

ORANGE COUNTY

Community Development Block Grant –

DISASTER RECOVERY

EXECUTIVE SUMMARY

FOR HURRICANE MILTON



COMMUNITY
DEVELOPMENT
BLOCK GRANT

**DISASTER
RECOVERY**



EXECUTIVE SUMMARY

Introduction

In October 2024, Hurricane Milton struck Central Florida with destructive force, leaving a trail of damage across Orange County and prompting a federal disaster declaration (DR-4834-FL). As a result of the widespread devastation—including housing loss, infrastructure damage, and economic disruption—Orange County was awarded \$33,357,000 in Community Development Block Grant–Disaster Recovery (CDBG-DR) funding from the U.S. Department of Housing and Urban Development (HUD). This allocation was made available through the American Relief Act of 2025 and is intended to support long-term recovery in communities that were most severely impacted and that face the greatest challenges to full recovery without additional assistance. This Action Plan outlines the County’s strategy for deploying these funds to address urgent unmet needs, promote an efficient recovery, and invest in community resilience.

Hurricane Milton followed a path similar to Hurricane Ian (2022), compounding existing vulnerabilities in housing, infrastructure, the economy and public services. With wind gusts reaching up to 87 mph and more than 10 inches of rainfall in some areas, the storm caused significant flooding, damage to thousands of homes, widespread power outages, and disruption to businesses and essential services. The County’s unmet needs assessment—based on Federal Emergency Management Agency (FEMA) and Small Business Administration (SBA) data, and local stakeholder input—identified over \$279 million in damages. After accounting for other funding sources, the total unmet recovery need remains at approximately \$196 million, the majority of which is concentrated in housing (77%), followed by economic recovery (19%), and infrastructure (4%). This assessment reflects both the severity of the disaster and the pre-existing affordability challenges faced by many Orange County residents, especially those in low- to moderate-income (LMI) households, who comprise nearly half the County’s population.

To address these needs, Orange County will invest in a range of targeted recovery programs designed to repair and replace damaged housing, restore essential public infrastructure, and assist small businesses. The Action Plan prioritizes housing recovery through three core programs: Homeowner Rehabilitation, Rental Housing Rehabilitation, and New Affordable Housing Construction. These programs respond to both disaster-related damages and affordable housing challenges—including a shortfall in affordable rental units and high rates of cost burden among low-income renters and homeowners. Infrastructure funds will help address remaining gaps in utility systems, and public facilities in disaster-impacted areas. Economic revitalization funds will support small businesses that suffered property loss or operational disruption, with particular attention to those denied or unable to access SBA loans. These programs also incorporate workforce stabilization measures to prevent job loss and strengthen the local economy through the provision of public services.

In accordance with HUD’s requirements, 100% of the CDBG-DR allocation will be used within the HUD-designated Most Impacted and Distressed (MID) areas—which include all of Orange County and its municipalities—and a minimum of 70% of funds will benefit LMI individuals and households. The County also commits to using at least 15% of the total allocation on mitigation activities, as required by HUD, that reduce future risks and build long-term resilience. Mitigation needs were assessed using both the Florida State Hazard Mitigation Plan (SHMP) and Orange County’s Local



Mitigation Strategy (LMS), which identify high-risk hazards such as hurricanes, flooding, sinkholes, and tornadoes. By incorporating mitigation into housing and infrastructure recovery programs, the County aims to not only recover but to emerge stronger and more resilient.

The development of this Action Plan was guided by meaningful community engagement, including public meetings, consultation with local jurisdictions, nonprofits, housing authorities, and tribal entities, and the collection of public comments. Orange County remains committed to transparency, efficiency, and accountability throughout the implementation of its CDBG-DR programs. This Action Plan provides a clear and forward-thinking roadmap for recovery—one that addresses the deepest impacts of Hurricane Milton, addressing unmet needs, and positions Orange County for a more resilient future.

Disaster-Specific Overview

In October of 2024, ([Hurricane Milton \(DR-4834-FL\)](#)) hit Orange County and led to presidential disaster declarations and the availability of FEMA Public Assistance and Individual Assistance in Orange County. At its strongest, only 24 hours after becoming a tropical storm, Milton was a Category 5 storm with winds up to 180 mph, extraordinarily low barometric pressure, and a ‘pinhole’ eye. This made Milton the fifth-strongest Atlantic hurricane before it made landfall as a Category 3 major hurricane near Siesta Key, FL, on October 9, 2024. Two years prior, the more destructive Hurricane Ian followed a similar path through Orange County. The President declared a major disaster for the State of Florida on October 11, 2024 as a result of Hurricane Milton, pursuant to his authority under the Stafford Act.

Though the most significant impacts were felt in west and southwest Orange County, the storm incurred substantial impacts throughout the county, with powerful winds, heavy rainfall, causing widespread power outages. The hurricane produced wind gusts reaching up to 87 mph in the County, causing damage to homes, businesses, and infrastructure, and downing trees and power lines. Additionally, parts of the County received more than 10 inches of rain, resulting in localized flooding and rises on areas rivers and creeks. Hurricane Milton's severity prompted more than 42 tornado warnings across Central Florida and knocked out power for more than 170,000 Duke and OUC customers.



Figure 1. Flooded Boathouses in Windermere Partially Submerged After Milton. Photo credit: West Orange Times Observer.

Overall, Hurricane Milton resulted in substantial damage with 35 fatalities reported throughout the state. It caused infrastructure damage and devastating flooding across numerous Florida counties, exacerbating the previously damaging effects of Ian and other storms. These storms led to evacuations, rescue operations, and ongoing recovery efforts across the affected region.

Most Impacted and Distressed (MID) Areas

Orange County and all the municipalities are the Most Impact and Distressed (MID) area. In the CDBG-DR Action Plan required by HUD, grantees must describe unmet needs in the HUD identified Most Impacted and Distressed (MID) areas; the allocations of funds are based on the unmet needs of these specific communities, which HUD has identified as the least likely to fully recover without additional assistance. Grantees are required to use at least 80% of the CDBG-DR award to benefit the HUD-identified MID areas, which is easily accomplished since the entire County is the MID area. In other disaster events, the MID area can be within a geographic area of the jurisdiction. Local government grantees whose HUD-identified MID areas include their entire jurisdiction must use 100% of the CDBG-DR award to benefit the HUD-identified MID area. Written descriptions of those needs and the use of maps are impactful ways to illustrate the recovery needs of the county to the public.

The Action Plan must also identify the use of all CDBG-DR funds – including criteria for eligibility and how users address long-term recovery needs, restoration of infrastructure and housing, economic revitalization, and mitigation in the MID areas.

Grantee-identified MID Areas

As required by the Federal Register notice, Orange County will spend 100% of its allocation in the HUD identified MID areas, which includes all of Orange County and its municipalities. Additionally, no less than 70% of the total allocation will be expended to benefit Low- to Moderate-income (LMI) persons. All proposed CDBG-DR programs will include some disaster recovery related mitigation initiatives, as well as allowing for stand-alone mitigation activities to ensure that Orange County complies with the 15% mitigation expenditure requirement established by Congress for these funds.

The following map and tables show the distribution of Low to Moderate Income populations across Orange County and in comparison to the state. The first table presents data on low to moderate income (LMI) individuals in Florida, using Area Median Income (AMI) thresholds.

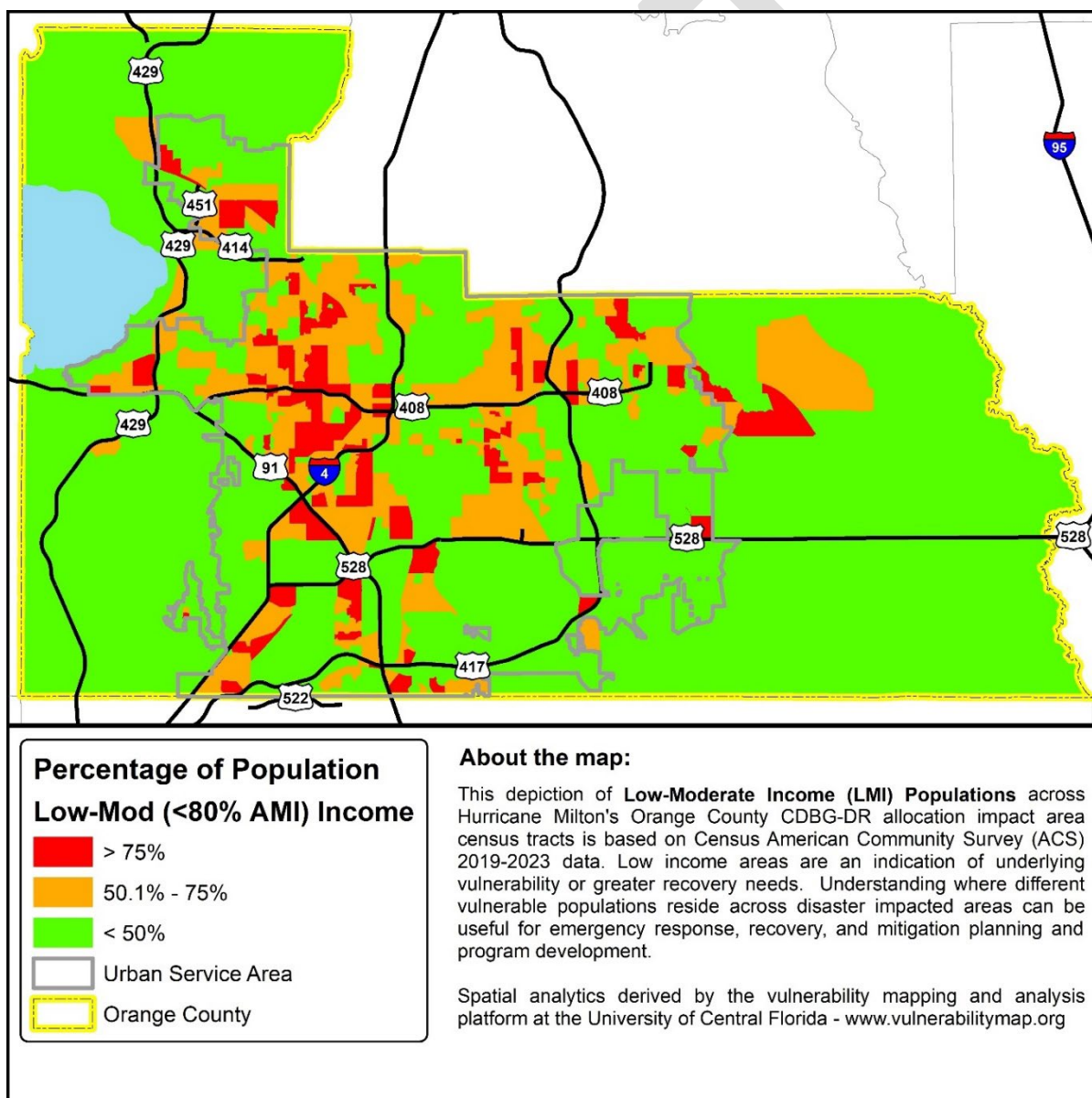




Figure 2. Low to Moderate Populations in Orange County. Map Credit: University of Central Florida.

Category	Total Persons	Total Population	Percent LMI
Low (<50% AMI)	5,423,482	20,784,704	26%
Low Mod (80% AMI)	9,330,950	20,784,704	45%
LMMI (< 120% AMI)	13,381,125	20,784,704	64%

Table 1: Low to Moderate Income Persons for Florida. Data Source: US Census, ACS 2019-2023.

County	MID-Total Population	MID-Total LMI Persons	MID% LMI
Orange	1,342,545	629,355	47%

Table 2. Declared Area Low to Moderate Income Persons. Data Source: US Census, ACS 2019-2023.

Out of Florida’s total population of 20,784,704, approximately 26% (5.42 million people) fall below 50% of AMI, classifying them as low income. Expanding the threshold to include those below 80% of AMI raises the LMI population to 45% (9.33 million people), and further expanding the threshold to include those under 120% of AMI – classified as low-moderate-middle income (LMMI) – raises the population to 64% (13.38 million people) of the state.

The second table focuses on Orange County, one of the HUD-designated Most Impacted and Distressed (MID) areas. Out of a total MID population of 1,342,545, approximately 629,355 residents are considered LMI, representing 47% of the county’s population. This indicates that nearly half of Orange County’s population may qualify for programs or resources targeting LMI households, highlighting a significant area of need within the disaster recovery context.

Overview of the Impacts of the Qualifying Disaster

The qualifying disaster, Hurricane Milton (DR-4834-FL), caused widespread devastation in Orange County, affecting residential areas with severe flooding, structural damage to homes, and significant infrastructure disruption, leaving a lasting impact on the community. The most pressing current unmet needs are long-term housing repairs, critical infrastructure restoration, and economic revitalization, particularly in the hardest-hit neighborhoods around west and southwest Orange County. Much of the observed impacts exacerbated impacts from previous storms, including Hurricane Ian. With an estimated \$243,520,269 in damages overall, hundreds of homes in Orange County sustained damage such as roof breaches, flood intrusion and compromised walls, rendering many housing units uninhabitable due to heavy rainfall, flooding, and hurricane force winds.

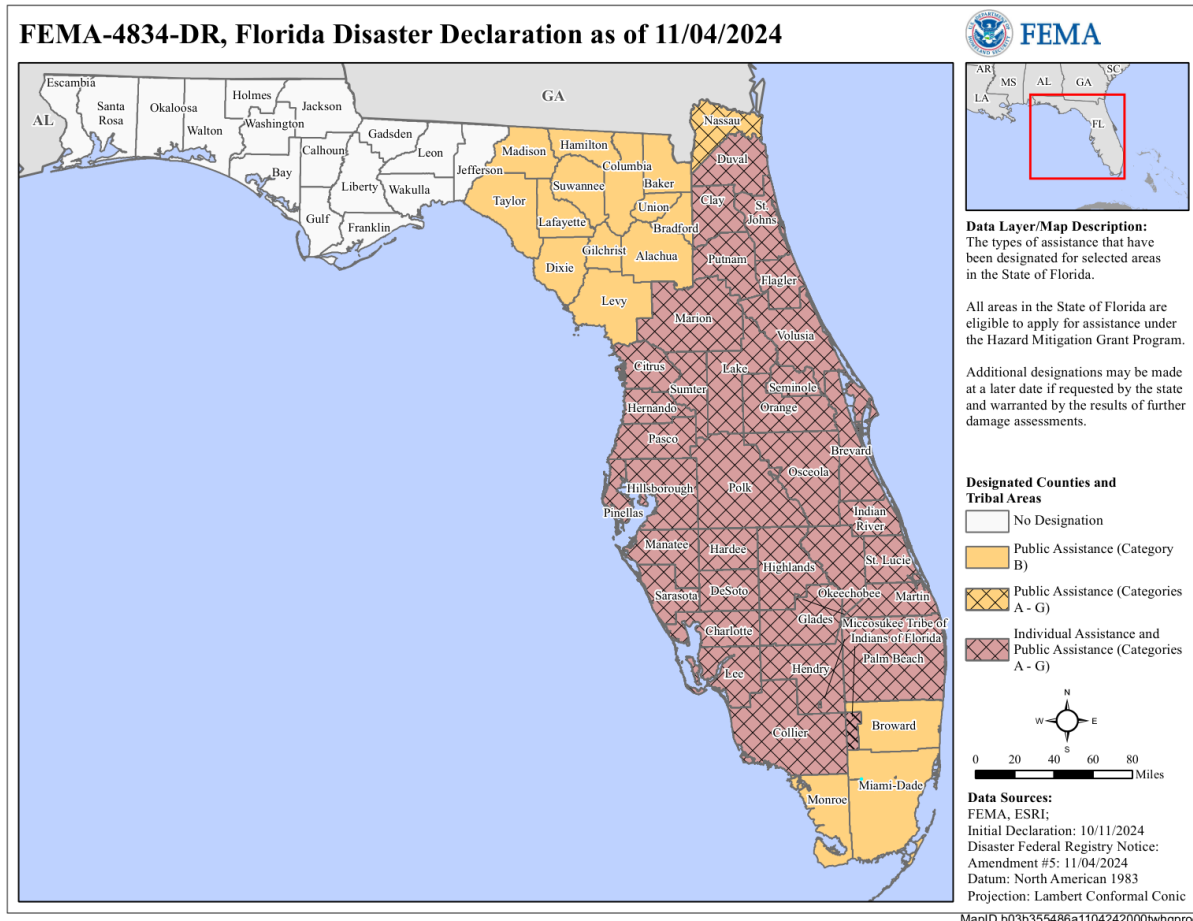


Figure 3. Hurricane Milton (DR-4834-FL) Disaster Declaration Map as of 11/04/2024. Image Source: FEMA.



Figure 4: Satellite Image of Hurricane Milton on Oct. 8, 2024, as it approaches Florida. Image Credit Milton Storm Imagery, NOAA.

Disaster Summary	
Qualifying Disaster:	Hurricane Milton with FEMA Disaster (DR-4834-FL)
HUD-identified MID Areas:	Orange County
Grantee-Identified MID Areas	Orange County

Table 3: Disaster Overview.

CDBG-DR Allocation Overview:	
CDBG-DR Allocation:	\$29,006,000
CDBG-DR Mitigation Set Aside:	\$4,351,000
Total Allocation:	\$33,357,000

Table 4: CDBG-DR Allocation Overview.

Unmet Needs Assessment and Allocation

Orange County has completed this assessment to identify community needs across the county by assessing the remaining effects of the qualifying disaster as they relate to housing, infrastructure, and the economy utilizing the quantifiable and verifiable data as of February 26, 2025. Specifically, as required by HUD, this assessment evaluates housing needs across four major areas: (1) emergency shelters; (2) interim and permanent housing; (3) rental and owner-occupied single family and multifamily housing; (4) public housing (including HUD-assisted housing) and other types of affordable housing.

The following table summarizes the losses and unmet needs related to Hurricane Milton's impact on Orange County. The unmet needs analysis identified a total unmet recovery need of \$196,195,089¹.

Summary of Impacts/Support	Housing	Infrastructure	Economy	Total
Amount of Estimated Impact	\$157,123,775	\$ 36,551,008	\$ 85,545,954	\$ 279,220,737
Amount of Funds Available	\$ 5,228,919	\$ 29,257,637	\$ 48,539,092	\$ 83,025,648
Unmet Needs (impact-Available Funds) + Resiliency Costs	\$151,894,856	\$ 7,293,371	\$ 37,006,862	\$ 196,195,089
% of Total Unmet Needs	77%	4%	19%	100%

Table 5: Summary of Unmet Needs and Proposed Funding Allocations.

Hurricane Milton's total estimated impact in Orange County across housing, infrastructure, and the economy amounts to \$279,220,737. Housing accounts for the largest portion of the damage at \$151,894,856 (and 77% of the total remaining unmet needs), followed by the economy at \$37,006,862 (19%), and infrastructure at \$7,293,371 (4%). Available funds are significantly lower, with a total availability of \$83,025,648 for recovery efforts. This significant funding gap, particularly in housing and economic recovery efforts, requires additional financial support to ensure a comprehensive recovery. The analysis shows that housing constitutes the greatest remaining need for CDBG-DR funds not addressed by other sources of funds, followed by economic revitalization and then infrastructure.

Mitigation Needs Assessment

The Mitigation Needs Assessment is a risk-based assessment that summarizes the natural threats and hazards in Orange County. The Mitigation Needs Assessment informs the use of Orange County's 15% minimum CDBG-DR mitigation set-aside and helps build resilience and mitigation measures into the county's CDBG-DR recovery programs and projects.

¹ The datasets used for the analyses for unmet needs include OPEN FEMA Public Assistance (PA) Data and Applicant Data, Individual Assistance (IA) Applicant Data; OPEN FEMA Disaster Declarations; HUD LMI Data and Continuum of Care; SBA Home and Business Report Data; US Census Data.

This Mitigation Needs Assessment highlights that Orange County faces significant risks from at least **ten natural hazards and sub hazards**, among which are **tropical systems, sinkholes, and severe storms, which include tornadoes and are the most frequent and pose the highest risk**. By analyzing these hazards in terms of their frequency and the county's vulnerability, Orange County and its recovery partners can utilize this assessment to identify current and future risks in their communities. This will enable them to target CDBG-DR funds toward cost-effective solutions for long-term mitigation.

Additionally, this assessment will guide all CDBG-DR programs and activities associated with this funding allocation, ensuring that they not only avoid existing hazards but actively work to lessen their future impact.

CDBG-DR Mitigation Set-Aside Needs Assessment			
Categories Affected	Total Need	Financial Assistance Budgeted and Obligated	Unmet Need
Housing	-	-	-
Infrastructure	\$ 128,989,976	\$ 100,079,669	\$ 28,910,307
Economic Development	-	-	-
Total	\$ 128,989,976	\$ 100,079,669	\$ 28,910,307

Table 6: CDBG-DR Mitigation Set-Aside Needs Assessment.

By analyzing responses to the Hurricane Ian Infrastructure and Public Facilities Request for Applications (RFA) submitted and reviewed in January 2025, Orange County gained critical insights into real-world unmet mitigation needs. The data collected highlights existing funding gaps in shovel-ready resilience projects, offering a grounded, evidence-based understanding of local hazards. This analysis informs local policy decisions, aligns with hazard mitigation planning, and provides a data-driven foundation for seeking additional state and federal resources. At least 15% of the CDBG-DR funds will be dedicated to mitigation efforts, which currently target high-impact infrastructure projects.

Orange County recognizes that while mitigation needs evolve over time, the core hazards facing the region have remained relatively consistent since Hurricane Ian. Persistent risks such as flooding, high winds, and severe storms continue to threaten the community's infrastructure, housing, and overall resilience. As recovery progresses and new data becomes available, the County remains committed to updating both the Mitigation Needs Assessment and the Action Plan to reflect emerging conditions and resource availability.

To ensure that mitigation strategies remain grounded in local realities, Orange County works closely with key partners—including emergency management agencies, and county departments. These stakeholders provide valuable, on-the-ground insight into the ongoing hazards and resilience priorities of the County's communities. Their expertise is instrumental in shaping mitigation investments that are both responsive and locally informed.



Unmet and Mitigation Needs Connection to Proposed Programs

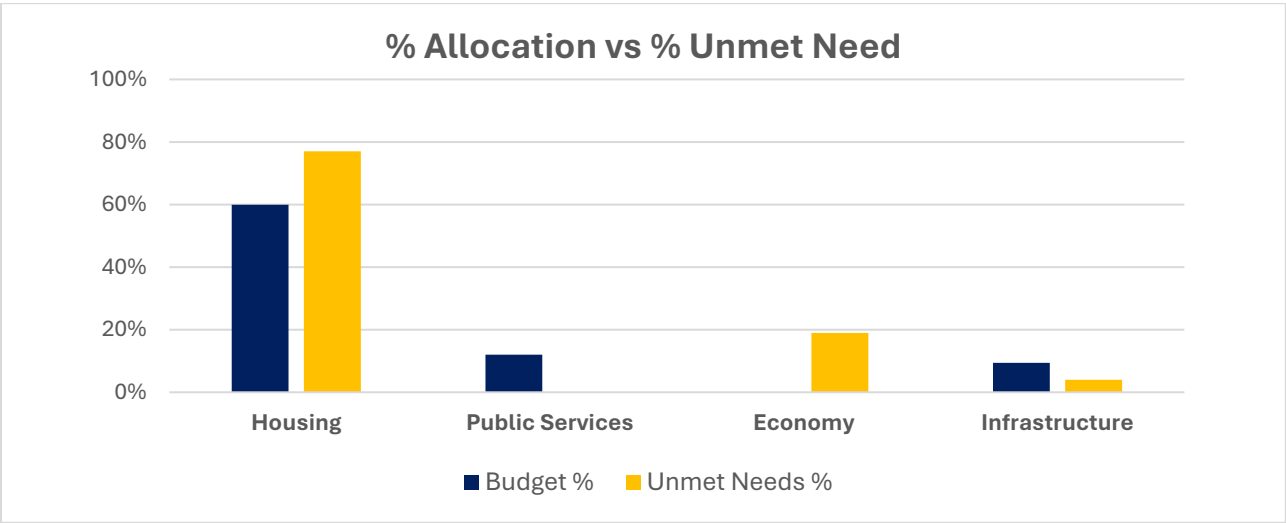


Table7: CDBG-DR Program Allocation and Unmet Need.

The programs proposed by Orange County in response to Hurricane Milton align with the unmet needs outlined in the needs assessment and demonstrate a proportionate allocation of resources that targets the areas of greatest impact. This ensures that funding and program design directly respond to the most critical unmet needs in the HUD and locally identified MID areas. The Unmet Needs Assessment shows that housing needs account for 77% of total unmet recovery needs, followed by economic recovery (19%) and infrastructure (4%). The program allocations reflect this prioritization, with approximately 60% of CDBG-DR recovery funds directed to housing programs, 12% to economic revitalization via workforce development², and 9% to infrastructure.

Housing programs proposed directly address the substantial \$151.9 million housing recovery gap. These programs focus on repairing and restoring single-family homes and affordable rental properties, with a strong emphasis on serving LMI residents. Economic revitalization will be addressed through public service activities, such as workforce development, which addresses economic needs by supporting displaced and underemployed workers in gaining skills relevant to the recovery process. Similarly, the Infrastructure and Public Facilities Recovery Program targets the unmet infrastructure needs, focusing on resilient repairs and enhancements that improve access and safety in Orange County communities.

Incorporation of Mitigation Needs Assessment to the MID Areas and to Proposed Programs

Orange County is taking a proactive and strategic approach to disaster recovery by embedding comprehensive hazard mitigation measures throughout its CDBG-DR programs. Guided by the findings of its Mitigation Needs Assessment, the County has identified a range of natural hazards

² Orange County is addressing impacts to the economy through proposed the proposed public service program.



that pose significant risk to its communities—including tropical systems (hurricanes), sinkholes, severe storms, flooding, and tornadoes. These hazards were assessed based on their frequency, geographic exposure, and the vulnerability of local infrastructure and populations.

In response, the County is incorporating mitigation into all aspects of its recovery framework to ensure that investments not only repair past damage but also reduce the impact of future disasters. This approach is informed by both qualitative community input and quantitative data, including past disaster impacts, infrastructure performance, and socioeconomic vulnerability.

To address these risks, the County has prioritized resilience-focused infrastructure improvements, including:

- **Stormwater management and flood control systems** to reduce flooding during high-rainfall events.
- **Hardening of critical infrastructure** such as water, sewer, and broadband networks to ensure continuity of services during extreme events.
- **Improved building standards** for shelters and public facilities to withstand high-intensity storms and wind damage.
- **Septic-to-sewer conversions** and other environmental infrastructure upgrades to prevent system failures during flooding.

Orange County has established clear project selection criteria to ensure that funded activities align with its long-term mitigation goals. Projects are prioritized if they address critical vulnerabilities, demonstrate cost-effectiveness, align with existing plans such as the County's Hazard Mitigation Plan and Consolidated Plan, and are implementation ready.

To further strengthen outcomes, the County emphasizes:

- **Integration with regional and local planning.**
- **Sustainability and maintenance planning** to preserve resilience investments.
- **Targeted funding**, ensuring that resources benefit low-to-moderate income (LMI) communities who are often most susceptible to disaster impacts.

This approach allows Orange County to build back safer and smarter, reducing future risk while fostering a culture of preparedness and resilience across all communities. By leveraging mitigation as a core component of recovery, the County is not only addressing past damage but also laying the foundation for a more secure and sustainable future.

Allocation of Milton CDBG DR Funds

Orange County is the lead agency and responsible entity for administering \$33,357,000 in CDBG-DR funds allocated for Hurricane Milton recovery efforts. CDBG-DR funds available to address unmet needs will be allocated to basic program categories pursuant to the table below.

CDBG-DR Program Allocation and Funding Thresholds					
Eligible Cost Category	CDBG-DR Allocation Amount	Percent of CDBG-DR Allocation	CDBG-DR Mitigation Set-aside	Estimated Percentage to HUD-Identified MID Areas	Overall LMI Benefit
Planning	\$ 200,000	1%	0%	100%	0%
Administration	\$ 1,667,850	5%	0%	100%	0%
Housing	\$ 20,000,000	60%	0%	100%	70%
Public Services	\$ 4,000,000	12%	0%	100%	70%
Infrastructure and Public Facilities	\$ 3,138,150	9%	0%	100%	70%
Mitigation Set Aside	\$ 4,351,000	15%*	100%	100%	70%
TOTAL	\$ 33,357,000		100%	100%	70%

*Mitigation set aside is equal to 15% of Unmet Needs allocation of \$29,006,000, therefore column will not equal 100%

Table 8: CDBG-DR Allocation and funding Thresholds.

Each of these activities is summarized in the following discussion.

PLANNING

Planning		
Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Planning Total:	\$ 200,000	1%

Table 9: Grantee Planning Activity Overview

A total of \$200,000, representing 1% of the allocation, is designated for planning-related activities. These funds will be accessible to Orange County departments, divisions, municipal governments, and quasi-governmental agencies to support studies, analyses, and expanded planning initiatives.

ADMINISTRATION

Administration		
Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration Total:	\$ 1,667,850	5%

Table 10: Grantee Administration Activity Overview.

An authorized portion of 5% of the total CDBG-DR allocation, amounting to \$1,667,850, will be dedicated to program administration.

HOUSING

Housing Programs Overview

Housing Program(s) Overview		
Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Homeowner Rehabilitation	\$ 6,000,000	70%
Rental Housing Rehabilitation	\$ 4,000,000	70%
New Affordable Housing Construction	\$ 10,000,000	70%
Housing Program Total:	\$ 20,000,000	70%

Table11: Grantee Housing Programs Overview.

Homeowner Rehabilitation Program

Amount of CDBG-DR Funds Allocated to this Program: \$6,000,000

Eligible Activity(ies): Rehabilitation of Single-Family Owner-Occupied Housing Units, HCDA Section 105(a)(4), 24 CFR 570.202(a)(1)

National Objective: Low to Moderate Income Housing (LMH), Urgent Need (UN)

Rental Housing Rehabilitation Program

Amount of CDBG-DR Funds Allocated to this Program: \$4,000,000

Eligible Activity(ies): Rehabilitation of Rental Units- HCDA Section 105(a)(4), 24 CFR 570.202(a)(1)

National Objective: Low to Moderate Income Housing (LMH), Urgent Need (UN)

New Affordable Housing Construction

Amount of CDBG-DR Funds Allocated to this Program: \$10,000,000

Eligible Activity(ies): Construction of Rental Units- HCDA Section 105(a)(4), 24 CFR 570.202(a)(1), CDBG DR Universal Notice: Waivers and Alternative Requirements, III.D.5.a. New Housing Construction Waiver

National Objective: Low to Moderate Income Housing (LMH), Urgent Need (UN)

INFRASTRUCTURE

Infrastructure Programs Overview

Infrastructure and Public Facilities Program(s) Overview		
Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Infrastructure and Public Facilities Total:	\$ 3,138,150	9%

Table12: Grantee Infrastructure Programs Overview.

Infrastructure and Public Facilities Recovery Program(s)

Amount of CDBG-DR Funds Allocated to this Program: \$3,138,150

Eligible Activity(ies): To be determined based on need, and will assist in the construction and/or rehabilitation of public facilities and infrastructure as eligible under HUD regulations.

National Objective: Low to Moderate Income Area Benefit (LMA), Urgent Need (UN)

PUBLIC SERVICES

Public Services Programs Overview

Public Services Program(s) Overview			
Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit	Is this Program Exempt from the 15% Public Service Cap?
Public Services Program	\$ 4,000,000	12%	No

Table13: Grantee Public Services Programs Overview

Public Services Program

Amount of CDBG-DR Funds Allocated to this Program: \$4,000,000

Eligible Activity(ies): Provision of public services via job training, HCDA 105(a)(8), 24 CFR 570.201(e)

National Objective: Benefitting Low to Moderate Income Persons (LMI)



CDBG-DR MITIGATION SET-ASIDE

CDBG-DR Mitigation Set-Aside Programs Overview

Grantee CDBG-DR Mitigation Set-Aside Program(s) Overview			
Eligible Cost Category	CDBG-DR Mitigation Set Aside Allocation Amount	% of CDBG-DR Allocation	Does this Program have tie back to the disaster?
Mitigation Total:	\$ 4,351,000	15%	No

Table14: Grantee CDBG-DR Mitigation Set-Aside Programs Overview

Mitigation Program

Amount of CDBG-DR Funds Allocated to this Program: \$4,351,000

Eligible Activity(ies): 24 CFR 570.201(c), Public facilities and improvements HCDA Section 105(a)(2)
- Public facilities and improvements

National Objective: Low to Moderate Income Area Benefit (LMA), Low to Moderate Income Clientele (LMC), Urgent Need (UN)

PLANNING

A total of \$200,000 will be used for planning activities. This funding will be available to the Orange County Housing and Community Development Division to support and administer CDBG-DR unmet needs, and mitigation needs assessments for the Hurricane Milton Disaster Recovery Action Plan.

Citizen Participation

To ensure that the disaster recovery action plan is comprehensive, addresses Orange County’s unmet needs, and aligns with regional redevelopment plans, Orange County consulted with stakeholders, citizens, local municipalities, and other entities to solicit feedback in the development of this plan. A complete listing of citizen participation consultations is in the body of the Action Plan.