane Ian. Tie-back will be documented through assessments and other means that will be outlined in program policies and guidelines.

4.3.1.2.6 National Objective

- (1) Low- and moderate-income and urgent need. Actions taken under urgent need will help alleviate or prevent the conditions which “pose a serious and immediate threat to the health or welfare of the community” as defined in 2.2.7.
- (2) At least 70 percent of these program funds will be spent on LMI-eligible projects

4.3.1.3. New Affordable Multifamily Housing

Table 4-4. New Affordable Multifamily Housing Allocation

Program	Estimated LMI Funding Goal Amount	Estimated LMI Funding Goal	Program Allocation
Housing			
New Affordable Multifamily Housing	\$40,000,000	100%	\$40,000,000

4.3.1.3.1 Program Description

In Sarasota County, multifamily housing projects will be funded to address the unmet rental housing needs, particularly for individuals who have been displaced from rental houses, apartments, and mobile homes or have become homeless due to the disaster. These multifamily projects will encompass apartment complexes and potentially mixed-use developments. The County will engage developer/property manager teams to develop multifamily housing projects. The aim is to replace rental housing units that were lost from Hurricane Ian and to stabilize the housing stock to mitigate disruption in the likely event of a similar disaster. This program does not need to address rehabilitation, reconstruction, or replacement of shelters or transitional housing, as no damage was reported in these types of facilities.

The objective of these CDBG-DR funds is to provide essential financial support for large-scale housing developments and bridge any funding gaps. The County has not determined per unit costs at this time but will use HUD information from 88 Fed. Reg. 20900 (April 7, 2023), estimated construction costs from industry standards such as Xactimate, potential for acquisition of land, as well as the size and scale of a particular project to evaluate cost reasonableness. The County intends to engage in no less than two multifamily housing development projects under this program. While the exact number of units is unknown at this time, the County anticipates developing no fewer than 200 residential units between all potential facilities developed under this program. All reconstruction or new construction will meet an industry-recognized standard that has achieved certification under at least one of the following programs:

- ENERGY STAR (Certified Homes or Multifamily High-Risk)
- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance or Neighborhood Development)
- ICC-700 National Green Building Standards
- EPA Indoor AirPlus
- Any other equivalent comprehensive green building standard program acceptable to HUD

The Multifamily Housing Program will establish guidelines that outline the program requirements and rules for specific projects. These guidelines will cover general eligibility, eligible and ineligible costs, and criteria for evaluating project proposals. Additionally, the guidelines will specify requirements for a minimum percentage of affordable units, the ratio of affordable to market rate units, deep affordability requirements, and the inclusion of permanent supportive housing units.

In accordance with CDBG-DR requirements, and Sarasota County's commitment to non-discrimination and equal opportunity in housing, the County will require established procedures to affirmatively market units acquired, rehabilitated, constructed, or otherwise assisted by this program. Sarasota County is also committed to the goals of increasing housing opportunities for persons with LEP, low-income residents, and underrepresented racial and ethnic groups. Applications for multifamily programs will need to include affirmative marketing plans based on the County's procedures and requirements for all CDBG-DR-assisted housing with five or more

units. These plans should include efforts to reach out to those least likely to apply and individuals with LEP. Furthermore, applications should demonstrate that the proposed projects will actively promote fair housing and help reduce racial, ethnic, and low-income concentrations in the area. They should also aim to promote affordable housing in low-poverty, non-minority areas in response to the impacts from natural disasters like Hurricane Ian. The projects should be designed with the existing community in mind to minimize the displacement of families and commit to affordability period of 20 years, depending on the project type. If other funds require a longer affordability period, the longest period will prevail.

Sarasota County will utilize internal resources, hire additional staff to increase capacity and expertise, and engage consultants as needed to provide technical assistance. Sarasota County will maintain the responsibility of overseeing the program and ensuring compliance with individual projects.

Duplication of Benefits

Pursuant to the Stafford Act, the County will establish policies and procedures to safeguard against DOB within the program guidelines for this eligible activity. Additional information can be found in the County's DOB policy and in Section 3.5.9 of this Action Plan.

URA

The County does not anticipate that this activity will qualify as a uniform relocation eligible activity. If this occurs, the County will ensure that the assistance and protections afforded to persons or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and Section 104(d) of the Housing and Community Development Act of 1974 are available.

Program Income

The County does not anticipate earning any program income from this activity. However, should program income be generated, the County will follow the policies and procedures in this document.

4.3.1.3.2 Program Estimated Beginning and End Date

- (1) Begin Date: The County expects to begin the program within a reasonable time frame from grant execution (90–120 days) to establish the program and prepare for application intake.
- (2) End Date: The County expects to complete program activities as quickly as possible to address the unmet housing need in the area. All program activities will be completed within the timeline requirements outlined in Federal Register, 88 Fed. Reg. 32,046.

4.3.1.3.3 Eligible Activities

Housing activities allowed under HCDA Section 105(a)(1), 105(a)(4), 105(a)(9), 105(a)(11), and 105(a)(14-15), including but not limited to:

- (1) Rehabilitation, reconstruction, and new construction of affordable multifamily housing projects

4.3.1.3.4 Eligible Applicants

- (1) Nonprofit developers
- (2) For-profit developers
- (3) Public housing authorities
- (4) Municipalities
- (5) Community-based development organizations

4.3.1.3.5 Assistance Thresholds

There are no program maximums for this category. Projects will be considered based on eligibility criteria and cost per unit. Cost reasonableness will be analyzed with each individual application using estimates of current multifamily construction costs.

4.3.1.3.6 Eligibility Criteria for Assistance

- (1) Proposed project must plan for a minimum of 51 percent of units to be affordable units.
- (2) Proposed project must be in Sarasota County.
- (3) Proposed project must be completed within the required time period.
- (4) Proposed project must establish affordable rents at the annual high HOME rents or below.
- (5) New construction of rental projects with more than five units shall be deed-restricted for a minimum affordability period of 20 years. Program policies and procedures will provide that a developer may be required to repay all or a portion of the funds received.
- (6) Underwriting review.

4.3.1.3.7 Program Tie-Back

The Multifamily Housing Program will replace rental housing units that were lost due to impacts from Hurricane Ian and provide additional affordable housing stock.

4.3.1.3.8 National Objective

- (1) Low- to Moderate-Income Housing
This program will allow for eligibility under the Benefit LMI Persons, and the Low- to Moderate-Income Housing (LMH). To meet the LMH national objective, 51 percent of units must be occupied by LMI households.

4.3.1.4. Homeowner Reimbursement Program (for damage repair)

Table 4-5. Homeowner Reimbursement Program Allocation

Program	Estimated LMI Funding Goal Amount	Estimated LMI Funding Goal	Program Allocation
Housing			
Homeowner Reimbursement	\$10,500,000	70%	\$15,000,000

4.3.1.4.1 Program Description

The County will administer a Homeowner Reimbursement Program for eligible expenses incurred by homeowners for repairs to a primary residence prior to application for these funds. Up to \$50,000 per household may be reimbursed.

The Homeowner Reimbursement Program will offer direct reimbursement assistance to homeowners affected by Hurricane Ian for incurred eligible expenses to a primary residence prior to application for federal assistance and meet the LMI Household National Objective.

Reimbursements are issued in accordance with relevant laws, regulations, and program requirements, including eligibility criteria and grant restrictions. To be considered for reimbursement, repairs must be carried out within the same area as the damaged structure, such as the footprint, sidewalk, driveway, parking lot, or other developed areas.

To align with federal guidelines, only costs incurred or associated with contracts signed before the homeowner's application to the program will be eligible for reimbursement.

The County's reimbursement program provides a grant amount that covers some or all eligible reimbursable expenses. The program conducts reviews to ensure that the expenses meet the necessary program requirements. In most cases, homeowners will receive reimbursement for eligible expenses with a maximum of \$50,000. However, the County reserves the right to increase the reimbursement percentage and maximum amount based on an applicant's extenuating circumstances. Potential increases will be reviewed on a case-by-case basis.

Duplication of Benefits

Pursuant to the Stafford Act, the County will establish policies and procedures to safeguard against DOB within the program guidelines for this eligible activity. Additional information can be found in the County's DOBs policy and in Section 3.5.9 of this Action Plan.

URA

The County does not anticipate that this activity will qualify as a uniform relocation eligible activity. If this occurs, the County will ensure that the assistance and protections afforded to persons or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and Section 104(d) of the Housing and Community Development Act of 1974 are available.

Program Income

The County does not anticipate earning any program income from this activity. However, should program income be generated, the County will follow the policies and procedures in this document.

Program Estimated Beginning and End Date

- (3) Begin Date: The County expects to begin the program within a reasonable time frame from grant execution (90–120 days) to establish the program and prepare for application intake.
- (4) End Date: The County expects to complete program activities as quickly as possible to address the unmet housing need in the area. All program activities will be completed within the timeline requirements outlined in Federal Register, 88 Fed. Reg. 32,046.

4.3.1.4.2 Eligible Activities

Housing activities allowed under CDBG-DR; HCDA Section 105(a)(3-4) include but are not limited to:

- (1) Expenses incurred by homeowners for repairs to a primary residence prior to application for these funds.

4.3.1.4.3 Eligible Applicants

- 1) Homeowners located in Sarasota County

4.3.1.4.4 Eligibility Criteria for Assistance

- (1) Home must have been owner-occupied at the time of the storm;
- (2) Home must have served as primary residence;
- (3) Home must be located in Sarasota County;
- (4) Home must have sustained damage from Hurricane Ian; and
- (5) Applicants that previously received federal disaster relief assistance which required the recipient to maintain flood insurance, but who did not maintain such insurance, are not eligible for assistance.

4.3.1.4.5 Assistance Thresholds

The maximum amount of assistance per damaged structure, after considering any DOBs, will be limited to \$50,000.

4.3.1.4.6 Program Tie-Back

This program will address the unmet needs of low-to-moderate income households who needed immediate repair to homes that were damaged by Hurricane Ian. Tie-back will be documented through assessments and other means that will be outlined in program policies and guidelines.

4.3.1.4.7 National Objective

- (1) Low- and moderate-income

4.3.1.5. Voluntary Home Buyout Program

Table 4-6. Voluntary Home Buyout Program Allocation

Program	Estimated LMI Funding Goal Amount	Estimated LMI Funding Goal	Program Allocation
Housing			
Voluntary Housing Buyouts	\$4,520,775	70%	\$6,458,250

4.3.1.5.1 Program Description

HUD's CDBG-DR funds can be used to acquire properties that were damaged in the September 2022 disaster event and to acquire properties in flood-prone areas as a mitigation activity. Sarasota County has the opportunity to utilize this funding to acquire properties, aiming to reduce risks for property owners and residents while promoting resilience against future impacts. The acquisition process follows a Voluntary Home Buyout Program (Buyout Program), which encourages residents to relocate to lower-risk areas outside of the repetitive loss area within the County⁶⁷. By targeting CDBG-DR resources toward LMI homeowners in the repetitive loss areas, Sarasota County ensures that residents with limited recovery resources receive support in their recovery process and are provided with an opportunity to move from flood-prone, high-risk areas to safer locations outside of the floodplain.

Properties acquired through HUD's Buyout Program are purchased using public funds and become public lands. These buyout parcels undergo the removal of all structures and are placed under a conservation-based restrictive covenant. This covenant eliminates the right to build on the parcel and prevents any future development, except for specific uses outlined in the covenant, such as related restrooms or parking or storm water management infrastructure like pump stations, bio-swales, or retention ponds. As per HUD's CDBG-DR National Objectives, parcels acquired through the Buyout Program are permanently designated as open green spaces. Additionally, these publicly owned, open-space parcels can be utilized by communities through collaborative agreements with neighboring residents, allowing for non-construction activities like community gardening or recreation.

To participate in the Buyout Program, homeowners must demonstrate that the residential structure was either their primary residence at the time of the storm or located in a HUD-designated LMA. HUD designates an LMA if 51 percent or more of the residents in the defined

⁶⁷ RLAA - Repetitive Loss Area Analysis." Sarasota County Government. Accessed July 20, 2023. <https://www.scgov.net/government/public-works/flood-protection/rlaa>.

area have incomes at or below 80 percent of the AMI for the County, as defined annually by HUD. In Sarasota County, HUD has provided an exception to 48.33 percent as the LMI threshold.

To comply with the HUD National Objectives, funds allocated to the Buyout Program must serve LMI individuals either through LMH or LMA qualification. The acquired properties must also be “maintained in perpetuity for a use that is compatible with open space, recreational, floodplain, and wetlands management practices, or other disaster-risk reduction practices” as required by the restrictive covenant. Participation in the program must be voluntary, and the acquired parcel cannot be included in any planned development project that does not meet the Buyout Program requirements. Parcels registered in the Buyout Program are appraised at their fair market value, and the acquisition is considered a fair market transaction rather than assistance, making it exempt from the DOB requirements of the Stafford Act.

The Buyout Program may offer housing replacement incentives to homeowners in addition to the fair market value of their property. These incentives are considered assistance and are subject to a DOB evaluation to determine if the homeowner has received any prior relocation-related assistance. Housing replacement incentives help Buyout Program participants relocate outside of the floodplain and may include funds to cover moving costs. Sarasota County may also offer additional program incentives to sellers who choose to purchase their replacement home in a lower-risk area within the County. This approach enables the County to encourage residents to remain within its boundaries while simultaneously reducing the vulnerability of LMI homeowners and providing parcels for managing stormwater runoff, groundwater levels, and flood occurrences in residential areas more effectively.

The County will develop an Open Space Management Plan specific to this activity and the properties involved. This plan will be developed to ensure that all properties are managed and maintained in compliance with CDBG-DR land use standards and local property maintenance codes. Additionally, the plan will describe the steps taken to support responsible floodplain and wetland management.

Duplication of Benefits

Pursuant to the Stafford Act, the County will establish policies and procedures to safeguard against DOB within the program guidelines for this eligible activity. Additional information can be found in the County’s DOBs policy and in Section 3.5.9 of this Action Plan.

Any housing replacement incentive offered to homeowners in addition to the fair market value of their property will be considered assistance and subject to a DOB evaluation to determine if the homeowner has received any prior relocation-related assistance.

URA

The County does not anticipate that this activity will qualify as a uniform relocation eligible activity. If this occurs, the County will ensure that the assistance and protections afforded to persons or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and Section 104(d) of the Housing and Community Development Act of 1974 are available.

Program Income

The County does not anticipate earning any program income from this activity. However, should program income be generated, the County will follow the policies and procedures in this document.

Program Estimated Beginning and End Date

- (1) Begin Date: The County expects to begin the program within a reasonable time frame from grant execution (120 days) to establish the program and prepare for application intake.
- (2) End Date: The County expects to complete program activities as quickly as possible to address the unmet housing need in the area. All program activities will be completed within the timeline requirements outlined in Federal Register, 88 Fed. Reg. 32,046.

4.3.1.5.2 Eligible Activities

Activities allowed under CDBG-DR including but not limited to HCDA Section 105(a)(1), 105(a)(7-8) 105(a)(24-25):

- (1) Acquisition
- (2) Relocation assistance with buyout or acquisition activation (URA required)
- (3) Down-payment assistance, which can be combined with buyout, or acquisition activities
- (4) Demolition only
- (5) Housing incentives
- (6) Activities designed to relocate families to a location of reduced flood risk

4.3.1.5.3 Assistance Thresholds

The maximum award per household will be the fair market value of the property. Projects may exceed the maximum award, but must be reviewed and approved on a case-by-case basis as described in the programmatic Policies and Procedures document.

4.3.1.5.4 Eligibility Criteria for Assistance

- (1) Home must have been owner-occupied at the time of the storm;
- (2) Home must have served as primary residence;
- (3) Home must be in Sarasota County;
- (4) Home must be in designated buyout zone; and,
- (5) Applicant must meet the program's income requirements as an LMI household or in a designated LMI service area.

4.3.1.5.5 Program Tie-Back

The Buyout Program will purchase properties that were damaged by Hurricane Ian and its effects and will also purchase properties are in flood-prone areas as a mitigation activity.

4.3.1.5.6 National Objective

- (1) Low- and moderate-income and urgent need

This program will allow for eligibility under the LMI benefit national objective qualifications and urgent need for applicants above LMI. The LMI benefit National Objective will include both household eligibility determination (LMH) and area benefit determination (LMA). Actions taken under urgent need will help alleviate or prevent the conditions which “pose a serious and immediate threat to the health or welfare of the community” as defined in 2.2.7. National Objectives for projects will be determined on a case-by-case basis.

The LMI benefit can occur by benefiting the LMH or as an LMA. Any buyout associated with some other CDBG-qualified activity, such as the provision of incentives, which results in the homeowner occupying a new residential structure, is qualified to meet the LMH qualification. A buyout that only pays a property owner for their property, with no other housing assistance provided, will only be eligible to meet the LMA qualification. This will require that the service area and benefit of the

buyout be clearly defined and that a methodology for the identification of the service area meeting the 48.33 percent LMI population area benefit be established.

4.3.2. Infrastructure and Public Facilities

Table 4-7. Infrastructure and Public Facilities Allocation

Category	Program Allocation Amount	% of Program Allocation
Sarasota County, Municipalities, Not-For-Profit	\$45,000,000	24%
South River Road Evacuation Corridor	\$25,000,000	13%

Hurricane Ian wreaked havoc on Sarasota County and its municipalities, inflicting severe damage upon numerous infrastructure and public facilities. As a result, critical services were inaccessible to many vulnerable residents, leading to disruptive and perilous situations. Countless neighborhood streets and main roads, including those in the City of North Port and City of Venice, became entirely impassable. This rendered residents trapped within their flooded homes while posing significant challenges for emergency services attempting to reach these areas. Additionally, the flooding of a crucial evacuation route in Englewood compelled residents to abandon plans to reach safer locations and navigate hazardous conditions to return to their homes, while others were unable to evacuate and had no choice but to remain in their homes, with no access to emergency services. It is important to note that both the City of North Port and the Englewood area harbor a substantial concentration of households categorized as LMI.

Additionally, there are specific populations that often face increased or special needs within the County. These populations include such groups as the elderly, persons with disabilities (mental, physical, developmental, etc.), victims of domestic violence, persons with alcohol or other substance-use disorder, persons with HIV/AIDS and their families, homeless and those at risk of homelessness. These populations are often served by public service providers, local government services, and non-profit organizations. The potential unmet needs for these populations were identified in 2.4.7. In order to assist these populations and address specific needs the County intends to provide funds for municipalities and non-profits to undertake activities which would include these populations. While specific projects benefitting vulnerable populations have yet to be identified the County felt it was in the best interest of these populations to allow the municipalities and non-profit service providers to approach the County with projects since these entities will be most keenly aware of specific needs for these populations.

The County does not anticipate that infrastructure and public facilities projects will generate program income.

All infrastructure and public facility projects will be evaluated to ensure conformity with the overall long-term planning goals of the County and local municipalities. Projects should support thoughtful and sustainable recovery and development in the County, especially as it relates to minimizing future hazard impacts. Additionally, the projects will require construction standards that support long term sustainability and resilience against future disasters.

4.3.2.1. Sarasota County, Municipalities, Not-For-Profit

4.3.2.1.1 Program Description

Table 4-8. Sarasota County, Municipalities, Not-for-Profit Allocation

Program	Estimated LMI Funding Goal Amount	Estimated LMI Funding Goal	Program Allocation
Public Facilities & Infrastructure			
Sarasota County, municipalities, not-for-profit	\$31,500,000	70%	\$45,000,000

The damage to infrastructure and public facilities was shared by the County and the municipalities. In order to ensure an efficient and coordinated distribution of funds for infrastructure and public facilities, the County will administer the grant award process and review and allocate infrastructure and public facilities projects in the County and municipalities.

4.3.2.1.2 Project Selection Overview

The County will make funding available for infrastructure and public facility improvements to be undertaken by the County, local municipalities, and non-profits. For these purposes, non-profit facilities that generally serve specific vulnerable or special needs population of the public are to be considered “public facilities”. The County met with non-profit organizations and municipal representatives during development of this Plan to help identify and quantify unmet need.

The County has identified potential infrastructure projects identified in Section 2.4.6 of this Plan. The constituent municipalities submitted their infrastructure requests and proposals to Sarasota County during the unmet needs discussions. The County will evaluate County projects and the municipal proposals based on predefined criteria, such as the urgency of the repair, the impact on public safety, environmental considerations, and alignment with the overall goals and priorities of the CDBG-DR grant program.

Nonprofits will also be asked to submit applications for their project proposals to be considered by the County. Once nonprofits submit their applications the County will evaluate the projects based on predefined criteria, such as the urgency of the repair, the impact on public safety, environmental considerations, populations benefitting or being served, impacts to vulnerable populations, and alignment with the overall goals and priorities of the CDBG-DR grant program. The County will conduct a comprehensive assessment of the proposals, carefully considering the feasibility, cost-effectiveness, and sustainability of each project. They may also consider public input, conducting meetings, or soliciting comments to ensure community engagement in the decision-making process. Program staff will make project recommendations to the Sarasota County Board of County Commissioners, who will evaluate the project recommendations during a public meeting and make the final project selection using evaluation criteria. Throughout the process, transparency and accountability will be maintained by providing regular updates to the public through the [Resilient SRQ](#) website, publishing the results, and addressing any concerns or disputes through the adopted appeals process if necessary.

4.3.2.1.3 Program Estimated Beginning and End Date

- (1) Begin Date: The County expects to begin the program within a reasonable time frame from grant execution to establish the program, prepare for application intake, and evaluate potential projects.
- (2) End Date: The County expects to complete program activities as quickly as possible to address the unmet infrastructure need. All program activities will be completed within the timeline requirements outlined in Federal Register, 88 Fed. Reg. 32,046.

4.3.2.1.4 Eligible Activities

Activities allowed under CDBG-DR; HCDA Section 105(a)(1-5), 105(a)(7-9), and 105(a)(11), including but not limited to:

- (1) Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management system;
- (2) Restoration of infrastructure (such as water and sewer facilities, streets, provision of permanent generators, bridges, etc.);
- (3) Demolition, rehabilitation, or construction of programmatically eligible public or semi-public facilities (such as fire stations, shelters, food banks);
- (4) Acquisition (easement, right-of-way [ROW]) following URA.

4.3.2.1.5 Eligible Applicants

The eligible applicants who may receive infrastructure and public facilities funds are:

- (1) Sarasota County
- (2) Sarasota County municipalities
- (3) Nonprofit organizations

4.3.2.1.6 Assistance Thresholds

There are no program maximums for this category. Projects will be considered based on eligibility criteria and overall cost reasonableness, which will be analyzed using estimates of current infrastructure construction costs as part of the evaluation criteria.

4.3.2.1.7 Eligibility Criteria for Assistance

Beneficiaries of public infrastructure projects will be those residents located within the defined service area of the public facility. If the service area in which the infrastructure is located contains 48.33 percent or more LMI residents, then the service area can be considered to meet the LMI National Objective given the County's exception criteria. If the service area serves less than 48.33 percent LMI, it will be considered an Urgent Need project.

Project priorities and evaluation matrix will be established and must include the following considerations at a minimum:

- (1) Projects that prioritize assistance to low-to-moderate income areas (projects with greater than 48.33 percent LMI benefit will receive highest priority).
- (2) Projects with strong ties and physical damage due to Hurricane Ian, unless the project is being considered as a mitigation project.

4.3.2.1.8 Program Tie-Back

This program addresses unmet recovery from Hurricane Ian and mitigation needs for infrastructure and public facilities throughout Sarasota County. Disaster-related impacts will also be part of the competitive application review criteria.

4.3.2.1.9 National Objective

- (1) Low- and moderate-income area and urgent need. Depending on the nature of the project, the activities taken may alleviate or prevent the conditions which "pose a serious and immediate threat to the health or welfare of the community" as defined in 2.4.8. National Objectives for projects will be determined on a case-by-case basis.
- (2) At least 70 percent of these program funds will be spent on LMI-eligible projects.

4.3.2.2. South River Road Evacuation Corridor

4.3.2.2.1 Program Description

Table 4-9. South River Road Evacuation Corridor

Program	Estimated LMI Funding Goal Amount	Estimated LMI Funding Goal	Program Allocation
Public Facilities & Infrastructure			
South River Road Evacuation Corridor	\$25,000,000	100%	\$25,000,000

This project entails improving the River Road Regional Interstate Connector in the southern area of Sarasota County. The road currently spans 13.5 miles, starting from State Road 776 in Charlotte County and ending at Interstate 75 in Sarasota County (see Figure 1). It serves as the main evacuation route for vulnerable populations within the County.

Already, significant investments have been made, including \$105.6 million that has been invested or committed to date. This funding has been sourced from various partners and stakeholders, demonstrating their shared commitment to the project's success. For instance, the completion of Winchester Boulevard, a joint project between Sarasota and Charlotte Counties, required an investment of \$10 million for construction. Additionally, the acquisition of ROW along River Road north and south of U.S. 41 amounted to \$11.3 million, including an exchange agreement with Thomas Ranch valued at approximately \$10.6 million.

The CDBG-DR funds will be used to complete River Road from Winchester Boulevard to U.S. 41. This will tie in with previous investments and provide improved flooding resilience to the evacuation route. The project is well-positioned to enhance the roadway's capacity, elevate flood-prone sections, and implement critical infrastructure improvements. This comprehensive approach ensures that the project aligns with the long-term goals of the County, fostering resilience and safeguarding the community's welfare in the face of future storms and natural disasters.

4.3.2.2.2 Program Estimated Beginning and End Date

- (3) Begin Date: The County expects to begin the program within a reasonable time frame from grant execution.
- (4) End Date: The County expects to complete program activities as quickly as possible to address the unmet infrastructure need. All program activities will be completed within the timeline requirements outlined in Federal Register, 88 Fed. Reg. 32,046.

URA

The entirety of this project is in the existing public ROW.

4.3.2.2.3 Eligible Activities

Activities allowed under CDBG-DR; HCDA Section 105(a)(1-5), 105(a)(7-9), including but not limited to:

- (1) Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management system.
- (2) Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.).

4.3.2.2.4 Program Tie-Back

This program addresses unmet recovery and mitigation needs for infrastructure and public facilities by repairing and improving a designated evacuation route that failed during Hurricane Ian.

4.3.2.2.5 National Objective

- 1) Low- and moderate-income area

Assistance provided under this project will meet the national objective of benefiting LMI areas by providing a more secure evacuation route to the population in the service area shown below:

Figure 4-1. South River Road Evacuation Corridor Benefit Area

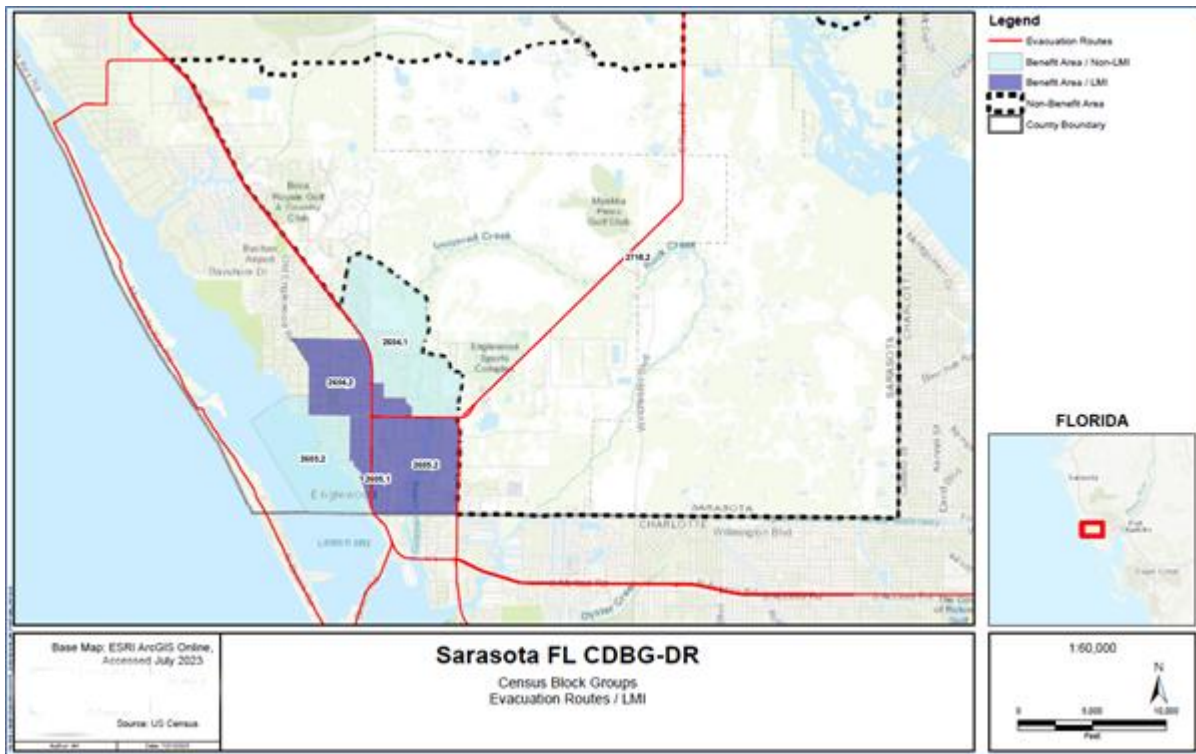


Table 4-10. South River Road Benefit Area Analysis

CDBG Recipient	Census Tract		LMI Pop	Total Pop	Percent LMI
Sarasota County	002603	2	165	395	42%
Sarasota County	002604	1	405	1,420	29%
Sarasota County	002604	2	705	1,075	66%
Sarasota County	002605	1	580	775	75%
Sarasota County	002605	2	860	1,585	54%
			2,715	5,250	52%

As can be seen in the map and table above, the population in south Sarasota County, where Hurricane Ian caused the most damage, has significant numbers of LMI residents. The areas highlighted currently evacuate east on River Road, which is prone to flooding. Other ways to evacuate include going to the south through Charlotte County on McCall Road, a path that is harder to access for the Englewood population and results in evacuees having to cross the El Jobean Bridge at the mouth of the Myakka River which poses additional risks. The other option

is to travel north, paralleling the coast, on Indiana Avenue, which is a heavily trafficked roadway primarily utilized by the populations in the Census Tracts and Block Groups north of this community. The census tracts to the north and east of Englewood were not included in the service area since it is almost completely park land (Myakka State Forest) in these areas. The only concentration of residents in these tracts live to the north of Englewood along the Indiana Avenue corridor and utilize the northern evacuation route. River Road is the best evacuation route for the LMI population in Englewood, and these improvements will help prevent future residents from being trapped by natural disasters.

4.3.3. Economic Recovery

4.3.3.1. Workforce Development and Training

4.3.3.1.1 Program Description

Table 4-11. Economic Recovery Program Allocation

Program	Estimated LMI Funding Goal Amount	Estimated LMI Funding Goal	Program Allocation
Economic Recovery			
Workforce Development & Training	\$10,500,000	70%	\$15,000,000

As noted in the Unmet Needs section of this Action Plan, Hurricane Ian has exacerbated labor market inefficiencies by causing employment loss in some sectors while also creating labor demands in others. For example, the County has seen increases in the need for labor in construction trades, where the pre-existing robust housing market has created further labor shortages coupled with the demand for reconstruction and repair necessary to remedy damage from Hurricane Ian.

The County recognizes the unique situations created by Hurricane Ian as an opportunity to invest in Sarasota County citizens and build skills that will help revitalize the economy now and in the event of future natural disasters. Investment in career development and training will serve County residents who are currently earning low and moderate incomes.

This program will help unemployed and underemployed residents find employment by providing career training in skill areas that are important to the Sarasota County economy and related to recovery efforts. The program will work with nonprofit organizations and other stakeholders that are able to provide career training. The graduates of the training curriculum will be able to join the workforce with marketable skills that are in demand as the cleanup from Hurricane Ian continues.

Workforce training programs will be developed as noted in the Unmet Needs section. These jobs may support recovery activities offered in the following categorical areas:

- (1) Inspections and enforcement services for hurricane damage and health and safety codes
- (2) Construction building trades (site preparation, masonry, framing and carpentry, plumbing, electrical, HVAC, painting, and finish work, etc.)
- (3) Green building and energy efficiency
- (4) Renewable energy
- (5) Lead and related hazard control and abatement
- (6) Weatherization/sustainable retrofitting
- (7) Green Infrastructure, hazard mitigation, and resilience

4.3.3.1.2 Program Estimated Beginning and End Date

- (1) Begin Date: The County expects to begin the program within one year from grant execution to establish the program.
- (2) End Date: The County expects to complete program activities as quickly as possible to address the unmet economic recovery need. All program activities will be completed within the timeline requirements outlined in Federal Register, 88 Fed. Reg. 32,046.

4.3.3.1.3 Eligible Activities

Activities allowed under CDBG-DR; HCDA Section 105 (a)(8), Section 105 (a)(14), Section 105 (a)(15), Section 105 (a)(17), Section 105 (a)(21), and Section 105 (a)(2), including but not limited to:

- (1) Provision of public services
- (2) Assistance to public or private nonprofit entities
- (3) Assistance to neighborhood-based nonprofit organizations, local development corporations, and nonprofit organization
- (4) Economic development assistance that creates or retains jobs
- (5) Assistance to institutions of higher education
- (6) Public facilities construction and acquisition

4.3.3.1.4 Eligible Applicants

- (1) Nonprofit organizations
- (2) Community-based development organizations
- (3) Public institutions of higher learning
- (4) Sarasota County municipalities

4.3.3.1.5 Assistance Thresholds

Projects will be selected based on evaluation criteria (to include CDBG-DR eligibility and LMI) regardless of project funding amount requested. Projects will be evaluated for cost reasonableness to account for the per beneficiary cost associated with any potential project. Per beneficiary cost may vary based on the type of training and number of beneficiaries included in any one program.

4.3.3.1.6 Eligibility Criteria for Assistance

Training and employment of Sarasota County residents, especially those who earn low and moderate incomes, including youth 18 years or older, unemployed adults, displaced workers, or the underemployed. In addition, training will be offered to residents who meet the criteria of a Section 3 Worker or Targeted Section 3 Worker as per 24 C.F.R. §75.

4.3.3.1.7 Program Tie-Back

This program will develop the workforce in economic areas that were impacted by Hurricane Ian.

4.3.3.1.8 National Objective

- (1) Low-to-moderate income.

4.3.4. Planning Activities

4.3.4.1. Program Description

Sarasota County will use a portion of their CDBG-DR funds for planning purposes as allowed by the FRN. The County will build on the existing efforts of State, local, and regional hazard

mitigation, emergency management, and resiliency planning. These funds will help the community's ability to minimize future damage and recover quickly from extreme events and changing conditions, including natural hazard risks. This program meets the definition of long-term resilience through the creation of comprehensive, local, plans that promote resilient land use, redevelopment, and long-term recovery as well as considering future risk conditions. The plans will enhance the value and integrity of the social, ecological, and economic resources in the region; improve public access and recreational opportunities; and reach underserved and socially vulnerable populations.

4.3.4.1.1 Eligible Activities

Eligible activities may include, but are not limited to, creating or updating local comprehensive plans that emphasis resiliency and mitigation activities as they relate to housing development, public land use, and infrastructure. The County will identify and implement all planning activities in accordance with HCDA Section 105(a)12. The County will prioritize planning work focused on mitigation in LMI and socially vulnerable communities, including for members of protected classes, HUD-identified vulnerable populations, and historically underserved communities.

4.3.4.1.2 Program Estimated Beginning and End Date

This program will begin within a reasonable time after adoption of this action plan. The program will end when all funds have been expended and all eligible participants have completed closeout, or 6 years after execution of the grant agreement with HUD.

4.3.4.1.3 Program Tie-Back

This program will address unmet recovery and mitigation needs for planning in the HUD-identified MID.

4.3.4.1.4 National Objective

Planning activities are presumed to meet a national objective under the requirements at 24 CFR 570.208(d)(4).

5. Appendices



Appendix A. Certifications

- a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan (RARAP) in connection with any activity assisted with CDBG–DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.
- b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. The grantee certifies that the action plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG–DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- d. The grantee certifies that activities to be undertaken with CDBG–DR funds are consistent with its action plan.
- e. 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, as such requirements may be modified by waivers or alternative requirements.
- f. 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 75.
- g. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).
- h. *State grantee certifies that it has consulted with all disaster-affected local governments (including any CDBG entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state. (Not Applicable)*
- i. 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, economic recovery, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).
 2. With respect to activities expected to be assisted with CDBG–DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
 3. The aggregate use of CDBG–DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) 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).
 - j. The grantee certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–3619), and implementing regulations, and that it will affirmatively further fair housing. An Indian tribe grantee certifies that the grant will be conducted and administered in conformity with the Indian Civil Rights Act.
 - k. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, state grantees must certify that they will require local governments that receive their 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 applicable to the use of grant funds.
 - m. The grantee certifies to the accuracy of its Financial Management and Grant Compliance Certification Requirements, or other recent certification submission, if approved by HUD, and related supporting documentation as provided in section III.A.1. of the Consolidated Notice and the grantee's implementation plan and related submissions to HUD as provided in section III.A.2. of the Consolidated Notice.
 - n. The grantee certifies that it will not use CDBG–DR funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the state, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the state, local, and tribal government land use regulations and hazard mitigation plans and the latest-issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.
 - o. 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.
 - p. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.
 - q. The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001, and 31 U.S.C. 3729.

Appendix B. Waivers

The Appropriations Act(s) authorizes the Secretary of HUD to waive or specify alternative requirements for any provision of any statute or regulation. For each waiver and alternative requirement, the Secretary of HUD has determined that good cause exists, and the waiver or alternative requirement is not inconsistent with the overall purpose of the HCD Act. The waivers and alternative requirement provide flexibility to support full and swift recovery. Waivers cannot conflict with cross-cutting requirements of:

- Equal Opportunity
- Fair Housing
- Environmental Review
- Davis Bacon Labor Standards

CDBG-DR grantees that are subject to the Consolidated Notice, as indicated in each Federal Register notice that announces allocations of the appropriated CDBG-DR funds (“Allocation Announcement Notice”), must comply with all waivers and alternative requirements in the Consolidated Notice, unless expressly made inapplicable.

(AAN) IV.A.4. Assistance to utilities (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32056)

The Appropriations Acts indicate that funds “may be used by a grantee to assist utilities as part of a disaster-related eligible activity under section 105(a) of the Housing and Community Development Act of 1974 (42 U.S.C. 5305(a)).”

Accordingly, paragraph III.G.3 of the Consolidated Notice does not apply to funds under the Appropriations Acts, and HUD is adding a modified alternative requirement that applies in lieu of paragraph III.G.3.

For grants made in response to 2022 disasters under the Appropriations Acts, the following alternative requirement applies:

A grantee may assist private for-profit, non-profit, or publicly owned utilities as part of disaster-related activities that are eligible under section 105(a) of the HCDA, or otherwise made eligible through a waiver or alternative requirement, provided that the grantee complies with the following:

1. The funded activity must comply with applicable CDBG-DR requirements, including the requirements that the assisted activity will meet a national objective, the activity will address an unmet recovery need or a risk identified in the grantee’s mitigation needs assessment, and if the assistance is provided to a for-profit entity for an economic development project under section 105(a)(17), the grantee must first comply with the underwriting requirements in section II.D.6 of the Consolidated Notice.
2. Each grantee must carry out the grant consistent with the grantee’s certification that “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.” To fortify compliance with the existing certification, if the grantee carries out activities that assist privately-owned, for-profit utilities, the grantee must prioritize assistance to for-profit utilities that will benefit areas where at least 51 percent of the residents are LMI persons and demonstrate how assisting the private, for-profit utility will benefit those areas.

3. The grantee must determine that the costs of the activity to assist a utility are necessary and reasonable and that they do not duplicate other financial assistance. To fortify these requirements and achieve a targeted use of funds and to safeguard against the potential over-subsidization when assistance is used to carry out activities that benefit private, for-profit utilities, the grantee must document that the level of assistance provided to a private, for-profit utility addresses only the actual identified needs of the utility. Additionally, the grantee must establish policies and procedures to ensure that the CDBG–DR funds that assist private, for-profit utilities reflect the actual identified financing needs of the assisted businesses by establishing a mix of financing terms (loan, forgivable loan, and/or grant) for each assisted private, for-profit utility, based on the business’s financial capacity, in order to ensure that assistance is based on actual identified need.

II.B.1. New housing construction waiver and alternative requirement (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32061)

42 U.S.C. 5305(a) and 24 CFR 570.207(b)(3) are waived to the extent necessary to permit new housing construction, subject to the following alternative requirement. When a CDBG–DR grantee carries out a new housing construction activity, 24 CFR 570.202 shall apply and shall be read to extend to new construction in addition to rehabilitation assistance. Private individuals and entities must remain compliant with federal accessibility requirements as well as with the applicable site selection requirements of 24 CFR 1.4(b)(3) and 8.4(b)(5).

II.B.2. Construction standards for new construction, reconstruction, and rehabilitation.

HUD is adopting an alternative requirement to require grantees to adhere to the applicable construction standards in II.B.2.a. through II.B.2.d. when carrying out activities to construct, reconstruct, or rehabilitate residential structures with CDBG-DR funds as part of activities eligible under 42 U.S.C. 5305(a) (including activities authorized by waiver and alternative requirement). For purposes of the Consolidated Notice, the terms “substantial damage” and “substantial improvement” shall be as defined in 44 CFR 59.1 unless otherwise noted.

II.B.5. Homeownership assistance waiver and alternative requirement. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32062)

42 U.S.C. 5305(a)(24) is waived and replaced with the following alternative requirement:

“Provision of direct assistance to facilitate and expand homeownership among persons at or below 120 percent of area median income (except that such assistance shall not be considered a public service for purposes of 42 U.S.C. 5305(a)(8)) by using such assistance to—

- a. subsidize interest rates and mortgage principal amounts for homebuyers with incomes at or below 120 percent of area median income;
- b. finance the acquisition of housing by homebuyers with incomes at or below 120 percent of area median income that is occupied by the homebuyers;
- c. acquire guarantees for mortgage financing obtained by homebuyers with incomes at or below 120 percent of area median income from private lenders, meaning that if a private lender selected by the homebuyer offers a guarantee of the mortgage financing, the grantee may purchase the guarantee to ensure repayment in case of default by the homebuyer. This subparagraph allows the purchase of mortgage insurance by the household but not the direct issuance of mortgage insurance by the grantee;
- d. provide up to 100 percent of any down payment required from homebuyers with incomes at or below 120 percent of area median income; or
- e. pay reasonable closing costs (normally associated with the purchase of a home) incurred by homebuyers with incomes at or below 120 percent of area median income.”

II.B.8. Safe housing incentives in disaster-affected communities. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32063)

The limitation on eligible activities in section 42 U.S.C. 5305(a) is waived and HUD is establishing the following alternative requirement to establish safe housing incentives as an eligible activity. A safe housing incentive is any incentive provided to encourage households to relocate to suitable housing in a lower risk area or in an area promoted by the community's comprehensive recovery plan. Displaced persons must receive any relocation assistance to which they are entitled under other legal authorities, such as the URA, section 104(d) of the HCDA, or those described in the Consolidated Notice.

II.D.2. National objective documentation for activities that support economic revitalization. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32065)

24 CFR 570.208(a)(4)(i)&(ii), 24 CFR 570.483(b)(4)(i)&(ii), 24 CFR 570.506(b)(5)&(6), and 24 CFR 1003.208(d) are waived to allow the grantees under the Consolidated Notice to identify the LMI jobs benefit by documenting, for each person employed, the name of the business, type of job, and the annual wages or salary of the job. HUD will consider the person income-qualified if the annual wages or salary of the job is at or under the HUD-established income limit for a one-person family.

II.D.3. Public benefit for activities that support economic revitalization. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32065)

HUD waives the public benefit standards at 42 U.S.C. 5305(e)(3), 24 CFR 570.482(f)(1), (2), (3), (4)(i), (5), and (6), and 570.209(b)(1), (2), (3)(i), (4), and 24 CFR 1003.302(c) for all economic development activities. Paragraph (g) of 24 CFR 570.482 and paragraph (c) and (d) under 570.209 are also waived to the extent these provisions are related to public benefit. However, grantees that choose to take advantage of this waiver in lieu of complying with public benefit standards under the existing regulatory requirements shall be subject to the following condition: grantees shall collect and maintain documentation in the project file on the creation and retention of total jobs; the number of jobs within appropriate salary ranges, as determined by the grantee; the average amount of assistance provided per job, by activity or program; and the types of jobs. Additionally, grantees shall report the total number of jobs created and retained and the applicable national objective in the DRGR system.

II.D.5. Waiver and modification of the job relocation clause to permit assistance to help a business return. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32065)

42 U.S.C. 5305(h), 24 CFR 570.210, 24 CFR 570.482(h), and 24 CFR 1003.209, are waived to allow a grantee to provide assistance to any business that was operating in the disaster-declared labor market area before the incident date of the applicable disaster and has since moved, in whole or in part, from the affected area to another state or to another labor market area within the same state to continue business.

III.B.2.c Direct grant administration and means of carrying out eligible activities (state grantees only). (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32068)

Requirements at 42 U.S.C. 5306(d) are waived to allow a state to use its disaster recovery grant allocation directly to carry out state-administered activities eligible under the Consolidated Notice, rather than distribute all funds to local governments. Pursuant to this waiver and alternative requirement, the standard at 24 CFR 570.480(c) and the provisions at 42 U.S.C. 5304(e)(2) will also include activities that the state carries out directly. Activities eligible under the Consolidated Notice may be carried out by a state, subject to state law and consistent with the requirement of 24 CFR 570.200(f), through its employees, through procurement contracts, or through assistance

provided under agreements with subrecipients. State grantees continue to be responsible for civil rights, labor standards, and environmental protection requirements, for compliance with 24 CFR 570.489(g) and (h), and subparagraph III.A.1.a.(2)(a) of the Consolidated Notice relating to conflicts of interest, and for compliance with 24 CFR 570.489(m) relating to monitoring and management of subrecipients.

III.B.2.f Recordkeeping (state grantees only) (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32068)

When a state carries out activities directly, 24 CFR 570.490(b) is waived and the following alternative provision shall apply: a state grantee shall establish and maintain such records as may be necessary to facilitate review and audit by HUD of the state's administration of CDBG-DR funds, under 24 CFR 570.493 and reviews and audits by the state under III.B.2.h.

III.B.2.h Responsibility for review and handling of noncompliance (state grantees only) (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32068)

This change is in conformance with the waiver allowing a state to carry out activities directly. 24 CFR 570.492 is waived, and the following alternative requirement applies for any state receiving a direct award: the state shall make reviews and audits, including on-site reviews of any local governments or Indian tribes (either as subrecipients or through a method of distribution) designated public agencies, and other subrecipients, as may be necessary or appropriate to meet the requirements of section 104(e)(2) of the HCDA, as amended, and as modified by the Consolidated Notice. In the case of noncompliance with these requirements, the state shall take such actions as may be appropriate to prevent a continuance of the deficiency, mitigate any adverse effects or consequences, and prevent a recurrence. The state shall establish remedies for noncompliance by any subrecipients, designated public agencies, or local governments.

III.C. Action Plan for Disaster Recovery Waiver and Alternative Requirement. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32069)

Requirements for CDBG actions plans, located at 42 U.S.C. 5304(a)(1), 42 U.S.C. 5304(m), 42 U.S.C. 5306(a)(1), 42 U.S.C. 5306(d)(2)(C)(iii), 42 U.S.C. 12705(a)(2), and 24 CFR 91.220 and 91.320, are waived for CDBG-DR grants. Instead, grantees must submit to HUD an action plan for disaster recovery which will describe programs and activities that conform to applicable requirements as specified in the Consolidated Notice and the applicable Allocation Announcement Notice.

III.C.4. Waiver of 45-day review period for CDBG-DR action plans to 60 days. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32072)

The Secretary has determined that good cause exists and waives 24 CFR 91.500(a) to extend HUD's action plan review period from 45 days to 60 days.

III.D.1. Citizen participation waiver and alternative requirement (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32073)

To permit a more streamlined process and ensure disaster recovery grants are awarded in a timely manner, provisions of 42 U.S.C. 5304(a)(2) and (3), 42 U.S.C. 12707, 24 CFR 570.486, 24 CFR 1003.604, 24 CFR 91.105(b) through (d), and 24 CFR 91.115(b) through (d), with respect to citizen participation requirements, are waived and replaced by the alternative requirements in this section. The streamlined requirements require the grantee to include public hearings on the proposed action plan and provide a reasonable opportunity (at least 30 days) for citizen comment.

III.E.1. Program income waiver and alternative requirement. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32074)

For state and unit of general local government grantees, HUD is waiving all applicable program income rules at 42 U.S.C. 5304(j), 24 CFR 570.489(e), 24 CFR 570.500, and 24 CFR 570.504 and providing the alternative requirement described below. Program income earned by Indian tribes that receive an allocation from HUD will be governed by the regulations at 24 CFR 1003.503 until grant closeout and not by the waivers and alternative requirements in this Consolidated Notice. Program income earned by Indian tribes that are subrecipients of state grantees or local government grantees will be subject to the program income requirements for subrecipients of those grantees.

III.F.1. Consolidated Plan waiver. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32075)

HUD is temporarily waiving the requirement for consistency with the consolidated plan (requirements at 42 U.S.C. 12706, 24 CFR 91.225(a)(5), and 24 CFR 91.325(a)(5)), because the effects of a major disaster alter a grantee's priorities for meeting housing, employment, and infrastructure needs. In conjunction, 42 U.S.C. 5304(e) is also waived, to the extent that it would require HUD to annually review grantee performance under the consistency criteria. These waivers apply only for 24 months after the applicability date of the grantee's applicable Allocation Announcement Notice.

III.F.3. Use of the urgent need national objective. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32075)

Because HUD provides CDBG-DR funds only to grantees with documented disaster-related impacts and each grantee is limited to spending funds only for the benefit of areas that received a Presidential disaster declaration, the Secretary finds good cause to waive the urgent need national objective criteria in section 104(b)(3) of the HCDA and to establish the following alternative requirement for any CDBG-DR grantee using the urgent need national objective for a period of 36 months after the applicability date of the grantee's Allocation Announcement Notice.

Pursuant to this alternative requirement, grantees that use the urgent need national objective must: (1) describe in the impact and unmet needs assessment why specific needs have a particular urgency, including how the existing conditions pose a serious and immediate threat to the health or welfare of the community; (2) identify each program or activity in the action plan that will use the urgent need national objective—either through its initial action plan submission or through a substantial amendment submitted by the grantee within 36 months of the applicability date of the grantee's Allocation Announcement Notice; and (3) document how each program and/or activity funded under the urgent need national objective in the action plan responds to the urgency, type, scale, and location of the disaster-related impact as described in the grantee's impact and unmet needs assessment.

The grantee's action plan must address all three criteria described above to use the alternative urgent need national objective for the program and/or activity. This alternative urgent need national objective is in effect for a period of 36 months following the applicability date of the grantee's Allocation Announcement Notice. After 36 months, the grantee will be required to follow the criteria established in section 104(b)(3) of the HCDA and its implementing regulations in 24 CFR part 570 when using the urgent need national objective for any new programs and/or activities added to an action plan.

III.F.4. Reimbursement of disaster recovery expenses by a grantee or subrecipient. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32075)

Section 570.200(h)(1)(i) is waived to the extent that it requires pre-agreement activities to be included in the local government's consolidated plan. As an alternative requirement, grantees must include any pre-agreement activities in their action plans, including any costs of eligible activities that were funded with short-term loans (e.g., bridge loans) and that the grantee intends to reimburse or otherwise charge to the grant, consistent with applicable program requirements.

III.F.6. Alternative requirement for the elevation of structures when using CDBG-DR funds as the non-Federal match in a FEMA-funded project. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32076)

Currently, CDBG-DR grantees using FEMA and CDBG-DR funds on the same activity have encountered challenges in certain circumstances in reconciling CDBG-DR elevation requirements and those established by FEMA. FEMA regulations at 44 CFR 9.11(d)(3)(i) and (ii) prohibit new construction or substantial improvements to a structure unless the lowest floor of the structure is at or above the level of the base flood and, for Critical Actions, at or above the level of the 500-year flood. However, 44 CFR 9.11(d)(3)(iii) allows for an alternative to elevation to the 100- or 500-year flood level, subject to FEMA approval, which would provide for improvements that would ensure the substantial impermeability of the structure below flood level. While FEMA may change its standards for elevation in the future, as long as the CDBG-DR grantee is following a FEMA-approved flood standard this waiver and alternative requirement will continue to apply.

III.F.7. Certifications waiver and alternative requirement (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32076)

Sections 104(b)(4), (c), and (m) of the HCDA (42 U.S.C. 5304(b)(4), (c), & (m)), sections 106(d)(2)(C) & (D) of the HCDA (42 U.S.C. 5306(d)(2)(C) & (D)), and section 106 of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12706), and regulations at 24 CFR 91.225 and 91.325 are waived and replaced with the following alternative. Each grantee choosing to submit an action plan for program administrative costs must make the following certifications listed in section III.F.7 of the Consolidated Notice and include them with the submission of this plan: paragraphs b, c, d, g, i, j, k, l, p, and q.

IV.F.1. Section 104(d) one-for-one replacement of lower-income dwelling units. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32079)

One-for-one replacement requirements at section 104(d)(2)(A)(i) and (ii) and 104(d)(3) of the HCDA and 24 CFR 42.375 are waived for owner-occupied lower-income dwelling units that are damaged by the disaster and not suitable for rehabilitation. The section 104(d) one-for-one replacement housing requirements apply to occupied and vacant occupiable lower-income dwelling units demolished or converted in connection with a CDBG assisted activity. This waiver exempts all disaster-damaged owner-occupied lower-income dwelling units that meet the grantee's definition of "not suitable for rehabilitation," from the one-for-one replacement housing requirements of 24 CFR 42.375.

IV.F.2. Section 104(d) relocation assistance. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32079)

The relocation assistance requirements at section 104(d)(2)(A)(iii) and (B) of the HCDA and 24 CFR 42.350, are waived to the extent that an eligible displaced person, as defined under 24 CFR 42.305 of the section 104(d) implementing regulations, may choose to receive either assistance under the URA and implementing regulations at 49 CFR part 24, or assistance under section 104(d) and implementing regulations at 24 CFR 42.350. This waiver does not impact a person's

eligibility as a displaced person under section 104(d), it merely limits the amounts and types of relocation assistance that a section 104(d) eligible displaced person is eligible to receive.

IV.F.3. URA replacement housing payments for tenants (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32079)

The requirements of sections 204 and 205 of the URA (42 U.S.C. 4624 and 42 U.S.C. 4625), and 49 CFR 24.2(a)(6)(vii), 24.2(a)(6)(ix), and 24.402(b) are waived to the extent necessary to permit a grantee to meet all or a portion of a grantee's replacement housing payment obligation to a displaced tenant by offering rental housing through a rental housing program subsidy (to include, but not limited to, a housing choice voucher), provided that comparable replacement dwellings are made available to the tenant in accordance with 49 CFR 24.204(a) where the owner is willing to participate in the program and the period of authorized assistance is at least 42 months.

IV.F.4. URA voluntary acquisition—homebuyer primary residence purchase. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32080)

Grantees may implement disaster recovery program activities that provide financial assistance to eligible homebuyers to purchase and occupy residential properties as their primary residence. Such purchases are generally considered voluntary acquisitions under the URA and subject to the URA regulatory requirements at 49 CFR 24.101(b)(2). For CDBG-DR, 49 CFR 24.101(b)(2) is waived to the extent that it applies to a homebuyer, who does not have the power of eminent domain, and uses CDBG-DR funds in connection with the voluntary purchase and occupancy of a home the homebuyer intends to make their primary residence. This waiver is necessary to reduce burdensome administrative requirements for homebuyers following a disaster. Tenants displaced by these voluntary acquisitions may be eligible for relocation assistance.

IV.F.5. CDBG displacement, relocation, acquisition, and replacement housing program regulations - Optional relocation assistance. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32080)

The regulations at 24 CFR 570.606(d) are waived to the extent that they require optional relocation policies to be established at the grantee level. Unlike with the regular CDBG program, states may carry out disaster recovery activities directly or through subrecipients, but 24 CFR 570.606(d) does not account for this distinction. This waiver makes clear that grantees receiving CDBG-DR funds may establish optional relocation policies or permit their subrecipients to establish separate optional relocation policies.

IV.F.6. Waiver of Section 414 of the Stafford Act. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32080)

Section 414 of the Stafford Act and its implementing regulation at 49 CFR 24.403(d)(1) are waived to the extent that they would apply to real property acquisition, rehabilitation, or demolition of real property for a CDBG-DR funded project commencing more than one year after the date of the latest applicable Presidentially declared disaster undertaken by the grantees, or subrecipients, provided that the project was not planned, approved, or otherwise underway before the disaster.

V.A. Timely Distribution and Expenditure of Funds (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32057)

HUD waives the provisions at 24 CFR 570.494 and 24 CFR 570.902 regarding timely distribution and expenditure of funds, and establishes an alternative requirement providing that each grantee must expend 100 percent of its allocation within six years of the date HUD signs the grant agreement.

V.C.1. DRGR-related waivers and alternative requirements. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32081)

The Consolidated Notice waives the requirements for submission of a performance report pursuant to 42 U.S.C. 12708(a), 24 CFR 91.520, and annual status and evaluation reports that are due each fiscal year under 24 CFR 1003.506(a). Alternatively, HUD is requiring that grantees enter information in the DRGR system on a quarterly basis through the performance reports.

Appendix C. Summary and Response of Public Comments

A summary of public comments received during the public comment period beginning July 26, 2023 will be included in this Appendix of the Action Plan at the conclusion of the public comment period on August 25, 2023.

Appendix D. Data Sources and Methodologies

Methods for Estimating Serious Unmet Needs for Housing

HUD utilizes SBA data to determine the average repair costs. Average repair costs in this document were taken from over \$13 billion in HUD funded housing projects and taking that average.

Table 5-1. HUD Funded Housing Projects

Grantee	Event	Grants Awarded to Homeowners	Total Amount of Award	Average CDBG DR award amount
Louisiana	2016 Floods	17,264	\$668,656,371	\$38,731
New York	Hurricane Sandy	12,759	\$2,255,083,398	\$176,745
Louisiana	Katrina	130,053	\$9,030,446,583	\$69,437
New Jersey	Superstorm Sandy	7,100	\$950,000,000	\$133,803
Harris County	Hurricane Harvey	143	\$25,660,105	\$179,441
South Carolina	Hurricane Matthew	1,136	\$83,097,708	\$73,149
North Carolina	Hurricane Matthew	758	\$137,496,510	\$181,394
West Virginia	2016 Floods	265	\$54,602,919	\$206,049
Chicago	2013 Floods	51	\$3,600,438	\$70,597
City of Galveston	2008 Hurricane Ike	663	\$96,881,815	\$146,126
TOTAL		170,192	\$13,305,525,847	\$78,180

Each of the FEMA inspected owner units are categorized into one of five categories:

- Minor-Low: Less than \$3,000 of FEMA inspected real property damage.
- Minor-High: \$3,000 to \$7,999 of FEMA inspected real property damage.
- Major-Low: \$8,000 to \$14,999 of FEMA inspected real property damage.
- Major-High: \$15,000 to \$28,000 of FEMA inspected real property damage.
- Severe: Greater than \$28,000 of FEMA inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

FEMA does not inspect rental units for real property damage so personal property damage is used as a proxy for unit damage. Each of the FEMA-inspected renter units are categorized into one of five categories:

- Minor-Low: Less than \$1,000 of FEMA inspected personal property damage.
- Minor-High: \$1,000 to \$1,999 of FEMA inspected personal property damage.
- Major-Low: \$2,000 to \$3,499 of FEMA inspected personal property damage.
- Major-High: \$3,500 to \$7,500 of FEMA inspected personal property damage.
- Severe: Greater than \$7,500 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor or determination of “Destroyed” by the FEMA inspector.

Data sources

- U.S. Department of Commerce. "Hurricane Ian: September 30, 2022." April 7, 2023. National Weather Service. Accessed July 18, 2023. <https://www.ncei.noaa.gov/access/monitoring/monthly-report/national/202209/supplemental/page-5>.
- OpenFEMA. "Data Sets: Individual Assistance Applicant Data." Last modified 2023. FEMA.gov. Accessed May 15, 2023. <https://www.fema.gov/about/openfema/data-sets/>
- Small Business Administration. "SBA Disaster Assistance Applicant Data." Last modified 2023. SBA Open Data. Accessed June 13, 2023. <https://data.sba.gov/>
- National Hurricane Center. "Tropical Cyclone Report, Hurricane Ian." Last modified April 2023. National Oceanic and Atmospheric Administration. Accessed July 13, 2023. https://www.nhc.noaa.gov/data/tcr/AL092022_Ian.pdf.
- OpenFEMA. "Data Sets: Individual Assistance Applicant Data." Last modified 2023. FEMA.gov. Accessed May 15, 2023. <https://www.fema.gov/about/openfema/data-sets/>.
- U.S. Small Business Administration. "SBA Disaster Assistance Applicant Data." Last modified 2023. SBA Open Data. Accessed June 13, 2023. <https://data.sba.gov/>.
- United Way. "Eviction Mitigation Program – State of the Housing Crisis Dashboard." Accessed July 13, 2023. <https://unitedwaysuncoast.org/eviction-mitigation/>.
- Assisted Housing Inventory. Florida Housing Data Clearinghouse. Retrieved from: <http://flhousingdata.shimberg.ufl.edu/assisted-housing-inventory/results?nid=5800> on 6/30/2023.
- Sarasota Housing Authority. "Damage to Facilities, Public Housing and Affordable Housing Units, and Section 8 Units." Last modified June 27, 2023.
- 2021 ACS Five-Year Demographic and Housing Estimates. United States Census Bureau. <https://data.census.gov/table?q=deomgraphics+in+Sarasota+County,+Florida&tid=ACSDP5Y2021.DP05>
- 2021 ACS Five-Year Income in the Past 12 Months (in 2021 Inflation-Adjusted Dollars) in Sarasota County, Florida. United States Census Bureau. <https://data.census.gov/table?q=Income+in+Sarasota+County,+Florida&tid=ACSST5Y2021.S1901&moe=false>.
- 2021 ACS Five-Year Per Capita Income in Sarasota County, Florida. United States Census Bureau. <https://data.census.gov/table?q=per+capita+income+in+Sarasota+County,+Florida&tid=ACSST5Y2021.B19301&moe=false>.
- 2021 ACS Five-Year Income in the Past 12 Months (in 2021 Inflation-Adjusted Dollars) in Florida. United States Census Bureau. <https://data.census.gov/table?q=Income+in+Sarasota+County,+Florida&tid=ACSST5Y2021.S1901&moe=false>.
- 2021 ACS Five-Year Per Capita Income in Florida. United States Census Bureau. <https://data.census.gov/table?q=per+capita+income+in+Florida&tid=ACSST5Y2021.B19301>.
- 2021 ACS Five-Year Poverty Status in the Past 12 Months in Florida. United States Census Bureau. <https://data.census.gov/table?q=Poverty+in+Florida&tid=ACSST5Y2021.S1701>.
- 2021 ACS Five-Year Poverty Status in the Past 12 Months in Sarasota County, Florida. United States Census Bureau. <https://data.census.gov/table?q=poverty+in+Sarasota+County,+Florida&tid=ACSST5Y2021.S1701&moe=false>.
- ACS 2011-2015 Low-Mod All Mod All Local Governments. LMISD by Local Governments, Based on 2011-2015 ACS - HUD Exchange.
- 2021 ACS Five-Year Selected Housing Characteristics in Sarasota County, Florida. United States Census Bureau. DP04: SELECTED HOUSING CHARACTERISTICS - Census Bureau Table.
- 2021 ACS 5-Year Language Spoken at Home. in Sarasota County, Florida. United States Census Bureau. <https://data.census.gov/table?q=Sarasota+County,+Florida+Languages+Spoken&tid=ACSST5Y2021.S1601&moe=false>.
- "ACS 5-Year Estimates Details Tables C16001 Languages Spoken at Home For the Population 5 Years and Over." Accessed July 14, 2023. <https://api.census.gov/data/2021/acs/acs5>.

- HUD 2022 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations
- Suncoast Partnership Continuum of Care 2023 Point-in-Time Summary Detail Report. <https://www.suncoastpartnership.org/point-in-time>.
- Data provided by SHA
- Design and engineering estimates from the respective administering agencies.
- "Bureau of Labor Statistics Data." Accessed on July 19,2023. https://www.bls.gov/eag/eag.fl_sarasota_msa.htm.
- "Sarasota County Flood Zone Locator GIS Interactive Map." Accessed July 11, 2023. <https://ags3.scgov.net/sarcoflood/>.
- RLAA - Repetitive Loss Area Analysis." Sarasota County Government. Accessed July 20, 2023. <https://www.scgov.net/government/public-works/flood-protection/rlaa>.

Appendix E. Important Definitions and Terms

Acronyms and Abbreviations

ADA: Americans with Disabilities Act

AMI: Area Medium Income

CDBG: Community Development Block Grant

CDBG-DR: Community Development Block Grant - Disaster Recovery

CFR: Code of Federal Regulations

CoC: Continuum of Care

DOB: Duplication of Benefits

DR: Disaster Recovery

DRGR: Disaster Recovery and Grant Reporting System

EPA: Environmental Protection Agency

FBC: Florida Building Code

FDEM: Florida Division of Emergency Management

FEMA: Federal Emergency Management Agency

FEMP: Federal Emergency Management Program

GIS: Geographic Information Systems

HCDA: Housing and Community Development Act of 1974, as amended

HMGP: Hazard Mitigation Grant Program

HUD: The United States Department of Housing and Urban Development IA: (Federal Emergency Management Agency) Individual Assistance

LAP: Language Access and Accessibility Plan

LEP: Limited English Proficiency

LIHTC: Low-Income Housing Tax Credit

LMI: Low and Moderate-Income

LTRG: Long Term Recovery Group

MHU: Manufactured Housing Unit

MID: Most Impacted and Distressed Area

MIT: Mitigation

NFIP: National Flood Insurance Program **NGO:** Non-governmental organizations **NWS:** National Weather Service

PA: (Federal Emergency Management Agency) Public Assistance

RARAP: Residential Anti-displacement and Relocation Assistance Plan

RFP: Request for Proposal

SBA: United States Small Business Administration

URA: Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended

USACE: U.S. Army Corps of Engineers

Definitions

Acquisition – The acquiring of real property, in whole or in part, by the recipient, or other public or private nonprofit entity through purchase, long-term lease, donation, or otherwise for any public purpose, subject to the limitation of 24 CFR 570.207. Real property includes air rights, water rights, rights-of-way, easements, and other interests therein (24 CFR 570.201).

Allocable Costs – Costs assigned to a Community Development Block Grant-Disaster Recovery eligible activity with a methodology for clear determination of where to attribute costs.

Allowable Costs – Costs deemed allowable under the Community Development Block Grant-Disaster Recovery rules and regulations and 2 CFR 200 Subpart E.

Americans with Disabilities Act (ADA) – Effective July 20, 1990, a federal law which prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, state and local government services, public accommodations, commercial facilities, and transportation. It also mandates the establishment of TDD/telephone relay services.

Area Median Income (AMI) – The median household income for an area adjusted for household size as published and annually updated by the U.S. Department of Housing and Urban Development. Once household income is determined, it is compared to the U.S. Department of Housing and Urban Development's income limit for that household size.

Appraisal – A written statement independently and impartially prepared by a qualified appraiser setting forth an opinion of defined value of an adequately described property as of a specific date, supported by the presentation and analysis of relevant market information.

Bid – An offer by a company, firm, or individual to provide goods or services, in response to solicitation for those goods or services.

Buyout – The acquisition of a property located in a floodway, floodplain, or other Disaster Risk Reduction Area with the intention of reducing risk from future hazards.

Community Development Block Grant (CDBG) – Supports community development activities to build stronger and more resilient communities. To support community development, activities are identified through an ongoing process. Activities may address needs such as infrastructure, economic development projects, public facilities installation, community centers, housing rehabilitation, public services, clearance/acquisition, microenterprise assistance, code enforcement, homeowner assistance, etc.

Community Development Block Grant-Disaster Recovery (CDBG-DR) – The Community Development Block Grant Disaster Recovery Program, administered by the U.S. Department of Housing and Urban Development, as authorized under Title I of the Housing and Community Development Act of 1974, as amended. These funds are provided as a last resort to help cities, counties, and states to recover from Presidentially declared disasters.

Consolidated Notice – The U.S. Department of Housing and Urban Development's Community Development Block Grant-Disaster Recovery Consolidated Notice, Appendix B of Federal Register Vol. 88, No. 96. The Consolidated Notice governs all Office of Long-Term Resiliency Community Development Block Grant-Disaster Recovery grants beginning with 2020 disasters and includes amended requirements from previous Federal Register Notices and Community Planning and Development Notices that have regulated Community Development Block Grant-Disaster Recovery funds in the past. The Consolidated Notice includes waivers and alternative

requirements, relevant regulatory requirements, the grant award process, criteria for action plan approval, and eligible disaster recovery activities.

Cost Reimbursement – Payment made to the subgrantee and/or subrecipient after a request for funds has been submitted along with proper supporting documentation and has been approved by Sarasota County. In Community Development Block Grant-Disaster Recovery grant agreements, the subgrantees and/or subrecipients are required to pay in advance for all completed work that is associated with the deliverables set forth in the subrecipient agreement and is reimbursed based on the invoice and supporting documentation submitted to the Sarasota County.

Davis-Bacon and Related Acts (DBRA) – Federal law requiring contractors and subcontractors performing on federally funded or assisted contracts for the construction, alteration, or repair of public buildings or public works to pay their laborers and mechanics employed under the contract no less than the locally prevailing wages and fringe benefits for corresponding work on similar projects in the area.

Decent, Safe, and Sanitary (DSS) – A dwelling which meets local housing and occupancy codes. Any of the standards outlined in 49 CFR 24.2(a)(8) which are not met by the local code shall apply unless waived for good cause by the Federal Agency funding the project.

Direct Cost – Any project cost or project delivery cost that is identified specifically with completing an activity or product such as materials and labor. Costs identified specifically within a contract are direct costs of that contract. Administrative expenses are not generally considered direct costs.

Disability – Federal nondiscrimination laws define a person with a disability to include any (1) individual with a physical or mental impairment that substantially limits one or more major life activities; (2) individual with a record of such impairment; or (3) individual who is regarded as having such an impairment consistent with federal law under The Social Security Act, as amended, 42 U.S.C. §423(d), The Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §12102(1) - (3), and in accordance with the U.S. Department of Housing and Urban Development regulations at 24 CFR 5.403 and 891.505.

Disaster Recovery Grant Reporting (DRGR) System – The U.S Department of Housing and Urban Development’s web-based reporting and grants management system.

Duplication of Benefits (DOB) – When a person, household, business, government, or other entity receives financial assistance from multiple sources for the same purpose within the same time period, and the total assistance received for that purpose is more than the total need for assistance.

Federal Register (FR) – 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 document, the grantee is Sarasota County, Florida as recipient of Community Development Block Grant-Disaster Recovery funds from the U.S. Department of Housing and Urban Development.

Green Building Standards – All rehabilitation that meets the definition of substantial improvement, reconstruction, or new construction must meet an industry-recognized standard that has achieved certification under at least one of the following programs: (1) ENERGY STAR (Certified Homes or Multifamily High-Rise), (2) EPA Indoor Air Plus (Energy Star a prerequisite),

(3) LEED (New Construction, Homes, Midrise, Existing Buildings Operations, and Maintenance, or Neighborhood Development), or (4) ICC–700 National Green Building Standard.

Household – All persons occupying the same housing unit, regardless of their relationship to each other. The occupants could consist of a single family, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Increased Cost of Compliance (ICC) – Structures damaged by floods may be required to meet certain building requirements, such as elevation or demolition, to reduce the risk of future flood damage before the structure can be repaired or rebuilt. To help cover these costs, the National Flood Insurance Program includes Increased Cost of Compliance coverage for all new and renewed Standard Flood Insurance Policies. Increased Cost of Compliance is a potential source of a Duplication of Benefit, as a supplement to an existing National Flood Insurance Program policy. Policyholders are only eligible to receive Increased Cost of Compliance payment if a Substantial Damage Letter has been issued by the local floodplain manager.

Income – Annual income as reported under the United States Census long-form for the most recent available decennial U.S. Census. This definition includes:

- Wages, salaries, tips, commissions, etc.;
- Self-employment income from own nonfarm business, including proprietorships and partnerships;
- Farm self-employment income;
- Interest, dividends, net rental income, or income from estates or trusts;
- Social Security or railroad retirement;
- Supplemental Security Income, Aid to Families with Dependent Children, or other public assistance or public welfare programs;
- Retirement, survivor, or disability pensions; and
- Any other sources of income received regularly, including Veterans' (VA) payments, unemployment compensation, and alimony.

Indirect Cost – Any expense not directly identified with a cost objective, such as a specific project, facility, or function. Indirect costs include administration, personnel, and security costs.

Low Moderate Area Benefit (LMA) – An eligible activity that benefits all residents in a particular area, where at least 51 percent of the residents are Low-to-Moderate Income Persons as determined by the most recently available decennial Census information, together with the Section 8 income limits that would have applied at the time the income information was collected by the Census Bureau, or a current survey of the residents of the service area.

Low Moderate Housing (LMH) – Eligible activities that are undertaken for the purpose of providing or improving permanent residential structures which, upon completion, will be occupied by LMI households. To be eligible, structures with one unit must be occupied by a Low-to-Moderate Income Household, with two units, at least one unit must be Low-to-Moderate Income occupied, and structures with three or more units must have at least 51 percent occupied by Low-to-Moderate Income Households.

Low-to-Moderate Income (LMI) Household – A household whose annual income does not exceed 80 percent of the median income for the area as most recently determined by the Department of Urban and Housing Development.

- LMI 30 refers to those individuals/families making less than 30 percent of the Area Median Income.

- LMI 50 refers to those individuals/families making less than 50 percent of the Area Median Income.
- LMI 80 refers to those individuals/families making less than 80 percent of the Area Median Income.
- Above LMI 80 refers to those individuals/families making more than 80 percent of the Area Median Income.

Low-to-Moderate-Income (LMI) National Objective – Activities that benefit households whose total annual gross income does not exceed 80 percent of Area Median Income, adjusted for family size. Pursuant to federal statute, the grantee is required to expend 70 percent of Community Development Block Grant-Disaster Recovery funds to meet the Low-to-Moderate-Income National Objective.

Low-to-Moderate Income (LMI) Resident/Person/Individual – A person whose annual income does not exceed 80 percent of the median income for the area as most recently determined by the U.S. Department of Housing and Urban Development.

Mitigation Activities – Activities funded by the mitigation set-aside that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

Mitigation Measures – Measures that—per the U.S. Department of Housing and Urban Development’s Community Development Block Grant-Disaster Recovery Consolidated Notice, Appendix B of Federal Register Vol. 87, No. 23—must be incorporated into Community Development Block Grant-Disaster Recovery activities carried out by the grantee and its subrecipients as a construction standard to create communities that are more resilient, and to reduce the impacts of recurring natural disasters and the long-term impacts of climate change. When determining which mitigation measures to incorporate, the grantee should design and construct structures to withstand existing and future climate impacts expected to occur over the service life of the project.

Most Impacted and Distressed (MID) Areas – Areas of most impact as determined by the U.S. Department of Housing and Urban Development or the state using the best available data sources to calculate the amount of disaster damage.

National Flood Insurance Program (NFIP) –

- NFIP Zone A refers to those applicants within the 100-year flood zone.
- NFIP Zone V refers to those applicants within the 100-year flood zone with velocity (coastal storm surge risk).
- NFIP Zone X refers to those applicants outside of the 100-year flood zone.

Necessary Costs – Community Development Block Grant-Disaster Recovery funding will fill a necessary gap to address an unmet need that cannot be filled by another funding source. This is demonstrated by conducting a duplication of benefits analysis calculation for each activity.

Program Income – Gross income received by the subgrantee and/or subrecipient directly generated from the use of Community Development Block Grant-Disaster Recovery funds. Revenue that is received by a state, Unit of General Local Government, or subrecipient as defined at 24 CFR 570.500.

Project Cost – Direct costs of undertaking a Community Development Block Grant-Disaster Recovery project and which can be tied to a final cost objective and eligible activity. The project costs can count towards meeting the overall Low-to-Moderate Income benefit requirements.

Project Delivery Cost – Costs used specifically to meet the requirements to complete a particular project, especially as it applies to meeting Community Development Block Grant requirements.

Project/Program/Activity – The housing, infrastructure, economic development, or planning endeavor undertaken by Sarasota County, the subgrantee and/or subrecipient using Community Development Block Grant-Disaster Recovery funds.

Public Housing Authority (PHA) – state, county, municipality or other governmental entity or public body or agency or instrumentality of these entities that is authorized to engage or assist in the development or operation of low-income housing under the United States Housing Act of 1937 in accordance with 24 CFR 5.100.

Quarterly Performance Report (QPR) – The Community Development Block Grant-Disaster Recovery Quarterly Performance Report that is required to be uploaded quarterly in the Disaster Recovery Grant Reporting system for the U.S. Department of Housing and Urban Development's review of Sarasota County's disaster recovery programs.

Reasonable Costs – Costs that do not exceed what a prudent person would incur under similar circumstances, as demonstrated by the market price for comparable goods and services. For contracted work, the Responsible Entity should conduct an independent cost estimate to establish cost reasonableness as outlined in 2 CFR Part 200.

Subsidized Loans – Loans, including forgivable loans, other than private loans. Both Small Business Administration and Federal Emergency Management Agency provide subsidized loans for disaster recovery.

Section 3 – Section 3 of the Housing and Urban Development Act of 1968, as amended, and the implementing regulations at 24 CFR Part 135 and 24 CFR Part 75, as applicable, relating to employment and other economic opportunities for low and very low-income persons.

Section 3 Business or Business Concern – As related to Section 3 of the of the Housing and Urban Development Act of 1968, as amended:

- Is at least 51 percent owned and controlled by low or very low-income persons;
- Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Section 3 Workers; or
- A business at least 51 percent owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.

Section 3 Covered Contracts – A contract or subcontract (including a professional service contract) awarded by a recipient or contractor for work generated by the expenditure of Section 3 covered assistance, or for work arising in connection with a Section 3 covered project.

Section 3 Covered Non-Construction Project – A project associated with a Section 3 Covered Project such as maintenance contracts, re-painting, routine maintenance, HVAC servicing, and professional services (architectural, engineering, legal, accounting, marketing, etc.).

Section 3 Covered Project – The construction, reconstruction, conversion, or rehabilitation of housing (including reduction and abatement of lead-based paint hazards), other public construction such as roads, sewers and community centers, and buildings or improvements (regardless of ownership) assisted with housing or community development assistance.

Section 3 Workers – A worker whose income for the previous or annualized calendar year is below 80 percent of the area median income for the area in which the worker resides, is employed by a Section 3 business concern, or the worker is a YouthBuild participant.

Service Area – The total geographic area to be directly or indirectly served by a subgrant project that addresses the Low-to-Moderate Income National Objective, in which at least 48.33 percent of the residents are low-to-moderate income persons. A service area must include all, and only those, beneficiaries who are reasonably served or would be reasonably served by the activity.

Solicitation – Any request to submit offers or quotations to the local government. Solicitations under sealed bid procedures are called “invitations for bids”. Solicitations under negotiated procedures are called “requests for proposals.” Solicitations under simplified acquisition procedures may require submission of either a quotation or an offer.

Special Flood Hazard Area (SFHA) – Areas where the National Flood Insurance Program’s (NFIP’s) floodplain management regulations must be enforced, and the mandatory purchase of flood insurance applies.

Subcontract – A contract entered into by a subcontractor to furnish supplies or services for performance of a prime contract, or another subcontract. It includes, but is not limited to, purchase orders, and changes and modifications to purchase orders.

Subcontractor – Any supplier, distributor, vendor, or firm that furnishes supplies or services to or for a subrecipient. As related to Section 3 of the of the Housing and Urban Development Act of 1968, as amended, any entity (other than a person who is an employee of the contractor) which has a contract with a contractor to undertake a portion of the contractor’s obligation for the performance of work generated by the expenditure of Section 3 covered assistance or arising in connection with a Section 3 covered project.

Subgrantee – A recipient that demonstrated its abilities to carry out competitive applications due to their expertise related to goals of the program.

Subrecipient – A competitively-selected recipient, usually a local government, that is provided Community Development Block Grant-Disaster Recovery funds from Sarasota County to agreed-upon eligible disaster recovery activities documented in a Subrecipient Agreement.

Subrecipient Agreement – An agreement between the Sarasota County and the subrecipient for the subrecipient to undertake activities using Community Development Block Grant- Disaster Recovery funds.

Uniform Relocation Assistance and Real Property Acquisition Act (URA) of 1970, as amended – 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. The URA's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects pursuant to 49 CFR Part 24 and applicable waivers provided in the U.S. Department of Housing and Urban Development’s Community Development Block Grant-Disaster Recovery Consolidated Notice, Appendix B of Federal Register Vol. 87, No. 23.

Urgent Need (UN) – A recent need that poses a serious and immediate threat to the health or welfare of the community.

Very Low-Income (VU) Household/Family – A household whose annual income does not exceed 30 percent of the median income for the area as most recently determined by the Department of Housing and Urban Development.

Very Low-Income (VU) Person or Individual – A person whose annual income does not exceed 30 percent of the median income for the area as most recently determined by the Department of Housing and Urban Development.

Waiver – A revision to the standard Community Development Block Grant-Disaster Recovery regulations, requirements, and activities, granted by the U.S. Department of Housing and Urban Development.

YouthBuild – A national organization administered by the U.S. Department of Labor with a community- based pre-apprenticeship program that provides job training and educational opportunities for at-risk youth ages 16 to 24 who have previously dropped out of high school.

Appendix F. Standard Form 424

Sarasota County will submit Standard Form 424 with this Action Plan to HUD.

Appendix G. EJScreen Community Report

5. Appendices



Appendix A. Certifications

- a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan (RARAP) in connection with any activity assisted with CDBG–DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.
- b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. The grantee certifies that the action plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG–DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- d. The grantee certifies that activities to be undertaken with CDBG–DR funds are consistent with its action plan.
- e. 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, as such requirements may be modified by waivers or alternative requirements.
- f. 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 75.
- g. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).
- h. *State grantee certifies that it has consulted with all disaster-affected local governments (including any CDBG entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state. (Not Applicable)*
- i. 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, economic recovery, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).
 2. With respect to activities expected to be assisted with CDBG–DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
 3. The aggregate use of CDBG–DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) 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).
 - j. The grantee certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–3619), and implementing regulations, and that it will affirmatively further fair housing. An Indian tribe grantee certifies that the grant will be conducted and administered in conformity with the Indian Civil Rights Act.
 - k. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, state grantees must certify that they will require local governments that receive their 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 applicable to the use of grant funds.
 - m. The grantee certifies to the accuracy of its Financial Management and Grant Compliance Certification Requirements, or other recent certification submission, if approved by HUD, and related supporting documentation as provided in section III.A.1. of the Consolidated Notice and the grantee's implementation plan and related submissions to HUD as provided in section III.A.2. of the Consolidated Notice.
 - n. The grantee certifies that it will not use CDBG–DR funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the state, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the state, local, and tribal government land use regulations and hazard mitigation plans and the latest-issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.
 - o. 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.
 - p. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.
 - q. The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001, and 31 U.S.C. 3729.

Appendix B. Waivers

The Appropriations Act(s) authorizes the Secretary of HUD to waive or specify alternative requirements for any provision of any statute or regulation. For each waiver and alternative requirement, the Secretary of HUD has determined that good cause exists, and the waiver or alternative requirement is not inconsistent with the overall purpose of the HCD Act. The waivers and alternative requirement provide flexibility to support full and swift recovery. Waivers cannot conflict with cross-cutting requirements of:

- Equal Opportunity
- Fair Housing
- Environmental Review
- Davis Bacon Labor Standards

CDBG-DR grantees that are subject to the Consolidated Notice, as indicated in each Federal Register notice that announces allocations of the appropriated CDBG-DR funds (“Allocation Announcement Notice”), must comply with all waivers and alternative requirements in the Consolidated Notice, unless expressly made inapplicable.

(AAN) IV.A.4. Assistance to utilities (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32056)

The Appropriations Acts indicate that funds “may be used by a grantee to assist utilities as part of a disaster-related eligible activity under section 105(a) of the Housing and Community Development Act of 1974 (42 U.S.C. 5305(a)).”

Accordingly, paragraph III.G.3 of the Consolidated Notice does not apply to funds under the Appropriations Acts, and HUD is adding a modified alternative requirement that applies in lieu of paragraph III.G.3.

For grants made in response to 2022 disasters under the Appropriations Acts, the following alternative requirement applies:

A grantee may assist private for-profit, non-profit, or publicly owned utilities as part of disaster-related activities that are eligible under section 105(a) of the HCDA, or otherwise made eligible through a waiver or alternative requirement, provided that the grantee complies with the following:

1. The funded activity must comply with applicable CDBG-DR requirements, including the requirements that the assisted activity will meet a national objective, the activity will address an unmet recovery need or a risk identified in the grantee’s mitigation needs assessment, and if the assistance is provided to a for-profit entity for an economic development project under section 105(a)(17), the grantee must first comply with the underwriting requirements in section II.D.6 of the Consolidated Notice.
2. Each grantee must carry out the grant consistent with the grantee’s certification that “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.” To fortify compliance with the existing certification, if the grantee carries out activities that assist privately-owned, for-profit utilities, the grantee must prioritize assistance to for-profit utilities that will benefit areas where at least 51 percent of the residents are LMI persons and demonstrate how assisting the private, for-profit utility will benefit those areas.

3. The grantee must determine that the costs of the activity to assist a utility are necessary and reasonable and that they do not duplicate other financial assistance. To fortify these requirements and achieve a targeted use of funds and to safeguard against the potential over-subsidization when assistance is used to carry out activities that benefit private, for-profit utilities, the grantee must document that the level of assistance provided to a private, for-profit utility addresses only the actual identified needs of the utility. Additionally, the grantee must establish policies and procedures to ensure that the CDBG–DR funds that assist private, for-profit utilities reflect the actual identified financing needs of the assisted businesses by establishing a mix of financing terms (loan, forgivable loan, and/or grant) for each assisted private, for-profit utility, based on the business’s financial capacity, in order to ensure that assistance is based on actual identified need.

II.B.1. New housing construction waiver and alternative requirement (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32061)

42 U.S.C. 5305(a) and 24 CFR 570.207(b)(3) are waived to the extent necessary to permit new housing construction, subject to the following alternative requirement. When a CDBG–DR grantee carries out a new housing construction activity, 24 CFR 570.202 shall apply and shall be read to extend to new construction in addition to rehabilitation assistance. Private individuals and entities must remain compliant with federal accessibility requirements as well as with the applicable site selection requirements of 24 CFR 1.4(b)(3) and 8.4(b)(5).

II.B.2. Construction standards for new construction, reconstruction, and rehabilitation.

HUD is adopting an alternative requirement to require grantees to adhere to the applicable construction standards in II.B.2.a. through II.B.2.d. when carrying out activities to construct, reconstruct, or rehabilitate residential structures with CDBG-DR funds as part of activities eligible under 42 U.S.C. 5305(a) (including activities authorized by waiver and alternative requirement). For purposes of the Consolidated Notice, the terms “substantial damage” and “substantial improvement” shall be as defined in 44 CFR 59.1 unless otherwise noted.

II.B.5. Homeownership assistance waiver and alternative requirement. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32062)

42 U.S.C. 5305(a)(24) is waived and replaced with the following alternative requirement:

“Provision of direct assistance to facilitate and expand homeownership among persons at or below 120 percent of area median income (except that such assistance shall not be considered a public service for purposes of 42 U.S.C. 5305(a)(8)) by using such assistance to—

- a. subsidize interest rates and mortgage principal amounts for homebuyers with incomes at or below 120 percent of area median income;
- b. finance the acquisition of housing by homebuyers with incomes at or below 120 percent of area median income that is occupied by the homebuyers;
- c. acquire guarantees for mortgage financing obtained by homebuyers with incomes at or below 120 percent of area median income from private lenders, meaning that if a private lender selected by the homebuyer offers a guarantee of the mortgage financing, the grantee may purchase the guarantee to ensure repayment in case of default by the homebuyer. This subparagraph allows the purchase of mortgage insurance by the household but not the direct issuance of mortgage insurance by the grantee;
- d. provide up to 100 percent of any down payment required from homebuyers with incomes at or below 120 percent of area median income; or
- e. pay reasonable closing costs (normally associated with the purchase of a home) incurred by homebuyers with incomes at or below 120 percent of area median income.”

II.B.8. Safe housing incentives in disaster-affected communities. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32063)

The limitation on eligible activities in section 42 U.S.C. 5305(a) is waived and HUD is establishing the following alternative requirement to establish safe housing incentives as an eligible activity. A safe housing incentive is any incentive provided to encourage households to relocate to suitable housing in a lower risk area or in an area promoted by the community's comprehensive recovery plan. Displaced persons must receive any relocation assistance to which they are entitled under other legal authorities, such as the URA, section 104(d) of the HCDA, or those described in the Consolidated Notice.

II.D.2. National objective documentation for activities that support economic revitalization. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32065)

24 CFR 570.208(a)(4)(i)&(ii), 24 CFR 570.483(b)(4)(i)&(ii), 24 CFR 570.506(b)(5)&(6), and 24 CFR 1003.208(d) are waived to allow the grantees under the Consolidated Notice to identify the LMI jobs benefit by documenting, for each person employed, the name of the business, type of job, and the annual wages or salary of the job. HUD will consider the person income-qualified if the annual wages or salary of the job is at or under the HUD-established income limit for a one-person family.

II.D.3. Public benefit for activities that support economic revitalization. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32065)

HUD waives the public benefit standards at 42 U.S.C. 5305(e)(3), 24 CFR 570.482(f)(1), (2), (3), (4)(i), (5), and (6), and 570.209(b)(1), (2), (3)(i), (4), and 24 CFR 1003.302(c) for all economic development activities. Paragraph (g) of 24 CFR 570.482 and paragraph (c) and (d) under 570.209 are also waived to the extent these provisions are related to public benefit. However, grantees that choose to take advantage of this waiver in lieu of complying with public benefit standards under the existing regulatory requirements shall be subject to the following condition: grantees shall collect and maintain documentation in the project file on the creation and retention of total jobs; the number of jobs within appropriate salary ranges, as determined by the grantee; the average amount of assistance provided per job, by activity or program; and the types of jobs. Additionally, grantees shall report the total number of jobs created and retained and the applicable national objective in the DRGR system.

II.D.5. Waiver and modification of the job relocation clause to permit assistance to help a business return. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32065)

42 U.S.C. 5305(h), 24 CFR 570.210, 24 CFR 570.482(h), and 24 CFR 1003.209, are waived to allow a grantee to provide assistance to any business that was operating in the disaster-declared labor market area before the incident date of the applicable disaster and has since moved, in whole or in part, from the affected area to another state or to another labor market area within the same state to continue business.

III.B.2.c Direct grant administration and means of carrying out eligible activities (state grantees only). (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32068)

Requirements at 42 U.S.C. 5306(d) are waived to allow a state to use its disaster recovery grant allocation directly to carry out state-administered activities eligible under the Consolidated Notice, rather than distribute all funds to local governments. Pursuant to this waiver and alternative requirement, the standard at 24 CFR 570.480(c) and the provisions at 42 U.S.C. 5304(e)(2) will also include activities that the state carries out directly. Activities eligible under the Consolidated Notice may be carried out by a state, subject to state law and consistent with the requirement of 24 CFR 570.200(f), through its employees, through procurement contracts, or through assistance

provided under agreements with subrecipients. State grantees continue to be responsible for civil rights, labor standards, and environmental protection requirements, for compliance with 24 CFR 570.489(g) and (h), and subparagraph III.A.1.a.(2)(a) of the Consolidated Notice relating to conflicts of interest, and for compliance with 24 CFR 570.489(m) relating to monitoring and management of subrecipients.

III.B.2.f Recordkeeping (state grantees only) (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32068)

When a state carries out activities directly, 24 CFR 570.490(b) is waived and the following alternative provision shall apply: a state grantee shall establish and maintain such records as may be necessary to facilitate review and audit by HUD of the state's administration of CDBG-DR funds, under 24 CFR 570.493 and reviews and audits by the state under III.B.2.h.

III.B.2.h Responsibility for review and handling of noncompliance (state grantees only) (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32068)

This change is in conformance with the waiver allowing a state to carry out activities directly. 24 CFR 570.492 is waived, and the following alternative requirement applies for any state receiving a direct award: the state shall make reviews and audits, including on-site reviews of any local governments or Indian tribes (either as subrecipients or through a method of distribution) designated public agencies, and other subrecipients, as may be necessary or appropriate to meet the requirements of section 104(e)(2) of the HCDA, as amended, and as modified by the Consolidated Notice. In the case of noncompliance with these requirements, the state shall take such actions as may be appropriate to prevent a continuance of the deficiency, mitigate any adverse effects or consequences, and prevent a recurrence. The state shall establish remedies for noncompliance by any subrecipients, designated public agencies, or local governments.

III.C. Action Plan for Disaster Recovery Waiver and Alternative Requirement. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32069)

Requirements for CDBG actions plans, located at 42 U.S.C. 5304(a)(1), 42 U.S.C. 5304(m), 42 U.S.C. 5306(a)(1), 42 U.S.C. 5306(d)(2)(C)(iii), 42 U.S.C. 12705(a)(2), and 24 CFR 91.220 and 91.320, are waived for CDBG-DR grants. Instead, grantees must submit to HUD an action plan for disaster recovery which will describe programs and activities that conform to applicable requirements as specified in the Consolidated Notice and the applicable Allocation Announcement Notice.

III.C.4. Waiver of 45-day review period for CDBG-DR action plans to 60 days. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32072)

The Secretary has determined that good cause exists and waives 24 CFR 91.500(a) to extend HUD's action plan review period from 45 days to 60 days.

III.D.1. Citizen participation waiver and alternative requirement (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32073)

To permit a more streamlined process and ensure disaster recovery grants are awarded in a timely manner, provisions of 42 U.S.C. 5304(a)(2) and (3), 42 U.S.C. 12707, 24 CFR 570.486, 24 CFR 1003.604, 24 CFR 91.105(b) through (d), and 24 CFR 91.115(b) through (d), with respect to citizen participation requirements, are waived and replaced by the alternative requirements in this section. The streamlined requirements require the grantee to include public hearings on the proposed action plan and provide a reasonable opportunity (at least 30 days) for citizen comment.

III.E.1. Program income waiver and alternative requirement. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32074)

For state and unit of general local government grantees, HUD is waiving all applicable program income rules at 42 U.S.C. 5304(j), 24 CFR 570.489(e), 24 CFR 570.500, and 24 CFR 570.504 and providing the alternative requirement described below. Program income earned by Indian tribes that receive an allocation from HUD will be governed by the regulations at 24 CFR 1003.503 until grant closeout and not by the waivers and alternative requirements in this Consolidated Notice. Program income earned by Indian tribes that are subrecipients of state grantees or local government grantees will be subject to the program income requirements for subrecipients of those grantees.

III.F.1. Consolidated Plan waiver. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32075)

HUD is temporarily waiving the requirement for consistency with the consolidated plan (requirements at 42 U.S.C. 12706, 24 CFR 91.225(a)(5), and 24 CFR 91.325(a)(5)), because the effects of a major disaster alter a grantee's priorities for meeting housing, employment, and infrastructure needs. In conjunction, 42 U.S.C. 5304(e) is also waived, to the extent that it would require HUD to annually review grantee performance under the consistency criteria. These waivers apply only for 24 months after the applicability date of the grantee's applicable Allocation Announcement Notice.

III.F.3. Use of the urgent need national objective. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32075)

Because HUD provides CDBG-DR funds only to grantees with documented disaster-related impacts and each grantee is limited to spending funds only for the benefit of areas that received a Presidential disaster declaration, the Secretary finds good cause to waive the urgent need national objective criteria in section 104(b)(3) of the HCDA and to establish the following alternative requirement for any CDBG-DR grantee using the urgent need national objective for a period of 36 months after the applicability date of the grantee's Allocation Announcement Notice.

Pursuant to this alternative requirement, grantees that use the urgent need national objective must: (1) describe in the impact and unmet needs assessment why specific needs have a particular urgency, including how the existing conditions pose a serious and immediate threat to the health or welfare of the community; (2) identify each program or activity in the action plan that will use the urgent need national objective—either through its initial action plan submission or through a substantial amendment submitted by the grantee within 36 months of the applicability date of the grantee's Allocation Announcement Notice; and (3) document how each program and/or activity funded under the urgent need national objective in the action plan responds to the urgency, type, scale, and location of the disaster-related impact as described in the grantee's impact and unmet needs assessment.

The grantee's action plan must address all three criteria described above to use the alternative urgent need national objective for the program and/or activity. This alternative urgent need national objective is in effect for a period of 36 months following the applicability date of the grantee's Allocation Announcement Notice. After 36 months, the grantee will be required to follow the criteria established in section 104(b)(3) of the HCDA and its implementing regulations in 24 CFR part 570 when using the urgent need national objective for any new programs and/or activities added to an action plan.

III.F.4. Reimbursement of disaster recovery expenses by a grantee or subrecipient. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32075)

Section 570.200(h)(1)(i) is waived to the extent that it requires pre-agreement activities to be included in the local government's consolidated plan. As an alternative requirement, grantees must include any pre-agreement activities in their action plans, including any costs of eligible activities that were funded with short-term loans (e.g., bridge loans) and that the grantee intends to reimburse or otherwise charge to the grant, consistent with applicable program requirements.

III.F.6. Alternative requirement for the elevation of structures when using CDBG-DR funds as the non-Federal match in a FEMA-funded project. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32076)

Currently, CDBG-DR grantees using FEMA and CDBG-DR funds on the same activity have encountered challenges in certain circumstances in reconciling CDBG-DR elevation requirements and those established by FEMA. FEMA regulations at 44 CFR 9.11(d)(3)(i) and (ii) prohibit new construction or substantial improvements to a structure unless the lowest floor of the structure is at or above the level of the base flood and, for Critical Actions, at or above the level of the 500-year flood. However, 44 CFR 9.11(d)(3)(iii) allows for an alternative to elevation to the 100- or 500-year flood level, subject to FEMA approval, which would provide for improvements that would ensure the substantial impermeability of the structure below flood level. While FEMA may change its standards for elevation in the future, as long as the CDBG-DR grantee is following a FEMA-approved flood standard this waiver and alternative requirement will continue to apply.

III.F.7. Certifications waiver and alternative requirement (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32076)

Sections 104(b)(4), (c), and (m) of the HCDA (42 U.S.C. 5304(b)(4), (c), & (m)), sections 106(d)(2)(C) & (D) of the HCDA (42 U.S.C. 5306(d)(2)(C) & (D)), and section 106 of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12706), and regulations at 24 CFR 91.225 and 91.325 are waived and replaced with the following alternative. Each grantee choosing to submit an action plan for program administrative costs must make the following certifications listed in section III.F.7 of the Consolidated Notice and include them with the submission of this plan: paragraphs b, c, d, g, i, j, k, l, p, and q.

IV.F.1. Section 104(d) one-for-one replacement of lower-income dwelling units. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32079)

One-for-one replacement requirements at section 104(d)(2)(A)(i) and (ii) and 104(d)(3) of the HCDA and 24 CFR 42.375 are waived for owner-occupied lower-income dwelling units that are damaged by the disaster and not suitable for rehabilitation. The section 104(d) one-for-one replacement housing requirements apply to occupied and vacant occupiable lower-income dwelling units demolished or converted in connection with a CDBG assisted activity. This waiver exempts all disaster-damaged owner-occupied lower-income dwelling units that meet the grantee's definition of "not suitable for rehabilitation," from the one-for-one replacement housing requirements of 24 CFR 42.375.

IV.F.2. Section 104(d) relocation assistance. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32079)

The relocation assistance requirements at section 104(d)(2)(A)(iii) and (B) of the HCDA and 24 CFR 42.350, are waived to the extent that an eligible displaced person, as defined under 24 CFR 42.305 of the section 104(d) implementing regulations, may choose to receive either assistance under the URA and implementing regulations at 49 CFR part 24, or assistance under section 104(d) and implementing regulations at 24 CFR 42.350. This waiver does not impact a person's

eligibility as a displaced person under section 104(d), it merely limits the amounts and types of relocation assistance that a section 104(d) eligible displaced person is eligible to receive.

IV.F.3. URA replacement housing payments for tenants (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32079)

The requirements of sections 204 and 205 of the URA (42 U.S.C. 4624 and 42 U.S.C. 4625), and 49 CFR 24.2(a)(6)(vii), 24.2(a)(6)(ix), and 24.402(b) are waived to the extent necessary to permit a grantee to meet all or a portion of a grantee's replacement housing payment obligation to a displaced tenant by offering rental housing through a rental housing program subsidy (to include, but not limited to, a housing choice voucher), provided that comparable replacement dwellings are made available to the tenant in accordance with 49 CFR 24.204(a) where the owner is willing to participate in the program and the period of authorized assistance is at least 42 months.

IV.F.4. URA voluntary acquisition—homebuyer primary residence purchase. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32080)

Grantees may implement disaster recovery program activities that provide financial assistance to eligible homebuyers to purchase and occupy residential properties as their primary residence. Such purchases are generally considered voluntary acquisitions under the URA and subject to the URA regulatory requirements at 49 CFR 24.101(b)(2). For CDBG–DR, 49 CFR 24.101(b)(2) is waived to the extent that it applies to a homebuyer, who does not have the power of eminent domain, and uses CDBG–DR funds in connection with the voluntary purchase and occupancy of a home the homebuyer intends to make their primary residence. This waiver is necessary to reduce burdensome administrative requirements for homebuyers following a disaster. Tenants displaced by these voluntary acquisitions may be eligible for relocation assistance.

IV.F.5. CDBG displacement, relocation, acquisition, and replacement housing program regulations - Optional relocation assistance. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32080)

The regulations at 24 CFR 570.606(d) are waived to the extent that they require optional relocation policies to be established at the grantee level. Unlike with the regular CDBG program, states may carry out disaster recovery activities directly or through subrecipients, but 24 CFR 570.606(d) does not account for this distinction. This waiver makes clear that grantees receiving CDBG-DR funds may establish optional relocation policies or permit their subrecipients to establish separate optional relocation policies.

IV.F.6. Waiver of Section 414 of the Stafford Act. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32080)

Section 414 of the Stafford Act and its implementing regulation at 49 CFR 24.403(d)(1) are waived to the extent that they would apply to real property acquisition, rehabilitation, or demolition of real property for a CDBG-DR funded project commencing more than one year after the date of the latest applicable Presidentially declared disaster undertaken by the grantees, or subrecipients, provided that the project was not planned, approved, or otherwise underway before the disaster.

V.A. Timely Distribution and Expenditure of Funds (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32057)

HUD waives the provisions at 24 CFR 570.494 and 24 CFR 570.902 regarding timely distribution and expenditure of funds, and establishes an alternative requirement providing that each grantee must expend 100 percent of its allocation within six years of the date HUD signs the grant agreement.

V.C.1. DRGR-related waivers and alternative requirements. (Federal Register Vol. 88, No. 96, May 18, 2023, p. 32081)

The Consolidated Notice waives the requirements for submission of a performance report pursuant to 42 U.S.C. 12708(a), 24 CFR 91.520, and annual status and evaluation reports that are due each fiscal year under 24 CFR 1003.506(a). Alternatively, HUD is requiring that grantees enter information in the DRGR system on a quarterly basis through the performance reports.

Appendix C. Summary and Response of Public Comments

A summary of public comments received during the public comment period beginning July 26, 2023 will be included in this Appendix of the Action Plan at the conclusion of the public comment period on August 25, 2023.

Public Comments Resilient SRQ Draft Action Plan

Sarasota County public comment period on the draft action plan for the Community Development Block Grant – Disaster Recovery (CDBG-DR), or “Resilient SRQ” took place from July 26, 2023, through August 25, 2023. A total of 992 comments were received during this time.

Comments could be submitted using the following formats:

- Using an online form at the webpage, www.scgov.net/ResilientSRQ
- Emailing ResilientSRQComments@scgov.net
- Attending the public hearing and providing comments either in writing or orally
- Mailing a letter to the Resilient SRQ team

The below table provides a summary of the comments received and the County’s response. Section A. provides comments received on specific projects, while Section B. provides general comments received about the draft Action Plan.

Section A. Comments Received on Specific Projects and Programs

Topic	# of Comments Received	Summary of Comments Received	County Response
Midnight Pass	599	<p>Comments received about Midnight Pass asked the County to invest the required funds to begin the permitting and planning process to restore “Midnight Pass,” a historical tidal connection between the Gulf of Mexico and Little Sarasota Bay. Midnight Pass was closed in the 1980’s.</p> <p>Comments claimed this project would restore the water quality in the area and assist with Sarasota County’s primary economic driver, clean water and beaches.</p>	<p>According to the federal register notice, broad eligibility requirements extend to all CDBG-DR projects which includes but is not limited to having to meet a HUD national objective (elimination of slum or blight; having an urgent need; or benefiting low to moderate income persons) as well as having a direct or indirect tie-in to Hurricane Ian - of note, this latter tie-in requirement is waived in the use of the 15% statutory set aside of mitigation funds. Based on only these few factors, the proposed project may have the potential to only qualify under CDBG-DR as an urgent need as a result of a direct or indirect impact from Hurricane Ian or possibly under the mitigation set aside.</p> <p>However, in consideration of other factors, all CDBG-DR projects must also qualify as an eligible activity in accordance with Title I of the Housing and Community Development Act (HCDA) of 1974, which is the original authorizing legislation for the CDBG program, and any of its applicable waivers and alternative requirements. One of the core purposes and legislative intent of the HCDA and the resulting creation of the CDBG program is to eliminate blight; to conserve and renew urban areas; to improve the living environment of low-to-moderate income families; and</p>

			<p>develop new centers of population group and economic activity. Specifically, HCDA eligible activities include those primarily related to advancement of quality housing especially for vulnerable populations and low to moderate income persons, improvements to infrastructure, and economic revitalization programs to create pathways to upward economic mobility for underserved communities.</p> <p>As a function of CDBG-DR, these same HCDA activities, to include any associated planning activities, are to be deployed by grantees in the context of disaster recovery to address the continuing unmet needs as a result of a major disaster. In the case of the proposed project and the re-opening of a channel, which has a historical and documented core purpose to reverse a man-made issue in the pursuit of potential environmental benefits, this activity is not contemplated as one of the intended purposes and eligible uses of the HCDA, nor any of its applicable waivers and alternative requires afforded under CDBG-DR. For example, the proposed project does not rehabilitate or reconstruct impacted homes or develop new affordable housing; it does not repair critically needed infrastructure and other public facilities; and it does not fund job growth programs and other economic revitalization programs due to job losses and business impacts from a disaster.</p> <p>While staff recognize this is an important project of the community, to recommend this project for inclusion in the action plan with its eligibility concerns may have the unintended consequence of coming under intense scrutiny by HUD to include evaluation of its ability to be in compliance with the National Environmental Protection Act (NEPA) and associated federal environment laws. This proposed project's inclusion may then delay the approval of the action plan in the critical stage of its initial approval by HUD, thereby delaying all projects and programs proposed. Therefore, staff are not recommending this project be included in the action plan and instead recommends an alternative, non-HUD related funding source be identified and pursued.</p>
Heritage Oaks Lift Station	77	Comments received about the lift stations located near the Heritage Oaks community asked Sarasota County to install emergency back-up diesel generators at the 3 wastewater lift stations in Heritage Oaks. These lift stations move sewage from not only Heritage Oaks but other nearby communities towards the wastewater	The Heritage Oaks Lift Station was carefully considered by staff. Due to the nature of the project, it would not be eligible to meet the remediation of slums and blight National Objectives. However, the project may be eligible for consideration if the lift station serves a low-to-moderate area (LMA). The exact service area will have to be determined during application intake after the launch of the Infrastructure and Public Facilities program. In addition, the nature of the project may meet the Urgent Need National Objective as defined in the Federal Register Notice if it poses an immediate threat to the health and welfare of the community. More

		<p>treatment plant. They do not currently have back-up generators in case of power failure. After Hurricane Ian, power was not quickly restored to at least one of these lift stations before the neighboring area, resulting in a sewage that damaged individual homes within Heritage Oaks.</p>	<p>information on the project specifics would be needed before staff could make a formal recommendation.</p> <p>Infrastructure and public facility projects to be considered by the County can be submitted via application process once the Infrastructure and Public Facilities program launches after HUD’s formal approval of this Action Plan and development of programmatic Policies and Procedures. This project may be considered for an application for funding at program launch and its eligibility and service area would be formally vetted by staff at this stage. The County anticipates potentially launching the program sometime in 2024 at which time applications will need to be submitted by the responsible public entity.</p>
Matheny Creek and Elligraw Bayou	76	<p>Comments received about Matheny Creek and Elligraw Bayou expressed their support for Phase 1 of the Matheny Creek and Elligraw Bayou Stormwater Management System and Water Quality Resilience Project, which includes acquisition and conversion of the abandoned golf course in the Gulf Gate development to a stormwater management/water quality/passive recreation project.</p> <p>Comments received claimed the project would provide flood protection for an area of 1,900 acres representing 7,600 living units and would promote a more resilient community and filter stormwater before it flows into Little Sarasota Bay.</p>	<p>The Matheny Creek and Elligraw Bayou project was carefully reviewed by County Staff. The County’s concerns after considering the project include:</p> <p>National Objective – Though the project lacks a direct tie-back, the project could possibly be undertaken as a mitigation project, depending on its final design and subject to ensuring the project would meet a HUD National Objective. Based on a preliminary review, it does not appear that the project meets two of the three HUD National Objectives, an Urgent Need or prevention of slum or blight. Therefore, this project would likely only be eligible if meeting the third HUD National Objective, a low-to-moderate income (LMI) benefit. Based on preliminary analysis of LMI data, the Gulf Gate community, containing the previous Gulf Gate Golf Course, is not located in a LMI qualified block group. Gulf Gate Estates is located in Census Tract 2004, Block Group 2 where 44.4% of the population is identified as LMI. This LMI population percentage is below the exception grantee percent of 48.33%, thereby potentially making it ineligible to meet the Low- Moderate Area benefit. The exact service area will have to be determined during application intake after the launch of the Infrastructure and Public Facilities program.</p> <p>This project may be considered for an application for funding at program launch and its eligibility and service area would be formally vetted by staff at this stage. The County anticipates potentially launching the program sometime in 2024 at which time applications will need to be submitted by eligible public or non-profit entities.</p>
Gottfried Creek	75	<p>Comments received about Gottfried Creek noted the neighborhood’s ongoing concern with Gottfried Creek, including the 64 homes in the Foxwood Condominium Community that were</p>	<p>Gottfried Creek and the establishment of a grant program for homeowners was carefully considered. The County’s concerns for use of CDBG-DR funds after considering the project include:</p>

		<p>flooded from Hurricane Ian from Gottfried Creek. Requests were made to inspect the broken and felled trees on part of the privately owned property of Gottfried Creek to reduce blockage for future heavy rainfall.</p> <p>These comments requested the action plan include an allocation of grant money for Condominium Associations and Homeowner Associations to clear Gottfried Creek to improve storm-water drainage.</p>	<p>Meeting a HUD National Objective - While the project appears to have tie-back to the storm event, and in some cases debris removal can be a qualified activity, the primary issue is the concern that the project does not appear to meet at least two of the HUD National Objectives. The project inherently doesn't involve the remediation of slums and blight. The project does not meet the second HUD national objective, a low-to-moderate (LMI) benefit. Based on preliminary review of Gottfried Creek and its orientation and locale within the Foxwood Condominiums residential complex it appears that the project would not qualify. Due to the specificity of the beneficiaries, the County would have to obtain individual household income data for those persons benefiting from project, those in proximity to the creek or those who may be impacted by creek flooding. Analysis of HUD and Census data for this area, as well as the County's familiarity with the location, leads the County to believe that the residents of this area would not qualify as predominantly LMI qualified. Based on preliminary analysis of LMI data, Foxwood Condominiums is also not located in a LMI qualified block group. Foxwood Condominiums are located in Census Tract 2604, Block Group 1 where 28.5% of the population is identified as LMI. This LMI population percentage is below the exception grantee percent of 48.33%, thereby making it ineligible to meet the Low- Moderate Area benefit.</p> <p>The nature of the project may meet the Urgent Need National Objective as defined in the Federal Register Notice if it poses an immediate threat to the health and welfare of the community. More information on the project specifics would be needed before staff could make a formal recommendation.</p> <p>This project may be considered for an application for funding at program launch and its eligibility and service area would be formally vetted by staff at this stage. The County anticipates potentially launching the program sometime in 2024 at which time applications will need to be submitted by eligible public or non-profit entities.</p>
Housing	23	<p>Comments in support of housing rehabilitation, reconstruction, and mobile home replacement asked that the county dedicate funding to assisting residents repair or replace their homes so that they can safely return to their property.</p>	<p>Comments received helped further justify the substantial need for housing rehabilitation, reconstruction, and replacement and indicated public support for such projects.</p> <p>Requests for assistance can be submitted via application process once the housing programs launch after HUD's formal approval of this Action Plan and development of programmatic Policies and Procedures. The County anticipates potentially launching the program sometime in 2024 at which time applications will need to</p>

			be submitted by eligible homeowners. The public will be made aware of the launch of this program through the County’s website.
Dredging Forked Creek	18	<p>Comments received about Forked Creek requested assistance from Sarasota County to dredge the creek due to erosion that occurred during the hurricane resulting in the creek being filled with silt making it no longer navigable during all tides.</p>	<p>The County’s concerns for use of CDBG-DR funds after considering the Forked Creek project include:</p> <p>Lack of tie-back – There is concern that the project does not appear to have a direct tie-back to the storm event. Those seeking approval for the project would need to provide evidence that the excessive sedimentation issue was related to impacts from the storm event and not an issue of deferred maintenance. Maintenance is not an eligible activity under CDBG-DR funding. More information about the creek before and after Hurricane Ian would be needed to determine a direct or indirect tie back.</p> <p>Meeting a HUD National Objective – As with all CDBG-DR projects, a project would need to meet one of the three HUD National Objectives. The project doesn’t inherently involve the remediation of slums and blight. This project does not meet the second HUD national objective, a low-to-moderate (LMI) benefit. Based on preliminary review of the location of Forked Creek, as well as the waterways and tributaries extending from it, it appears that the project would not qualify. The creek originates in undeveloped areas and extends through several block groups eventually emptying into Lemon Bay. Based on a preliminary staff review of HUD data, none of the block groups encompassing any of the creek or its associated waterways, are LMI qualified. These block groups include the following: Census Tract 2601, Block Group 1, Census Tract 2601, Block Group 2, Census Tract 2602, Block Group 1, Census Tract 2602, Block Group 2, Census, Tract 2603, Block Group 1, and Census Tract 2718, Block Group 2.</p> <p>The percent LMI population for this service is 30.9% which is below the exception grantee percent of 48.33%, thereby making it ineligible to meet the Low- Moderate Area benefit.</p> <p>The nature of the project may meet the Urgent Need National Objective as defined in the Federal Register Notice if it poses an immediate threat to the health and welfare of the community. More information on the project specifics would be needed before staff could make a formal recommendation.</p> <p>This project may be considered for an application for funding at program launch and its eligibility and service area would be formally vetted by staff at this stage. The County anticipates potentially launching the program sometime in 2024 at</p>

			which time applications will need to be submitted by eligible public or non-profit entities.
Support for Nonprofit Organizations Receiving CDBG-DR Funds	16	Comments received in this category supported the requests for specific nonprofits, including the Hermitage Artist Retreat, the Venice Theater, Kiwanis Club of North Port, the Sarasota County Agricultural Fair Association, North Port Coalition for the Homeless/Needy Children, Inc, The Salvation Army Sarasota County, Boys & Girls Clubs of Sarasota and DeSoto Counties, Education Foundation of Sarasota County, Family Promise of South Sarasota County, several home owner associations, along with comments in support of a new structure or facility to better organize the nonprofit organizations in North Port.	<p>Comments received helped further justify the substantial need for nonprofit projects under the public facilities and infrastructure program.</p> <p>Some comments provided suggestions for additional projects for consideration. Infrastructure and public facility projects to be considered by the County can be submitted via application process once the Infrastructure and Public Facilities program launches after HUD’s formal approval of this Action Plan and development of programmatic Policies and Procedures. The County anticipates potentially launching the program sometime in 2024 at which time applications will need to be submitted by eligible public or non-profit entities. The public will be made aware of the launch of this program through the County’s website.</p> <p>All projects must meet a HUD National Objective: serve an urgent need, aid in the elimination of slum or blight, or benefit low to moderate income persons. Projects must also have a direct or indirect tie back to Hurricane Ian.</p>
Fox Lea Farm	14	Comments received requested a hurricane barn in Sarasota County for horses and other large livestock as the nearest major hurricane barn is in Ocala, Florida and not accessible for many in Sarasota County. Comments requested a hurricane barn to be built at Fox Lea Farm for future disasters.	<p>The County carefully considered this project request and have the following concerns:</p> <p>Meeting a HUD National Objective – As with all CDBG-DR projects, the project would need to meet one of the three HUD National Objectives: urgent need, elimination of slum or blight, or benefit low to moderate income persons. It would not qualify as Urgent Need since it is already on record as being a long-standing issue pre-Hurricane Ian and it does not pose a serious and immediate threat to the health or welfare of the community. While the threat to animals may be serious and immediate, HUD would not consider this an immediate threat to the community. The project also inherently doesn’t involve the remediation of slums and blight. In order to meet the third objective, a low-to-moderate income (LMI) benefit, the hurricane barn would need to serve a vulnerable population. HUD considers the following to be vulnerable populations: the working poor, minorities, Native Americans, people with disabilities, people with AIDS, the elderly, and the homeless.</p>

			With these considerations of a hurricane barn, staff would not recommend inclusion of this project in the Action Plan.
Support for Businesses (for profit)	11	<p>Comments received in support of funding for businesses requested that a portion of these funds go to restoring losses, including loss of business operations, incurred because of Hurricane Ian.</p>	<p>The County has reviewed and considered the comments related to assisting businesses. Any business assistance program would need to have tie-back to the event as indicated in the HUD CDBG-DR Policy Guide, <i>“All economic revitalization activities must address economic impact(s) caused by the disaster”</i>. This could possibly include assistance with repairs to damaged businesses, buy-out of damaged properties, business development assistance in the wake of business/job loss, or similar recovery activities.</p> <p>If a tie-back to Hurricane Ian could be established, these programs would still have to meet a HUD National Objective. Economic development and economic revitalization activities typically can only meet the Benefit to Low to Moderate Income (LMI) Persons or Urgent Need National Objective (with Urgent Need only being permitted in special situations). To qualify as an Urgent Need, businesses would need to demonstrate there is a serious and immediate threat to the health or welfare of the community.</p> <p>In order to meet the LMI National Objective, the activities undertaken must result in the creation or retention of permanent jobs where at least 51% of these jobs are made available to LMI persons. This can require substantial documentation and cooperation from local businesses to ensure eligibility and compliance. The other LMI National Objective option would be an “area benefit” (LMA) where assistance is provided to a business that provides goods or services to residents of an LMI qualified residential area. In this case the service area must be defined, confirmed as LMA qualified, and the area must be predominantly residential.</p> <p>There are a variety of concerns the County had when considering potential economic recovery projects which include anticipated low interest based on HUD requirements, applicant eligibility, ongoing compliance requirements, slow expenditure of funds, and service area determination for individual businesses, among others.</p> <p>While none of these issues strictly exclude other economic revitalization projects, they were taken into consideration when projects and programs were being developed and would need to be accounted for in any potential economic recovery projects or programs considered in the future.</p>

<p>Career Training/Economic Recovery</p>	<p>8</p>	<p>Comments received encouraged the County to greatly reduce or eliminate Career training/economic recovery funds from the plan to increase funding for infrastructure and affordable housing projects. Respondents felt that there are already high-quality training programs in the county and the labor shortage is largely due to a lack of affordable housing.</p> <p>Several comments named other industries besides construction fields that would benefit from a career training program including healthcare and trucking.</p>	<p>The County has reviewed and considered these comments, however, the economic recovery program not only addresses the issues surrounding the skilled worker shortage suffered in the wake of the disaster but also helps provide a longer term, more holistic approach, by providing residents with increased and enhanced work skills to potentially secure higher paying jobs. Increased household income has a direct impact on an individual or household’s ability to comfortably afford housing. Because of these multiple benefits the County will continue to consider the economic recovery Career Training program.</p>
<p>Infrastructure Projects</p>	<p>8</p>	<p>Comments received asked the County to consider specific infrastructure projects and to increase the resiliency of our roads, bridges, stormwater and wastewater management, and the electrical power grid.</p>	<p>Comments received helped further justify the substantial need for these projects and indicated public support for such projects. No further actions were taken.</p> <p>Several comments provided suggestions for additional projects for consideration. Infrastructure and public facility projects to be considered by the County can be submitted via application process once the Infrastructure and Public Facilities program launches after HUD’s formal approval of this Action Plan and development of programmatic Policies and Procedures. The County anticipates potentially launching the program sometime in 2024 at which time applications will need to be submitted by eligible public or non-profit entities. The public will be made aware of the launch of this program through the County’s website.</p> <p>All projects must meet a HUD National Objective: serve an urgent need, aid in the elimination of slum or blight, or benefit low to moderate income persons. All projects must also have a direct or indirect tie back to Hurricane Ian, unless using the mitigation set aside.</p>
<p>Affordable Housing</p>	<p>8</p>	<p>Comments were both in support of new affordable housing and in opposition to new affordable housing were received with the vast majority asking the county to utilize as much funding as possible to create additional affordable and work force housing. Comments</p>	<p>Comments received helped further justify the substantial need for affordable housing and indicated public support for such projects. Creation of new affordable housing is an eligible activity under CDBG-DR and meets the HUD National Objective of benefit low to moderate income people.</p> <p>Affordable housing projects to be considered by the County can be submitted via application process once the housing programs launch after HUD’s formal approval</p>

		include the considerable unmet housing needs, and that new affordable housing would help the business community to attract and retain a trained workforce.	of this Action Plan and development of programmatic Policies and Procedures. The County anticipates potentially launching the program sometime in 2024 at which time applications will need to be submitted by eligible entities. The public will be made aware of the launch of this program through the County's website.
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Section B: General comments received on Action Plan

Topic	# of Comments Received	Summary of Comments Received	County Response
Insurance/ Deductibles	15	Comments received discussed issues with insurance companies filing for bankruptcy or not paying enough to cover the cost to repair the damages from Hurricane Ian.	Comments received help further justify the need for a rehabilitation and reimbursement program and indicated public support for such projects. Requests for assistance can be submitted via application process once the housing programs launch after HUD's formal approval of this Action Plan and development of programmatic Policies and Procedures. The County anticipates potentially launching the program sometime in 2024 at which time applications will need to be submitted by eligible homeowners. The public will be made aware of the launch of this program through the County's website.
Funds needed for South Sarasota County (Englewood, North Port, Venice)	10	Comments received about Funds Needed for South County including North Port and Englewood encouraged Sarasota County to invest significant funding in the southern part of the county where much of the damage from Hurricane Ian occurred.	Comments received further justified the substantial need for housing and infrastructure/public facilities programs in areas of Sarasota County most impacted by Hurricane Ian. All projects must have a direct or indirect tie back to Hurricane Ian and must meet a HUD National Objective: urgent need, remediation of slum or blight, or benefit low to moderate income persons. Projects would not need to have a tie back to Hurricane Ian if mitigation funding is being used for the project. Housing rehabilitation/reconstruction and Infrastructure/public facilities projects to be considered by the County can be submitted via an application process once programs launch after HUD's formal approval of this Action Plan and development of programmatic Policies and Procedures. The County anticipates launching the programs sometime in 2024 at which time applications can be submitted. The public will be made aware of the launch of these programs through the County's website.

<p>Environmental Concerns</p>	<p>8</p>	<p>Comments received asking the County to consider taking additional steps to combat climate change and protect the environment.</p>	<p>Comments received regarding environmental concerns were previously addressed in the draft Action Plan in section 3.5.1. Green Building Standards. All CDBG-DR-funded projects must identify an industry-recognized green building standard and a minimum energy efficiency standard. HUD requires all rehabilitation, reconstruction, and new construction to be designed to incorporate principles of sustainability, including water and energy efficiency, resilience, and to mitigate the impact of future disasters. Qualifying standards include any of the green building and green development standards under the following programs:</p> <ul style="list-style-type: none"> • Florida Green Building Coalition • U.S. Green Building Council Leadership in Emergency and Environmental Design (LEED) • National Green Building Standard • Green Gloves • Living Building Challenge <p>Per Sec. 124-122 - Landscaping and Buffering of the Sarasota County Unified Development Code, properly landscaped and maintained areas can reduce the potential incompatibility of adjacent land uses, conserve natural resources and maintain open space, protect established residential neighborhoods, and promote and enhance community image and roadway beautification. Additional Environmental and Natural Resource preservation can be found in Chapter 54 of the Code of Ordinances, including air quality, water quality, environmentally sensitive land, etc.</p> <p>One comment indicated the County has an additional levee that was not indicated in section 2.7.3.1.3 Levee Failure. This clarification was added to the Action Plan.</p>
<p>General Concerns</p>	<p>8</p>	<p>Comments included general concerns on the draft action plan and a concern about the location of the public hearing.</p>	<p>The County reviewed and considered the general concerns and did not make any changes to the Action Plan.</p> <p>For the location of the hearing, staff chose a location for the public hearing that could be accessible via bus routes with a focus on areas that experienced significant damage from Hurricane Ian. The event was also held in the evening to maximize attendance.</p> <p>For those who could not attend the event in person, a livestream of the event was arranged, which aired on television and YouTube. The recording is available on the Resilient SRQ webpage. Sarasota County residents also had multiple ways to</p>

			provide public comments on the draft action plan including using an online form on the webpage, emailing ResilientSRQComments@scgov.net , or mailing a letter.
Request to be added to contact list	5	Several comments asked the County to add their contact information to be notified when applications open and additional information is available.	These individuals will be added to the Resilient SRQ distribution list.
Compliments to Staff and Offer of Assistance	5	Comments included accolades for the draft action plan and were complimentary of Staff for how they ran the Public Hearing on August 9, 2023. A local radio station offered assistance spreading the word about Resilient SRQ.	The Resilient SRQ communications team contacted the radio station for potential future partnerships.
No New Development Projects	4	Comments received regarding new development expressed concern regarding building practices and indicated a desire for funds to be focused on infrastructure and land preservation rather than housing.	The County received and reviewed comments recommending that funds be used on infrastructure rather than housing. Based upon data analysis, there is a strong need for both housing and infrastructure/public facilities programs, especially in areas that were most impacted from Hurricane Ian. The County will consider infrastructure and housing projects that best meet the unmet needs of Sarasota County following Hurricane Ian.
Urgent Housing Assistance Needed	4	Comments received by community members who needed immediate housing assistance for their damaged properties.	Comments received helped further justify the substantial need for these projects and indicated that residents seem willing to participate in these programs. Additional resources were provided to those who expressed urgent need. No further actions were taken.

Appendix D. Data Sources and Methodologies

Methods for Estimating Serious Unmet Needs for Housing

HUD utilizes SBA data to determine the average repair costs. Average repair costs in this document were taken from over \$13 billion in HUD funded housing projects and taking that average.

Table 5-1. HUD Funded Housing Projects

Grantee	Event	Grants Awarded to Homeowners	Total Amount of Award	Average CDBG DR award amount
Louisiana	2016 Floods	17,264	\$668,656,371	\$38,731
New York	Hurricane Sandy	12,759	\$2,255,083,398	\$176,745
Louisiana	Katrina	130,053	\$9,030,446,583	\$69,437
New Jersey	Superstorm Sandy	7,100	\$950,000,000	\$133,803
Harris County	Hurricane Harvey	143	\$25,660,105	\$179,441
South Carolina	Hurricane Matthew	1,136	\$83,097,708	\$73,149
North Carolina	Hurricane Matthew	758	\$137,496,510	\$181,394
West Virginia	2016 Floods	265	\$54,602,919	\$206,049
Chicago	2013 Floods	51	\$3,600,438	\$70,597
City of Galveston	2008 Hurricane Ike	663	\$96,881,815	\$146,126
TOTAL		170,192	\$13,305,525,847	\$78,180

Each of the FEMA inspected owner units are categorized into one of five categories:

- Minor-Low: Less than \$3,000 of FEMA inspected real property damage.
- Minor-High: \$3,000 to \$7,999 of FEMA inspected real property damage.
- Major-Low: \$8,000 to \$14,999 of FEMA inspected real property damage.
- Major-High: \$15,000 to \$28,000 of FEMA inspected real property damage.
- Severe: Greater than \$28,000 of FEMA inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

FEMA does not inspect rental units for real property damage so personal property damage is used as a proxy for unit damage. Each of the FEMA-inspected renter units are categorized into one of five categories:

- Minor-Low: Less than \$1,000 of FEMA inspected personal property damage.
- Minor-High: \$1,000 to \$1,999 of FEMA inspected personal property damage.
- Major-Low: \$2,000 to \$3,499 of FEMA inspected personal property damage.
- Major-High: \$3,500 to \$7,500 of FEMA inspected personal property damage.
- Severe: Greater than \$7,500 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor or determination of “Destroyed” by the FEMA inspector.

Data sources

- U.S. Department of Commerce. "Hurricane Ian: September 30, 2022." April 7, 2023. National Weather Service. Accessed July 18, 2023. <https://www.ncei.noaa.gov/access/monitoring/monthly-report/national/202209/supplemental/page-5>.
- OpenFEMA. "Data Sets: Individual Assistance Applicant Data." Last modified 2023. FEMA.gov. Accessed May 15, 2023. <https://www.fema.gov/about/openfema/data-sets/>
- Small Business Administration. "SBA Disaster Assistance Applicant Data." Last modified 2023. SBA Open Data. Accessed June 13, 2023. <https://data.sba.gov/>
- National Hurricane Center. "Tropical Cyclone Report, Hurricane Ian." Last modified April 2023. National Oceanic and Atmospheric Administration. Accessed July 13, 2023. https://www.nhc.noaa.gov/data/tcr/AL092022_Ian.pdf.
- OpenFEMA. "Data Sets: Individual Assistance Applicant Data." Last modified 2023. FEMA.gov. Accessed May 15, 2023. <https://www.fema.gov/about/openfema/data-sets/>.
- U.S. Small Business Administration. "SBA Disaster Assistance Applicant Data." Last modified 2023. SBA Open Data. Accessed June 13, 2023. <https://data.sba.gov/>.
- United Way. "Eviction Mitigation Program – State of the Housing Crisis Dashboard." Accessed July 13, 2023. <https://unitedwaysuncoast.org/eviction-mitigation/>.
- Assisted Housing Inventory. Florida Housing Data Clearinghouse. Retrieved from: <http://flhousingdata.shimberg.ufl.edu/assisted-housing-inventory/results?nid=5800> on 6/30/2023.
- Sarasota Housing Authority. "Damage to Facilities, Public Housing and Affordable Housing Units, and Section 8 Units." Last modified June 27, 2023.
- 2021 ACS Five-Year Demographic and Housing Estimates. United States Census Bureau. <https://data.census.gov/table?q=deomgraphics+in+Sarasota+County,+Florida&tid=ACSDP5Y2021.DP05>
- 2021 ACS Five-Year Income in the Past 12 Months (in 2021 Inflation-Adjusted Dollars) in Sarasota County, Florida. United States Census Bureau. <https://data.census.gov/table?q=Income+in+Sarasota+County,+Florida&tid=ACSST5Y2021.S1901&moe=false>.
- 2021 ACS Five-Year Per Capita Income in Sarasota County, Florida. United States Census Bureau. <https://data.census.gov/table?q=per+capita+income+in+Sarasota+County,+Florida&tid=ACSST5Y2021.B19301&moe=false>.
- 2021 ACS Five-Year Income in the Past 12 Months (in 2021 Inflation-Adjusted Dollars) in Florida. United States Census Bureau. <https://data.census.gov/table?q=Income+in+Sarasota+County,+Florida&tid=ACSST5Y2021.S1901&moe=false>.
- 2021 ACS Five-Year Per Capita Income in Florida. United States Census Bureau. <https://data.census.gov/table?q=per+capita+income+in+Florida&tid=ACSST5Y2021.B19301>.
- 2021 ACS Five-Year Poverty Status in the Past 12 Months in Florida. United States Census Bureau. <https://data.census.gov/table?q=Poverty+in+Florida&tid=ACSST5Y2021.S1701>.
- 2021 ACS Five-Year Poverty Status in the Past 12 Months in Sarasota County, Florida. United States Census Bureau. <https://data.census.gov/table?q=poverty+in+Sarasota+County,+Florida&tid=ACSST5Y2021.S1701&moe=false>.
- ACS 2011-2015 Low-Mod All Mod All Local Governments. LMISD by Local Governments, Based on 2011-2015 ACS - HUD Exchange.
- 2021 ACS Five-Year Selected Housing Characteristics in Sarasota County, Florida. United States Census Bureau. DP04: SELECTED HOUSING CHARACTERISTICS - Census Bureau Table.
- 2021 ACS 5-Year Language Spoken at Home. in Sarasota County, Florida. United States Census Bureau. <https://data.census.gov/table?q=Sarasota+County,+Florida+Languages+Spoken&tid=ACSST5Y2021.S1601&moe=false>.
- "ACS 5-Year Estimates Details Tables C16001 Languages Spoken at Home For the Population 5 Years and Over." Accessed July 14, 2023. <https://api.census.gov/data/2021/acs/acs5>.

- HUD 2022 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations
- Suncoast Partnership Continuum of Care 2023 Point-in-Time Summary Detail Report. <https://www.suncoastpartnership.org/point-in-time>.
- Data provided by SHA
- Design and engineering estimates from the respective administering agencies.
- "Bureau of Labor Statistics Data." Accessed on July 19,2023. https://www.bls.gov/eag/eag.fl_sarasota_msa.htm.
- "Sarasota County Flood Zone Locator GIS Interactive Map." Accessed July 11, 2023. <https://ags3.scgov.net/sarcoflood/>.
- RLAA - Repetitive Loss Area Analysis." Sarasota County Government. Accessed July 20, 2023. <https://www.scgov.net/government/public-works/flood-protection/rlaa>.

Appendix E. Important Definitions and Terms

Acronyms and Abbreviations

ADA: Americans with Disabilities Act

AMI: Area Medium Income

CDBG: Community Development Block Grant

CDBG-DR: Community Development Block Grant - Disaster Recovery

CFR: Code of Federal Regulations

CoC: Continuum of Care

DOB: Duplication of Benefits

DR: Disaster Recovery

DRGR: Disaster Recovery and Grant Reporting System

EPA: Environmental Protection Agency

FBC: Florida Building Code

FDEM: Florida Division of Emergency Management

FEMA: Federal Emergency Management Agency

FEMP: Federal Emergency Management Program

GIS: Geographic Information Systems

HCDA: Housing and Community Development Act of 1974, as amended

HMGP: Hazard Mitigation Grant Program

HUD: The United States Department of Housing and Urban Development IA: (Federal Emergency Management Agency) Individual Assistance

LAP: Language Access and Accessibility Plan

LEP: Limited English Proficiency

LIHTC: Low-Income Housing Tax Credit

LMI: Low and Moderate-Income

LTRG: Long Term Recovery Group

MHU: Manufactured Housing Unit

MID: Most Impacted and Distressed Area

MIT: Mitigation

NFIP: National Flood Insurance Program **NGO:** Non-governmental organizations **NWS:** National Weather Service

PA: (Federal Emergency Management Agency) Public Assistance

RARAP: Residential Anti-displacement and Relocation Assistance Plan

RFP: Request for Proposal

SBA: United States Small Business Administration

URA: Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended

USACE: U.S. Army Corps of Engineers

Definitions

Acquisition – The acquiring of real property, in whole or in part, by the recipient, or other public or private nonprofit entity through purchase, long-term lease, donation, or otherwise for any public purpose, subject to the limitation of 24 CFR 570.207. Real property includes air rights, water rights, rights-of-way, easements, and other interests therein (24 CFR 570.201).

Allocable Costs – Costs assigned to a Community Development Block Grant-Disaster Recovery eligible activity with a methodology for clear determination of where to attribute costs.

Allowable Costs – Costs deemed allowable under the Community Development Block Grant-Disaster Recovery rules and regulations and 2 CFR 200 Subpart E.

Americans with Disabilities Act (ADA) – Effective July 20, 1990, a federal law which prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, state and local government services, public accommodations, commercial facilities, and transportation. It also mandates the establishment of TDD/telephone relay services.

Area Median Income (AMI) – The median household income for an area adjusted for household size as published and annually updated by the U.S. Department of Housing and Urban Development. Once household income is determined, it is compared to the U.S. Department of Housing and Urban Development's income limit for that household size.

Appraisal – A written statement independently and impartially prepared by a qualified appraiser setting forth an opinion of defined value of an adequately described property as of a specific date, supported by the presentation and analysis of relevant market information.

Bid – An offer by a company, firm, or individual to provide goods or services, in response to solicitation for those goods or services.

Buyout – The acquisition of a property located in a floodway, floodplain, or other Disaster Risk Reduction Area with the intention of reducing risk from future hazards.

Community Development Block Grant (CDBG) – Supports community development activities to build stronger and more resilient communities. To support community development, activities are identified through an ongoing process. Activities may address needs such as infrastructure, economic development projects, public facilities installation, community centers, housing rehabilitation, public services, clearance/acquisition, microenterprise assistance, code enforcement, homeowner assistance, etc.

Community Development Block Grant-Disaster Recovery (CDBG-DR) – The Community Development Block Grant Disaster Recovery Program, administered by the U.S. Department of Housing and Urban Development, as authorized under Title I of the Housing and Community Development Act of 1974, as amended. These funds are provided as a last resort to help cities, counties, and states to recover from Presidentially declared disasters.

Consolidated Notice – The U.S. Department of Housing and Urban Development's Community Development Block Grant-Disaster Recovery Consolidated Notice, Appendix B of Federal Register Vol. 88, No. 96. The Consolidated Notice governs all Office of Long-Term Resiliency Community Development Block Grant-Disaster Recovery grants beginning with 2020 disasters and includes amended requirements from previous Federal Register Notices and Community Planning and Development Notices that have regulated Community Development Block Grant-Disaster Recovery funds in the past. The Consolidated Notice includes waivers and alternative

requirements, relevant regulatory requirements, the grant award process, criteria for action plan approval, and eligible disaster recovery activities.

Cost Reimbursement – Payment made to the subgrantee and/or subrecipient after a request for funds has been submitted along with proper supporting documentation and has been approved by Sarasota County. In Community Development Block Grant-Disaster Recovery grant agreements, the subgrantees and/or subrecipients are required to pay in advance for all completed work that is associated with the deliverables set forth in the subrecipient agreement and is reimbursed based on the invoice and supporting documentation submitted to the Sarasota County.

Davis-Bacon and Related Acts (DBRA) – Federal law requiring contractors and subcontractors performing on federally funded or assisted contracts for the construction, alteration, or repair of public buildings or public works to pay their laborers and mechanics employed under the contract no less than the locally prevailing wages and fringe benefits for corresponding work on similar projects in the area.

Decent, Safe, and Sanitary (DSS) – A dwelling which meets local housing and occupancy codes. Any of the standards outlined in 49 CFR 24.2(a)(8) which are not met by the local code shall apply unless waived for good cause by the Federal Agency funding the project.

Direct Cost – Any project cost or project delivery cost that is identified specifically with completing an activity or product such as materials and labor. Costs identified specifically within a contract are direct costs of that contract. Administrative expenses are not generally considered direct costs.

Disability – Federal nondiscrimination laws define a person with a disability to include any (1) individual with a physical or mental impairment that substantially limits one or more major life activities; (2) individual with a record of such impairment; or (3) individual who is regarded as having such an impairment consistent with federal law under The Social Security Act, as amended, 42 U.S.C. §423(d), The Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §12102(1) -(3), and in accordance with the U.S. Department of Housing and Urban Development regulations at 24 CFR 5.403 and 891.505.

Disaster Recovery Grant Reporting (DRGR) System – The U.S Department of Housing and Urban Development’s web-based reporting and grants management system.

Duplication of Benefits (DOB) – When a person, household, business, government, or other entity receives financial assistance from multiple sources for the same purpose within the same time period, and the total assistance received for that purpose is more than the total need for assistance.

Federal Register (FR) – 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 document, the grantee is Sarasota County, Florida as recipient of Community Development Block Grant-Disaster Recovery funds from the U.S. Department of Housing and Urban Development.

Green Building Standards – All rehabilitation that meets the definition of substantial improvement, reconstruction, or new construction must meet an industry-recognized standard that has achieved certification under at least one of the following programs: (1) ENERGY STAR (Certified Homes or Multifamily High-Rise), (2) EPA Indoor Air Plus (Energy Star a prerequisite),

(3) LEED (New Construction, Homes, Midrise, Existing Buildings Operations, and Maintenance, or Neighborhood Development), or (4) ICC–700 National Green Building Standard.

Household – All persons occupying the same housing unit, regardless of their relationship to each other. The occupants could consist of a single family, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Increased Cost of Compliance (ICC) – Structures damaged by floods may be required to meet certain building requirements, such as elevation or demolition, to reduce the risk of future flood damage before the structure can be repaired or rebuilt. To help cover these costs, the National Flood Insurance Program includes Increased Cost of Compliance coverage for all new and renewed Standard Flood Insurance Policies. Increased Cost of Compliance is a potential source of a Duplication of Benefit, as a supplement to an existing National Flood Insurance Program policy. Policyholders are only eligible to receive Increased Cost of Compliance payment if a Substantial Damage Letter has been issued by the local floodplain manager.

Income – Annual income as reported under the United States Census long-form for the most recent available decennial U.S. Census. This definition includes:

- Wages, salaries, tips, commissions, etc.;
- Self-employment income from own nonfarm business, including proprietorships and partnerships;
- Farm self-employment income;
- Interest, dividends, net rental income, or income from estates or trusts;
- Social Security or railroad retirement;
- Supplemental Security Income, Aid to Families with Dependent Children, or other public assistance or public welfare programs;
- Retirement, survivor, or disability pensions; and
- Any other sources of income received regularly, including Veterans' (VA) payments, unemployment compensation, and alimony.

Indirect Cost – Any expense not directly identified with a cost objective, such as a specific project, facility, or function. Indirect costs include administration, personnel, and security costs.

Low Moderate Area Benefit (LMA) – An eligible activity that benefits all residents in a particular area, where at least 51 percent of the residents are Low-to-Moderate Income Persons as determined by the most recently available decennial Census information, together with the Section 8 income limits that would have applied at the time the income information was collected by the Census Bureau, or a current survey of the residents of the service area.

Low Moderate Housing (LMH) – Eligible activities that are undertaken for the purpose of providing or improving permanent residential structures which, upon completion, will be occupied by LMI households. To be eligible, structures with one unit must be occupied by a Low-to-Moderate Income Household, with two units, at least one unit must be Low-to-Moderate Income occupied, and structures with three or more units must have at least 51 percent occupied by Low-to-Moderate Income Households.

Low-to-Moderate Income (LMI) Household – A household whose annual income does not exceed 80 percent of the median income for the area as most recently determined by the Department of Urban and Housing Development.

- LMI 30 refers to those individuals/families making less than 30 percent of the Area Median Income.

Project Delivery Cost – Costs used specifically to meet the requirements to complete a particular project, especially as it applies to meeting Community Development Block Grant requirements.

Project/Program/Activity – The housing, infrastructure, economic development, or planning endeavor undertaken by Sarasota County, the subgrantee and/or subrecipient using Community Development Block Grant-Disaster Recovery funds.

Public Housing Authority (PHA) – state, county, municipality or other governmental entity or public body or agency or instrumentality of these entities that is authorized to engage or assist in the development or operation of low-income housing under the United States Housing Act of 1937 in accordance with 24 CFR 5.100.

Quarterly Performance Report (QPR) – The Community Development Block Grant-Disaster Recovery Quarterly Performance Report that is required to be uploaded quarterly in the Disaster Recovery Grant Reporting system for the U.S. Department of Housing and Urban Development's review of Sarasota County's disaster recovery programs.

Reasonable Costs – Costs that do not exceed what a prudent person would incur under similar circumstances, as demonstrated by the market price for comparable goods and services. For contracted work, the Responsible Entity should conduct an independent cost estimate to establish cost reasonableness as outlined in 2 CFR Part 200.

Subsidized Loans – Loans, including forgivable loans, other than private loans. Both Small Business Administration and Federal Emergency Management Agency provide subsidized loans for disaster recovery.

Section 3 – Section 3 of the Housing and Urban Development Act of 1968, as amended, and the implementing regulations at 24 CFR Part 135 and 24 CFR Part 75, as applicable, relating to employment and other economic opportunities for low and very low-income persons.

Section 3 Business or Business Concern – As related to Section 3 of the of the Housing and Urban Development Act of 1968, as amended:

- Is at least 51 percent owned and controlled by low or very low-income persons;
- Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Section 3 Workers; or
- A business at least 51 percent owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.

Section 3 Covered Contracts – A contract or subcontract (including a professional service contract) awarded by a recipient or contractor for work generated by the expenditure of Section 3 covered assistance, or for work arising in connection with a Section 3 covered project.

Section 3 Covered Non-Construction Project – A project associated with a Section 3 Covered Project such as maintenance contracts, re-painting, routine maintenance, HVAC servicing, and professional services (architectural, engineering, legal, accounting, marketing, etc.).

Section 3 Covered Project – The construction, reconstruction, conversion, or rehabilitation of housing (including reduction and abatement of lead-based paint hazards), other public construction such as roads, sewers and community centers, and buildings or improvements (regardless of ownership) assisted with housing or community development assistance.

Section 3 Workers – A worker whose income for the previous or annualized calendar year is below 80 percent of the area median income for the area in which the worker resides, is employed by a Section 3 business concern, or the worker is a YouthBuild participant.

Service Area – The total geographic area to be directly or indirectly served by a subgrant project that addresses the Low-to-Moderate Income National Objective, in which at least 48.33 percent of the residents are low-to-moderate income persons. A service area must include all, and only those, beneficiaries who are reasonably served or would be reasonably served by the activity.

Solicitation – Any request to submit offers or quotations to the local government. Solicitations under sealed bid procedures are called “invitations for bids”. Solicitations under negotiated procedures are called “requests for proposals.” Solicitations under simplified acquisition procedures may require submission of either a quotation or an offer.

Special Flood Hazard Area (SFHA) – Areas where the National Flood Insurance Program’s (NFIP’s) floodplain management regulations must be enforced, and the mandatory purchase of flood insurance applies.

Subcontract – A contract entered into by a subcontractor to furnish supplies or services for performance of a prime contract, or another subcontract. It includes, but is not limited to, purchase orders, and changes and modifications to purchase orders.

Subcontractor – Any supplier, distributor, vendor, or firm that furnishes supplies or services to or for a subrecipient. As related to Section 3 of the of the Housing and Urban Development Act of 1968, as amended, any entity (other than a person who is an employee of the contractor) which has a contract with a contractor to undertake a portion of the contractor’s obligation for the performance of work generated by the expenditure of Section 3 covered assistance or arising in connection with a Section 3 covered project.

Subgrantee – A recipient that demonstrated its abilities to carry out competitive applications due to their expertise related to goals of the program.

Subrecipient – A competitively-selected recipient, usually a local government, that is provided Community Development Block Grant-Disaster Recovery funds from Sarasota County to agreed-upon eligible disaster recovery activities documented in a Subrecipient Agreement.

Subrecipient Agreement – An agreement between the Sarasota County and the subrecipient for the subrecipient to undertake activities using Community Development Block Grant- Disaster Recovery funds.

Uniform Relocation Assistance and Real Property Acquisition Act (URA) of 1970, as amended – 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. The URA's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects pursuant to 49 CFR Part 24 and applicable waivers provided in the U.S. Department of Housing and Urban Development’s Community Development Block Grant-Disaster Recovery Consolidated Notice, Appendix B of Federal Register Vol. 87, No. 23.

Urgent Need (UN) – A recent need that poses a serious and immediate threat to the health or welfare of the community.

Very Low-Income (VU) Household/Family – A household whose annual income does not exceed 30 percent of the median income for the area as most recently determined by the Department of Housing and Urban Development.

Very Low-Income (VU) Person or Individual – A person whose annual income does not exceed 30 percent of the median income for the area as most recently determined by the Department of Housing and Urban Development.

Waiver – A revision to the standard Community Development Block Grant-Disaster Recovery regulations, requirements, and activities, granted by the U.S. Department of Housing and Urban Development.

YouthBuild – A national organization administered by the U.S. Department of Labor with a community- based pre-apprenticeship program that provides job training and educational opportunities for at-risk youth ages 16 to 24 who have previously dropped out of high school.

Appendix F. Standard Form 424

Sarasota County will submit Standard Form 424 with this Action Plan to HUD.

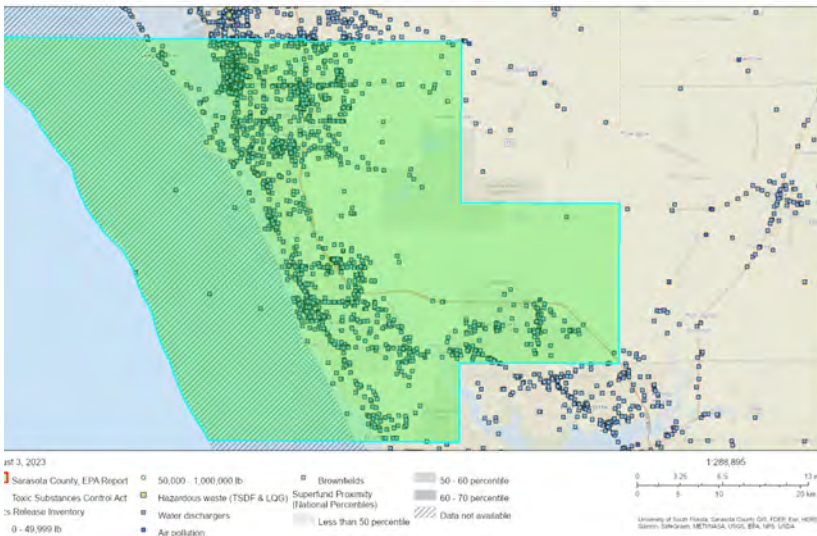
Appendix G. EJScreen Community Report

EJScreen Community Report

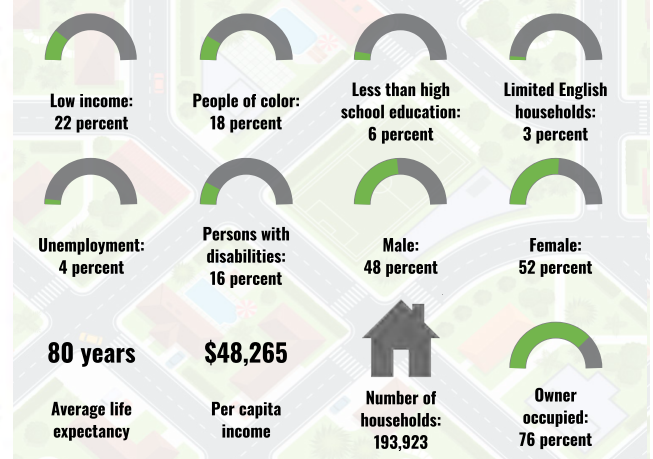
This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

Sarasota County, FL

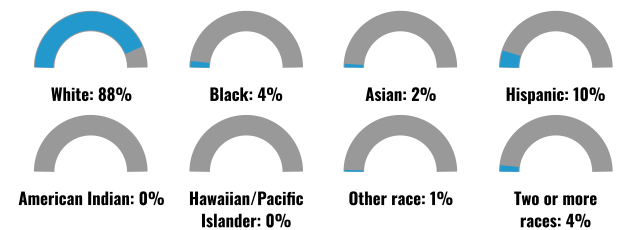
County: Sarasota
 Population: 429,336
 Area in square miles: 975.55



COMMUNITY INFORMATION



BREAKDOWN BY RACE



BREAKDOWN BY AGE



LIMITED ENGLISH SPEAKING BREAKDOWN



LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	87%
Spanish	7%
French, Haitian, or Cajun	1%
German or other West Germanic	1%
Russian, Polish, or Other Slavic	1%
Other Indo-European	1%
Total Non-English	13%

Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

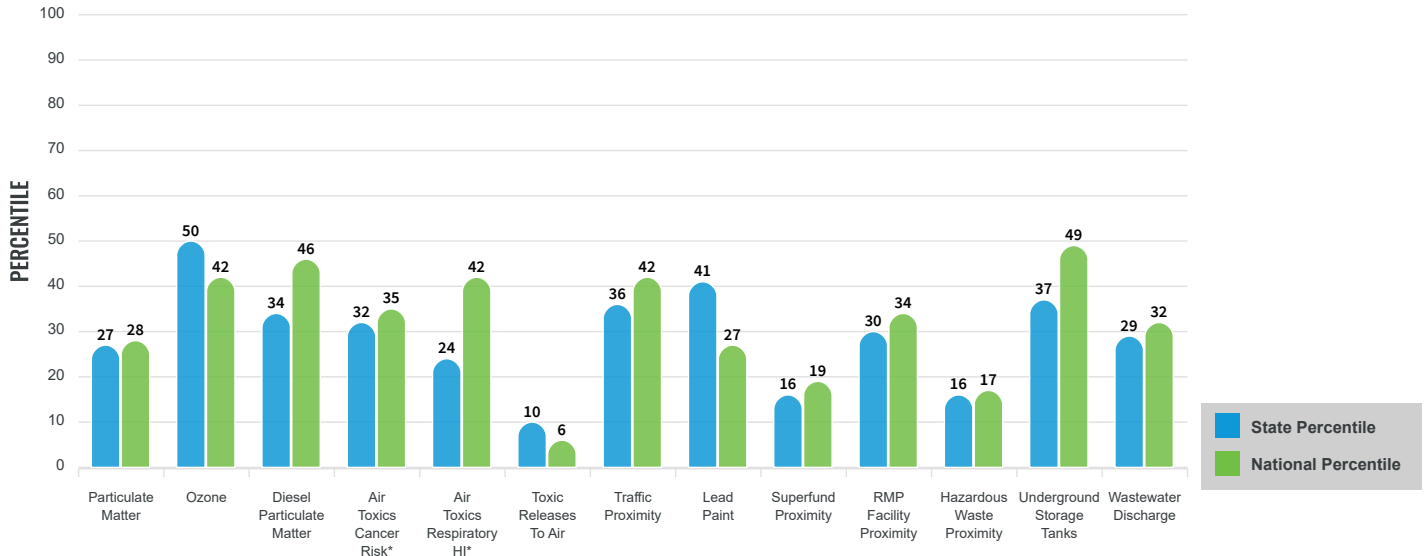
Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

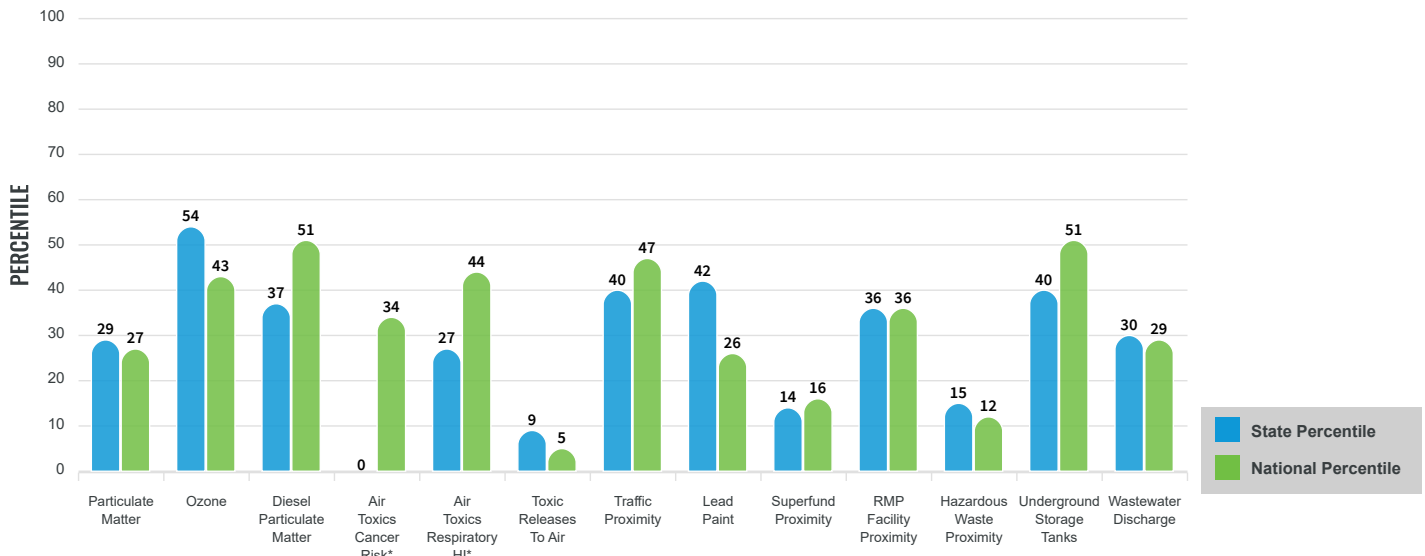
EJ INDEXES FOR THE SELECTED LOCATION



SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for County: Sarasota

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter ($\mu\text{g}/\text{m}^3$)	7.27	7.52	30	8.08	26
Ozone (ppb)	60.4	59.4	61	61.6	44
Diesel Particulate Matter ($\mu\text{g}/\text{m}^3$)	0.218	0.293	34	0.261	50
Air Toxics Cancer Risk* (lifetime risk per million)	22	27	0	28	3
Air Toxics Respiratory HI*	0.29	0.32	1	0.31	4
Toxic Releases to Air	2.8	1,900	12	4,600	6
Traffic Proximity (daily traffic count/distance to road)	87	160	49	210	53
Lead Paint (% Pre-1960 Housing)	0.086	0.14	62	0.3	33
Superfund Proximity (site count/km distance)	0.02	0.13	15	0.13	18
RMP Facility Proximity (facility count/km distance)	0.15	0.31	53	0.43	46
Hazardous Waste Proximity (facility count/km distance)	0.06	0.52	11	1.9	11
Underground Storage Tanks (count/km ²)	3.6	7	54	3.9	70
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.079	0.52	82	22	81
SOCIOECONOMIC INDICATORS					
Demographic Index	20%	39%	24	35%	32
Supplemental Demographic Index	10%	15%	31	14%	36
People of Color	18%	45%	26	39%	35
Low Income	22%	33%	36	31%	41
Unemployment Rate	4%	5%	49	6%	47
Limited English Speaking Households	3%	7%	54	5%	67
Less Than High School Education	6%	11%	42	12%	42
Under Age 5	3%	5%	45	6%	36
Over Age 64	36%	23%	83	17%	94
Low Life Expectancy	16%	19%	17	20%	16

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

Sites reporting to EPA within defined area:

Superfund	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities	0
Water Dischargers	2216
Air Pollution	100
Brownfields	11
Toxic Release Inventory	33

Other community features within defined area:

Schools	62
Hospitals	8
Places of Worship	25

Other environmental data:

Air Non-attainment	No
Impaired Waters	Yes

Selected location contains American Indian Reservation Lands*	No
Selected location contains a "Justice40 (CEJST)" disadvantaged community	Yes
Selected location contains an EPA IRA disadvantaged community	Yes

Report for County: Sarasota

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	16%	19%	17	20%	16
Heart Disease	8.7	7.2	75	6.1	90
Asthma	7.9	8.7	24	10	5
Cancer	9.9	6.9	86	6.1	97
Persons with Disabilities	15.2%	13.9%	62	13.4%	66

CLIMATE INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	28%	26%	71	12%	90
Wildfire Risk	33%	32%	64	14%	84

CRITICAL SERVICE GAPS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	11%	13%	53	14%	51
Lack of Health Insurance	11%	13%	46	9%	70
Housing Burden	Yes	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	Yes	N/A	N/A	N/A	N/A

Footnotes

Report for County: Sarasota