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Record of Amendments

Date	Description of Change	Substantial/Non-Substantial
April 14, 2025	1. Affordability periods updated for the housing program 2. Additional language added to the Single-Family Housing Rehabilitation and Reconstruction Program requirements and award limits 3. National objectives updated to include urgent need and slum and blight 4. Amended Budgets for Housing and Infrastructure 5. Additional language regarding Urgent Need and Slum and Blight National Objectives 6. Updated Action Plan language to align with Universal Notice	Substantial
February 2026	Incorporated provisions for PAC Interchangeability between Ian and Milton CDBG DRs (Page 158).	Non-Substantial
October 2026	Reallocation of program budget	Non-Substantial

1. Executive Summary

1.1. Overview

The U.S. Department of Housing and Urban Development (HUD) announced that Orange County, FL will receive $219,712,000 in funding to support long-term recovery efforts following Hurricane Ian (FEMA Disaster No. 4673) through the Orange County Housing and Community Development Division. Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address unmet needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address the remaining unmet needs in Orange County, FL.

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 an expedient and efficient recovery. HUD has allocated $219,712,000 in CDBG-DR funds to Orange County, FL in response to Hurricane Ian (FEMA Disaster No. 4673) through the publication of the Federal Register Notice (5/18/2023, Docket No. FR–6393–N–01) (https://www.hud.gov/sites/dfiles/CPD/documents/FR-6393-N-01-AAN.pdf). This allocation was made available through the Disaster Relief Supplemental Appropriations Act of 2023 (Public Law 117-328).

The CDBG DR funds granted to Orange County must be expended in very specific ways to meet the intent and purpose of the program. All programs funded by CDBG DR funds must adhere to guidelines for eligible activities, and every eligible activity must meet one of three National Objectives (as defined by 24 CFR Part 570):

1. Benefit to Low and Moderate Income (LMI) Residents
2. Urgent Need
3. Elimination of Slum and Blight

Of these national objectives, LMI Benefit is the most widely used, and 70% of all program funds must fall under this category of eligibility. Urgent Need can also be utilized in circumstances where specific needs have a particular urgency impacting the health and welfare of the County. Finally, Elimination of Slum and Blight is a rarely used national objective in the CDBG DR program that addresses urban decay within defined geographic areas (This national objective is unlikely to be used in Orange County's program).

The Action Plan will review and summarize the impacts of Hurricane Ian, determine unmet needs based on damage assessments and other storm data, and describe recovery programs utilizing the CDBG DR allocation.

1.2. Disaster-Specific Overview

Hurricane Ian was a strong Category 4 hurricane that made landfall in Florida on September 28, 2022, with effects that were felt across the State. Although Orange County did not suffer a direct hit from the hurricane, its effect was significant, resulting in widespread damage to infrastructure, homes, and the local economy. Some roads were deemed impassable due to high water levels and debris, hampering transportation and access to essential services. The County faced immediate challenges in emergency response and long-term recovery, prompting concerted efforts to rebuild and expand infrastructure, support affected communities, and fortify against future disasters.

In Orange County, Hurricane Ian brought approximately 16 inches of rain, resulting in significant flooding, road closures, and over $300 million in major damages. Storm surges peaked between 8 to 10 feet, exacerbating the flooding for days after the hurricane passed. The impact was widespread, causing downed trees, power outages, property damage, and debris. Critical infrastructure, communication systems, and businesses were affected, leaving several communities without electricity and standing water long after the hurricane event.

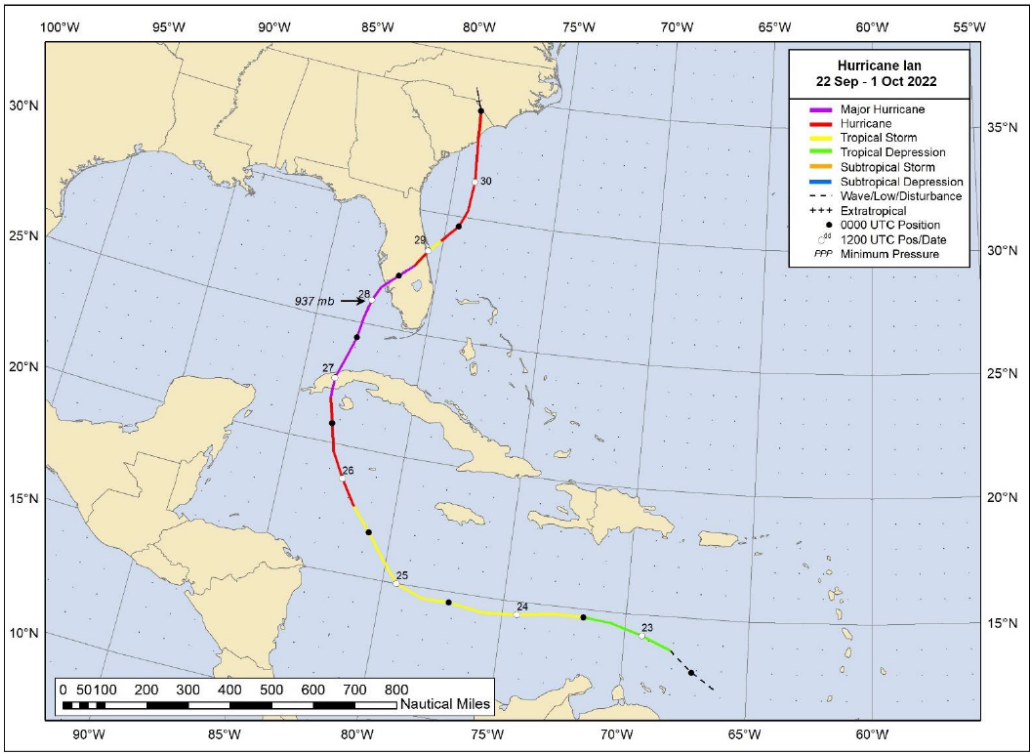

Figure 1. Best Track Position for Hurricane Ian, September 23-30, 2022

Source: National Hurricane Center, Tropical Cyclone Report for Hurricane Ian (AL092022), https://www.nhc.noaa.gov/data/tcr/AL092022_Ian.pdf.

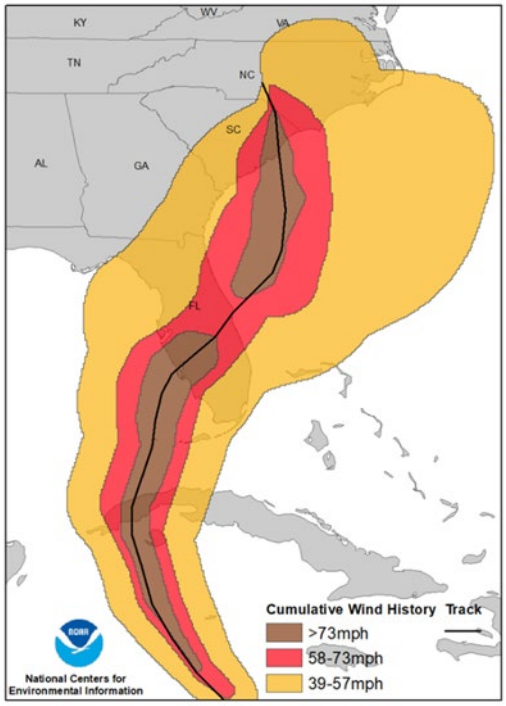

Figure 2. Hurricane Ian Track and Wind History
Source: National Centers for Environmental Information, https://www.ncei.noaa.gov.

Flash flooding hit parts of Orange County, washing out sections of major roadways and causing significant disruption, including flooding near tourist attractions like Universal Studios. Law enforcement and emergency response teams conducted rescue operations, such as airport rescues in flooded neighborhoods.

The extensive flooding overwhelmed the Orlando metro area, with Lake Eola overflowing and Interstate ramps along I-4 turning into rivers. Orlando International Airport remained closed due to inundated access roads.

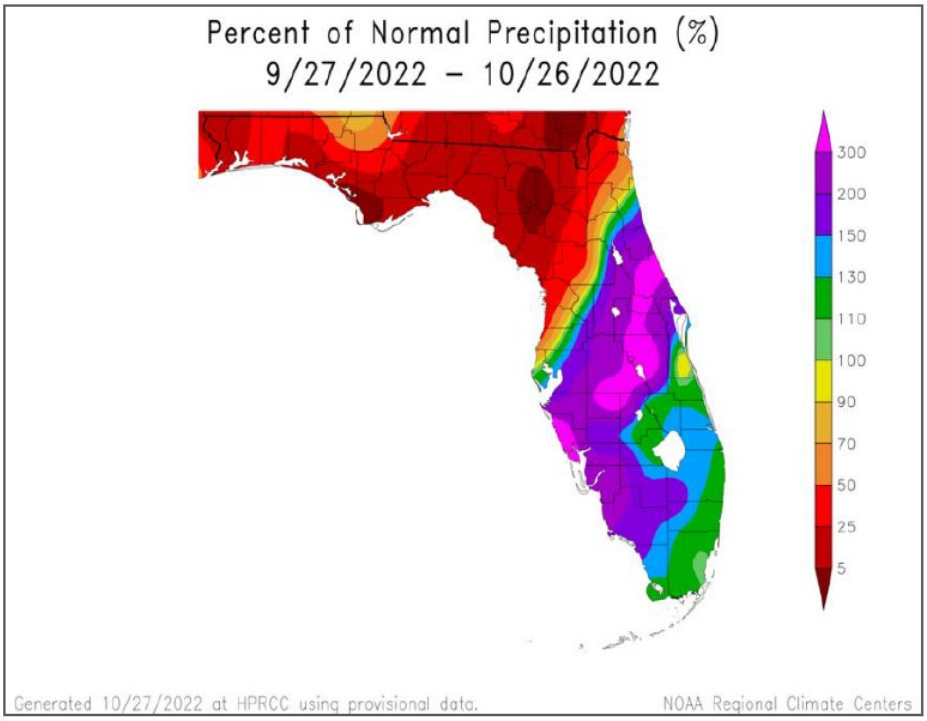

Figure 3. Percent of Normal Rainfall Observed from September 27 to October 26, 2022
Source: NOAA Regional Climate Centers, as adopted from the Hurricane Ian Report by Florida Climate Center at Florida State University,
https://climatecenter.fsu.edu/images/docs/Hurricane_Ian_Report.pdf

Residential and Business Impact: The flooding from Hurricane Ian had a profound impact on residential neighborhoods within Orange County. Homes located in low-lying areas or those near bodies of water experienced flooding, causing structural damage to their properties, and rendering some homes uninhabitable. Residents have been displaced, seeking refuge in emergency shelters or with friends and family.

Figure 4. Hurricane Ian Impact on Residential Neighborhoods
Source: Orange County Government, October 2022

There were reports of floodwater damage to personal belongings, furniture, and essential infrastructure within homes. Parts of Orange County's stormwater management systems were unable to sustain the overflow, which dropped excessive amounts of water onto ground already saturated by recent rainfalls. Residents felt isolated in their homes due to floodwaters. Some had to use canoes to travel to and from their homes.

Figure 5. Hurricane Ian Impact - Residents being rescued by boats
Source: Orange County Government, October 2022

Florida officials warned residents to stay away from the waters on the roads due to potential fecal contamination (Spectrum News). The city of Orlando asked residents and businesses to refrain from flushing toilets, doing laundry, washing dishes, and taking

showers as much as possible. At the same time, workers made emergency repairs to the city's sewer systems after breaks in mains caused overflows of sewage in the surrounding lakes and streets (ClickOrlando.com).

Power outages were significant throughout Orange County.

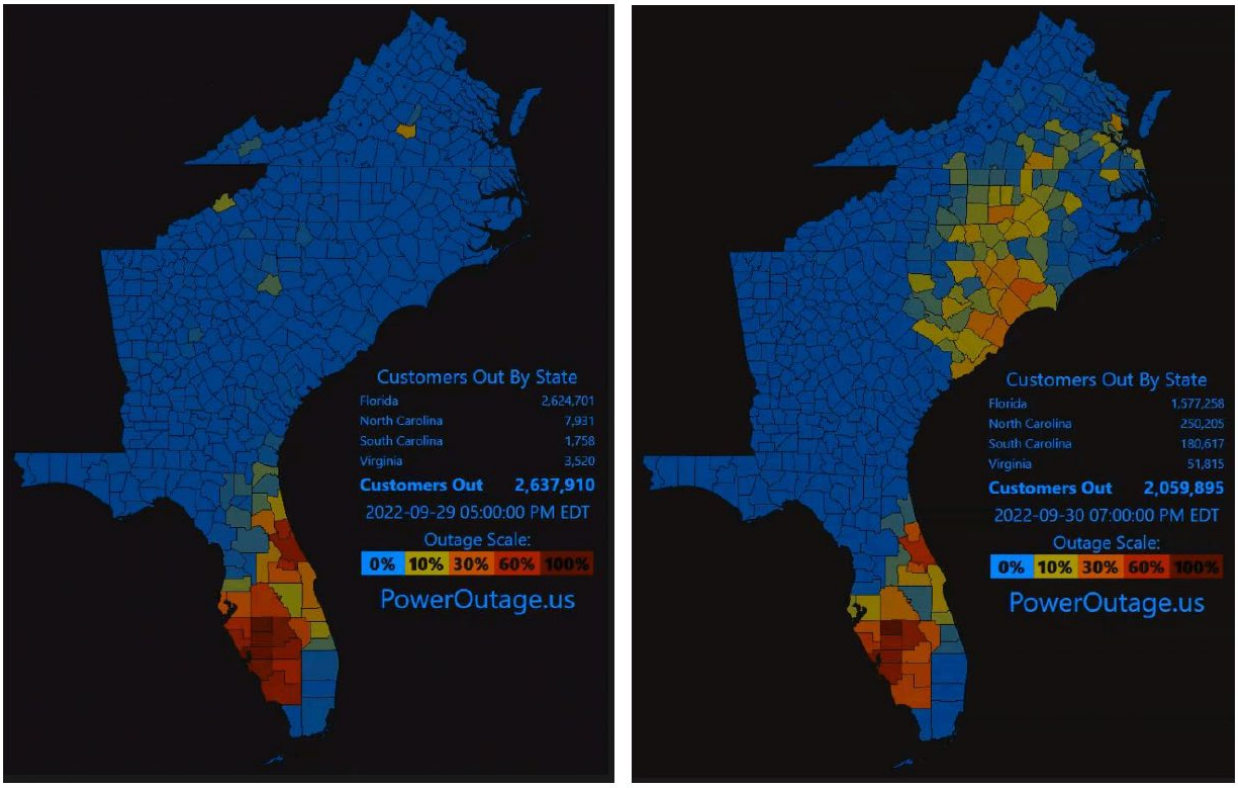

Figure 6. Power Outage Map for September 29, 2022 (left) and September 30, 2022 (right)
Source: PowerOutage.us; adopted from National Hurricane Center, Tropical Cyclone Report for Hurricane Ian (AL092022), https://www.nhc.noaa.gov/data/tcr/AL092022_Ian.pdf.

Local non-profits and commercial establishments were affected, leading to economic disruptions (damage to inventory, equipment, and infrastructure) and temporary closures of businesses.

Long-Term Impacts: The aftermath of the flooding caused by Hurricane Ian in Orange County will have long-term implications. The recovery process will involve extensive efforts to rehabilitate damaged properties, restore and improve infrastructure, and support affected individuals and businesses. Efforts to mitigate future flood risks and enhance resiliency in Orange County will also require comprehensive planning, infrastructure improvements, and community engagement to minimize the impact of similar disasters in the future.

The damage caused by flooding in Orange County as a result of Hurricane Ian reiterates, reiterates the urgency of coordinated response efforts, resource allocation, and long-

term planning to facilitate a robust recovery and rebuild a community that is more resilient against future natural disasters. The emphasis needs to be on implementing resilience-building measures to mitigate future risks, including improved drainage systems, flood-resistant infrastructure, and community-based disaster preparedness initiatives.

Overall, Hurricane Ian's impact resulted in catastrophic damage, totaling $112.9 billion across Florida, with 156 fatalities reported throughout the State. It caused substantial agricultural losses, infrastructure damage, and devastating flooding across numerous counties. The storm's aftermath led to widespread evacuations, rescue operations, and ongoing recovery efforts across the affected regions.

1.3. Summary

Orange County conducted a comprehensive analysis of housing, infrastructure, public services, and economic development needs that remain unmet as a result of Hurricane Ian's impact on the County. More specifically, County staff used Federal Emergency Management Agency (FEMA) and Small Business Administration (SBA) data related to filled claims for public and individual assistance, as well as insurance claims, to determine basic unmet needs related to damages to housing and infrastructure. The FEMA and SBA data were supplemented with information received from the County Departments and Divisions, local jurisdictions, public housing authorities, community partners and stakeholders, providers of homeless services, and County residents. The input was collected through several focus group meetings, a citizen participation survey, and thirteen (13) community meetings held in various locations throughout Orange County. Table 1 below summarizes unmet needs identified in Orange County.

Category	$ of Unmet Needs	% of Unmet Needs
Housing	$253,300,768	59.31%
Infrastructure & Public Facilities	$160,700,743	37.63%
Economic Revitalization	$13,047,152	3.06%
TOTAL	**$427,048,663**	**100%**

Table 1. Summary of Unmet Needs and Proposed Funding Allocations

Housing Needs: Analysis of FEMA data, specifically claims for individual assistance, indicated that currently $253,300,768 is needed to repair damage to units, primarily owner-occupied units that incurred damage as a result of Hurricane Ian.

More specifically, 9,911 units were damaged, according to FEMA claims. The majority of claims were reported in the minor-low damage category (4,409 – all unit types), followed by major-low damages (2,864 – all unit types), major-high damages (901 – houses), and

minor-high damages (803 – all unit types). Impacts from flooding covered by the National Flood Insurance Program (NFIP) account for 680 claims, with a total impact of more than $48,000,000. These, combined with the FEMA claims, represent the total sum of Orange County's housing losses of more than $243M to 10,591 units, or a modified total of $315.9M when accounting for an additional 30% needed to rebuild more resiliently. The unit count includes single-family homes, condos and apartments, mobile homes, and other housing types. The total unmet housing need of $253,300,768 was calculated by subtracting the funds made available for recovery and adding an additional 30% in funding needed to support resilient housing features, such as rebuilding to higher standards to minimize damages from future disaster events.

Furthermore, public housing authorities reported 50 damaged units that still require repair (20 units – minor damage, 30 units – major damage) and one unit that was destroyed (no dollar amount in unmet needs reported). Additionally, out of 801 respondents to the citizen participation survey, 36.48% reported property damage, but only 1.89% reported they applied for and received all the assistance they needed. Furthermore, 6.42% reported they had to move as a result of the hurricane, and 5.53% reported their residences are still unsafe. The need for housing rehabilitation programs, special needs housing, and new affordable housing was also highlighted during the community meetings with County residents, and by the community stakeholders that took part in focus group discussions.

Infrastructure Needs: Analysis of FEMA data on public assistance claims, combined with information related to the County's projects submitted as part of the Hazard Mitigation Grant Program (HMGP) and various infrastructure repairs/capacity expansion needs reported by the local municipalities, resulted in a total unmet need of $160,700,743 for various infrastructure and public facilities projects. This number accounts for $30,835,935 in non-federal cost share in FEMA public assistance projects (with 30% in resiliency costs added), $11,264,808 in non-federal cost share in projects submitted for the HMGP funding, and $118,600,000 in Hurricane Ian-related projects submitted through the consultation process by various County Departments and Divisions and local jurisdictions. The majority of needed improvements are related to stormwater, drainage, and capacity improvements to existing facilities.

Furthermore, respondents to the citizen participation survey highlighted on-going flooding, streets, and drainage concerns as their main community need (at 54.7%) resulting from Hurricane Ian. The respondents also stated their highest spending priorities were infrastructure improvements and mitigation projects, with 31% and 23% of residents giving these two categories the highest rankings, respectively.

Economic Revitalization Needs: According to the SBA's business loan information pertaining to Hurricane Ian, there were 1,031 business applications issued across Orange County. Of those, 81 applicants had been approved for a loan for damage or economic disruption, 74 applicants had a verified property loss of $7,789,194, and another 950 applicants are either "in-process," have withdrawn, or were declined loans from the program. The losses were combined with known losses from SBA business data to estimate a total initial economic impact to business real property and contents of $15,831,167, or $20,580,517 when accounting for 30% in additional resilience costs on rebuilding damaged structures. After subtracting the SBA payouts to businesses, a total of $13,047,152 in unmet economic revitalization needs remain. This total accounts for resiliency costs.

During the community engagement process, some comments were received related to economic development and recovery. Of the survey respondents, 3.85% reported known business closures and/or relocations of key businesses as a result of Hurricane Ian. Additionally, 12% of respondents indicated a need to fund activities that encourage job creation, business development, and economic recovery.

It should be noted that Orange County has recently implemented initiatives to assist businesses with economic recovery. More specifically, nearly 8,000 Orange County small businesses received a total of $80M in small business grants utilizing CARES funding. In addition, the County provided $31.3M in business assistance, with funding available through the American Rescue Plan. Using these funds, Orange County established the Small Business BOOST program to provide grants to local small businesses, home-based businesses, and gig workers. The grant funds can be used for business expenses, including wages, mortgages, rent, utilities, payroll, and other costs. Grants are non-repayable and are issued on a "first-come, first-served" basis to qualified applicants. Finally, to help revitalize business zones in designated corridors by improving the aesthetic appeal for shoppers and business owners, Orange County's BANC Program (Business Assistance for Neighborhood Corridors) provides façade grants to small businesses.

Other needs: Additional needs identified during the community engagement and outreach process were related to public services (e.g., housing counseling, job training and placement, mental and health services, etc.), services for special needs populations, to include seniors, persons with disabilities, and homeless individuals and families, and needs related to pre-disaster preparation and post-disaster response.

Overall, addressing these needs will require sustained commitment, collaboration, and resource allocation from various sectors, including government bodies, community

organizations, businesses, and concerned citizens, to facilitate the holistic recovery and resilience-building of Orange County post-Hurricane Ian.

1.4. Unmet Need and Proposed Allocation

Prior to the obligation of CDBG-DR funds, Orange County is required to submit a plan detailing the use of funds to the U.S. Department of Housing and Urban Development (HUD). The plan must include the criteria for eligibility and state how the use of these funds will address long-term recovery and restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas. In the case of Orange County, the entire County, including all of its thirteen (13) municipalities, was identified as a most impacted and distressed area (MID). Orange County Housing and Community Development Division is the administering agency for these recovery funds.

Additionally, all CDBG-DR funded activities must meet the minimum requirements of the program. This means that each activity must:

- Be a CDBG eligible activity.
- Meet a National Objective of the CDBG program; and
- Address a direct or indirect impact of the major disaster in a Presidentially declared area (Hurricane Ian).

In compliance with these requirements, Orange County has developed this CDBG-DR Action Plan for disaster recovery to describe how the allocated funding will be administered. The programs and activities outlined in this Action Plan are supported by the findings of the Unmet Needs Assessment included in this document, along with community engagement and outreach, and collaboration with local community stakeholders and County residents. These sources helped determine the remaining unmet needs, as required by HUD.

Based on the identified unmet needs and the County's allocation of CDBG-DR funds, the following budget is being proposed in the Action Plan to implement strategies and activities addressing unmet and mitigation needs to ensure Orange County's long-term recovery from the effects of Hurricane Ian.

Category	Remaining Unmet Needs	% of Unmet Needs	Program Allocation	% of Program Funds
Housing (*rehab & new housing construction)*	$253,300,768	59.31%	$69,555,411	31.66%
Infrastructure & Public Facilities	$160,700,743	37.63%	$102,306,581	46.56%
Mitigation	$0	N/A	$28,658,000	13%
Economic Revitalization	$13,047,152	3.06%	$0	0%
Public Services (*includes economic recovery activities)*	-	N/A	$6,375,665	2.90%
Administration	-	N/A	$10,985,600	5%
Planning *(studies)*	-	N/A	$1,830,743	0.83%
TOTAL	**$427,048,663**	**100%**	**$219,712,000**	**100%**

Mitigation is 15% set-aside of initial funding amount and equal to 13% of entire allocation.

Table 2. Remaining Unmet Needs and Proposed Funding Allocations

The proposed allocation of funding described in this Action Plan includes housing, infrastructure, and public service activities, as well as the required minimum set aside for mitigation activities and funds for planning and administration.

The proposed programs and methods of distribution include a County-wide homeowner's rehabilitation program, new affordable housing construction, especially for special needs individuals, the County's infrastructure improvement program, and competitive awards for projects proposed by local jurisdictions, non-profits and community partners to address as much of the unmet needs as possible.

The primary objectives of the Action Plan are to:

1. Preserve existing housing stock and expand sustainable and affordable homeownership and rental opportunities for Orange County residents.
2. Build resilient communities by strengthening neighborhoods impacted by the disaster through investments in infrastructure and public facilities;
3. Enhance community resiliency and economic stability by providing expanded access to public services that ensure housing stability and self-sufficiency of the County residents; and
4. Promote and ensure fair access to housing for all residents.

2. Unmet Needs Assessment

2.1. Overview

Orange County is required by HUD to document the impacts and unmet needs resulting from Hurricane Ian in order to obtain federal CDBG-DR funds. The Unmet Needs Assessment identifies impacts and unmet needs in three main categories: housing, infrastructure, and economic revitalization. Identification of unmet needs helps the County guide the development of recovery programs to support the long-term hurricane recovery and future resiliency of our community, as well as the sustainability of our recovery efforts.

HUD uses the best available data to identify and calculate unmet needs for disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization. Based on this assessment, HUD notified Orange County that it will receive an allocation of $219,712,000. In accordance with the Federal Register notice, the County may use up to five (5) percent of the total grant award for grant administration, and up to fifteen (15) percent of the grant award for planning expenditures. The entire County, to include all thirteen (13) municipalities, was identified as the most impacted and distressed area (MID); therefore, CDBG-DR funds can be spent throughout Orange County on eligible projects and activities that address unmet disaster or mitigation needs.

2.1.1. Hurricane Ian's Impact on Orange County

Hurricane Ian made landfall in Florida on September 28, 2022, as a Category 4 hurricane. While the storm weakened as it slowly moved northeastward across central Florida, it resulted in significant damage, and the storm's effects were well felt in many Orange County communities and neighborhoods. The following day, on September 29, 2022, Presidential Declaration DR-4673 was signed for the state of Florida due to the catastrophic impacts of Hurricane Ian. Hurricane Ian-related U.S. Federal Emergency Management Agency (FEMA) assistance was made available to all 67 counties in Florida, demonstrating its massive direct and indirect scope and impact.

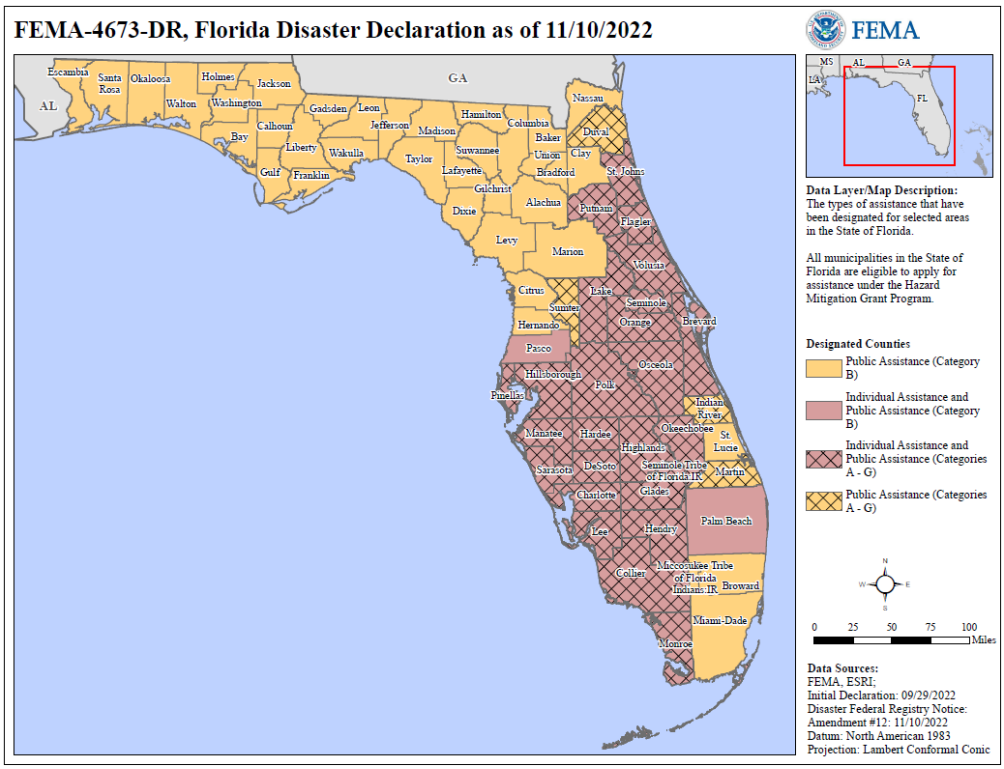

Figure 7. FEMA DR-4673, Florida Disaster Declaration (Designated Counties)
Source: FEMA, https://www.fema.gov/disaster/4673/designated-areas

Analysis of information (data and community input) pertaining to the disaster damage from Hurricane Ian indicates the main damages were caused by a combination of excessive rain, flooding, and high winds.

According to the National Hurricane Center, Ian produced widespread rainfall and flooding along its track. In central and eastern Florida, rainfall totals of 10-20 inches caused major floods along the St. Johns River, Lake George, Crest Lake, the Little Wekiva River, and Dunns and Shingle Creek, affecting Seminole, Orange, Lake, Putnam, and Osceola Counties (Source: Hurricane Ian Report, https://www.nhc.noaa.gov/data/tcr/AL092022_Ian.pdf).

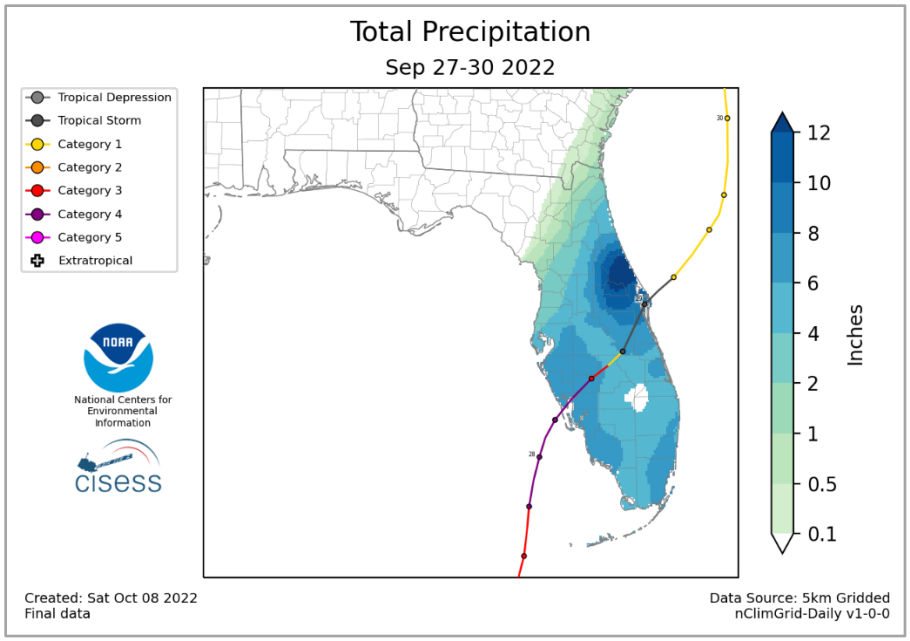

Figure 8. Amount of Total Rainfall (in inches) in the State of Florida
Source: National Center for Environmental Information, https://www.ncei.noaa.gov/access/monitoring/monthly-report/national/202209/supplemental/page-5

The highest rainfall in Orange County during Hurricane Ian was recorded at 17.24 in, in the Union Park area.

Area/Neighborhood	Rainfall Totals (in)
Union Park 3.5 SE	17.24 in
Union Park 3.1 SE	15.39 in
Orlando 5.3 ENE	14.96 in
Union Park 1.1 E	14.64 in
Orlando Intl Airport	13.20 in
Orlando 12.0 S	13.13 in
Meadow Wood 1.1 SSE	12.15 in
Bithlo 7.6 S	11.76 in
Orlando 4.9 N	11.58 in
Apopka 0.4 NW	10.95 in
Orlando 6.8 W	10.87 in
Orlando West	9.09 in
Bay Lake 4.1 WSW	8.99 in
Oakland 1.5 WSW	6.66 in

Table 3. Rainfall Total from Hurricane Ian – Orange County, FL
Source: National Weather Service, https://www.weather.gov/mlb/ian_rainfall_totals

The figure below depicts the locations of the heaviest rainfall.

The unprecedented amount of rainfall that occurred over a short period of time resulted in significant flooding as the stormwater systems struggled to handle the amounts of water, while waterbodies were also overflowing and flooding nearby streets and properties.

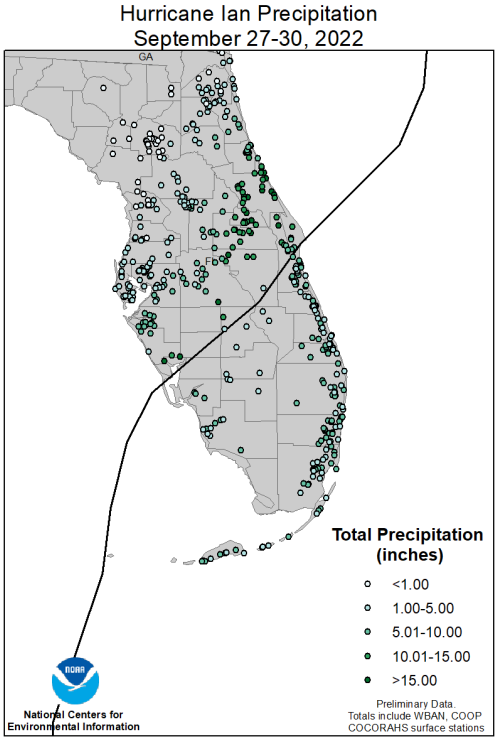

Figure 9. Hurricane Ian Rainfall (in inches) in the State of Florida
Source: National Center for Environmental Information,
https://www.ncei.noaa.gov/access/monitoring/monthly-report/national/202209/supplemental/page-5

Additionally, hurricane-force winds caused wide-spread power outages in Orange County, especially in older neighborhoods where utility lines are traditionally located overhead. According to the National Center for Environmental Information, winds in Orlando/Orange County reached 74 mph. The wind impact can often cause damage to structures, specifically to roofs, resulting in excessive amounts of debris, and causing further damage to power lines (often due to falling trees).

2.1.2. Unmet Needs Methodology and Summary of Results

Orange County conducted a comprehensive analysis of housing, infrastructure, public services, and economic development needs that remain unmet as a result of Hurricane Ian's impact on the County. More specifically, County staff used Federal Emergency Management Agency (FEMA) and Small Business Administration (SBA) data related to

filled claims for public and individual assistance, as well as insurance claims, to determine basic unmet needs related to damages to housing and infrastructure. The FEMA and SBA data were supplemented with information received from the County Departments and Divisions, local jurisdictions, public housing authorities, community partners and stakeholders, providers of homeless services, and County residents. The input was collected through several focus group meetings, a citizen participation survey, and thirteen (13) community meetings held in various locations throughout Orange County. Table 1 below summarizes unmet needs identified in Orange County.

Category	$ of Unmet Needs	% of Unmet Needs
Housing	$253,300,768	59.31%
Infrastructure & Public Facilities	$160,700,743	37.63%
Economic Revitalization	$13,047,152	3.06%
TOTAL	**$427,048,663**	**100%**

Table 4. Summary of Unmet Needs and Proposed Funding Allocations

2.2. Housing Unmet Need

The following section describes the losses and unmet needs related to Hurricane Ian's impact on the housing stock in Orange County. The unmet needs analysis identified a total housing unmet recovery need of $253,300,768.

2.2.1. Housing Unmet Need – Summary

Analysis of FEMA data, specifically claims for individual assistance, indicated that currently $253,300,768 is needed to repair damage to units, primarily owner-occupied units that incurred damage as a result of Hurricane Ian.

More specifically, 9,911 units were damaged, according to FEMA claims. The majority of claims were reported in the minor-low damage category (4,409 – all unit types), followed by major-low damages (2,864 – all unit types), major-high damages (901 – houses) and minor-high damages (803 – all unit types). There are 680 claims for flooding-related damages covered by the National Flood Insurance Program (NFIP), with a total cost of more than $48,000,000. These, combined with the FEMA claims, represent the total sum of Orange County's housing losses of more than $243M to 10,591 units, or a modified total of $315.9M when accounting for an additional 30% needed to rebuild more resiliently. The units count includes single-family homes, condominiums and apartments, mobile homes, and other housing types. The total unmet housing need of $253,300,768 was calculated by subtracting the funds made available for recovery and adding an additional 30% in funding needed to support resilient housing features, such as rebuilding to higher standards to minimize damages from future disaster events.

2.2.2. Housing Unmet Need – Detailed Methodology

HUD calculates "unmet housing needs" as the number of housing units with unmet needs times the estimated cost to repair those units minus repair funds already provided. However, because complete data sources are often difficult to obtain after a major disaster event, HUD has stated that empirically justified calculations may be used to determine the average cost to fully repair a home. This is usually accomplished by "using the average real property damage repair costs determined by the Small Business Administration for its disaster loan program for the subset of homes inspected by both SBA and FEMA. Because SBA is inspecting for full repair costs, it is presumed to reflect the full cost to repair the home, which is generally more than the FEMA estimates on the cost to make the home habitable" (Source: https://www.govinfo.gov/content/pkg/FR-2013-03-05/pdf/2013-05170.pdf).

For Orange County, utilizing FEMA damage estimates by HUD category as described in the Federal Register, and accounting for FEMA applicants for whom damages (inspected or otherwise) were not calculated provides the most realistic measure of impacts and unmet needs for housing. Utilizing the unmet needs values from HUD discussed below and FEMA data about the number of applicants results in an unadjusted housing impact of $243,070,375 million. This value increases to nearly $316 million when adding 30% to account for the need to rebuild resiliently.

Methods for creating housing impacts and unmet needs are discussed below.

Housing impacts for the needs assessment were calculated using FEMA's Real Property Verified Loss (RPFVL) and applicant counts. We begin (Table 5) by utilizing FEMA's inspected RPFVL for the 4,409 Orange County applicants for which FEMA Minor-Low damage was is determined (A). Included here is also an estimate (B) of losses for FEMA applicants (803) who were found to have FEMA Minor-High damage and those applicants (2,864) who had at least Major-Low FEMA Verified Losses (C). Here, total losses (Column 5) for all minor-low and minor-high damaged housing units were derived by multiplying each count (Column 3) by the average loss (Column 4).

Accounting for a more accurate replacement cost for homeowner applicants with Major-High and Severe damage required a more detailed breakdown of average losses for houses, condo/apartments, mobile homes, and all "other" house types. Here, sub-setting each of these housing types produces a more realistic estimate of impacts across the AOI (Column 5, rows D-K).

Estimates for losses for homes damaged major-low, major-high, and severe were calculated by multiplying the count in each category by HUD's Federal Register multipliers

for each associated category (minor-high = $36,800, major-high, and severe = $45,952). Results indicate the greatest damage/highest impacts to houses (row D) in the major-high damage category, followed by condos/apartments (row E) and mobile homes (row F) in the major-high damage category. Relatively few homes (n=158) were classified as "Severe Damage" according to FEMA RPFVL.

Impacts from flooding covered by the National Flood Insurance Program (NFIP) account for 680 claims with a total impact of more than $48,000,000 (Table 5 – Row L).

The sum of losses from each line (A-L) represents the County's total housing losses (Row M) of more than $243 million. Recognizing the need to rebuild more resiliently, this total housing loss value was multiplied by 30% to account for increased cost of compliance and additional building materials necessary to move toward a more resilient society (Row L), leading to a modified total impact of $315.9 million.

Accounting for available recovery resources (Lines O-P) depicts the total benefit provided to Orange County to date. Here, more than $62.6 million across two (2) categories has been provided to help disaster survivors with repair, rebuilding, and relocation following Ian. Unfortunately, recovery funds provided to date still leave a large unmet housing need of more than $183 million for Orange County (Table 5 – Row R). When adjusting for resilient rebuilding of homes to the current building code, the total unmet need across Orange County climbs to more than $253,000,000 (Row S).

Column ID	Data	Count	Estimated Total Loss/Support
A	**Minor-Low Damage to FEMA IA Applicants (All Home Types)**	4,409	$1,948,039
B	**Minor-High Damage to FEMA IA Applicants (All Home Types)**	803	$2,640,669
C	**Major-Low Damage to FEMA IA Applicants (All Home Types)**	2,864	$105,395,200
D	**Major-High Damage to FEMA IA Applicants (Houses)**	901	$41,402,752
E	**Major-High Damage to FEMA IA Applicants (Condos/Apartments)**	622	$28,582,144
F	**Major-High Damage to FEMA IA Applicants (Mobile Homes)**	134	$6,157,568
G	**Major-High Damage to FEMA IA Applicants (All Other Types)**	20	$919,040
H	**Severe Damage to FEMA IA Applicants (Houses)**	57	$2,619,264
I	**Severe Damage to FEMA IA Applicants (Condos/Apartments)**	74	$3,400,448
J	**Severe Damage to FEMA IA Applicants (Mobile Homes)**	25	$1,148,800
K	**Severe Damage to FEMA IA Applicants (All Other Types)**	2	$91,904
L	**NFIP Identified Damages**	680	$48,764,546
M	**Total Housing Loss**		$243,070,375
N	**Total Housing Loss (Account for 30% Additional for Resiliency)**		$315,991,487
O	FEMA payments to repair homes	1,633	$13,926,173
P	Estimated NFIP building payments	680	$48,764,546
Q	**Total Support**		$62,690,719
R	Initial Unmet Needs	$180,379,656	$180,379,656
S	**Total Unmet Housing Need Accounting for an additional 30% in funding needed to support rebuilding to higher standards (resilience)**	$253,300,768	$253,300,768

Table 5. Housing Impacts and Unmet Needs – Orange County, FL
Source: FEMA

2.2.3. Disaster Damage and Impacts

Orange County is located in the heart of Central Florida. Encompassing an area of over 1,000 square miles and 13 municipalities, the County is home to almost one and a half million residents, making it the most populous County in Central Florida.

The Bureau of Economic and Business Research at the University of Central Florida (BEBR) estimated the total Orange County population and its thirteen municipalities at 1,481,321,

with the population of unincorporated Orange County at 928,465, or almost 63% of the County.

After English, the second most commonly spoken language in Orange County is Spanish. A total of 148,697 Orange County's households reported speaking Spanish at home. Between all languages, 43,801 households reported speaking English less than "very well." This has implications for the outreach and delivery of housing programs to the community and providing response and recovery from disaster impacts.

2.2.3.1. Pre-Disaster Housing Supply and Condition

Orange County offers a variety of housing types that have generally been characterized as single-family, multi-family, and mobile homes. Single-family detached homes make up the majority of Orange County's housing stock (townhouses are considered to be multi-family in this tabulation). The table below shows that, in 2021, there were 554,517 dwelling units within Orange County. Approximately 62.7 percent of these were single-family homes, while 33.5 percent were multi-family units.

Housing Types	Number	Percentage
Single Family	348,310	62.7
Multi-family (2 units or more)	187,171	33.5
Mobile Home	18,710	3.7
Other	326	0.1
TOTAL	**554,517**	**100**

Table 6. Housing Units by Type – Orange County, FL

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates

Housing units built between 1980 and 2021 comprise the majority of the housing stock (71.3 percent) in Orange County. The table below shows the age of housing units in the County.

Year the Structure was Built	Number	Percentage
2010 or after	72,917	13.1
2000-2009	117,112	21.1
1990-1999	130,688	18.7
1980-1989	102,036	18.4
1970-1979	66,958	12.1
1960-1969	38,700	7.0
1950-1959	36,615	9.6
1940-1949	8,303	
1939 or earlier	8,188	
TOTAL	**554,517**	**100**

Table 7. Year Structure Built – Orange County, FL

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates (adopted from the Florida Housing Data Clearinghouse at http://flhousingdata.shimberg.ufl.edu)

2.2.3.2. Housing Affordability

Orange County, like other counties in Central Florida and across the country, is experiencing an affordable housing crisis. A 2019 study conducted by the University of Florida's Shimberg Center for Housing Studies noted that 98,654 renter households in the Orlando area spend more than 40% of their monthly income on rent alone. The study also found that an overall declining homeownership rate matched the increasing renter rate. Many new renter households had lower incomes, with approximately 59,000 households earning less than 60% AMI and over 76,000 total households being cost burdened. Cumulatively, these trends indicate a need for the creation of additional renter housing and the preservation and creation of affordable housing for purchase. According to the 2022 ACS Five-Year Estimate, the median gross rent in Orange County is $1,553, and updated median household income for 2023 is $85,700.

The National Low-Income Housing Coalition's Gap Report estimates that Florida has the second worst housing affordability rate in the country, with only 23 affordable and available rental homes per 100 extremely low-income renter households. Affordability is even worse within the Orlando-Kissimmee-Sanford Metropolitan Area, with 15 affordable and available units per 100 extremely low-income families. The report also estimates that within the Metropolitan Area, 89% of these same extremely low-income households are severely cost burdened.

The figure below shows the annual household income and hourly wages needed to afford Fair Market Rents in Orange County. (Note: at the time of this report, Florida's minimum wage was $10 per hour and Orange County's average hourly wage was $19.29 per hour).

HOUSING COSTS (FAIR MARKET RENTS)	ANNUAL INCOME NEEDED TO AFFORD	HOURLY WAGE FOR 40/HR WEEK NEEDED TO AFFORD	HOURS/WK AT AVG HOURLY WAGE NEEDED TO AFFORD	HOURS/WK AT MINIMUM WAGE NEEDED TO AFFORD
1 bedroom: $1,237 2 bedroom: $1,422 3 bedroom: $1,827 4 bedroom: $2,211	1 bedroom: $49,480 2 bedroom: $56,880 3 bedroom: $73,080 4 bedroom: $88,440	1 bedroom: $23.79 2 bedroom: $27.35 3 bedroom: $35.13 4 bedroom: $42.52	1 bedroom: 49 2 bedroom: 57 3 bedroom: 73 4 bedroom: 88	1 bedroom: 95 2 bedroom: 109 3 bedroom: 140 4 bedroom: 170

*Figures presented in this data are for Orange County including the city of Orlando.

Figure 10. Required Income, Wages and Hours to Afford Fair Market Rents in Orange County, 2022

Source: National Low-Income Housing Coalition, Out of Reach 2022, Accessed from https://reports.nlihc.org/oor/florida

The table below shows the estimated cost burden for all households (renter and owner) based on their income. The table indicates that 104,839 households in Orange County are cost burdened, and 92,698 households are extremely cost burdened, regardless of income.

	Housing Cost Burden		
Household Income	**30% or less**	**30.1-50%**	**More than 50%**
30% AMI or less	6,088	5,890	48,663
30.01-50% AMI	12,949	23,808	28,987
50.01-80% AMI	40,616	46,193	11,607
80.01-100% AMI	41,261	14,543	1,489
Greater than 100% AMI	224,865	14,405	1,952
TOTAL	**325,779**	**104,839**	**92,698**

Table 8. Housing Cost Burden by Income, All Households (2021) – Orange County, FL

Sources: Estimates and projections by Shimberg Center for Housing Studies, based on U.S. Department of Housing Development, Comprehensive Housing Affordability Strategy (CHAS) dataset and population projections by the Bureau of Economic and Business Research, University of Florida

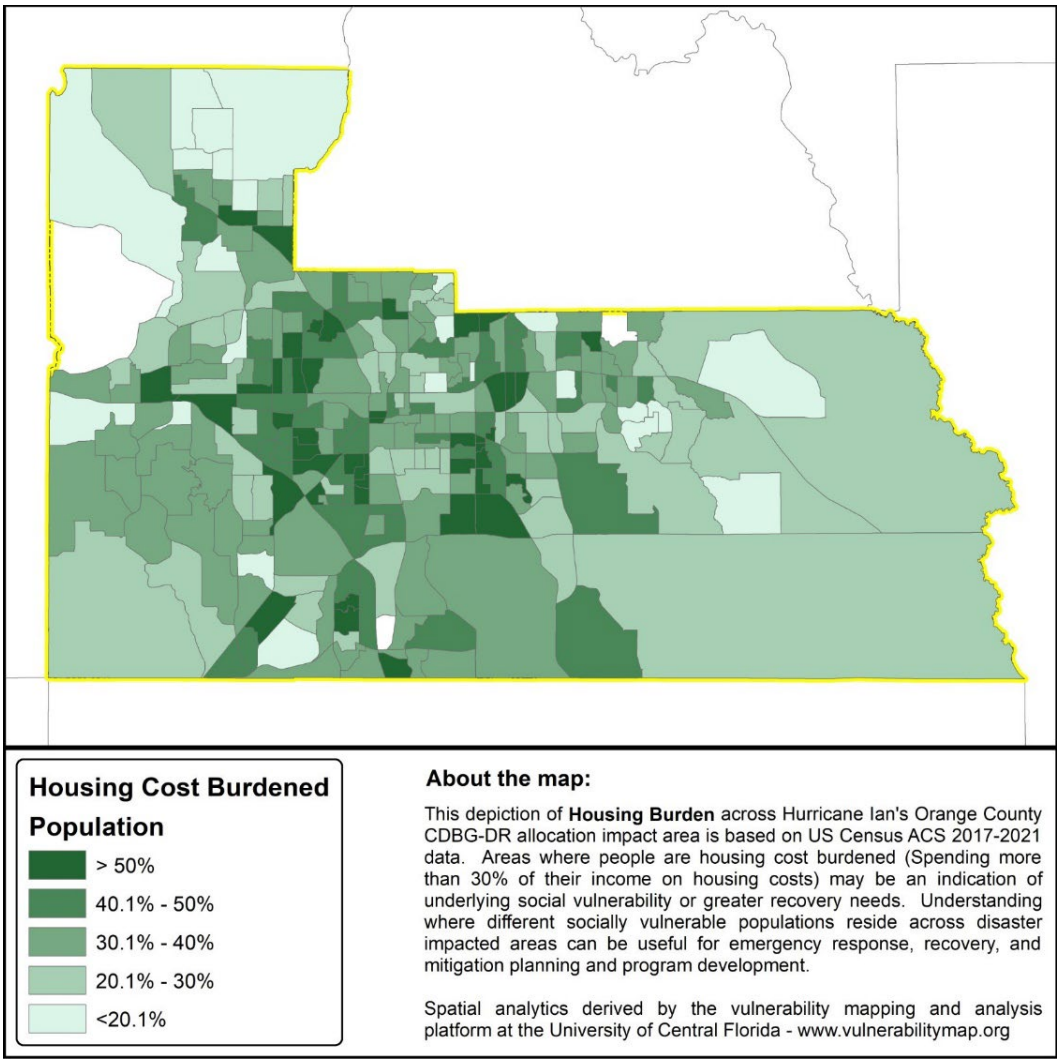

Figure 11. Housing Cost Burden by Census Tract – Orange County, FL
Source: UCF Vulnerability Mapping and Analysis platform; www.vulnerabilitymap.org

When separated by tenure, 65,400 renter households are cost burdened, compared to 39,439 owner-occupied households; and 62,783 of renter households are severely cost burdened, compared to 29,915 of severely cost burdened owner-occupied households. The data indicates that renter households are 65 percent more likely to be cost burdened, and twice as likely to be severely cost burdened than owner-occupied households. That is very concerning considering that renter households are also more likely to have lower incomes and, therefore, more likely to face difficulties in becoming homeowners.

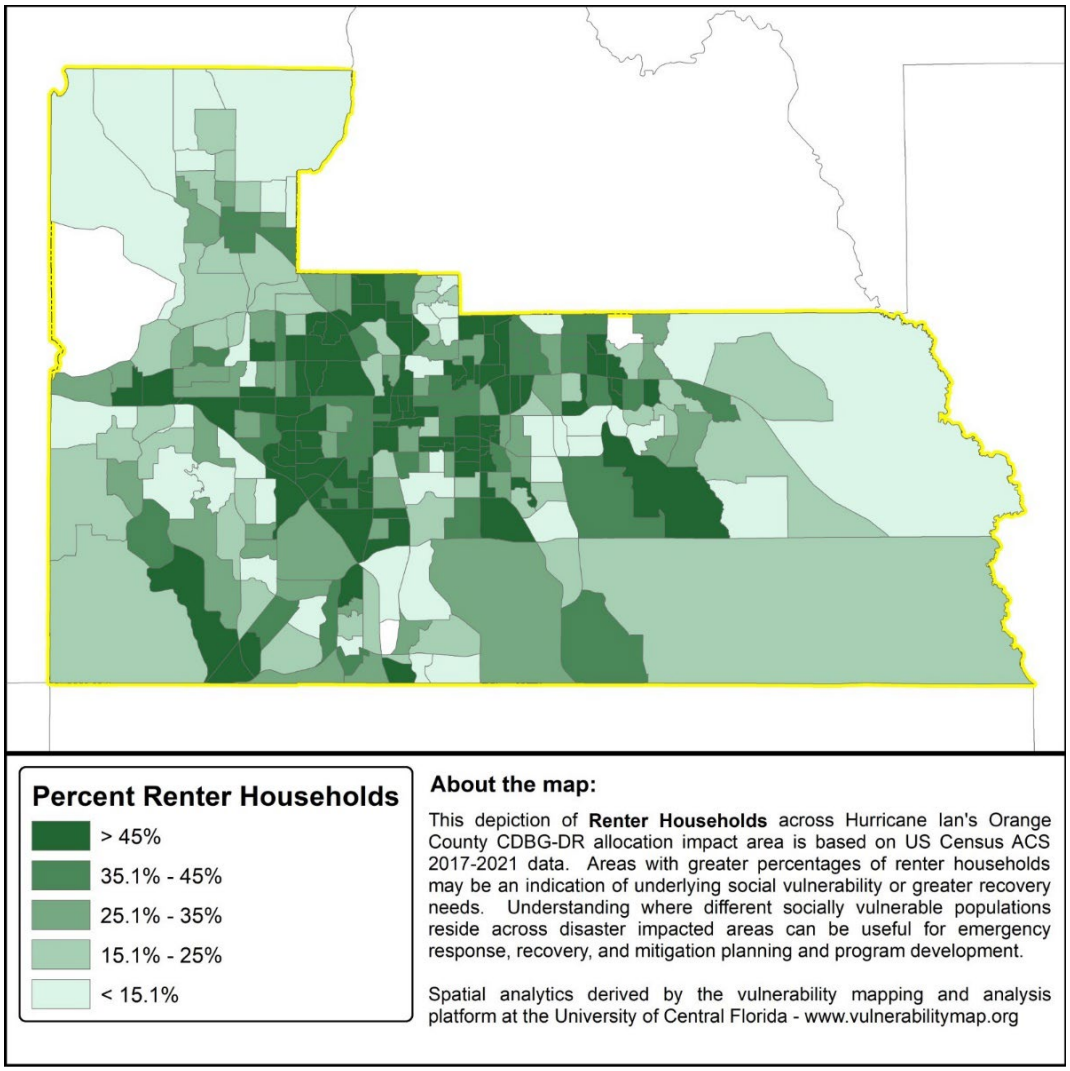

Figure 12. Renter Households by Census Tract – Orange County, FL

Source: UCF Vulnerability Mapping and Analysis platform; www.vulnerabilitymap.org

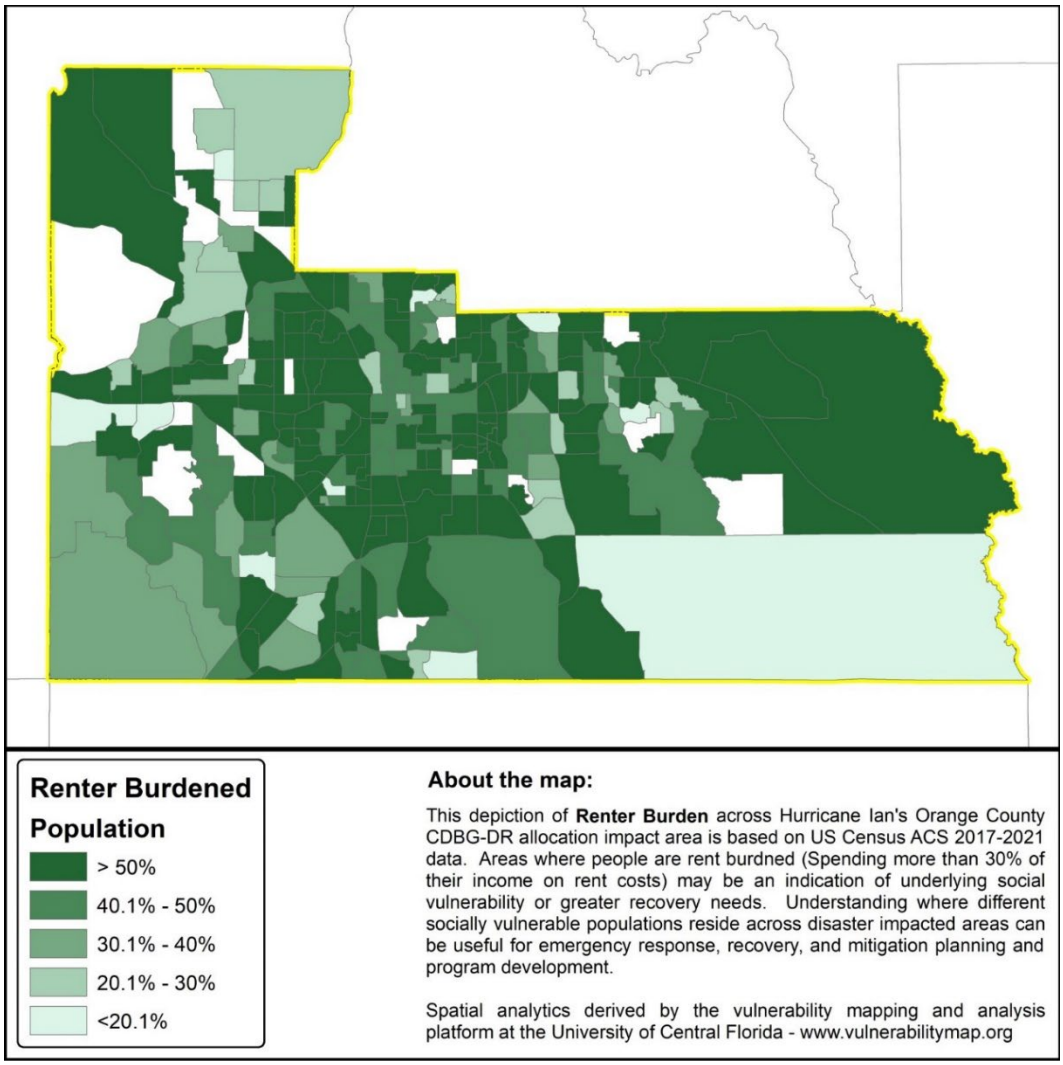

Figure 13. Cost-Burdened Renter Households by Census Tract – Orange County, FL
Source: UCF Vulnerability Mapping and Analysis platform; www.vulnerabilitymap.org

To further highlight the affordability crisis in Orange County prior to the disaster, the figure below shows the average home sales price County-wide, which has notably doubled from $204k to $460k between 2013-2022, all while the inventory of available homes has dropped.

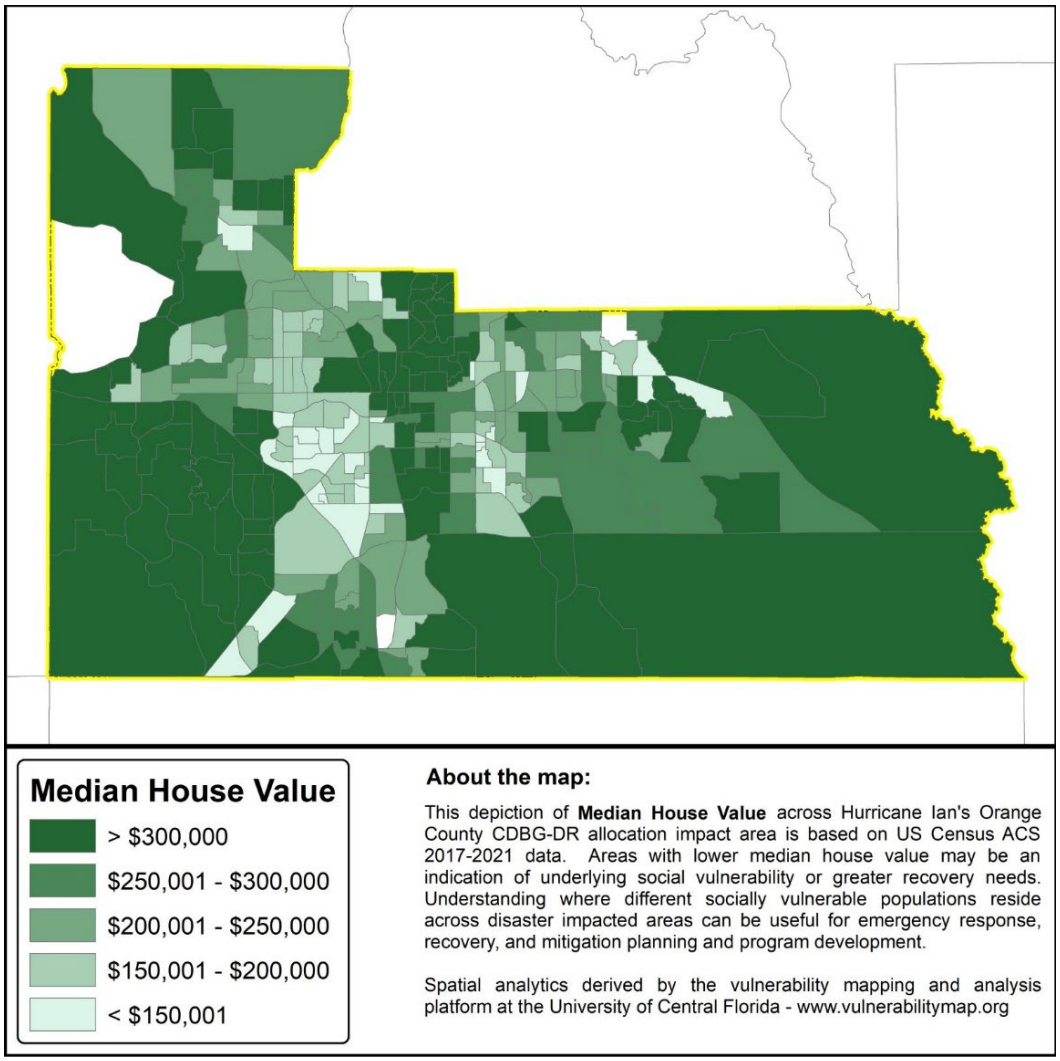

Figure 14. Median Housing Value – Orange County, FL

Source: UCF Vulnerability Mapping and Analysis platform; www.vulnerabilitymap.org

Two main factors that help to set the price of new housing developments are land values and construction costs, both of which have seen significant increases, especially during the COVID-19 pandemic. The rapid increases in the price of land were due to the increasing volume of land sales and a decline in the supply of large tracts of land.

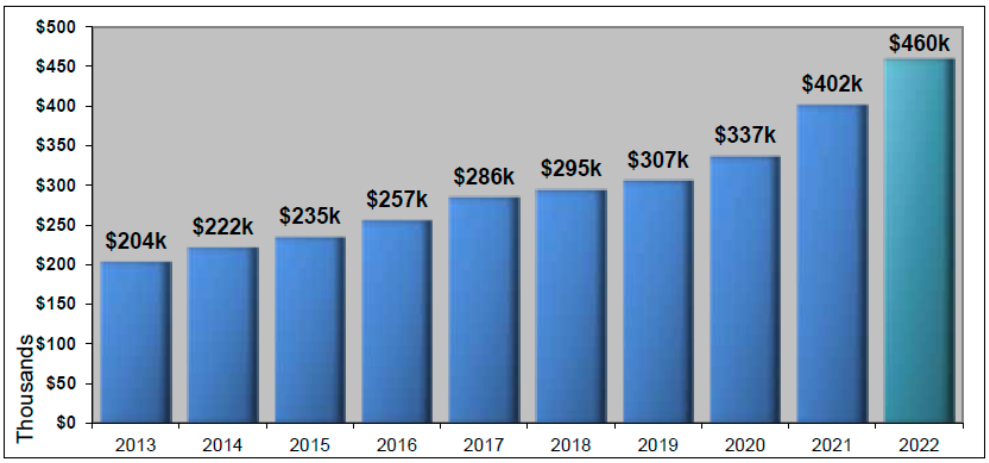

Figure 15. Existing Home Average Sales Price County-Wide

Source: Orange County Fiscal and Operational Support Division, January 2023; Orlando Regional Realtor Association

Several factors have contributed to the increase in the price of construction materials over the past few years. First, worldwide demand for construction materials continues to increase, as supply shortages and shipping delays prevail. Additionally, hurricane events resulted in construction materials becoming temporarily scarce due to the rebuilding efforts.

To summarize, prior to the Hurricane Ian event, Orange County was already in the midst of an affordable housing crisis, with rental rates continuously increasing, while home ownership was becoming more and more unattainable for the majority of Orange County households. At the same time, those who did own a home were finding that, due to increases in mortgage rates and housing prices, they could not afford to move. Additionally, insurance costs have started to climb, as the costs of rehabilitation or replacement of materials and appliances are also increasing, in line with increasing construction costs.

In addition to traditional owner-occupied and renter-occupied units, Orange County is also experiencing challenges with producing and preserving special needs housing, to include housing for seniors, housing for persons with disabilities, and housing for individuals and families who are homeless or at risk of becoming homeless. These populations and their needs are discussed in separate sections of the Unmet Needs Assessment.

2.2.4. Single Family v. Multi-Family Needs (Owner Occupied v. Tenant)

The FEMA IA data showed that 99,891 households in the County applied for disaster-related assistance, to include residents of apartments, mobile homes, houses, and

duplexes, etc. Those applicants at or below low-medium income (income below 80% AMI) may already be cost-burdened by housing and are especially exposed to the impacts of disaster as they recover their homes. The figure below shows the number of applications received throughout Orange County.

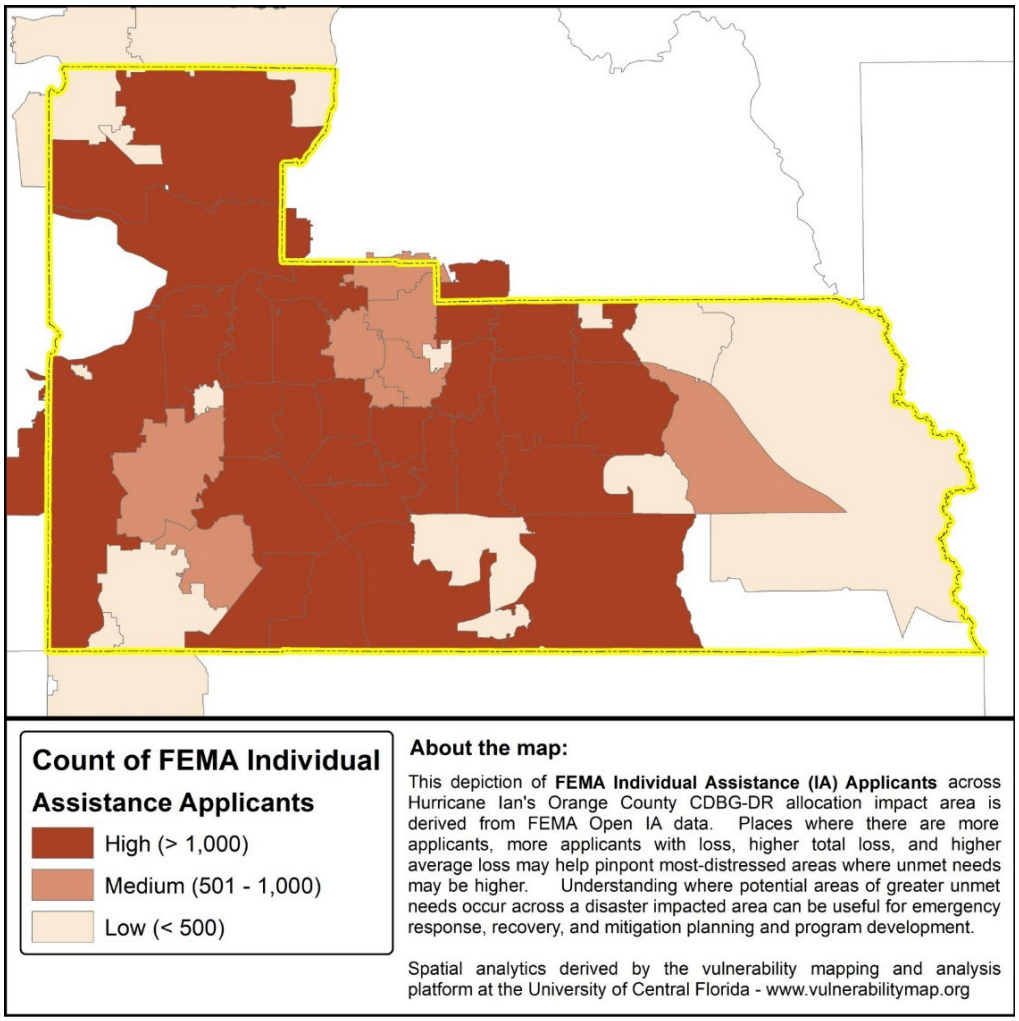

Figure 16. County of FEMA AI Applicants by Census Tract – Orange County, FL
Source: UCF Vulnerability Mapping and Analysis platform; www.vulnerabilitymap.org

2.2.4.1. Income Limits, Fair Market Rents, and Affordability Periods

To assist low-moderate income families with disaster recovery using CDBG-DR funds, applicants must be income-qualified to receive assistance. Using HUD established income limits, qualified families may be eligible for residential recovery programs such as housing rehabilitation, reconstruction, or the construction of new housing. The income limits for LMI households (incomes of 80% of the AMI) in the Orlando- Kissimmee-Sanford MSA are shown below.

1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
$49,150	$56,200	$63,200	$70,200	$75,850	$81,450	$87,050	$92,700

Table 9. Orange County CDBG FY 2023 Income Limits by Household Size (80% AMI)
Source: HUD

The County will utilize the most current income limits 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 to be assisted under the CDBG-DR Program.

In accordance with HUD guidelines, Orange County defines affordable rent as the lesser of:

- The fair market rent for existing housing for comparable units in the area, as established by HUD under 24 CFR 888.111; or
- Rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65 percent of the Area Median Income (AMI), as determined by HUD, with adjustments for the number of bedrooms in the unit.

The 2023 HUD-established fair market rents for Orange County are listed below.

Efficiency	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
$1,338	$1,422	$1,616	$2,064	$2,503

Table 10. Orange County 2023 Fair Market Rents and Rent Limits by Unit Bedrooms
Source: HUD

The County will utilize the most current HUD-established fair market rents for Orange County.

The minimum required affordability periods for units assisted with CDBG-DR funds are listed below..

- Single-family rehabilitation and reconstruction: 3 years;
- Modular/Mobile Home reconstruction: min 3 years;
- Multi-family (rehabilitation): min 10 year; and
- Multi-family (new construction): min 20 years.

Affordability restrictions will be enforceable by deed restrictions, agreements and/or similar instruments.

2.2.4.2. Analysis of FEMA Individual Assistance (AI) Data

The data tables below include impacts from Hurricane Ian to owner-occupied applicants with real property damage and renter applications with personal property damage, as reported through the FEMA IA application portal.

# of Applicants	#Inspected with Damage (Real Property)	# Assistance Received	Average FEMA Verified Loss
37,617	2,108	2,984	$9,763

Table 11. FEMA IA Owner-Occupied Applicants – Hurricane Ian

# of Applicants	#Inspected with Damage (Personal Property)	# Assistance Received	Average FEMA Verified Loss
62,153	3,854	1,534	$2,801.77

Table 12. FEMA IA Tenant-Occupied Applicants – Hurricane Ian

Residence Type	# of Applicants	% Owner Occupied	% Tenants	% Unknown	% Type
Apartment	30,675	0.02%	99.93%	0.05%	30.71%
Assisted Living Facility	88	0.00%	100.00%	0.00%	0.09%
Boat	10	60.00%	40.00%	0.00%	0.01%
College Dorm	25	0.00%	100.00%	0.00%	0.03%
Condo	3,231	44.44%	55.37%	0.19%	3.23%
Correctional Facility	6	0.00%	100.00%	0.00%	0.01%
House/Duplex	54,455	55.98%	43.88%	0.13%	54.51%
Military Housing	16	0.00%	100.00%	0.00%	0.02%
Mobile Home	4,381	70.55%	29.31%	0.14%	4.39%
Other	3,949	30.87%	68.65%	0.48%	3.95%
Townhouse	2,877	44.07%	55.82%	0.10%	2.88%
Travel Trailer	177	59.32%	40.68%	0.00%	0.18%
(blank)	1	0.00%	100.00%	0.00%	0.00%
Grand Total	**99,891**	**37.66%**	**62.22%**	**0.12%**	**100.00%**

Table 13. FEMA IA Applicants by Housing Type – Hurricane Ian

The damage categories utilized by FEMA are described below.

Owner-occupied units:

- 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 and/or 1 to 3.9 feet of flooding on the first floor.
- Major-High: $15,000 to $28,800 of FEMA inspected real property damage and/or 4 to 5.9 feet of flooding on the first floor.

- Severe: Greater than $28,800 of FEMA inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

Rental-occupied units:

- 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 or determination of "Moderate'' damage by the FEMA inspector.
- Major-Low: $2,000 to $3,499 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor or determination of ''Major'' damage by the FEMA inspector.
- Major-High: $3,500 to $7,500 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.

Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
2,696	781	1,357	733	55

Table 14. FEMA IA Real Property Damage Owner-Occupied Units – Hurricane Ian

Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
1,713	22	1,505	949	103

Table 15. FEMA IA Real Property Damage Renter-Occupied Units – Hurricane Ian

Similar to the total losses figure, average real property losses do not provide a complete picture of the most-impacted survivors. Zip codes with higher average damages can be categorized into either place with fewer high dollar losses, or places where many Orange County residences suffered moderate losses. Forming a more comprehensive understanding of Hurricane Ian's impacts and pinpointing the most-impacted areas requires an assessment of all FEMA data sets as seen in Figure 17 and 18 below. Mapping counts of applicants with any level of RPFVL provides a slightly different pattern of impacts across the Hurricane Ian AOI. Here, in addition to the areas highlighted by total and average losses, most across West and East central Orange appear to be the most impacted.

The figures below depict property losses reported and verified for all applicants for FEMA individual assistance, to include average verified losses.

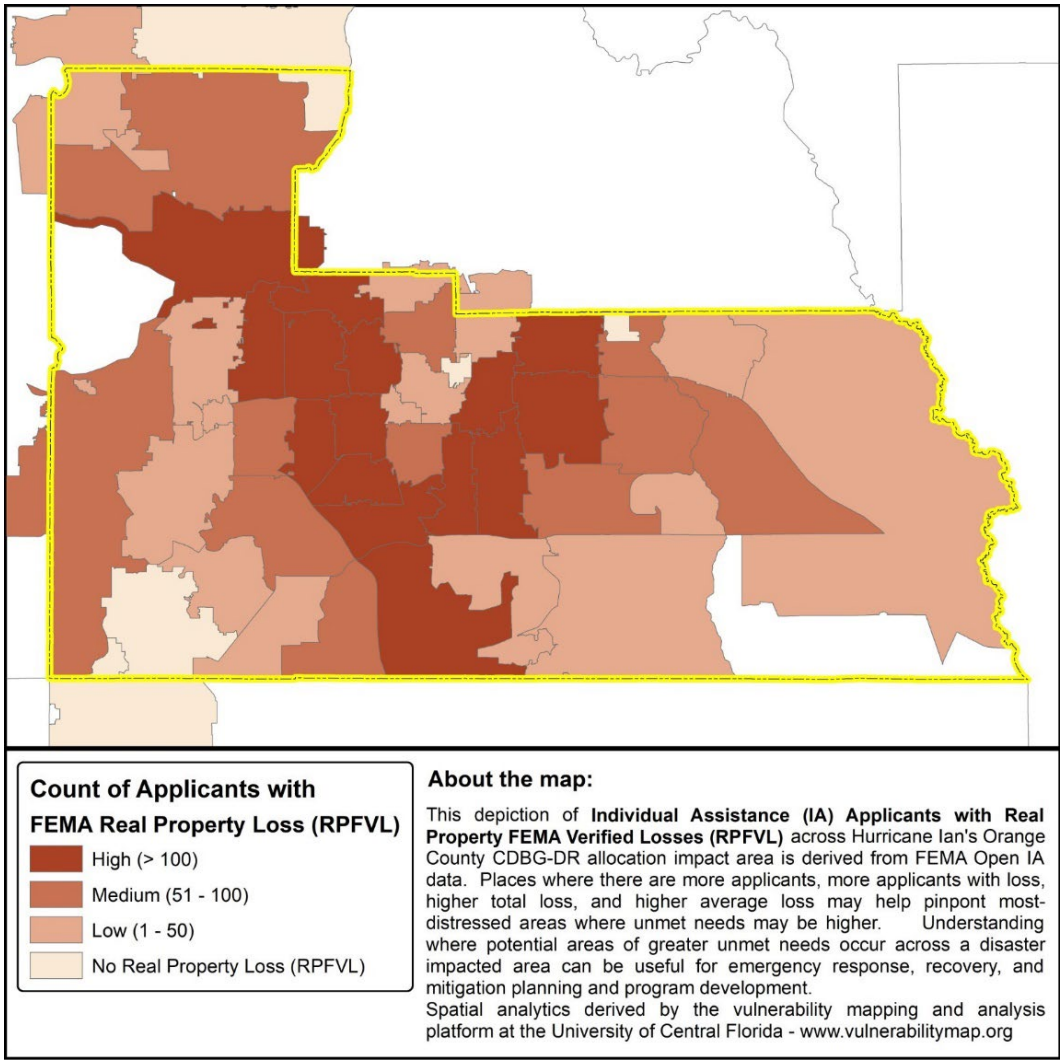

Figure 17. County of FEMA AI Applicants with Real Property Losses by Census Tract – Orange County, FL

Source: UCF Vulnerability Mapping and Analysis platform; www.vulnerabilitymap.org

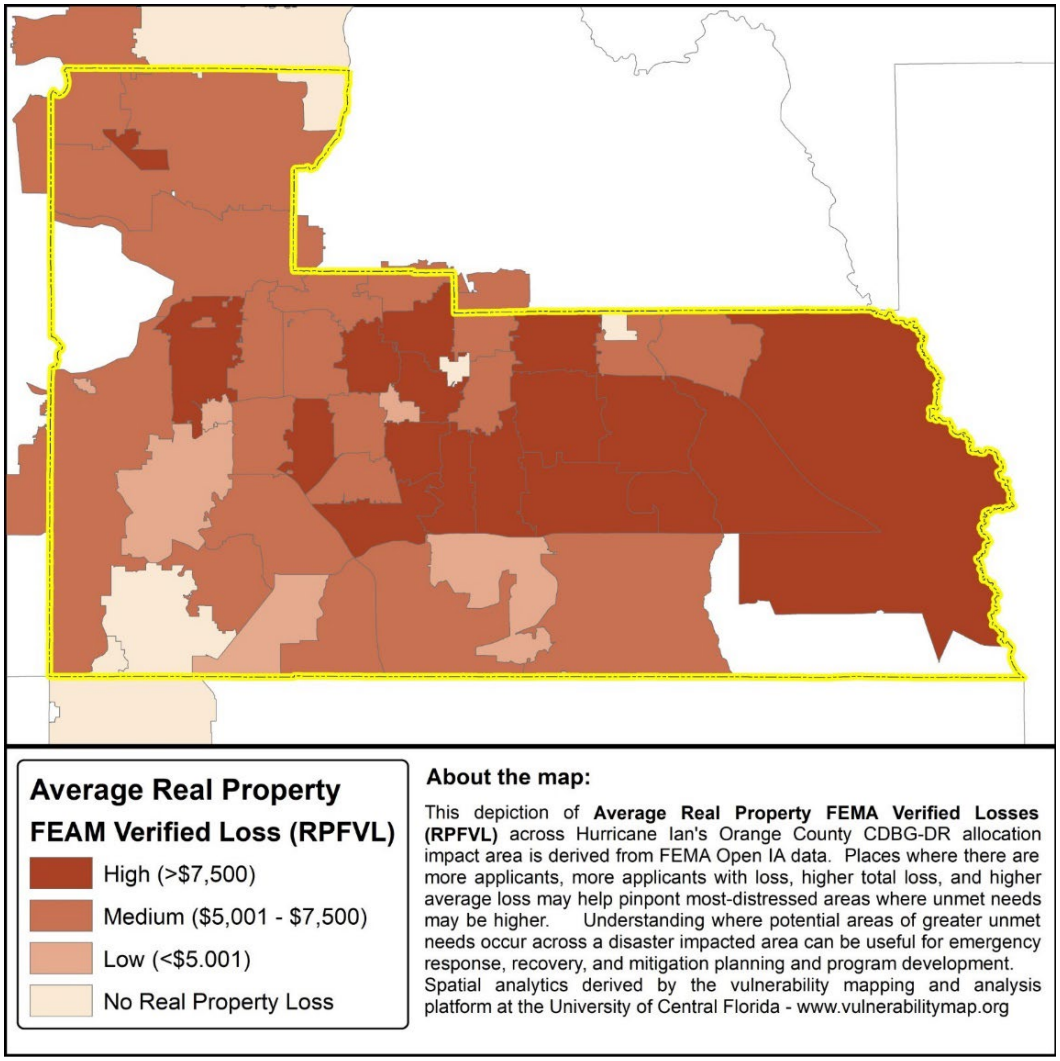

Figure 18. Average Real Property FEMA Verified Losses by Census Tract – Orange County, FL
Source: UCF Vulnerability Mapping and Analysis platform; www.vulnerabilitymap.org

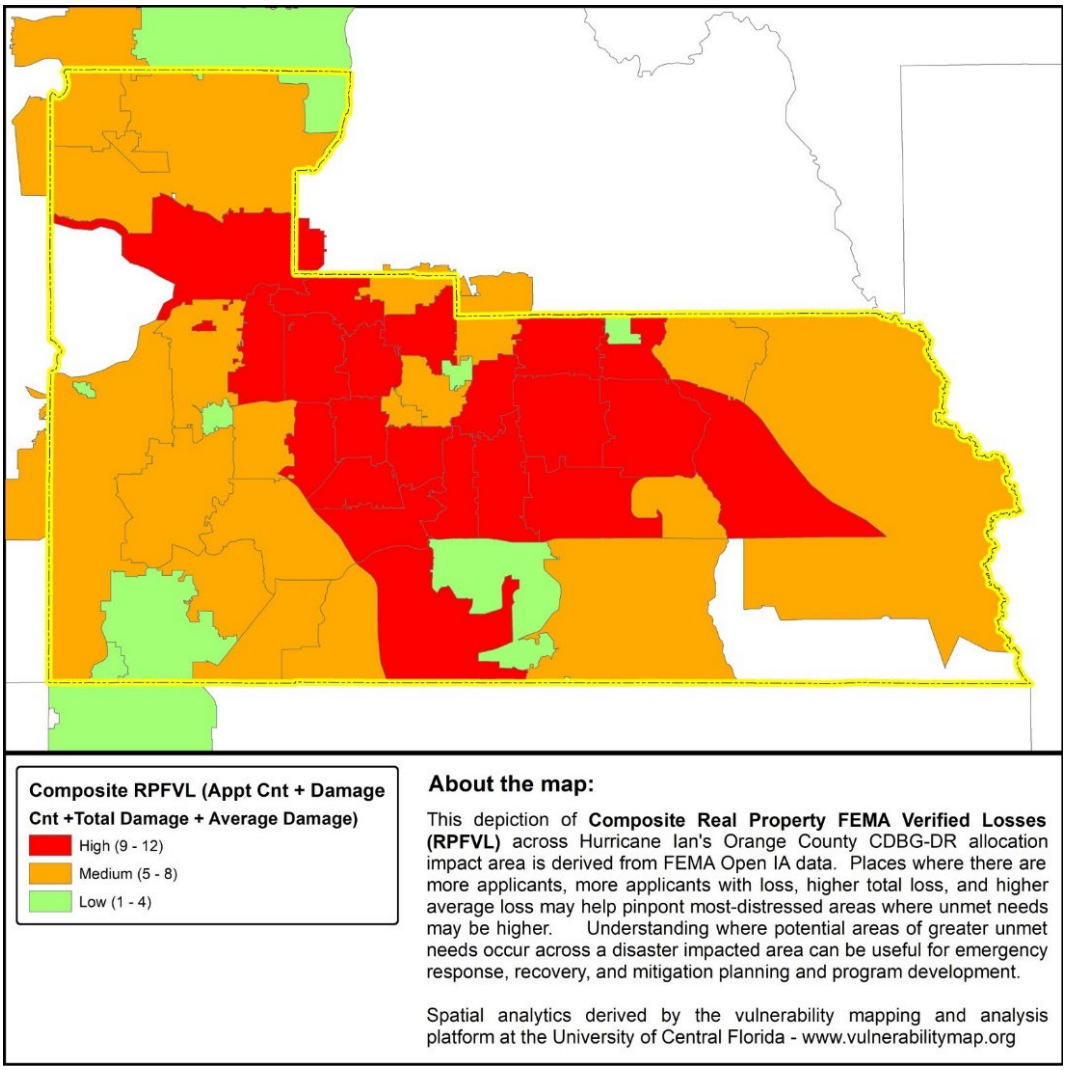

Figure 19. Composite Real Property Verified Losses by Census Tract – Orange County, FL
Source: UCF Vulnerability Mapping and Analysis platform; www.vulnerabilitymap.org

2.2.5. Public Housing and Affordable Housing

As part of the consultation process, Orange County held a meeting on September 11, 2023, with local public housing agencies. There are two public housing agencies with public housing units within Orange County the Winter Park Housing Authority with a total of 705 units and the Orlando Housing Authority with a total of 1,978 units.

2.2.5.1. Multifamily Assisted Housing

The information obtained during the consultation process showed that most of the multifamily units damaged by Hurricane Ian were not assisted housing units, with most of the damage reported in the Alafaya/University corridor area. Several assisted housing units owned by nonprofit organizations experienced damage, such as Grand Avenue

Economic Development Corporation. Aspire Health Partners relocated multiple programs to other locations after the hurricane due to significant roof damage.

2.2.5.2. Public Housing Authorities

Public Housing Authority	# of Units with Minor Damage	# of Units with Major Damage	# of Units Destroyed	Total # of Damaged Units
Orlando Housing Authority	0	0	1	1
Winter Park Housing Authority	20	30	0	50

Table 16. Reported Damages to Public Housing Units
Source: Orlando Housing Authority, Winter Park Housing Authority

Based on the data provided by two public housing agencies with public housing units within Orange County, 51 units total were damaged. Of the Winter Park Housing Authority's 705 total units, 20 units were reported to have had minor damage, while 30 units were reported to have had major damage, totaling 50 units (or 7% of total units). Of the Orlando Housing Authority's 1,978 total units, one was reported to have been destroyed.

A summary of the unmet housing needs is presented below. The FEMA claims, combined with the National Flood Insurance Program (NFIP), show Orange County's total housing losses at $243,070,375 and 10,591 units. The modified total of $315,991,487 accounts for an additional 30% needed to rebuild more resiliently. To ensure that housing repair assistance gets factored into the housing unmet needs calculation, FEMA IA payments to repair homes and NFIP building payments were added together to get the total support received, at $62,690,719. The total received was then subtracted from the total housing loss, which provides the total housing unmet needs for Orange County as a result of Hurricane Ian.

Data	Count	Estimated Totals
Total Housing Loss (FEMA/NFIP)	10,591	$243,070,375
Total Housing Loss (accounting for 30% resiliency costs)		**$315,991,487**
Total Support Received (FEMA/NFIP)	2,313	$62,690,719
Total Unmet Housing Needs		**$253,300,768**

Table 17. Summary of Unmet Housing Needs – Orange County, FL
Source: FEMA

2.2.6.2 Monitoring of Compliance with Fair Housing and Non-Discrimination Obligations

To ensure that the barriers identified in Orange County's 2022-2026 Analysis of Impediments to Fair Housing Choice document are addressed during the CDBG-DR Program implementation, the County indents to regularly monitor compliance with fair

housing and non-discriminatory obligations for both, County staff and implementing partners, such as local municipalities and other subrecipients of funds in accordance with the Fair Housing Act.

The County staff with CDBG-DR responsibilities will be required to take the training(s) on fair housing regulations and compliance and to provide training and/or extend training opportunities to subrecipients of funds. To integrate efforts to affirmatively further fair housing in its ongoing operations and implementation of the CDBG-DR Program, the County will provide the following resources and education to the subrecipients of funds, County staff, and the general public:

- **Trainings:** Post-award training, to include fair housing information and overview of the Language Access Plan requirements, for subrecipients of funds. Additional training opportunities to be provided during the Fair Housing Month (April), and throughout the program year. Some trainings/refreshers will be made mandatory for subrecipients of funds. At the request of the participant(s), in-person trainings will be made accessible for persons with disabilities by providing accommodations.
- **Marketing and outreach materials:** Provision of fair housing materials (posters, brochures, information flyers, etc.) in multiple languages to program participants and subrecipients of funds.
- **Program information:** Making the CDBG-DR Program website available in multiple languages and providing program information in multiple languages to ensure equitable access to CDBG-DR funds. This might also include conducting additional outreach in disadvantaged communities, potentially in collaboration with grassroots organizations.
- **Subrecipient agreements:** Inclusion of fair housing and non-discriminatory requirements language in project administration subrecipient agreements.
- **One-on-one technical assistance:** Upon request, consultations and/or technical assistance can be provided to target audiences on a variety of topics.
- **Monitoring:** Annual on-site monitoring of subrecipients and assessment of compliance.
- **Reporting:** Regular (quarterly) reporting to HUD to ensure compliance.

To reduce barriers in accessing disaster recovery assistance through the CDBG-DR Program, and in accordance with the adopted Language Access Plan and Citizen Participation Plan, Orange County will offer reasonable accommodations at no charge to the requestor and provide outreach, project documents, and all other communication in alternate formats for persons with disabilities or limited English proficiency.

Furthermore, the County will ensure on-going coordination with providers of public services and homeless services in an effort to keep track of any new information related to needs of populations affected by the disaster.

Limited English Proficiency Coordinator: The Limited English Proficiency Coordinator will oversee the implementation of the Language Access Plan (LAP) and compliance across CDBG-DR programs. The coordinator ensures that Orange County Housing and Community Development Division staff recognize their responsibilities to provide LEP persons with meaningful access to information, programs, and services. The LEP coordinator will also serve as the point of contact if members of the public or HCD staff have questions or complaints about language access services.

Ricardo Daye, Director, Human Resources Department
Title VI/Nondiscrimination Coordinator
Orange County Government
450 E. South Street
Orlando, Florida 32801
(407) 836-5825
Access@ocfl.net

Oral Interpretation: Interpreters were provided at the events hosted to solicit input from the community about their priorities in the use of CDBG-DR funds, especially in areas with high concentrations of Spanish/Creole speakers. The County utilized County staff who are fluent speakers of these languages, and contracted translation services when needed.

Online Language Access: All information on the Orange County, FL government's website is available in Spanish: (https://espanol.orangeCountyfl.net). Specific to the Orange County CDBG-DR Program, the program website provides translations of all vital documents and includes resources for LEP residents. The citizen participation survey, public meeting invitations, summaries, and FAQs are translated into Spanish and Haitian Creole and uploaded to the website. Ongoing updates, vital documents, and related public information will continue to be translated into Spanish and Haitian Creole over the 6-year duration of the CDBG-DR program to ensure continued access for LEP residents.

"I Speak" Cards: Orange County Housing and Community Development Division, which will oversee implementation of the CDBG-DR Program, will distribute the U.S. Census Bureau's "I Speak" cards to all public-facing departments and staff working on CDBG-DR funded programs and activities. These cards allow staff to identify LEP persons seeking access to programs and their language access needs.

LEP Outreach: Orange County will maintain a copy of the Language Access Plan and its Addendum for federal programs on the CDBG-DR Program website: www.ocfl.net/CDBG-DR. The website will also contain notices of LEP clients' language access rights and available services. These rights include the following:

- The right to qualified interpretation services at no cost;
- The right to not rely on family members or friends as interpreters; and
- The right to file grievances about the language access services provided (or lack thereof).

Training: HCD will provide training for all staff that directly interact with the public through the CDBG-DR programs to ensure that staff understand how to provide meaningful language assistance services to LEP persons. Training components will include:

- Definition of LEP persons;
- Federal and state regulations governing language access;
- Cultural sensitivity;
- Staff roles and responsibilities;
- Identifying the language needs of LEP persons;
- HCD language access procedures; and
- LAP complaints/appeals process.

Monitoring: The LEP Coordinator will regularly monitor the Language Access Plan and its Addendum and make updates as needed. Data on the frequency of translation/interpretation requests will be reviewed carefully to ensure that HCD is meeting the needs of its clients. Updated Census data will also be reviewed to identify any demographic changes in Orange County's LEP service population.

In addition to Orange County staff, subrecipients of CDBG-DR funding and implementing vendors are expected to comply with the County's Language Access Plan in the provision of services to eligible individuals.

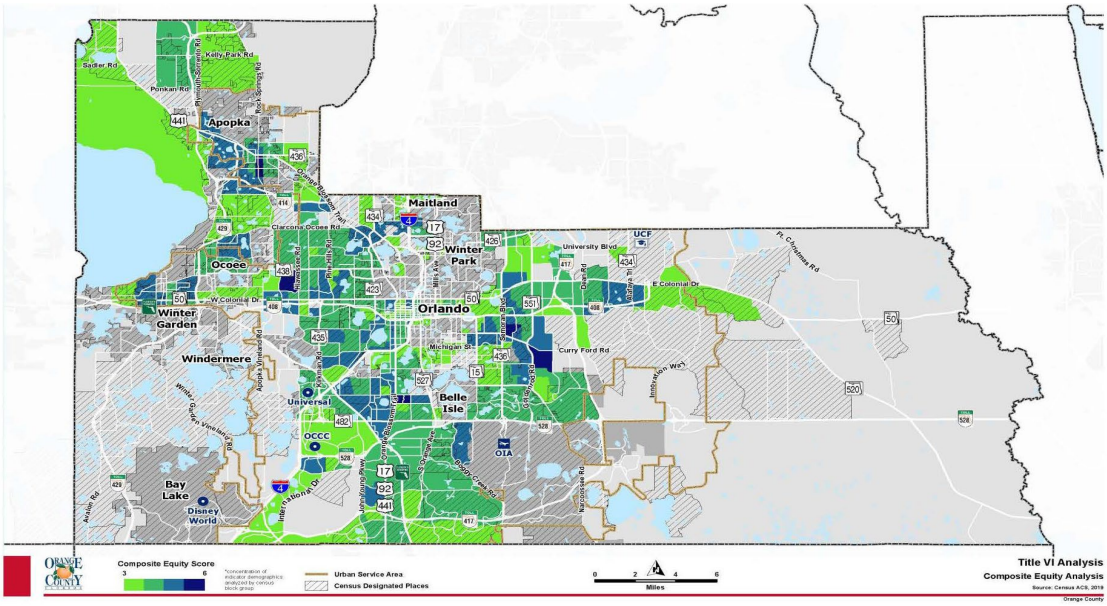

Figure 20. Composite Equity Score
Source: Census ACS, 2019

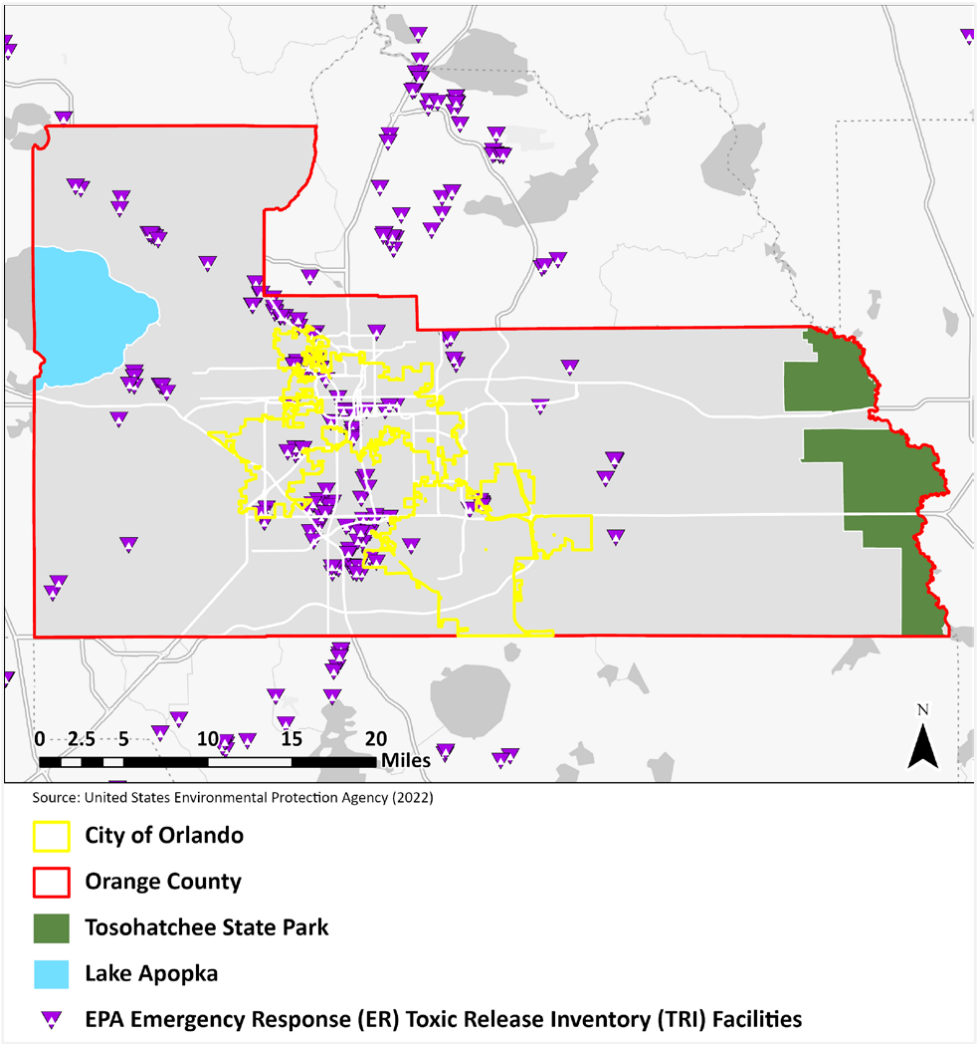

Figure 21. Proximity of Natural and Environmental Hazards
Source: United States Environmental Protection Agency (2022)

2.2.6.2. Education Demographics

Level of Education	Number	Percent
Less than 9th grade	40,159	4.2
9th to 12th grade, no diploma	60,336	6.3
High school graduate	231,759	24.3
Some college, no degree	171,937	18
Associate's degree	109,275	11.5
Bachelor's degree	219,794	23
Graduate or professional degree	120,846	12.7
TOTAL	**954,106**	**100**

Table 18. Educational Attainment (25 Years and Over) – Orange County, FL
Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, Table S1501

The educational attainment of a jurisdiction has a direct influence on the labor market pool and the development of specific industries. Most of Orange County's residents 25

years of age and over have at least a high school education, and 47.2 percent have an associate degree or higher, almost a 10 percent increase from 2007. Orange County is home to several higher learning institutions, including the University of Central Florida, Valencia Community College, and Rollins College. Higher levels of education correlate with higher incomes and, potentially, increased housing affordability.

In regard to disaster recovery, research states that disaster preparedness planning is associated with having a higher education (Source: American Journal of Preventive Medicine; 2006; 30(1):1-6.) and that having some college or trade school education was associated with increased odds of having emergency supplies. Barriers and challenges may occur for those individuals and families because they are more likely to live in areas that are at risk for disasters, i.e., flood and hurricane areas. Another challenge may be the lack of access to transportation and communication networks, which can make it difficult to evacuate or get help in the event of a disaster. The data will be used to make decisions regarding equitability and decrease potential obstacles in the development of strategies that promote opportunities and inclusivity for individuals enrolling in and accessing disaster recovery assistance.

2.2.6.3. Income Demographics

Income Level	% Households	% Families	% Married-Couple Families	% Non-family Households
Less than $10,000	5.5	3.8	1.9	10.4
$10,000 to $14,999	3.4	2.2	1.3	6.2
$15,000 to $24,999	7.8	6.5	4.2	11.4
$25,000 to $34,999	8.4	8.1	5.6	10.7
$35,000 to $49,999	12.9	12	10.1	15
$50,000 to $74,999	17.8	17.2	15.8	18.9
$75,000 to $99,999	13.3	14	15.2	11.1
$100,000 to $149,000	15.8	17.7	21.4	10.3
$150,000 to $199,999	7	8.3	11	3.3
$200,000 or more	8.1	10.4	13.7	2.8
TOTAL #	**475,292**	**316,908**	**220,661**	**158,384**

Table 19. Income in the Past 12 Months – Orange County, FL

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, Table S1901

The median household income in 2021 was $65,784. The table above depicts the number of households by income categories in Orange County. As household income levels determine housing affordability, this information is cause for concern. Family households often have more than one wage earner, which may explain the difference in the median incomes between family and non-family households.

2.2.6.4. Income Demographics – Low Income

Hurricane Ian deposited more than 14 inches of water in areas in Orange County causing economic impacts that devastated low-income families. Many lost their homes, their jobs, and their savings. Some may have lost the ability to pay for medical expenses, funeral expenses, and other costs associated with the disaster. As a result, many of these low to moderate-income families were forced further into poverty after Hurricane Ian. U.S. Census data indicates that 13.9% of Orange County residents live below the poverty level (Source: U.S. Census, American Community Survey, 5-Year Estimates, 2017-2021).

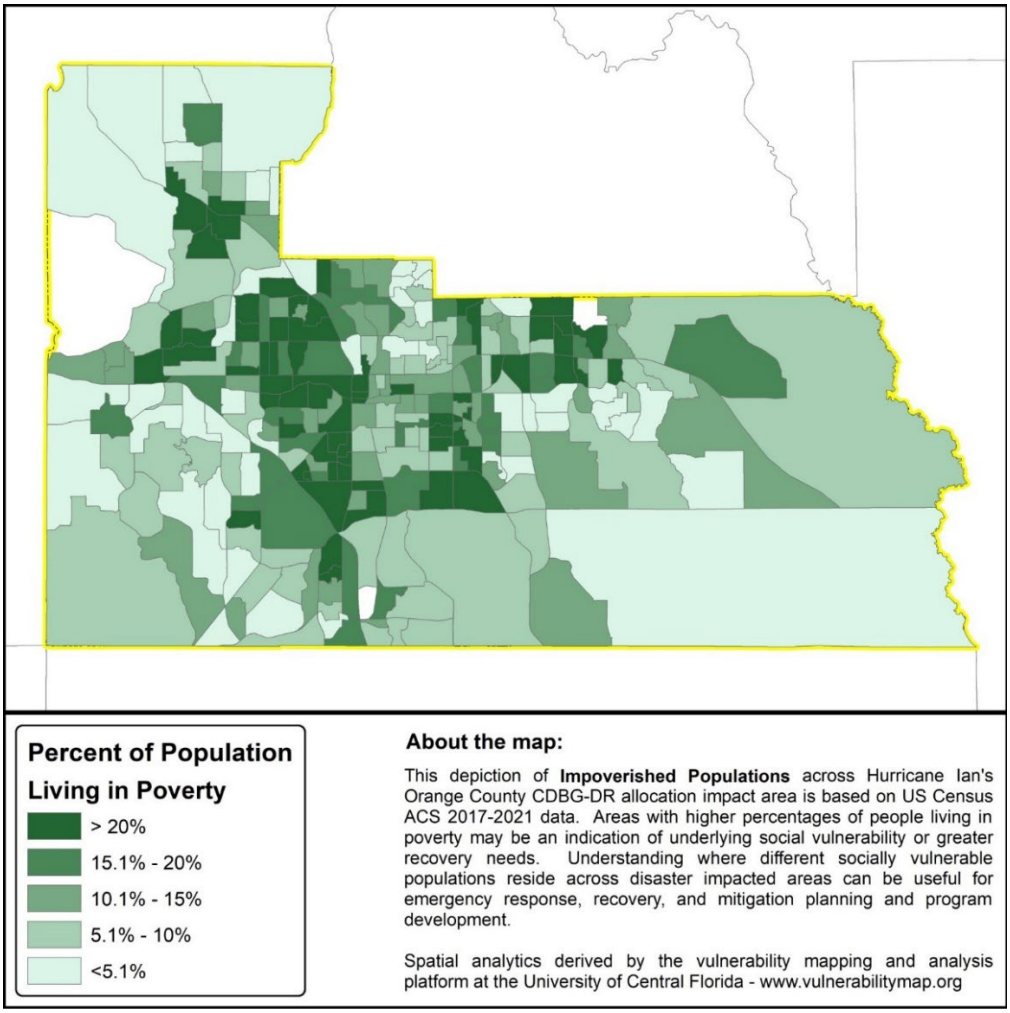

Figure 20. Impoverished Populations by Census Tract – Orange County, FL
Source: UCF Vulnerability Mapping and Analysis platform; www.vulnerabilitymap.org

The updated 2022 U.S. Census data indicates that this percentage increased to 14.9%. Poverty especially affects individuals and households from specific demographic group. Through programs implemented using the CDBG-DR funds, Orange County will be able to provide financial assistance to help families rehabilitate their homes, as well as provide

job training and placement services to help residents obtain higher income and become more self-sufficient.

2.2.6.5. LMI Analysis – Overall

Total LMI Persons	Total Population	Percentage LMI
512,575	1,196,175	42.85%

Table 20. Low-Mod Population – Orange County, FL
Source: U.S. Census Bureau

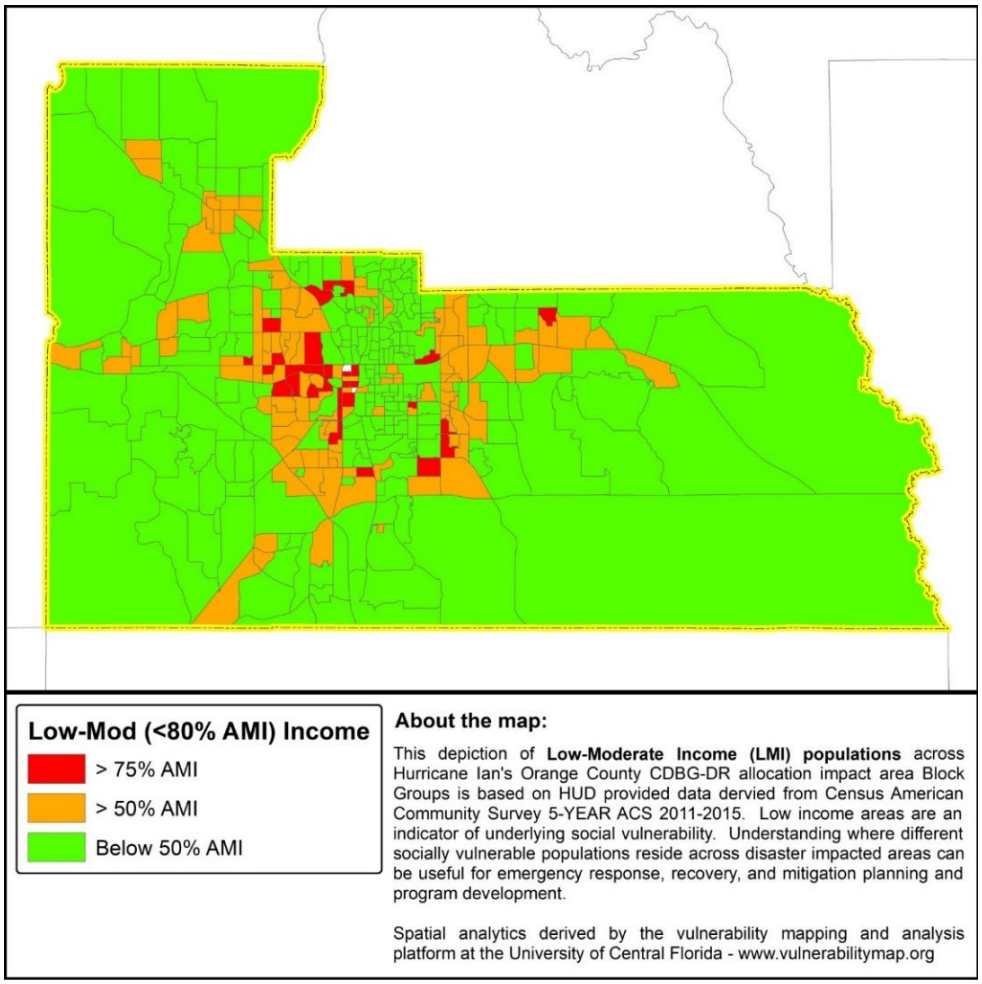

Figure 23. Low-Moderate Income (LMI) by Census Tract – Orange County, FL
Source: UCF Vulnerability Mapping and Analysis platform; www.vulnerabilitymap.org

Low-Moderate Income (LMI) populations are especially exposed to the catastrophic impacts of disasters. Figure 25 depicts Low-Moderate Income (LMI) populations across Hurricane Ian's Orange County's CDBG-DR allocation impact areas by block groups based on the American Community Survey 5-Year ACS 2011-2015 Census data.

2.2.6.6. LMI Analysis – Federally Declared Disaster Areas

Category	Total Persons	Total Population	Percent LMI
Low (<50% AMI)	1,196,175	303,614	25.38%
Low Mod (80% AMI)	1,196,175	512,575	42.85%
LMMI (< 120% AMI)	1,196,175	734,790	61.43%

Table 21. Percentages of Low-Mod Populations by Income – Orange County, FL
Source: U.S. Census Bureau

2.2.6.7. Manufactured Housing Units Impacted by Disaster

Total # of Manufactured Homes in Orange County	# of Manufactures Homes Impacted	% pf Manufactured Homes Impacted
18,710	4,381	23.42%

Table 22. Manufactured Homes Impacted by Disaster – Orange County, FL
Source: FEMA

Almost a quarter of mobile homes in Orange County were impacted by Hurricane Ian. This concern was also brought up during the focus group discussions and community meetings. Participants noted that mobile home residents are particularly susceptible during disaster events, as they are often low-moderate income, and limited assistance for home repairs is available to them after a disaster event.

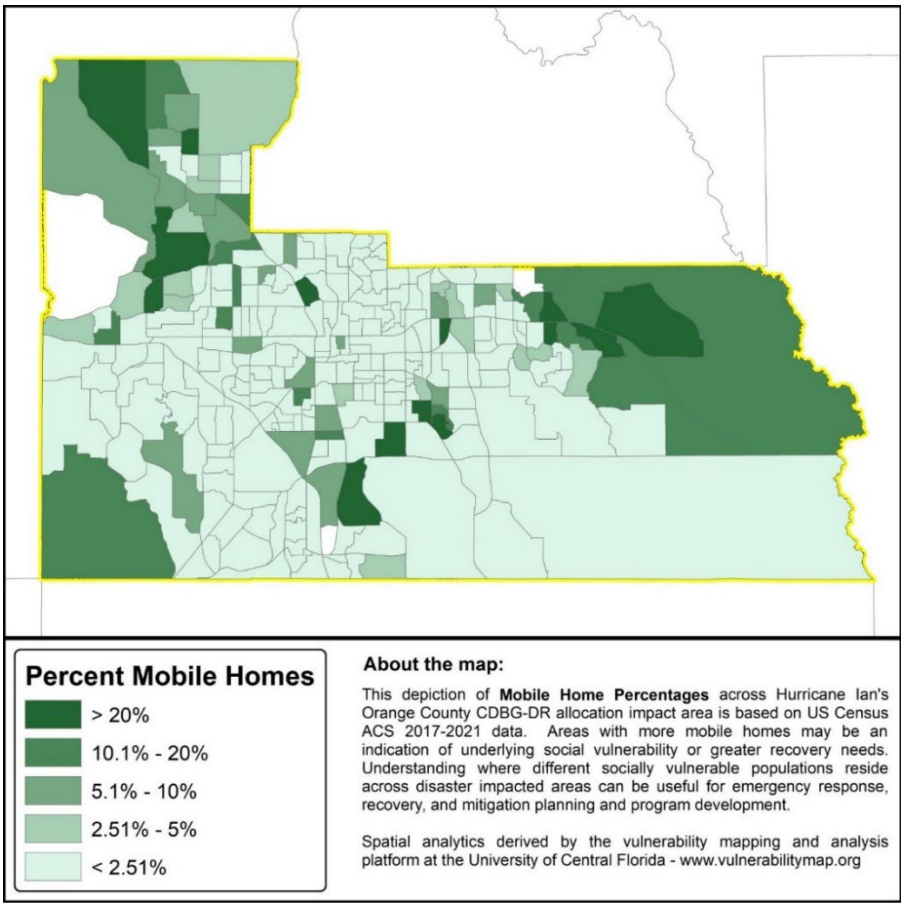

Figure 24. Mobile Home Percentages by Census Tract – Orange County, FL
Sources: UCF Vulnerability Mapping and Analysis platform; www.vulnerabilitymap.org

2.2.6.9. Affected Continuum of Care Entities

Homeless Services Network of Central Florida, Inc. (HSN) is the lead agency for the local Continuum of Care, also known as Central Florida Commission on Homelessness. HSN operates the region's Homeless Management Information System (HMIS). As the lead agency, HSN provides oversight, quality assurance, HMIS training for all stakeholders, help desk support and required/requested reports.

The table below identifies the CoC Entity and includes the total count of known individuals experiencing homelessness**.**

CoC Number	CoC Entity	Impacted County	Homeless Count
FL-507	Central Florida Commission on Homeless *(Orlando/Orange, Osceola, Seminole Counties)*	Orange, Osceola, Seminole	2,258

Table 23. Affected Continuum of Care Agency
Source: 2023 Point-in-Time County, CoC FL-507

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

The table below provides a breakdown of homelessness within the designated areas, specifically focusing on different types of shelter categories, such as emergency shelter, transitional housing, and unsheltered homeless. The data is based on the 2023 Point-in-Time summary from the Central Florida Commission on Homeless (CoC-507).

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Orange County	831	464	331	1,626

Table 24. 2023 Point-in-Time Count – Type of Shelter

Sources: 2023 Point-in-Time County, CoC FL-507; University of Central Florida

2.2.6.11. Point-in-Time Count – Impacted by the Disaster

The table below provides an overview of homelessness within a specific geography following Hurricane Ian. 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 homelessness in Orange County, the designated MID area. The methodology involves extracting values for different geographic areas, such as area-wide, FEMA declared, and MID, and inserting them into the respective fields. This information is essential for understanding the immediate impact of the disaster on homelessness, and it enables stakeholders to assess the magnitude of the issue and plan appropriate interventions. Unhoused individuals in Orange County can be presumed to have experienced detrimental impacts from the storm event because of the severity and extensive impact area of the storm.

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Statewide	10,040	4,041	11,746	25,959
FEMA Declared	5,089	2,218	5,123	12,514
Orange County	831	464	331	1,626

Table 25. 2023 Point-in-Time Count – Impacted by Disaster

Sources: 2023 Point-in-Time County, CoC FL-507; University of Central Florida

Immediately following Hurricane Ian, many families were displaced from their homes with insufficient resources for support. Additionally, social service agencies in the area and emergency shelters reported issues such as power outages, flooding, and roof damage, which limited efforts to assist homeless families and individuals impacted by the disaster.

Unmet needs for the homeless remain because of Hurricane Ian. The County will seek to address these needs through allocation of funding for public services, housing, and public facilities projects and activities. Nonprofit agencies and providers of housing and homeless services can access the funding, to enhance access to those services for populations with special housing needs.

2.2.6.12. Assisted Housing Impacted by the Disaster

Hurricane Ian significantly impacted housing stability for citizens, including residents who are unhoused or at risk of homelessness, individuals with disabilities (mental, physical, or developmental), and the elderly. Planning for future resiliency should consider the strength and severity of recent natural disasters, and the resulting risks they pose to safety for these populations. In addition to income eligibility of the CDBG-DR Program, the County will prioritize services for the following populations:

- Individuals with disabilities;
- Individuals who are elderly, including those with disabilities; and
- Individuals who are homeless, at risk of becoming homeless, and victims of domestic violence and their children.

The sections below provide additional details on each one of the population groups listed.

Individuals with Disabilities

The population with at least one disability in Orange County is estimated at 11.7 percent. The most common disability in Orange County residents is ambulatory difficulty, which is present in 5.5 percent of the population. Other common disabilities include cognitive difficulty (present in 4.7% of the population), independent living difficulty (3.9%), hearing difficulty (2.7%), vision difficulty (2.6%), and self-care difficulty (2.1%).

Disability Type	Number	Percentage
Hearing Difficulty	28,929	2.7%
Vision Difficulty	27,758	2.6%
Cognitive Difficulty	50,944	4.7%
Ambulatory Difficulty	59,512	5.5%
Self-Care Difficulty	22,930	2.1%
Independent Living Difficulty	42,233	3.9%
TOTAL POPULATION WITH A DISABILITY	**125,807**	**11.7%**

Table 26. Disability by Type – Orange County, FL

Source: U.S. Census Bureau, 2016-2020 American Community Survey 5-Year Estimates, Table S1810

The County will prioritize the provision of CDBG-DR funding to improve and increase safe, available, affordable, and accessible housing for Orange County residents with special needs who may require supportive services and additional housing accommodations.

Housing for individuals with special needs to be accessible, affordable, and, in some cases, supportive.

- **Accessible**: Persons with disabilities often find that housing options are not ADA compliant and lack the necessary architectural modifications including wheelchair ramps, roll in or walk in showers, grab bars, etc. for safe access to entry ways and common areas. They also need appropriate access to wider community living provisions including ADA parking, paratransit, recreation, and employment.
- **Affordable:** Residents with special needs often live at or below the federal poverty level on fixed income, Social Security or are unemployed or underemployed, spending 30% or more of their income on housing. HUD's fair market rent documentation for FY 2022 estimates fair market rent for a two-bedroom unit in Orange County at $1,422 per month or $17,064 annually, and for a three-bedroom unit at $1,827 per month to $21,924 annually. In comparison, the federal rate for SSI benefits is $914.00 per month or $10,968 annually rendering the current housing structure unaffordable for these groups and their families.
- **Supportive:** People with physical, intellectual, or developmental disabilities might have specific housing needs that may be addressed through housing supplemented with wraparound services, including case management, independent living skills programming, and mental/health services. These services strengthen societal safety nets, promote appropriate disaster planning, and increase resiliency.

CDBG-DR investment in increasing safe, affordable, and accessible housing for individuals with disabilities may include some of the following:

1. Modification, rehabilitation, and improvement of existing residential rehabilitation facilities that house individuals with significant disabilities. Modifications are architectural changes to ensure safe ADA access to the home and community.
2. New construction of additional ADA accessible housing units.

The County has established working partnerships with many organizations that have the experience and expertise necessary to deliver services to individuals with disabilities. These organizations include Primrose Center, Life Concepts (dba Quest), Center for Independent Living in Central Florida, and Lighthouse Central Florida, to name a few.

Elderly and Frail Elderly

Population estimates from the 2021 American Community Survey reported about 169,351 of Orange County residents were 65 and above.

Age	Number	Percentage
Under 65	1,240,598	88
65-74	104,422	7.4
75 and over	64,929	4.6
TOTAL	**1,409,949**	**100**

Table 27. Age Composition: Elderly and Frail Elderly – Orange County, FL

Source: U.S. Census Bureau, 2016-2020 American Community Survey 5-Year Estimates, Table S0101

Most older people live on fixed incomes, such as pensions, Social Security, and personal savings, and often spend more than 30 percent of their income on housing. Low-income elderly face special challenges to live in and maintain their homes. Elderly homeowners often are unable to afford modifications to improve their safety and mobility, such as handrails and ramps. Similarly, individuals with disabilities are also in need of accessible and affordable housing options. Hurricane Ian has resulted in damage to the County's housing stock, including units owned by seniors. Some of those units are still in need of repair, remediation, or rebuilding post Ian.

Activities aimed at improving affordability and accessibility of housing for the elderly and individuals with disabilities will improve health of the residents, increase the safety and resiliency of our housing stock, and might result in reduced housing costs (including insurance). These activities may include one or more of the following:

1. A County-wide home rehabilitation program for eligible individuals to repair storm damaged structures which will help lower insurance coverage cost and mitigate against future natural disasters.
2. Enhancing disaster preparedness of nursing homes, supportive housing units, and senior housing by reinforcing structures, providing appropriate backup generators, and installing hurricane-prove windows and doors.

Homeless Persons

The County will prioritize increasing the capacity of shelter facilities for individuals who are homeless or housing insecure. As the lead agency for the Local Continuum of Care, Homeless Services Network of Central Florida (HSN) maintains a Coordinated Entry System (CES) to prioritize services to those most in need. Each year, HSN conducts a single-day Point-in-Time (PIT) count for the number of sheltered and unsheltered homeless persons and works to ensure the Homeless Management Information System

(HMIS) delivers data needed for HUD and local government reporting. The 2023 PIT count noted that 1,626 individuals in Orange County are homeless.

The Coalition for the Homeless of Central Florida is one of the largest providers of emergency shelter services in Central Florida, and it reports serving over 800 homeless individuals daily. The agency has identified an urgent and compelling need for shelter expansion, especially to assist youth and homeless families. Up to 240 single parents with children may reside in the current facility on any given night. In 2023 Covenant House Florida, the only specialized shelter for homeless youth in the County, closed its doors leaving a 17-bed gap in the shelter system. With more people experiencing homelessness than ever before and an aging facility that is underserving community needs, Coalition for the Homeless of Central Florida intends to upgrade its facility to include an increase in shelter beds, support services, and bridge housing that will meet the needs of Central Florida residents. Sufficient emergency shelter capacity is of the most importance during extreme weather events, to include any future hurricanes or similar storms.

The table below shows the current supply of shelter units for homeless adults, families, and veterans that is readily available, and the gap in the number of units needed. The data reflects the state of the shelter system before the closure of the Covenant House Florida facility.

	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets					Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	612	210	549	-	10								
Transitional Housing	309	91	249	-	42								
Permanent Supportive Housing	98	29	1,372	-	713								
Other Permanent Housing	0	0	0	0	0								
Sheltered Homeless						650	657	--	--				
Unsheltered Homeless						0	224	--	--				
Current Gap										-188 emergency and transitional housing beds			

Table 28. Homeless Needs Inventory and Gap Analysis – Orange County, FL

Sources: 2022 Point in Time Count (PIT); Continuum of Care 2022 Housing Inventory Count (HIC); Consultation (adopted from the HOME-ARP Allocation Plan).

CDBG-DR activities aimed at improving services for homeless or housing insecure individuals may include one or more of the following:

- Investment to increase the number of emergency shelter and transitional housing beds, to include shelter beds for individuals with children and youth, by expanding the capacity of existing shelters and creating new shelter beds to fill the gap and increase the number of individuals who can be housed, especially during emergency situations and disaster events.
- Investment in "bridge housing". With the lack of affordable housing options, which was further exacerbated by Hurricane Ian, "bridge" or longer-term temporary housing will allow shelters to move guests out of a short-term residential shelter while they continue to search for more permanent housing options. This, in turn, will increase the availability of emergency shelter beds and enable facilities to serve more people.
- Investment in affordable housing will increase available housing for low-income communities, relieving pressures on the homeless emergency shelter system.

2.3. Infrastructure Unmet Need

2.3.1. Disaster Damage and Impacts - Infrastructure

Hurricane Ian caused widespread flooding and damage to infrastructure systems in Orange County, to include roadways, storm water systems, water and wastewater treatment systems, flood mitigation systems, public facilities, schools, homeless shelters, senior centers, and many residential units. Many neighborhoods' streets throughout Orange County, including the City of Orlando, were completely impassable making it impossible for residents to leave their flooded homes and dangerous for emergency services to reach these areas.

This section highlights the losses and damage to infrastructure in Orange County as a result of Hurricane Ian. The unmet infrastructure need is calculated by an assessment of losses to public infrastructure under the FEMA Public Assistance Program (local government cost share 25 percent), FEMA Hazard Mitigation Projects (local government cost share 25 percent), and County identified non-match projects with the tie backs to Hurricane Ian and mitigation that are not covered by other grant sources.

For Hurricane Ian, cost share percentages are as follows:
FEMA PA Non-Federal Cost Share: The federal share of assistance is 75 percent of the eligible project cost, requiring the local government to contribute the remaining 25 percent in cost share.

FEMA HMGP Non-Federal Cost Share: The federal share of assistance is 75 percent of the eligible project cost, requiring the local government to contribute the remaining 25 percent in cost share.

The County analyzed several data sources to determine public facilities and infrastructure unmet needs. The largest data set was FEMA's Public Assistance program, which included data from Orange County, Orange County Sheriff's Office, Orange County Public Schools, Orlando Aviation authority, City of Orlando, Lynx, and multiple municipalities in Orange Cunty. The County also reviewed and assessed its priority request under the FEMA Hazard Mitigation Program as part of its unmet need and 25 percent cost share. Finally, the County did a preliminary assessment of jurisdictional and County department projects related to unmet need, eligibility, and storm tie back.

The significant infrastructure and public facilities damage described in the above programs and data sources assisted in identifying Orange County's unmet infrastructure needs. The table below represents the estimated total unmet needs broken out by each infrastructure program. The total unmet need for infrastructure in the County is estimated to be $160,700,743. Each program and data source are further explained in this section.

Infrastructure Unmet Need by Program	Estimated Number of Projects	Estimated Unmet Need
PA (Cat C-G) Non-Federal Cost Share*		$30,835,935
HMGP Non-Federal Cost Share	14	$11,264,808
Orange County Non-Match Projects**		$118,600,000
Total		**$160,700,743**

Table 29. Summary of Infrastructure Unmet Need by Program

**PA non-federal cost share (25%), resiliency (+30%) and building materials (+32%)*

*** Estimated cost of preliminary unmet needs submission from jurisdiction and County departments*

Sources: FEMA PA Projects, HMGP Projects, Orange County Government, Local Municipalities

2.3.2. FEMA Public Assistance Program

FEMA's Public Assistance (PA) Program provides supplemental grants to state, tribal, territorial, and local governments, and certain types of private non-profits so that communities can quickly respond to and recover from major disasters or emergencies. Orange County was included in both Individual Assistance and Public Assistance Presidential Disaster Declarations (Source: www.fema.gov/disaster-federal-register). Impacts to Orange County's public infrastructure caused by Hurricane Ian are covered by FEMA's PA program at an initial cost share of 3:1 (federal share to local share for PA

categories C – G and 100 percent for PA categories A and B for activities occupying within the first 30 days of disaster (as of May 15, 2023).

This portion of the impact assessment summarized losses to public infrastructure as a result of Hurricane Ian. The table below is a breakdown of FEMA PA sites and costs for Orange County. Here, Orange County has identified more than $96 million in infrastructure impacts covered by FEMA's Public Assistance Program resulting in more than $23 million in unmet needs.

PA Category	# Damaged Sites	Sum of Approx. Cost	Sum of Federal Share	Sum of Non-Federal Share
A - Debris	35	6,574,761	5,110,616	1,464,145
B - Emergency Measures	72	20,470,637	15,857,491	4,613,146
C - Roads and Bridges	35	6,248,434	4,686,326	1,562,108
D - Water Control Facilities	24	3,693,115	2,769,836	923,279
E - Building and Equipment	99	29,174,051	21,880,538	7,293,513
F - Utilities	36	27,066,600	20,299,950	6,766,650
G - Other	47	2,323,070	1,742,303	580,768
All Categories	**348**	**$95,550,668**	**$72,347,059**	**$23,203,609**
TOTAL - without A and B:	**241**	**$68,505,270**	**$51,378,953**	**$17,126,317**

Table 30. FEMA Public Assistance Program
Source: FEMA

2.3.3. Total Cost and Need by PA Category

Because of the long lifetime of most infrastructure elements, many were built using outdated building codes and will need to be brought up to compliance (made resilient) in accordance with the current building code. Here, an estimate of 30% for increased cost of compliance with current code requirements for infrastructure elements in categories C-G will drive up the true cost of replacing these damaged structures and lifelines. The table below provides a breakdown of disbursements of FEMA PA by category and cost share provisions accounting for added resilience costs, resulting in unmet needs across Orange County that are close to $23 million.

PA Category	Estimated PA Cost	30% Resiliency	25% Local Match (Total Unmet Need)
A - Debris	$6,574,761		
B - Emergency Measures	$20,470,637		
C - Roads and Bridges	$6,248,434	$8,122,964	$2,030,741
D - Water Control Facilities	$3,693,115	$4,801,049	$1,200,262
E - Building and Equipment	$29,174,051	$37,926,266	$9,481,566
F - Utilities	$27,066,600	$35,186,581	$8,796,645
G - Other	$2,323,070	$3,019,991	$754,998
Total	**$95,550,668**	**$89,056,851**	**$22,264,213**

Table 31. Estimated Total Cost and Need by PA Category

Source: FEMA

Beyond the need to build up to the current code requirements, current cost of materials has increased precipitously over the past several years by 38.5% (Source: https://fred.stlouisfed.org/series/PCU44414441). Accounting for this increased cost of construction materials in the total cost to repair or replace damaged infrastructure results in a total unmet need of $30,835,935 across Orange County.

PA Category	Estimated PA Cost	30% Resiliency	32% Increased Cost of Building Materials	25% Local Match (Total Unmet Need
A - Debris	$6,574,761	$0	$0	$0
B - Emergency Measures	$20,470,637	$0	$0	$0
C - Roads and Bridges	$6,248,434	$8,122,964	$3,127,341	$2,812,576
D - Water Control Facilities	$3,693,115	$4,801,049	$1,848,404	$1,662,363
E - Building and Equipment	$29,174,051	$37,926,266	$14,601,612	$13,131,970
F - Utilities	$27,066,600	$35,186,581	$13,546,834	$12,183,354
G - Other	$2,323,070	$3,019,991	$1,162,697	$1,045,672
Total	**$95,550,668**	**$89,056,851**	**$34,286,888**	**$30,835,935**

Table 32. Estimated Total Cost and Need by PA Category (including inflation)

Source: University of Central Florida, Orange County Government

2.3.4. Hazard Mitigation Needs per County or Known Project

The Hazard Mitigation Grant Program (HMGP) will be an important part of the long-term recovery process of rebuilding, protecting, and improving vital infrastructure. Orange

County has identified an unmet need for cost share of eligible local governments projects for the HMGP non-federal cost share. The federal share of assistance is 75 percent of the eligible project cost, requiring local government to contribute the remaining 25 percent in cost share. While some HMGP projects may be deemed ineligible for CDBG-DR match assistance, the County will work to identify those projects under mitigation funding for implementation. The County has fourteen (14) estimated projects submitted for HMGP. The table below outlines the estimated cost and the non-federal cost share unmet need of $11,264,808.

County	Estimated Number of Projects	Estimated Total Cost	Estimated Federal Cash Share 75%	Estimated Non-Federal Cost Share (25%)
Orange	***14***	***$45,059,233***	***$33,794,424***	***$11,264,808***

Table 33. Total Estimate HMGP Non-Federal Cost Share Unmet Need
Source: Orange County Government, Office of Emergency Management

2.3.5. Total Cost and Need for Non-Match Projects

In response to the widespread damage caused by Hurricane Ian, Orange County reached out to all municipalities during the development of the CDBG-DR Action Plan to discuss the program eligibility criteria and unmet needs in their respective jurisdictions. Municipalities and County departments were asked to submit potential unmet need projects, with an emphasis on Ian tie-back and Low to Moderate-Income Areas (LMAs). Based on a preliminary review, some of these projects were determined to not be eligible for CDBG-DR funding because of non-storm tie-back or low moderate area benefit. Based on the detailed review of all projects submitted, including jurisdictional projects and potential Orange County projects (infrastructure and public facility activities), the total unmet need of $118,600,000 was identified. A list of infrastructure and public facilities unmet needs by jurisdictions can be found in attachment to this document. During the community engagement and outreach process, it was noted that improving existing infrastructure to prevent future flooding was of a high priority for the County residents.

2.3.6. Coordination of Mitigation Efforts

Orange County's CDBG-DR investment into infrastructure projects and rebuilding activities will integrate preparedness and mitigation measures into the project design. Orange County will develop program guidelines that include mitigation measures into all activities to construct, reconstruct or rehabilitate non-residential and residential structures with CDBG-DR funds.

CDBG- DR mitigation funded activities do not require a tie-back to an impact of Hurricane Ian. However, all activities funded by CDBG-DR mitigation set aside must:

1. Be an eligible CDBG activity.
2. Meet a National Objective under the CDBG program.
3. Address current or future risks identified in Orange County's mitigation plan.

Orange County's CDBG-DR allocation includes as a required set-aside of $28,658,000 for mitigation activities. Mitigation activities are defined as those activities 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. Orange County will continue to coordinate and collaborate on mitigation activities for the Action Plan and subsequent substantial amendments to the Plan with internal and external stakeholders. The County will collaborate with jurisdictions within the County to ensure that mitigation and resilience measures are promoted across all impacted communities within the County.

2.4. Economic Revitalization Unmet Need

Orange County, with assistance from a consultant from the University of Central Florida, analyzed data regarding economic revitalization unmet needs. Below is a summary, along with an analysis of Small Business Administration loans provided to the business community following the Hurricane Ian event. The analysis references the critical need to allocate CDBG-DR funding for new housing units, infrastructure, and public services to aid with job placement and development services to address the economic revitalization unmet needs described below.

2.4.1. Disaster Damage and Impacts – Economic Revitalization

The focus of the economic revitalization unmet need assessment of this Action Plan centers on identifying those immediate impacts to businesses (buildings and content) resulting from Ian. As part of the recovery efforts, the Small Business Administration (SBA) makes low-cost disaster loans available to qualified businesses and the levels of usage of their services are an important indicator of business impact.

2.4.2. Total Business Loans Approved by the SBA

Utilizing SBA business data in conjunction with HUD methods laid out in the Federal Register informs the approach to identify property and content impacts to businesses across Orange County. According to SBA's Hurricane Ian business loan information, there were 1,031 business applications issued across Orange County. Of those, 81 applicants were approved for a loan for damage or economic disruption, 74 applicants had a verified property loss of $7,789,194, and another 950 applicants are either "in-process", have withdrawn, or were declined for a loan from the program. It should be noted that the high percentage of applications that were issued but not returned. Anecdotal evidence

suggests that many business owners did not take SBA assistance because they either feared they simply could not repay a business loan or did not have the time or expertise to manage the loan process.

SBA BUSINESS APPLICANT STATUS	COUNT OF APPLICANTS	% IN STATUS
Approved	81	7.86%
Declined	584	56.64%
In Process	1	0.10%
Withdrawn	365	35.40%
TOTAL	1,031	100.00%

Table 34. Status of SBA Applicants as of June 16, 2023

Source: SBA

2.4.3. SBA Applicant Breakdown

The Federal Register provides guidance on how to calculate impact and unmet needs for businesses. Specifically, federal guidance seeks to ascertain impacts based on a 5-category system of damage to combined real property and operational costs. These extended loss estimates were established by utilizing HUD's methodology outlined in the Federal Register. As can be seen from the table below, businesses are grouped into one of five categories based on total real property and content losses. For this assessment, real property loss includes verified repair, reconstruction, or relocation costs and content losses include impacts to furniture, machinery, or inventory. The table shows the number of businesses in each of these loss categories, as well as the median loss and percentage of total businesses within said category. These median values are utilized in estimating additional unmet need to other businesses.

HUD Category	DAMAGE	COUNT	MEDIAN LOSS	PERCENTAGE OF ALL BUSINESSES
Category 1	< $12,000	26	$6,409	35.14%
Category 2	$12,000 - $29,999	14	$18,318	18.92%
Category 3	$30,000 - $64,999	17	$44,018	22.97%
Category 4	$65,000 - $149,999	8	$93,446	10.81%
Category 5	>= $150,000	9	$316,795	12.16%

Table 35. Federal Register Method for Estimated Impacted Businesses Count

Source: SBA

2.4.4. Estimating Business Operations Losses

Estimating additional losses to the nearly 300 businesses across Orange County that were declined/withdrawn but had made it far enough through the loan process to have losses estimated by HUD required utilization of SBA data and HUD methods outlined in the Federal Register.

HUD Category	DAMAGE	COUNT	MEDIAN LOSS	ESTIMATED LOSSES
Category 1	< $12,000	113	$4,236	$724,245
Category 2	$12,000 - $29,999	75	$18,514	$1,373,830
Category 3	$30,000 - $64,999	35	$44,288	$1,540,614
Category 4	$65,000 - $149,999	20	$81,118	$1,868,927
Category 5	>= $150,000	8	$208,470	$2,534,358

Table 36. Federal Register Method for Estimated Additional Businesses Counts and Estimated Losses

Source: SBA

These losses were combined with known losses from SBA business data to estimate a total initial economic impact to business real property and contents of $15,831,167. Accounting for 30% in additional resilience costs on rebuilding damaged structure, such as more stringent building codes, cost of compliance measures, elevations, or freeboard requirements, increases the total cost of repairs to $20,580,517.

Category	Count	Value/Impact
SBA approved applicants with a verified HUD Category 1 Losses	26	$160,036
SBA approved applicants with a verified HUD Category 2 Losses	14	$274,701
SBA approved applicants with a verified HUD Category 3 Losses	17	$740,030
SBA approved applicants with a verified HUD Category 4 Losses	8	$790,972
SBA approved applicants with a verified HUD Category 5 Losses	9	$5,823,455
SBA declined applicants with a verified HUD Category 1 Losses	113	$724,245
SBA declined applicants with a verified HUD Category 2 Losses	75	$1,373,830
SBA declined applicants with a verified HUD Category 3 Losses	35	$1,540,614
SBA declined applicants with a verified HUD Category 4 Losses	20	$1,868,927
SBA declined applicants with a verified HUD Category 5 Losses	8	$2,534,358
Total verified loss for all businesses (Estimate)		**$15,831,167**
Accounting for an additional 30% in funding needed to support rebuilding to higher standards (resilience)		**$20,580,517**

Table 37. Estimated SBA Property and Content Losses

Source: SBA

SBA payouts to businesses totaled $7,533,365 for these lines of loss, leaving a potential unmet need of $8.3 million, or $13 million when accounting for resilience costs.

CATEGORY	COUNT	VALUE
SBA repair, reconstruction, relocation payments	48	$5,455,400
SBA furniture payments	27	$334,240
SBA machinery payments	50	$1,331,525
SBA inventory payments	21	$412,200
Total Benefit		$7,533,365
Total remaining unmet need for all businesses (Estimate)		**$8,297,802**
Remaining unmet need for all businesses accounting for additional resilience costs		**$13,047,152**

Table 38. SBA Business Loans and Remaining Unmet Needs

Source: SBA

Orange County has determined that the most impactful activities and programs to support overall economic recovery include housing, infrastructure, and public services programs. However, the County will continue to evaluate information related to the unmet needs of the business community and collaborate with municipal partners and other stakeholders to assess the feasibility of CDBG-DR programs in supporting economic revitalization efforts. Consequently, an economic revitalization program could be incorporated into the Action Plan at a later date through a substantial amendment.

2.5. Public Service Unmet Needs

The remaining needs related to public services were identified through a comprehensive community outreach process involving focus group discussions, community meetings, and input from various stakeholders. The County engaged nonprofits, local municipalities, community advocates and community leaders to solicit information about the remaining challenges the community is still experiencing as a result of Hurricane Ian. The County conducted thirteen (13) meetings across all six commission districts in locations central to community life in the disaster impacted areas. All Orange County citizens were encouraged to participate in a needs assessment survey (Citizen Participation Survey). The survey was made available to the public on the CDBR-DR Program website from September 25 to November 10, 2023. The survey was made available in Spanish and Haitian Creole languages, in addition to English.

Responses from the citizen participation survey, community meetings, and stakeholder engagement revealed that the County-wide damages sustained during Hurricane Ian exacerbated the existing affordable housing crisis, and highlighted deficiencies in disaster preparedness. Additionally, needs were identified related to public services for populations, such as seniors, unhoused persons, and individuals with disabilities, as well as limited English proficient residents.

Public comments did not identify an unmet need in economic development; however, they did identify a need for more proactive disaster preparedness for small businesses, especially those in more rural communities that provide essential community services in the area (e.g., food/groceries, pharmacies, etc.). Such business closures impacted citizens who regularly depend on them for basic needs and emergency supplies.

CDBG-DR Program funds allocated for Public Services will support the delivery of essential services to eligible households impacted by Hurricane Ian to further promote community resiliency. CDBG-DR public services activities are expected to specifically target the most impacted populations where other financial resources are not available or insufficient to meet such needs. Whenever possible, Orange County will leverage CDBG-DR funds with other federal, state, and local resources to undertake public service activities and achieve the best outcome possible. Specific public service needs identified during the community engagement process are detailed below.

Housing Stabilization Services: Securing and maintaining stable housing was identified as a significant unmet need, and it is an essential component of the long-term community recovery. The County will prioritize activities that specifically address housing counseling, housing stability, self-sufficiency, and related services.

Access to stable, decent, safe housing provides opportunities for individuals to bounce back quickly and contribute to long-term recovery in their communities. Unfortunately, with the rising cost of housing and damages to the housing stock due to Hurricane Ian, it is becoming increasingly difficult for a significant number of Orange County residents to afford decent housing. Homeless individuals and families are especially exposed and less likely to have the resources needed to plan for, respond to and recover from a natural disaster. Persons who are unhoused or at risk of homelessness include, but are not limited to, victims of domestic violence and their children, foster youth, pregnant individuals and youth, persons with mental and substance abuse problems, underinsured, seniors and persons with disabilities living on fixed income, and those who are severely cost burdened.

Public Services to promote stable housing could include, but are not limited to the following:

- Proactive and innovative outreach to connect homeless individuals to shelter and supportive services.
- Legal services, including advice and representation in areas such as housing, insurance, debt and collection matters, bankruptcy, and other legal issues arising from Hurricane Ian.
- Wraparound case management to provide individuals with tools to promote resiliency. These services could include intake and assessment of the needs of

displaced persons , identifying available resources, providing information to impacted households, identifying gaps in services, and advocating for timely resolutions of issues for those with disaster-related housing needs.

- Housing counseling can provide an array of services ranging from financial education and counseling, securing insurance, rental assistance, down payment assistance, and advocacy.
- Working to advance fair housing education and support will ensure tenants and landlords have the tools to create and maintain equitable rental relationships.

Job Training and Job Placement: Improved access to higher paying jobs for individuals in low to moderate-income communities directly improves a household's wealth and resiliency, especially financial resiliency. Increased financial independence ensures that households can maintain stable housing, move to lower disaster risk areas, provide for basic needs, and successfully prepare for and respond to future disasters. These services can be supplemented by a case management component to help those in crisis secure basic needs including food, shelter, clothing, medical care, childcare, and transportation, therefore allowing program participants to maintain successful employment.

The County will invest in activities that promote increased access to:

- Employability and job skill training which assists displaced, low-income adults facing high barriers to long-term employment by helping them transition to higher wage jobs in high demand industries including construction, health care, and technology. These programs may feature tuition assistance, success coaching, life skills training (money management, planning, accessing resources etc.), and financial assistance to set participants up for success.
- Supported employment programs provide job-readiness training and job placement for intellectually and developmentally disabled adults to enable them to live a more independent life.
- Trade programs can provide program participants with hands-on skills to obtain higher paying jobs in a timely manner.

Disaster Preparedness: Disaster preparedness and post-disaster response planning are proactive services to better identify, plan for and address deficiencies in disaster preparedness, especially for small businesses, individuals with disabilities, unhoused persons, and the elderly. These programs could engage existing community hubs, such as homeless shelters, community centers, resiliency hubs, and Neighborhood Centers for families, community health centers and homeless outreach organizations, to distribute information and essential supplies as part of outreach programs to exposed individuals.

As a strategy to empower small businesses that are vital to rural and remote communities, the County can use public service funds to equip them with the knowledge and tools needed to better mitigate losses in the event of a disaster. Effective preparation will decrease the duration business are closed, speed-up economic recovery, and preserve businesses in the community. The County may engage other agencies and entities to generate and disseminate disaster preparation materials designed specifically for small business. As part of a post-disaster response, information needs to be provided (in various languages) on how to get help and apply for assistance.

Mental/Health Services: The needs assessment identified a deficiency in mental/ health services in rural and low-income communities most impacted by Hurricane Ian. These services play a vital role in community resiliency and disaster preparation. Individuals who are medically exposed, mentally ill, physically disabled, or otherwise impaired may have difficulty adequately preparing for or responding appropriately during and after an emergency.

This is a crucial area of concern, as Florida continues to rank low in per-capita funding for mental health services according to Mental Health America. Critical mental/health services provide residents with personal resiliency tools that will assist them in better preparing for and recovering from future disasters.

These services may include the following:

- Expanding capacity of existing mental/health mobile and drop-in centers, especially in income eligible communities impacted by Hurricane Ian.
- Funding specialized wraparound medical case management services to assist individuals in addressing barriers to medical and mental health and stability.

Public services will be funded through a competitive application process after the associated planning effort has been completed. Orange County Government, housing authorities, nonprofit agencies and community partners may be involved in the provision of services. As the lead agency, Orange County Housing and Community Development Division will select subrecipients through a competitive application process that will ensure potential subrecipients have the capacity and expertise required to administer a proposed project or activity.

2.6. Mitigation Only Activities

Orange County received $28,658,000 in CDBG-DR funds as a set-aside for mitigation activities. To best identify projects that may be funded by the mitigation set-aside, a mitigation needs assessment is required to make the connections between current and

future hazards, foreseeable mitigation needs, and proposed mitigation activities. Orange County's CDBG-DR Needs Assessment is informed primarily by the Orange County Local Mitigation Strategy (LMS) to best identify mitigation-only activities that will be funded under the CDBG-DR program. Per requirements of the Federal Register notice, an analysis of the current LMS is required to meet the requirement to "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)."

As required by federal guidelines, Orange County has adopted and updated its Local Mitigation Strategy (LMS), which identifies potential hazards that may threaten the County. In addition to the unincorporated County, the Orange County LMS has been adopted by eleven (11) municipalities, one (1) aviation authority, one (1) drainage district, and one (1) university. The following governmental entities adopted Orange County's LMS:

- Orange County (unincorporated)
- City of Apopka
- City of Belle Isle
- Town of Eatonville
- City of Edgewood
- City of Maitland
- Town of Oakland
- City of Ocoee
- City of Orlando
- Town of Windermere
- City of Winter Garden
- City of Winter Park
- Greater Orlando Aviation Authority
- Ranger Drainage District
- University of Florida

The LMS identifies hazards that have the ability to impact Orange County and its municipalities and determines what populations, properties, and areas of the County are most exposed to these various hazards, so measures can be taken to help prevent or reduce the vulnerability and/or their impacts. The following hazards and sub-hazards are described in the LMS and are based on the various natural, technological, and/or human-caused disasters that have been identified as having potential impacts on Orange County:

- Diseases and Pandemic
  - Animal
  - Human
  - Plant/Agricultural
- Extreme Temperatures
  - Drought
  - Freezes/Winter Storms
  - Heat Waves
- Floods
- Severe Thunderstorms
  - Hail
  - Lightning
  - Tornadoes
- Sinkholes/Land-subsidence
- Hazardous Materials
- Terrorism/CBRNE
- Tropical Systems
- Wildfires

A review of historical data, previous disaster declarations, information provided by the National Weather Service (NWS), and other sources were analyzed for this section for natural, human-caused, and technological hazards. This section will describe each hazard

and its potential impact(s) on the County, as well as list previous occurrences, vulnerabilities, probability of occurrence, and the associated risk(s).

The Orange County LMS includes a Hazard and Vulnerability Assessment Tool, which used the following factors to determine the overall risk of each hazard: 1) probability of future instances; 2) severity of the hazard, including the magnitude felt by the human impacts, property impacts, spatial impacts, and economic impacts; and 3) mitigation measures currently in place to address the hazards.

The risk scoring is based on a 0-100% scale and is calculated using the **"Probability* (Magnitude-Mitigation) = Relative Risk"** formula. The risk scoring methodology is described in the Orange County LMS, but is a brief summary is described below:

- Low- Risk scoring is less than 30%
- Medium- Risk scoring is between 31% to 60%
- High- Risk scoring is 61% or greater

The following section identifies and describes the potential hazards identified in the LMS as "High" relative threats (risk scoring is 61% or greater). The analysis of these potential hazards and vulnerabilities was used to inform the identification and evaluation of mitigation only projects to be funded by CDBG-DR. The potential hazards listed below are mainly natural hazards, but several human-caused and technological hazards have also been identified. A hazard/risk identification and vulnerability assessment are conducted as a process of defining, identifying, and classifying vulnerabilities and their risks to Orange County and its municipalities.

Orange County LMS									
Hazard and Vulnerability Assessment Tool									
Hazard	Probability	Severity = (Magnitude-Mitigation)							
		Human Impact	Property Impact	Environmental	Program operations	Preparedness	Training exercise	Logistics	Risk
	Likelihood this will occur	Possibility of death or injury	Physical losses and damages	Amount of environment affected (spatial impacts)	Interruption of services	Specialized plans	Multi-year training and/or exercise planning	Equipment, teams, and/or support	Relative threat
Score	0= No threat 1= 10 + yrs 2 = 6-10 yrs 3 = 1-5 yrs	0 = None 1 = Low 2 = Moderate 3 = High	0 = None 1 = Low 2 = Moderate 3 = High	0 = None 1 = Up to 25% 2 = 26-50% 3 = 51% or more	0 = None 1 = Low 2 = Moderate 3 = High	0 = Specific Plan 1 = Addressed in other plans 2 = Addressed in one plan 3 = No plans address	0 = Yearly 1 = Every other year 2 = Rarely 3 = None	0 = Highly Specialized 1 = Moderate 2 = Minimal 3 = None	0-100%
Diseases and Pandemic	2	2	3	2	3	2	2	1	**52%**
Animal	2	1	3	2	3	2	2	2	**44%**
Human	3	3	2	3	3	1	0	0	**57%**
Plant/Agriculture	2	1	3	2	3	2	3	2	**51%**
Extreme Temperatures	3	1	1	2	2	2	3	2	**54%**
Drought	3	0	1	2	3	2	2	2	**57%**
Freezes/Winter Storms	2	1	1	2	2	2	3	2	**41%**
Heat Waves	3	1	1	2	1	2	3	3	**62%**
Floods	3	1	2	2	2	1	1	0	**43%**
Severe Thunderstorms	3	1	2	1	2	2	3	1	**59%**
Hail	3	0	2	1	1	2	3	2	**52%**
Lightning	3	1	2	1	1	2	3	1	**52%**
Tornados	3	3	3	2	3	1	2	1	**71%**
Sinkholes/Land-Subsidence	3	1	3	1	2	1	3	2	**62%**
Hazardous Materials	3	2	1	1	2	0	0	0	**29%**
Terrorism/CBRNE	2	3	3	1	3	0	0	0	**32%**
Cyberterrorism	3	1	2	3	3	1	2	1	**62%**
Tropical Systems	3	3	3	3	3	1	0	1	**67%**
Wildfires	3	1	3	1	3	1	1	1	**52%**
*Threat increases with percentage. Low = 0-30%; Medium = 31-60%; High = 61%+									

Figure 25. Orange County LMS Hazard and Vulnerability Assessment Tool

Source: Local Mitigation Strategy, Orange County, FL

Heat Waves: Orange County generally has temperatures characteristic of a tropical climate, and experiences two main climatic seasons each year. The LMS lists different types of sub-hazards associated with the County's extreme temperatures and identifies heat waves as a high-scoring threat to the County.

Heat waves, which differ from droughts, are extended periods of time when temperatures are abnormally and uncomfortably hot. Heat waves are often accompanied by high humidity, which can have negative impacts on humans and animals. The latest LMS states the County has experienced 36 days of record temperatures over 100° F since 1892. All areas of the County and its jurisdictions are just as likely to experience heatwaves, but the population of the County living in highly populated urban areas are most susceptible to the effects of heat waves due to the heat island effect. The LMS states that there have not been any reported cases of property damage to buildings or infrastructure at this time. There are few measures enacted by the County and its jurisdictions to mitigate the effects of heat waves.

Floods: Flooding refers to general or temporary conditions of partial or complete inundation of typically dry areas from the overflow of water from a variety of sources, including inland and tidal water or surface water runoff. Flooding in Orange County and most of its jurisdictions is typically caused by rain that exceeds the carrying capacity of its drainage systems. Tropical systems, including tropical depressions and storms or hurricanes can also cause substantial localized and widespread flooding. Orange County experiences a lesser amount of extended flooding periods compared to surrounding counties, as it is at a higher elevation and serves as the headwaters for many of the major rivers in the area. The LMS states that while there is no standard rainfall depth that creates flooding conditions, the western area of the County is characterized by high recharge areas, which are typically affected by the total amount of rainfall during a storm event rather than the intensity of the storm. In contrast, the eastern area of the County is flatter with a groundwater table closer to the land surface, which makes the area more sensitive to storm intensities or rate of rainfall.

According to the LMS, most rainfall events in the County (90% of storms) create one inch or less of rain. According to the Orange County Public Works Department, flooding problems typically begin with the mean annual storm (4.5 inches in 24 hours), however portions of the County have experienced localized flooding with even 2-3 inches of rainfall.

Storm Event	Rainfall Amount
Mean Annual/ 24 Hour	4.5 inches
10 Year / 24 Hour	7.5 inches
25 Year/ 24 Hour	8.6 inches
100 Year / 24 Hour	10.6 inches

Table 39. Storm Events – Rainfall Amount

Source: Orange County Public Works, Stormwater Management Division

Tornados: Tornados are large violently rotating columns of air that are in contact with both the surface of earth and its cloud base. Wind speeds for tornados can range from 40-300 mph. The LMS mentions that while tornados are most prevalent in west-central Florida, southeast Florida, and portions of the state's panhandle, Orange County has been subject to many tornado events over the years. Florida has two tornado seasons – the summer tornado season (June-September), and the spring tornado season (February-April). The highest frequencies of tornadoes in the County occur in the month of June.

The LMS states there have been a total of 68 tornados in Orange County between 1950-2021, totaling an estimated $37 million in property damages. Densely populated and urban areas of the County are most susceptible to higher occurrences of property damage or human casualties due to higher populations and housing units. Due to their prevalence and evaluated high risk by the LMS, the County has taken several measures to mitigate the hazard of tornados. The County conducts training and exercise drills to familiarize emergency response teams with their roles and responsibilities. There is also emphasis placed on monitoring tropical systems, such as hurricanes and tropical storms form for associated tornados, as well as reducing the impacts of tornados through better detection technology, public outreach, and emergency notification systems.

Sinkholes/Land Subsidence: Sinkholes are a type of land subsidence that is formed when carbonate layers of limestone or dolomite below the ground's surface are eroded away by acidic flowing groundwater, creating an underground cavern or cavity. The groundwater might support the walls of the cavern for a period of time, but variability in the water table may shift support and erode and further expand the cavern. As a result, the weight from the ground above will increase stress on the cavern and cause collapse, taking with it whatever objects may have been located above ground. These hazards are typically abrupt and have the potential to be catastrophic to any infrastructure, roadways, or homes/other buildings located on the surface above. Sinkholes may also have economic impacts on residents and businesses.

The LMS states that there have been 195 reported sinkholes in Orange County between 1961 and 2021.

Depth (feet)	Number of sinkholes
<5	102
5-9	29
10-24	39
25-49	15
50-99	7
100-199	2
>200	1
TOTAL	**195**

Table 40. Sinkholes in Orange County, 1961-2021
Source: FDEP FGS SIR

The LMS states that the return rate of sinkholes in the County amounts to roughly four instances per year since 1961 indicating the probability of recurrence of sinkholes is high, with the extent of impact/damages being variable. Other hazards such as drought, flood, and tropical systems can influence the number of sinkholes due to the impact of rapid changes to the water table (caused by drought, heavy rainfall, or pumping), which may dissolve underground limestone bedrock.

Sinkhole awareness and predicting efforts have been increasing across the state to identify potential sinkholes using geospatial information systems (GIS) and probability statistics. Historically, sinkholes have not typically been exercised and are limited in mitigation efforts. Currently, the County and its jurisdictions can provide limited support in the remediation of sinkholes. The LMS states the County is very exposed to sinkholes because they are a recurring hazard that are highly unpredictable in occurrence and potential impact. The LMS suggests that mitigation efforts such as research and predictive modeling may reduce impacts, but further training and exercises are needed so that first responders and emergency managers can better address the major hazard of sinkholes.

Cyberterrorism: A cyberattack is defined as malicious computer-to-computer attack that compromises the confidentiality, integrity, or availability of a computer (or network), data on that computer, or processes and systems controlled by that computer. Further, cyberspace is defined as the interdependent network of informational technology infrastructures, and includes the internet, telecommunications networks, computer systems, and embedded processors and controllers in critical industries. The LMS states that threats to cyber space are considered one of the most serious economic and national security challenges to the United States in present day. As the Directory of National Intelligence stated before Congress: “the growing connectivity between information systems, the Internet, and other infrastructures creates opportunities for attackers to

disrupt communications, electrical power, energy pipelines, refineries, financial networks, and other critical infrastructures."

While all functions in the County rely on the Internet in some capacity or another (individual uses, business, government functions, infrastructure, etc.), the LMS states energy pipelines have been cited by the Department of Homeland Security as a potential target. The LMS further states that cyber risks typically do not have specific locations, but physical sites such as government agencies, higher education institutions, and medical facilities could be affected. Threats to cyber space are also particularly devastating during response and recovery efforts of other hazards (tornados, tropical systems, floods, etc.) when telecommunication systems are required for emergency response.

The LMS stresses that the growing sophistication of cyberterrorism and the current political climate increases the probability of a future cyberattack in the County as a high probability. A cyberattack could disable critical infrastructure systems, as well as traffic control, emergency response dispatch, utility, and water and wastewater treatment facilities. Not only does this have the potential to disrupt everyday functions but could be debilitating in the response and recovery to other hazards. The LMS states that despite mitigation actions, the unpredictability of cyberterrorism events and the large number of potential targets makes the County at a high risk for cyberterrorism.

Tropical Systems: Tropical systems are one of the most destructive natural hazards and create considerable amounts of damage throughout the state of Florida and Orange County. Tropical systems are formed over warm water due to atmospheric instability and are characterized by sustained high velocity winds circulating around a moving low-pressure center. These storms could impact entire regions and affect the lives of people, homes, and businesses. There are various degrees of tropical systems that can affect the County, as listed below:

- Tropical depressions (TD/SD) are those storms containing copious amounts of rain associated with a moving low-pressure system with a maximum of sustained winds at less than 39 mph. The LMS does not include data on tropical depressions because they are not "named storms," despite their moderate rate of recurrence.
- Tropical storms (TS/SS) contain a moving low-pressure system carrying massive amounts of rain with better organization and sustained winds of 39-73 mph. The center of the storm (also known as the eye) may be present but difficult to discern.
- Hurricanes (H1, H2, H3, H4, H5) have a full rotation around the low-pressure center with a distinct eye. These storms can create a variety of associated severe weather hazards (such as tornados, lightning, and flooding), and produce a torrential amount of rain across a widespread area. Hurricanes are categorized on

a scale of H1-H5 based on their sustained winds (between 74-157 mph with even higher gusts.

The LMS cites that the County has experienced 38 different tropical systems that have all come within 65 miles of the center point of the County. The tropical system occurrences listed below are those systems whose "eye" or center point crossed the border of the County. Notably, the LMS has not been updated since the devastating hurricane named Hurricane Ian, the hurricane for which these CDBG-DR funds have been received, and thus are not listed in the table below.

Storm Name	Date of Impact	Magnitude Crossing Orange County Border	Greatest Magnitude of System	Area(s) of Direct Impact(s) within Orange County
Easy	09/06/1950	TS	H3	Winter Garden, Ocoee, Apopka
King	10/18/1950	H1	H3	Ocoee, Apopka
Unnamed 1959	06/18/1959	TD	H1	Unincorporated Orange County
Donna	09/11/1960	H3	H4	Apopka
Cleo	08/28/1964	TS	HS	Unincorporated Orange County
Brenda	06/19/1968	TD	H1	Unincorporated Orange County
Jenny	10/04/1969	TD	TS	Unincorporated Orange County
Subtropical 1 1974	06/25/1974	SS	SS	Unincorporated Orange County
Subtropical 3 1976	09/13/1976	TD	SS	Windermere, Ocoee, Apopka
Dennis	08/18/1981	TS	H1	Unincorporated Orange County
Gabrielle	09/14/2001	TS	H1	Bay Lake, Lake Buena Vista, Orlando, Winter Park
Henri	09/06/2003	TD	TS	Winter Garden, Ocoee, Orlando, Eatonville, Maitland
Charley	08/14/2004	H1	H4	Lake Buena Vista, Orlando, Eatonville
Irma	09/10/2017	TS	HS	Unincorporated Orange County

Table 41. Tropical Systems within Borders of Orange County, 1950-2017
Source: Local Mitigation Strategy, Orange County, FL

"Hurricane Season" occurs from June 1st through November 30th of each year, and it is the period where a vast majority of Atlantic Ocean tropical cyclones occur. The probability of a hurricane impacting Orange County is a near certainty, as the Florida peninsula has historically received the highest number of tropical system activity in the

nation. The County and its jurisdictions are located inland and are much more likely to experience a lower category of tropical system as they weaken across land.

Any hurricane could cause property damage of some kind to all building types, significant economic impacts, and disruption of services, such as utilities (electric, sewer, water). Substantial amounts of debris as a result of high winds and torrential rains could cause utility outages, as well as cut off transportation routes for emergency and first responders. The economy could also be affected, as businesses and industries are not able to operate normally in the aftermath of a tropical system.

The LMS states that the County is highly exposed to the effects of tropical systems, and all areas throughout the County are exposed to their impacts. The probability/frequency of the most severe tropical systems is low in Orange County, but smaller storms with shorter return periods can cause moderate damage to the County and its jurisdictions. The state of Florida puts a great deal of emphasis on preparedness and mitigation for tropical systems, particularly hurricanes. Orange County participates in a variety of emergency response exercises and training, including damage assessment courses, electronic incident management systems, and periodic review of Emergency Operations Center protocols. The LMS also suggests that there are opportunities for the County to increase public awareness about the dangers of tropical systems through outreach events. There are also opportunities to continually review and improve buildings codes to better address the potential impacts to property, as well as evaluate and improve the most critical infrastructure so that it is equipped to manage the most frequent types of tropical systems that the County faces.

The LMS cites tropical systems as a high threat mainly because of the significant impacts that they can pose to humans, structures and property, the geographic area, and the potential disruption to economics and services. The County has already engaged in a number of mitigation efforts, which can help to reduce recovery times, but tropical systems will continue to occur. Hurricanes are more predictable than other types of hazards, although not always completely accurate. The LMS recommends that while impacts can be reduced through better detection technology, public outreach, and emergency notification systems, it is incumbent upon residents to continue to plan, train, exercise, and equip themselves in preparation for an incident.

3. General Requirements

3.1. Citizen Participation

Orange County revised its Citizen Participation Plan (CPP) on November 28, 2023, to meet all the federal requirements specified in the Federal Register notice. The updated Citizen Participation Plan, along with the Language Access Plan and addendum to it covering the requirements for federal programs, to include the CDBG-DR Program, are posted to the program website: www.ocfl.net/CDBG-DR.

The primary goal of the Citizen Participation Plan is to provide residents with numerous avenues to engage in the planning process as it pertains to the CDBG-DR funds. The CPP provides at least 30 days for citizen comment and ongoing citizen access to information about the use of grant funds. Orange County values citizen and stakeholder involvement and is committed to helping its residents in disaster recovery efforts from the devastating impacts of Hurricane Ian. To facilitate this community involvement, the County has laid out targeted actions to encourage citizen participation and allow equal access to information about the CDBG-DR program. Orange County focused its outreach efforts on facilitating participation from resource-limited and income-qualified communities within the County and ensuring those most impacted are able to access information about the program and potential assistance once the program implementation starts.

3.1.1. Outreach and Engagement

In the development of this CDBG-DR Action Plan, Orange County consulted with disaster-affected citizens, stakeholders, local governments, public housing authorities, and other affected parties in the surrounding geographic area to ensure consistency in identifying disaster-related impacts in the Plan, and to ensure the Plan and planning process was comprehensive and inclusive.

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

Orange County recognizes that affected stakeholders are the focus of this plan as well as its partners vital to the development and implementation of this action plan. Opportunities for citizen input were provided throughout the planning process. A summary of the outreach and engagement efforts with community members, stakeholders, local governments, and other entities that occurred during the development of this action plan is detailed below.

3.1.1.1. Engagement with Community Partners, NGOs, and Advocacy Groups

Among the first outreach and engagement activities conducted by the County was the solicitation of input from community partners, nonprofits, and advocacy groups. In preparation for these engagement efforts, Orange developed a short five (5) question questionnaire to guide initial engagement with our community partners/advocates and nonprofit organizations (NGOs). Stakeholders were provided with several methods to complete the questionnaire, including online responses through emails, or by phone interview with one of the Orange County Housing and Community Development staff. In the initial announcement, County staff provided stakeholders with general information on the CDBG-DR Action Plan and the planning process and requested feedback regarding their remaining unmet needs related to Hurricane Ian.

The County requested input from more than forty (40) non-profit organizations regarding unmet needs resulting from Hurricane Ian. Orange County consulted the following stakeholders during the CDBG-DR initial planning process:

Agency/Organization	Agency/Organization Description	Responses
Aspire Health Partners ***(healthcare services)***	Behavioral healthcare organization that provides a full continuum of behavioral healthcare services across six (6) Central Florida Counties.	Yes, online surveys and focus groups
Boys and Girls Clubs of Central Florida ***(children services)***	Non-profit focused on inspiring young people, in disadvantaged circumstances, to realize their full potential as productive, responsible, and caring citizens through educational and afterschool programs.	Yes, online surveys and focus groups
Catholic Charities of Central Florida ***(homeless services)***	Ministries and faith-based service provider focusing on their areas of needs: preventing homelessness, alleviating hunger, access to healthcare, caring for immigrants and refugees.	Yes, online surveys and focus groups
Central Florida Jobs with Justice (***advocacy group***)	Community organization that engages specific populations in addressing the root causes of poverty, organizing support for workers treated unjustly in the workplace, and builds an economic base that respects the dignity of the entire community.	Yes, online surveys and focus groups
Center for Independent Living ***(services for persons with disabilities)***	A nonprofit organization that promotes inclusion of people with disabilities striving to eliminate architectural, communication and attitudinal barriers education, by conducting trainings and providing resources.	Yes, online surveys
Agency/Organization	**Agency/Organization Description**	**Responses**
Coalition for the Homeless of Central Florida	Homeless service provider (emergency shelter, services and programs) assisting homeless people	Yes, online surveys and focus groups

(homeless services, housing)	with ending their crisis of homelessness and regaining stable housing.	
Community Coordinated Care for Children (4Cs) ***(children services)***	Childcare resource and referral agency providing an array of services supporting children, families, and childcare community.	No, but received online surveys and materials
Community Legal Services of Mid-Florida ***(legal services, fair housing education)***	Legal service provider assisting low-income renters and homeowners with landlord/tenant disputes, foreclosures, subsidized housing, fair housing, civil rights, etc.	Yes, online surveys and focus groups
Consumer Credit Counseling Services of Puerto Rico (dba Florida Consumer) ***(financial services, Limited English Proficiency)***	Private nonprofit agency dedicated to providing consumers with the highest quality financial education and counseling services.	Yes, online surveys and focus groups
Covenant House Florida ***(homeless services, youth services)***	A nonprofit agency that serves young people experiencing homelessness and housing instability through emergency shelters, transitional housing, and community outreach programs.	No, but received online surveys and materials
Embrace Families Solutions ***(homeless services, self-sufficiency, job training)***	A nonprofit providing families and youths stability by focusing on family housing stability, child victim services, youth mental health initiatives, and young adult career training initiatives.	No, but received online surveys and materials
Family Promise of Greater Orlando ***(homeless services)***	A nonprofit agency that helps address the root causes of family homelessness through provision of prevention services, shelter and case management, and stabilization programs.	No, but received online surveys and materials
First Step Staffing ***(homeless services, job placement)***	Connects homeless, veterans and recently incarcerated individuals, to employment, income, and the supportive services they need to obtain and retain a job to provide economic opportunity and self-sufficiency for those otherwise locked out of the employment system.	Yes, online surveys and focus groups
Florida Rising ***(advocate group)***	A nonprofit agency and people-powered organization made up of members advancing economic and racial justice across Florida.	Yes, online surveys and focus groups
Grand Avenue Comm. Development Corp. (Pathlight HOME) ***(homeless services, housing)***	Pathlight HOME assists individuals who are homeless or at-risk of chronic homelessness by providing them with affordable housing and economic opportunities.	Yes, online surveys and focus groups
Harbor House of Central Florida ***(homeless services, DV)***	Domestic violence and homeless service provider that strives to eliminate domestic abuse by providing critical life-saving services to survivors, and outreach education to communities at large.	Yes, online surveys
Agency/Organization	**Agency/Organization Description**	**Responses**
Healthcare Center for the Homeless	Healthcare service provider focusing on primary medical care, oral health services, behavioral health and substance use counseling and health	Yes, online surveys and focus groups

(healthcare services, homeless services)	and outreach services for homeless and low-income housed but uninsured or under-insured residents.	
Hispanic Federation ***(Limited English Proficiency, job placement, other)***	The agency serves as a national model for empowerment. With a strong presence in New York, Florida, North Carolina, and Puerto Rico, the agency works to uplift Hispanic youth and families.	Yes, online surveys and focus groups
Homeless Services Network of Central Florida ***(homeless services)***	Homeless service provider and Continuum of Care (CoC) lead agency performing coordination, planning, administrative functions for CFCH/CoC partners along with providing Veteran Administration Supportive Services.	Yes, online surveys and focus groups
Hope Community Center ***(Limited English Proficiency)***	The nonprofit agency fosters diverse, empowered, learning communities engaged in personal and societal transformation. The agency provides service and advocacy in the Apopka area, including services for immigrants.	Yes, online surveys and focus groups
IDignity ***(homeless services, identification services, self-sufficiency)***	The agency aids in navigating complex process of obtaining various forms of legal identification documents for low-income, marginalized and disadvantaged community members.	No, but received online surveys and materials
IMPOWER ***(homeless services, youth services, housing)***	Behavioral health and child well-being nonprofit service provider accredited by the Council on Accreditation (COA) based in Central Florida that offers services throughout the state of Florida to children, youth, and adolescents.	Yes, online surveys
Jewish Family Services of Greater Orlando ***(self-sufficiency, crisis intervention)***	The agency provides a variety of services through their food pantry, mental health counseling, case management, emergency services, transportation assistance for seniors, and disabled adults, and low-mod income households.	Yes, online surveys and focus groups
J.U.M.P. Ministries ***(homeless services, housing)***	Faith-based organization that aims to help the homeless population in finding a safe place to reside, to have their basic needs met with case management services and by partnering with other non-profits and optical, mental health providers to aid the community.	Yes, online surveys and focus groups
Life Concepts dba Quest ***(services for persons with disabilities, housing)***	The agency supports children and adults with intellectual and developmental disabilities through adult residential housing, vocational training, and job placement programs.	Yes, online surveys
Legal Aid Society of the Orange County Bar Association, Inc. ***(legal services, housing)***	Legal service provider assisting low-income renters and homeowners with landlord/tenant disputes, foreclosures, eviction prevention, housing counseling, etc.	Yes, online surveys and focus groups
Agency/Organization	**Agency/Organization Description**	**Responses**
Lighthouse Central Florida	Empowers vision loss, blindness, and vision impaired individuals with rehabilitation training	No, but received online surveys

(services for persons with disabilities, self-sufficiency)	and real-world application by certified instructors to fulfill their highest ambitions.	
Primrose Center ***(services for persons with disabilities, housing, job training)***	Transforms the lives of people with intellectual and developmental disabilities by providing programs aimed at developing productivity and independence (housing, job training and placement, etc.).	Yes, online surveys and focus groups
SALT Outreach ***(homeless services)***	Faith-based organization that serves the unsheltered individuals through comprehensive outreach services and mobile drop-in centers.	Yes, online surveys and focus groups
Seniors First ***(services for elderly)***	Senior and elderly service agency providing home-delivered meals, transportation, in-home care, guardianships, community food pantry, and mobility equipment to frail elderly who may be at risk of losing their independence.	No, but received online surveys and materials
LGBT+ Center Orlando ***(homeless services, youth services, LGBTQ+)***	LGBT+ organization focused on community and its allies through advocacy, education, information, legal, and immigration support, career planning, and scholarship programs.	Yes, online surveys and focus groups
The CLEO Institute ***(climate justice and advocacy)***	A nonprofit, nonpartisan organization in Florida exclusively dedicated to climate education, advocacy, and engagement. The devastating hurricanes, the increased flooding, and rising temperatures we regularly witness in Florida underscore the importance of CLEO's work.	Yes, online surveys and focus groups
The Farmworker Association of Florida ***(Limited English Proficiency)***	Grassroots, community-based organization focused on building power among rural low-income and farmworkers communities.	Yes, online surveys and focus groups
The Salvation Army ***(homeless services)***	Faith-based homeless service provider with several community centers that ensure individuals receive food, shelter, case management, clothing and more.	Yes, online surveys and focus groups
United Against Poverty ***(food pantry, job training)***	The nonprofit agency serves those in poverty by providing crisis care, food and household subsidies, employment training, empowerment training, case management, and referrals to other social service providers.	Yes, online surveys and focus groups
Zebra Coalition ***(homeless services, youth services, LGBTQ+)***	LGBTQ+ and youth led organization that provide services to all youth facing homelessness, bullying, isolation, physical, sexual and drug abuse with individualized programs to guide them to recovery and stability.	No, but received online surveys

Table 42. Stakeholders and NGO Representatives and Engagement

The five (5) question questionnaire was sent out to the agencies listed above on July 17, 2023, and 21 responses were received from various agencies, which led to follow-up

informational session and additional focus group discussions. Survey questions and input received are provided below.

Question 1: Concerning your agency/organization, please let us know who was impacted by these natural disasters (i.e., Hurricane Ian).

a. Clients/Program Participants
b. Employees
c. Building/Location
d. All the above
e. Other (please specify)

Summary of Input Received: Respondents were asked to identify parties impacted by these natural disasters based on the work and programs being offered by the agencies and/or organizations. Seventeen (17) responded with all the above: clients, program participants, employees, their building/location, or other; three (3) respondents identified clients and/or program participants; and one (1) respondent chose building and locations as the main impacted parties. The figure below shows the percentages of the detailed results for reference.

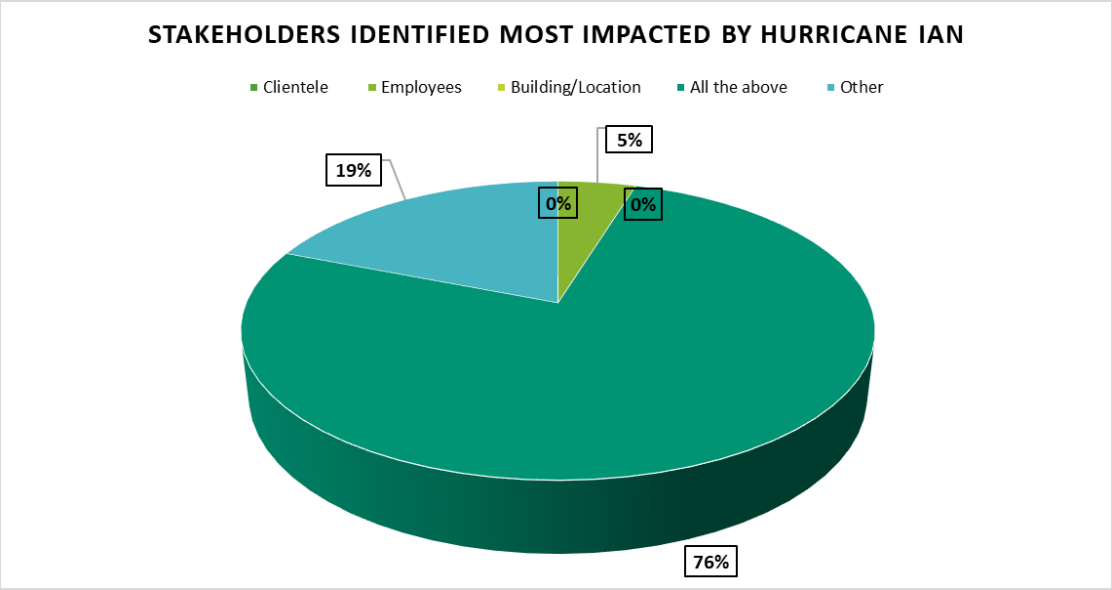

Figure 26. Stakeholder Identified Parties Most Impacted by Hurricane Ian

Question 2: Did your agency participate, or currently participating, in any Orange County disaster recovery efforts? (Provide a brief explanation)

Summary of Input Received: Though there were no responses related to specific Orange County disaster recovery efforts reported, all the agencies and/or organizations detailed

their past state-wide disaster relief efforts and expertise in the field of housing and community-based programs. Specifically, many respondents detailed being a part of the Florida Housing Coalition's State-Led Disaster Housing Task Force.

Question 3: Please describe the areas or resources needed to assist your agency and/or populations you serve with disaster recovery efforts.

Summary of Input Received: Agencies identified the following main areas and resources as needed to help them better serve their communities in disaster recovery efforts: County-wide pre-disaster preparedness and post-disaster response education available in Spanish and Creole, due to language access challenges; a need for citizen outreach concerning disaster recovery before, during, and after a major storm (grassroots agencies). Many agencies detailed that resources on disaster preparedness are very limited for limited English proficiency individuals, especially those who speak Haitian Creole.

Question 4: Are there any needs or issues related to Hurricane Ian and/or Hurricane Nicole that you feel have not been adequately addressed?

Summary of Input Received: Respondents identified a need for language access, support for immigrants, access to funds for Mobile Homeowners and displaced residents, relocation services, and related funding after natural disasters since FEMA funds fell short for many impacted residents.

Question 5: Would you be interested in providing additional input? If so, specify how you can/are willing to participate.

Summary of Input Received: All stakeholders were interested in providing additional input, if needed.

Based on the input received from the initial short five (5) question questionnaire, staff determined that further engagement through focus group meetings was necessary. Orange County held two (2) topic-specific focus group discussions. The first focus group focused on housing construction, infrastructure, rehabilitation, and affordable housing-related CDBG-DR priorities. The subsequent or second focus group discussed public services, community needs, and economic revitalization topics. Both groups discussed unmet and mitigation needs. Both focus group meetings were held virtually, via WebEx, and each meeting lasted about one hour. The meetings were facilitated by dual moderators who posed guided questions and documented participant's feedback. The

detailed notes from each focus group meeting can be found in attachments to the Plan. Summaries of the focus group discussions are presented below.

Focus Group 1: Housing Construction and Infrastructure

Focus Group 1 (Housing and Infrastructure) Agencies Represented
Miracle of Love, Inc.
Catholic Charities of Central Florida, Inc.
Grassroots Impact
Coalition for the Homeless of Central Florida, Inc.
Bright Community Trust
LGBT+ The Center, Inc.
Habitat for Humanity of Greater Orlando and Osceola County, Inc.
Orange Blossom Family Health/Health Care Center for the Homeless, Inc.
Family Promise of Greater Orlando, Inc.
Habitat for Humanity of Greater Apopka and Seminole County, Inc.
Habitat for Humanity of Florida
H.E.L.P. Community Development Corporation
Coalition for the Homeless of Central Florida, Inc.
The Salvation Army
Community Legal Services of Mid-Florida, Inc.
Future Leaders
Health Care Center for the Homeless, Inc.
Catholic Charities of Central Florida, Inc.

Question 1: What areas and/or communities do you believe were hardest hit by Hurricane Ian, or at the highest risk of housing instability due to natural disasters?

Attendees identified the following areas that were impacted by Hurricane Ian resulting in loss or damage to housing stock, slow release of FEMA funds, and delayed or insufficient funds to meet repair costs. It was noted that residents of those communities were **again distressed** by subsequent storms/flooding/damage.

- **Taft**
- **Pine Hills**
- **Parramore**
- **Englewood**
- **Orlo Vista**
- **Oak Ridge**
- **Eatonville**
- **East Winter Garden**
- **UCF and University Blvd. Areas**
- **University and Rouse Road Areas**
- **Bithlo and Ocoee** *(specifically Mobile Home Parks)*
- **Lake Nostalgia** *(including communities around the area)*
- **Maxwell Terrace** *(experienced damages to 93 units/floods)*
- **Semoran Blvd./Colonial Dr. to Aloma Ave.** (e.g., *a great deal of flooding impacting an assisted living facility, resulting in closure and inability to reopen. Several condos/apartment complexes flooded as well.)*

Question 2: In your opinion, which perspective areas would be most impactful in addressing unmet long-term recovery and housing needs?

Below is a summarized list of perspective areas that attendees identified as being most impactful in addressing unmet long-term recovery and housing needs:

- Rental assistance
- Transitional housing
- Homeownership assistance
- Additional shelter for Immediate crises
- Housing for Special Needs populations
- Replacement of structures damaged by Hurricane Ian
- Rezoning commercial property into residential properties
- Housing for moderate income and working-class families

Question 3: What housing construction programs do you believe are needed in Orange County, specifically relating to Hurricane Ian and disaster recovery efforts?

- Housing retention for seniors on fixed income was identified as of importance, as many seniors are now unable to afford their homes, have no other affordable housing options, and are not at the stage in life for a nursing home.
- Orange County desperately needs affordable housing to address increasing homelessness, including those who are couch surfing, temporarily staying with family, etc.
- Newer housing solutions to replace mobile homes: whether someone owns or is renting an older mobile home, it is hard to justify putting money into mobile home units because they will still be substandard. In some cases, the structure is so compromised, the unit is not strong enough to hold a new roof. The solution is newer housing options.

Question 4: What housing rehabilitation and infrastructure needs are not being addressed in our community for both your agencies, and clients?

- Increased funding for housing rehabilitation and repairs.
- There is still a need for residents who have received funds from FEMA etc. but funds were insufficient to meet the need.

Question 5: Many of you identified public facilities improvements, infrastructure improvements, and rehabilitation as a major concern during the aftermath of Hurricane Ian for both your individual agencies and perspective clients. Please provide feedback to this insight. Do you believe this is still the case? And are these activities that should be prioritized?

- Maxwell Terrace Roof Repair is still needed.

- Staff requested that participants provide additional feedback by email or phone.

Question 6: What concerns do you have regarding the rehabilitation of disaster-related systems in Orange County (e.g., stormwater management systems, or other disaster-related mitigation systems)?

- Rehabilitation efforts are impacted by material cost. FEMA dollars are not going as far as they did in the past, and there have been no cost adjustments at the federal level.

Question 7: In the larger conversation of the affordable housing crisis, how significant was Hurricane Ian in exacerbating the affordable housing crisis for Orange County residents? And what disaster recovery needs do you believe remain unmet?

- Affordability of replacement housing stock post disaster: when lower cost housing stock is lost due to disasters, replacements are usually higher priced.
- Any significant weather event often impacts more exposed groups – older homes, mobile homes, etc. which reduces the amount of affordable housing.

Question 8: What gaps do you believe still exist in the system that are contributing to the affordable housing crisis? Was Hurricane Ian a major contributor to these gaps?

- **Significant Gaps in Building Affordable "starter homes"**: Those who live in "affordable" housing tend to stay because they can't afford current home prices, insurance, and interest rates.
- **The Homeowner Insurance Crisis:** Due to Hurricane Ian and other disasters, insurance cost for the retention of home ownership is astronomical resulting in canceled insurance, an inability to find insurance, and increased costs beyond homeowner capacity.
- **Creating Affordable Housing**: Zoning limit types of housing, therefore feeding into the cost of material cost, accessibility etc. Zoning needs to be discussed to improve affordability.
- **Rezoning Reclassification of Existing Buildings**: Building reuse should be considered (such as redevelopment of vacant commercial buildings) to address housing shortages.
- **Housing cost burden:** The income levels of the communities are impacted when creating new housing. The former middle class cannot afford current housing costs. Any new construction needs to keep this in mind.
- **Significant Rent Increases:** After making improvements, landlords increase rent beyond the means of residents.

Question 9: What are some mitigation strategies and measures that the County should prioritize throughout the CDBG-DR Program cycle (i.e., six-year timeline)?

- Roof replacements and the mitigation & prevention of future flooding.
- Maintenance and updating of shelter structures and facilities for the homeless.

Question 10: Describe any of the areas or resources needed to assist your agency and/or populations you serve with long-term disaster recovery efforts.

- Staff requested participants provide feedback at a later time by email or phone.

Question 11: Are there any needs or issues related to Hurricane Ian that you feel have not been adequately addressed? Or are there any additional topics missed in the focus group?

- Making it possible for people to enter shelters without a government ID is essential. Also, media directed at people who are not native English speakers.
- Eligibility for any of these options must reflect the reality that so much of our agricultural, construction, and tourism work forces are undocumented and have great need for housing.

Focus Group 2: Economic Revitalization and Public Services

Focus Group 2 (Economic Revitalization and Public Services) Agencies Represented
Florida Rising
Miracle of Love, Inc.
Seniors First, Inc.
The Salvation Army
Shepherd's Hope, Inc.
Legal Aid Society of the OCBA, Inc.
Habitat for Humanity of Greater Orlando and Osceola County, Inc.
Catholic Charities of Central Florida, Inc.
Pathlight HOME
JUMP INN/JUMP Ministries, Inc.
Coalition for the Homeless of Central Florida, Inc.
Health Care Center for the Homeless, Inc.
Grace Medical Home, Inc.
Habitat for Humanity of Greater Orlando and Osceola County, Inc.
IDignity, Inc.
Central Florida Jobs with Justice
SALT Outreach, Inc.
Legal Aid Society of the OCBA, Inc.
Aspire Health Partners, Inc.
Catholic Charities of Central Florida, Inc.
Pathlight HOME
Aspire Health Partners, Inc.
Bright Community Trust

Due to many agencies and/or organizations participating in the first focus group, the discussion was centered around the question below.

Question 1: Other than housing, what is another current, unmet public service need in Orange County that resulted from Hurricane Ian?

Below is a summarized list of unmet public service(s) needs in Orange County that resulted from Hurricane Ian disaster.

- Mental health services
- Relocation assistance
- Resource navigation – i.e., case management
- Loss of income for extremely low income-people living
- Preparation of communities before a disaster
- Hurricane Preparedness and Resiliency
- Dedicated Resilience Hubs

3.1.1.2. Community Development Advisory Board (CDAB)

During the regularly scheduled meeting of the Community Development Advisory Board (CDAB), which took place on September 20, 2023, Housing and Community Development Division staff provided an overview of the CDBG-DR allocation and basic program requirements to the Board members and solicited their input. The Board oversees federal funds Orange County received as part of the consolidated planning process, which includes Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) program, and Emergency Solutions Grant (ESG) funds. More recently, the Board also provided oversight for the COVID dollars received though the CDBG and ESG programs and the HOME-ARP funds allocated to the County under the American Rescue Plan.

Staff presented and distributed CDBG-DR information and then asked a series of pointed discussion questions to assist in the County's data collection process and gain greater perspective on unmet needs in the community.

The Board members identified the following **areas** as **most impacted by Hurricane Ian**: Orlo Vista, City of Apopka, Mobile Homes in East Orlando, Pine Hills, East of Winter Garden, and Mills Avenue Area.

Additionally, the following comments were received from the Board members:

- Orlo Vista residents do not have the finances or resources available to address issues of mold and such that occurred because of Hurricane Ian. Pine Hills residents are experiencing the same.
- The issue of cluttered homes and a lack of resources for abatement.
- Most Orange County residents have unreported issues because they are fearful of losing their homes and being homeless.
- Owners of rental units have not addressed the inside living conditions of their units. The tenants do not address them either, as they have nowhere to go if the units are deemed unlivable.
- The visibility of mold and other interior and exterior structural elements increased because of Hurricane Ian. Many renters and low-income families remain in deplorable housing because they are afraid of becoming homeless.
- Mitigation needs: change of construction materials from wood to brick or metal; weather/wind-resistant windows, doors, roofs, etc.; HVAC systems need to be remedied. There is water damage inside and outside from drainage blocks and leaks. Renters and owners are not aware that these units need to be cleared out every so often. This leads to water blockage, leaks, and mold. Education to residents is needed.

- Set up large and additional generators.
- Replace older model septic tanks and/or the septic pumps.
- Elevated housing structures are only viable for new construction.
- Develop an inspection, similar to an audit – Healthy Home Inspections.
- Transportation Needs: educate residents on where and how to use public transportation, and transportation systems need improvements and/or enhancements.
- Disaster resiliency hubs.

3.1.1.3. Affordable Housing Advisory Board (AHAB)

On October 11, 2023, Housing and Community Development Division staff presented to the Affordable Housing Advisory Board (AHAB), which comprises of seven (7) appointed members that review Orange County policies, procedures, ordinances, land development regulations, and adopted comprehensive plan to ultimately report back to the Board of County Commissioners with recommendations on specific initiatives that encourage and/or facilitate affordable housing. The staff disseminated CDBG-DR marketing and outreach materials to inform AHAB on the funding source; moreover, staff provided an overview of the CDBG-DR planning process with a timeline and additional outreach opportunities for members to provide further feedback and input.

3.1.1.4. Central Florida Commission on Homelessness (Continuum of Care)

On September 26, 2023, Orange County staff attended the monthly general membership meeting held by the Central Florida Commission on Homelessness (local Continuum of Care). The staff provided an overview of the CDBG-DR funding source, potential uses of funding as they related to providers of homeless services and housing and encouraged agencies to participate in additional outreach efforts planned by the County, such as community meetings and citizen participation survey, to provide detailed input during the action planning process. Some providers of homeless services offered suggestions for how the funds could be used to address capacity for housing individuals during emergencies, including natural disasters, and the use of funds for expansion of permanent supportive housing and emergency shelters.

3.1.1.5. Engagement with Internal Stakeholders (Orange County Departments/Divisions)

During the action planning process, Housing and Community Development Division staff solicited input from the following Orange County Departments and Divisions: Public Works, Utilities, Emergency Management, Fire Rescue, Community & Family Services, Environmental Protection, Neighborhood Services, Planning, Sustainability & Resilience Office, Fiscal & Operational Support, County Administration Office, Administrative Services, Capital Projects, Community Action, and Facilities Management. The input received was utilized in developing the unmet and mitigation needs assessment, and the proposed budget allocations for the CDBG-DR Program.

3.1.1.6. Engagement with Local Jurisdictions

On September 13, 2023, the County staff met with several local jurisdictions to provide an overview of disaster relief funds from HUD and to receive feedback on unmet needs in their respective communities. The feedback received from the municipalities included some damages reported and proposed projects to meet unmet and mitigation needs. County staff requested data from the jurisdictions on rental housing needs and damages, owner-occupied housing needs and damages, and infrastructure improvement projects, to include mitigation projects and potential planning studies. The following jurisdictions sent representatives to attend the meeting: City of Orlando (Housing & Community Development; Public Works); City of Winter Park; City of Belle Isle; City of Winter Garden; and Town of Eatonville. Housing and Community Development Division staff followed up with all of the municipalities via email and invited municipal staff to attend community meetings held in/near their jurisdictional boundaries.

3.1.1.7. Engagement with Public Housing Authorities

As discussed in the Federal Register notice (88 Fed. Reg. 32,046 (May 18, 2023), County staff did their due diligence to consult with its public housing authorities to determine the use of funds and assess any unmet needs or disaster impacts. A meeting was held on September 11, 2023, with Orlando Housing Authority & Winter Park Housing Authority. Orlando Housing Authority (OHA) identified remaining flooding issues, drainage systems, and generators as the main concern when relating back to Hurricane Ian. OHA is working on rebuilding Griffin Park apartments and Lake Mann Homes due to the sites flooding and the need for drainage system improvements. Winter Park Housing Authority (WPHA) determined that they have similar unmet needs with several of their properties flooding, which had led to damaged facilities and roof leakages. WHPA gave the following list of properties that are currently in need of repair: 1) Tuscany at Aloma Apartments; 2) Plymouth Apartments; 2) Tranquil Terrace; and 3) The Meadows Apartments.

Orange County staff followed up with both public housing authorities via email to solicit additional information needed to complete the unmet needs assessment portion of the Action Plan.

3.1.1.8. Engagement through Digital Outreach, Publications, & Postings

The table below provides statistics on digital outreach, mainly as it pertains to the CDBG-DR Program website: www.ocfl.net/CDBG-DR.

Web Page	Views	Users
www.ocfl.net/NeighborsHousing/OCDisasterRecovery.aspx	6,438	1,604
www.ocfl.net/NeighborsHousing/OCDisasterRecovery/ActionPlan.aspx	1,588	122
www.ocfl.net/NeighborsHousing/OCDisasterRecovery/CommunityEngagement.aspx	2,048	317
www.ocfl.net/NeighborsHousing/OCDisasterRecovery/Procurement.aspx	1,456	75
www.ocfl.net/NeighborsHousing/OCDisasterRecovery/Programs.aspx	1,522	111
www.ocfl.net/NeighborsHousing/OCDisasterRecovery/Reporting.aspx	1,436	47
Total	**14,488**	**1,723**

Table 43. CDBG-DR Program Website – Webpage Engagement (9/25/23 – 12/04/23)

Social Media Sites	# of Social Media Posts	Dates	Impressions	Reach	Engagements
Facebook Instagram Nextdoor	45	Sept 25 – Oct 30	109,604	109,169	179

Table 44. CDBG-DR Social Media Outreach

3.1.1.9. Publications and Postings

As part of the community engagement and outreach process, and in compliance with requirements of the Federal Register notice, Orange County established a program name and logo, webpage (www.ocfl.net/CDBG-DR), email address (Disaster.Recovery@ocfl.net), developed digital and printed media materials, 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 Orange County Public Libraries and Orange County Public Schools to provide engagement opportunities at public locations accessible to residents. County staff distributed flyers and postcards about the scheduled public meetings and placed paper copies of the citizen participation survey in local libraries and many County buildings. Orange County also disseminated content via its social media channels to expand its ability to target specific areas and demographics of the community. Materials and action plan documents were made available in Spanish, Haitian Creole, and English.

The County provided notification regarding all community meetings, the citizen participation survey and the public comment period via press release, social media, website, email newsletter, and outreach to non-profit organizations, local municipalities, local Continuum of Care, and other stakeholders. Community meetings were held in

locations central to the life of the neighborhood, in community centers, churches, and elementary schools. All meeting locations were physically accessible by persons with disabilities in accordance with section 504 of the Rehabilitation Act of 1973, (29 U.S.C 794 Architectural Barriers Act of 1968 (42 U.S.C. 4151–4157; 24 CFR part 40) and where adequate parking was available.

A press release announcing the CDBG-DR community meetings' schedule was published on September 25, 2023. Notification regarding the availability of translation services and ADA accommodations for all meetings was made available in English, Spanish and Haitian Creole. Several news outlets provided written and on-air coverage of the meeting schedule, and some media were present at the meetings.

The County also provided two media pitches and three media releases to local and regional media outlets with content about the Orange County CDBG-DR Program. The table below provides a list of the related news coverage.

News Agency	Date	Article Name & Link
Orange County **(Press Release)**	September 25, 2023	Public Input Requested to Determine the Use of $219M in Federal Funding for Hurricane Recovery
NPR 90.7 WMFE **(News Article)**	September 26, 2023	Orange County Surveys Asks How to Spend $220 Million in Hurricane Ian Relief
Click Orlando.com **(News Article)**	September 28, 2023	Nearly $220M allocated to Orange County, hurricane disaster recovery
Spectrum News 13 **(News Report)**	September 28, 2023	Orange County to allocate millions to residents still recovering from Hurricane Ian
WFTV 9 **(News Article)**	September 29, 2023	Orange County asks residents for input on how to spend $220M in Hurricane Ian recovery funds
Central Florida News 13 **(News Report)**	October 17, 2023	Public Meeting on Federal Storm Relief Funds
Observer **(News Article)**	November 3, 2023	Orange County to receive $219M for disaster recovery

Table 45. Orange County CDBG-DR Outreach – News Media Outreach and Engagement

3.1.1.10. Engagement with Orange County Residents – Community Members

Orange County staff conducted 13 community meetings around the County to target impacted areas where citizens and stakeholders could provide staff with their direct feedback. At these community meetings participants were given a brief overview of the program with an opportunity to ask questions of staff. Most of the meetings were open dialogue with local government staff, where community members asked questions and County staff provided responses. In addition to serving as an outreach platform, these meetings provided Orange County an opportunity to focus on community-specific issues

and challenges. The figure below and corresponding table show locations and dates/times of all community meetings.

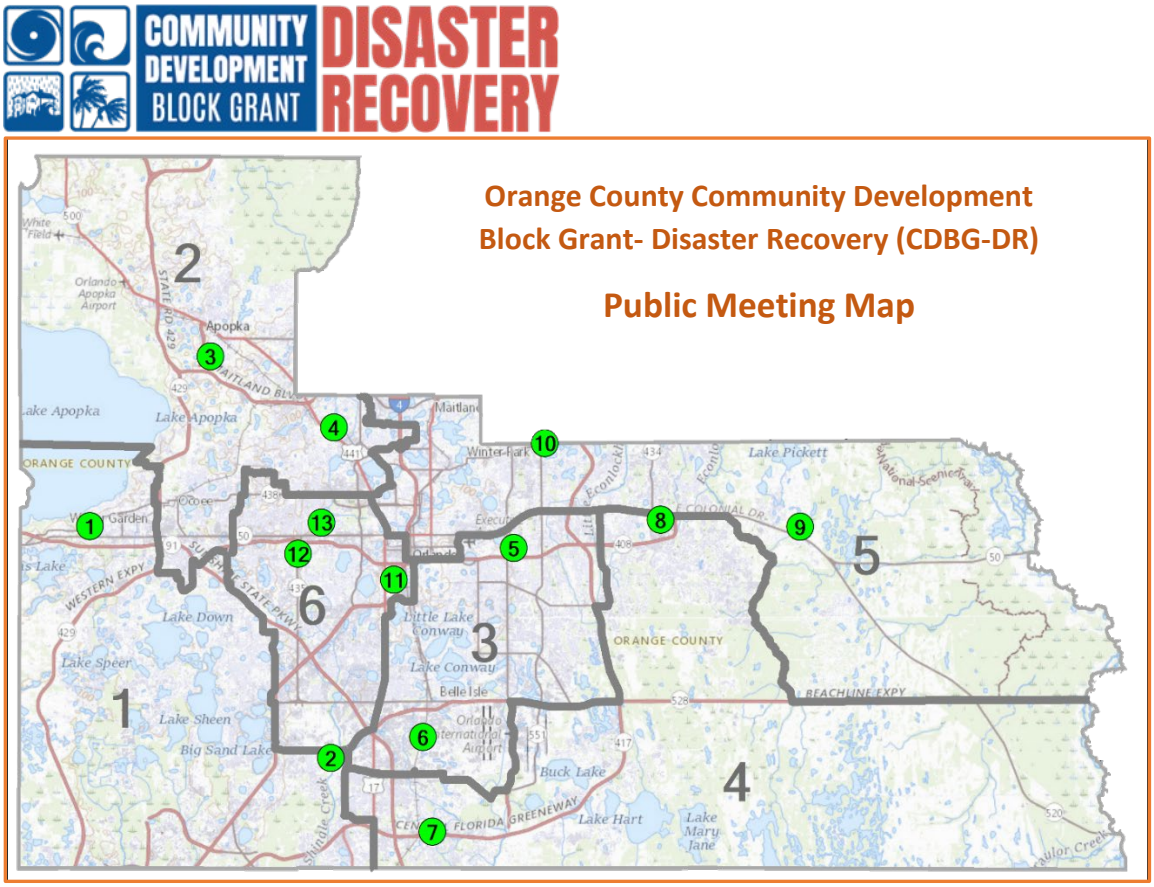

Figure 27. CDBG-DR Community Meetings – Locations and Dates/Times

Approximately 223 residents and stakeholders were present at the community meetings. A basic overview of the CDBG-DR process and proposed programs was provided at each meeting, along with question-and-answer sessions, and opportunity for residents to provide input verbally, written (on comment cards), or through an online survey form. Additionally, in each community meeting, there were two breakout sessions held in the back of the room with four poster boards in each section. Two (2) staff members facilitated and guided a list of discussion questions. The other staff member managed the CDBG-DR poster boards that summarized eligible activities and recorded comments. Each breakout session had guided discussion questions on all related CDBG-DR topics: Housing, Rehabilitation, Infrastructure, Economic Development, and Public Services.

Materials were provided in English, Spanish and Haitian Creole, and oral language interpretation was available for community meetings in accordance with Title VI of the Civil Rights Act of 1964, Executive Order (EO) 13166, and 72 FR 2732, required of recipients of U.S. Department of Housing and Urban Development's (HUD) funds,

including the Community Development Block Grant (CDBG) program and Community Development Block Grant Disaster Recovery (CDBG-DR) program. The County also provided resources about currently available programs to address immediate needs or ineligible activities while the CDBG-DR planning and implementation process continues. Summaries of the responses from each public meeting were posted on the CDBG-DR Program website for further public review.

Community Meeting Location	Date & Time	CDBG-DR Eligible Activities Top Priorities Identified	Number of Attendees
District 2 – Apopka John Bridges Community Center 445 W. 13th Street Apopka, FL 32703	September 28, 2023 6:00PM – 8:00PM	**Housing** Rehabilitation Reconstruction	38
District 2 – Englewood Park New Beginnings Church 6859 Edgewater Commerce Pkwy. Orlando, FL 32810	October 5, 2023 6:00PM – 8:00PM	**Housing** Rehabilitation Reconstruction	11
District 6 – Holden Heights Grand Avenue Neighborhood Center 800 Grand Street, Orlando, FL 32805	October 10, 2023 6:00PM – 8:00PM	**Housing** Rehabilitation Reconstruction New Construction	16
District 1 – Tildenville Tildenville Elementary School 1221 Brick Road, Winter Garden, FL 34787	October 11, 2023 6:30PM – 8:30PM	**Infrastructure** Drainage & Utilities	13
District 4 – Meadow Woods Meadow Woods Elementary School 500 Rhode Island Woods Circle Orlando, FL 32824	October 12, 2023 6:30PM – 8:30PM	**N/A**	1
District 5 – Bithlo Bithlo Community Park 18501 Washington Avenue Orlando, FL 32820	October 16, 2023 6:00PM – 8:00PM	**Housing** Rental Assistance **Infrastructure**	3
District 5 – Goldenrod Goldenrod Recreation Center 4863 N. Goldenrod Road Winter Park, FL 32792	October 17, 2023 6:00PM – 8:00PM	**Housing** Rental Assistance Rehabilitation Reconstruction	14
District 1 – Shingle Creek Green Briar Village Clubhouse 10151 Gifford Blvd. Orlando, FL 32821	October 18, 2023 6:00PM – 8:00PM	**Housing** **Infrastructure** Drainage & Utilities	7
District 4 – Alafaya East Orange Community Center 12050 E. Colonial Drive Orlando, FL 32826	October 19, 2023 6:00PM – 8:00PM	**Infrastructure** Drainage & Utilities Water & Wastewater Facilities	12
District 3 - Azalea Park Christ The King Episcopal Church 26 Willow Drive	October 24, 2023 6:00PM – 8:00PM	**Infrastructure** Drainage & Utilities	24

Orlando, FL 32807			Water & Wastewater Facilities	
District 3 – Taft Taft Community Center 9450 S. Orange Avenue Orlando, FL 32824		October 25, 2023 6:00PM – 8:00PM	**Housing** Rehabilitation Reconstruction	19
District 6 - Orlo Vista Orlo Vista Elementary School 3 S. Hastings Street Orlando, FL 32835		October 26, 2023 6:30PM – 8:30PM	**See Exhibit (?)**	35
District 6 – Barnett Barnett Park 4801 W. Colonial Drive Orlando, FL 32808		October 30, 2023 6:00PM – 8:00PM	**Housing** Rehabilitation Reconstruction	30
Total Numbers	**6 Districts**	**13 Meetings**	Main Priority**: Housing**	**223 Attendees**

Table 46. CDBG-DR Community Meetings – Main Priorities Identified

Below are the summaries of all community meetings, by Commission District.

Orange County Commission District 1: Two (2) community meetings were held in District 1 (Tildenville Elementary School and Green Briar Village Clubhouse). A total of 20 attendees provided insight into the on-going unmet needs in their diverse communities. Residents in the Tildenville area identified new construction in flood-prone areas causing other localized flooding in neighborhoods with no history of flooding being a major concern to community members. Residents also discussed the ongoing drainage issues and lack of trash and/or debris being picked up in the area. The Williamsburg residents also experienced excessive flooding and drainage issues during Hurricane Ian.

Orange County Commission District 2: Two (2) meetings were held in Pine Hills and Apopka communities with 49 attendees. Residents shared concerns about debris removal, trash pickup, and tree trimmings unattended a year after Hurricane Ian. Residents also identified a need for better emergency management awareness to ensure communities can be informed about ongoing disaster recovery efforts.

Orange County Commission District 3: Two (2) meetings were held in District 3 (Azalea Park and Taft neighborhoods), and 43 attendees discussed ongoing unmet needs and concerns of power outages with downed power poles for extended periods during Hurricane Ian. Similar to other communities, drainage issues caused by new construction and development with water management concerns due to open pump systems. The Rio Pinar community was heavily impacted with over sixty (60) homes flooded.

Figure 28. Orange County CDBG-DR Citizen Community Meetings in Districts 1-6

Orange County Commission District 4: At the Meadow Woods Elementary School and East Orange Community Center fourteen (14) attendees shared their feedback on a need for affordable housing with a mixed-income model that allows working-class or higher-income individuals to access housing assistance. The major concern was for stormwater and waste management systems, and a fear of overdevelopment that would result in loss of wetlands around Colonial Drive, near Econlockhatchee River.

Orange County Commission District 5: Orange County had two (2) community meetings in District 5, at Bithlo Community Center and Goldenrod Recreation Center. Seventeen (17) attendees stated that new construction in flood-prone areas is causing localized flooding in neighborhoods with no history of flooding, as it was similarly described in several other communities. Due to the lack of homeless shelters on the east side of the County, attendees discussed the need for mental health centers in East Orlando area and potential funding for public services for "street psychology" services to diagnose, prescribe medication, and medically stabilize homeless persons with mental illness. The Bithlo community is concerned about the ongoing drainage issues that are due to the lack of trash and/or debris being picked up in the area.

Orange County Commission District 6: Because District 6 was identified as an impacted area by FEMA IA data, Orange County held three (3) community meetings at Barnett Park, Orlo Vista Elementary School, and Grand Avenue Neighborhood Center. A total of eighty (81) attendees in all three locations advised the staff on the impacts and unmet needs of Hurricane Ian that are still being faced. Residents in Orlo Vista detailed major infrastructure issues that resulted in extensive damage to income-qualified homeowners due to multi-year flooding that was exacerbated by Hurricane Ian. Residents encouraged

staff to use more inclusive language; many residents felt "low-income" was disparaging to locals. Additionally, community members advocated for additional post-and pre-disaster recovery outreach in these localized areas since they are most at risk during natural disasters.

Identified Priorities	Priority Details/Activities	Number	%
Housing	New construction Rehabilitation & Reconstruction of units Homeowner assistance Rental assistance Other	145	45%
Infrastructure	Public facilities Drainage/Utilities	131	41%
Public Services	Mental/Health Services Legal assistance Housing stability services	39	12%
Economic Revitalization	Loans and grants for businesses Business retention	8	2%
TOTAL		**323**	**100%**

Table 47. CDBG-DR Community Meetings – Main Priorities Identified by Activities

3.1.1.11. Citizen Participation Survey

As part of the community engagement process, Orange County made a citizen participation survey available on the program website: www.ocfl.net/CDBG-DR. The survey was open to the public from September 25, 2023, to November 10, 2023, and it was available in English, Spanish, and Haitian Creole. The County collected a total of 801, responses from residents in both English and Spanish (no responses were submitted in Haitian Creole), with most responses in the area zip code 32828 (Avalon Park region near Bithlo and University areas that were identified by stakeholders as a high interest area for unmet needs), with 250 respondents in this localized area.

County staff summarized and analyzed the data to help better guide the unmet needs assessment portion of the Action Plan and to aid in determining budget priorities for CDBG-DR funds. The figures and tables below provide an analysis of the data collected for the survey.

Question 1: In what language do you write most fluently?		
Answer Choices	**Responses**	
English	96.63%	774
Kreyòl Ayisyen	0.00%	0
Español	3.37%	27
Total Answered	**100%**	**801**

Table 48. Orange County CDBG-DR Citizen Participation Survey – Question 1

For the demographic data, 774 respondents answered in their preferred language of English and twenty-seven responded in Spanish with no responses in Creole. Haitian speakers are the second most populous limited English proficiency (LEP) population in Orange County with 7.1% of the LEP population, and 1% of the total population translation of the survey was provided to all respondents, according to 2021 American Community Survey One-Year Data.

Question 2: Which of the following best describes your current housing status?		
Answer Choices	**Responses**	
Homeless Individual	1.13%	9
Homeowner	75.78%	604
Renter	19.07%	152
Other, please specify	4.02%	32
Total Answered	**100%**	**797**

Table 49. Orange County CDBG-DR Citizen Participation Survey – Question 2

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.

Question 5: What type of property do you reside in?		
Answer Choices	**Responses**	
Single family home	78.54%	626
Apartment	10.66%	85
Townhome or a similar structure	4.02%	32
Condo	3.01%	24
Room/student housing or similar	0.13%	1
Mobile home – in mobile home park	1.13%	9
Mobile Home – on private land or co-op	0.25%	2
Other (please specify)	2.26%	18
Total Answered	**100%**	**797**

Table 50. Orange County CDBG-DR Citizen Participation Survey – Question 5

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 conclusion that the survey respondents are representative of the impacted community.

Question 6: Did you experience any damage(s) to your home or personal property due to Hurricane Ian?			
Answer Choices	**Responses**	**Total**	**Percentage**
Yes	35.68%	274	35.68%
No	58.85%	452	58.85%
Other (please specify)	5.47%	42	5.47%
Total Answered	**100%**	**768**	**100%**

Table 51. Orange County CDBG-DR Citizen Participation Survey – Question 6

The percentage of survey respondents who reported no impact to their home or personal property was. 58.85%. This could be due to many residents not having physical damage to their personal property but still feeling the impacts of Hurricane Ian through infrastructure needs and public service needs.

Question 7: Are you a small business owner who relocated, downsized, or closed your business because of the impacts (immediate or long-term) of Hurricane Ian? (view graph below)		
Answer Choices	**Responses**	
Yes	5.32%	42
No	83.92%	663
N/A	10.76%	85
Total Answered	**100%**	**790**

Table 52. Orange County CDBG-DR Citizen Participation Survey – Question 7

As FEMA IA data suggests, 663 survey respondents reported no impacts to small business owners from Hurricane Ian. This supports the conclusion that survey respondents are representative of the impacted Community.

Question 8: Have you filed any claims with your insurance company for damages caused by Hurricane Ian?				
Answer Choices	**Responses**			
	English	**Spanish**	**Total**	**Percentage**
Yes, I applied and received all of the assistance needed	15	0	15	1.89%
Yes, I applied and received some assistance	45	2	47	5.92%
Yes, I applied but was denied assistance	47	4	51	6.42%
No, I did not	545	12	557	70.16%
No, I don't have insurance	54	7	61	7.68%
N/A	61	2	63	7.93%
Total Answered	**767**	**27**	**794**	**100%**

Table 53. Orange County CDBG-DR Citizen Participation Survey – Question 8

Question 9: Have you applied for disaster assistance from any government or non-government organization(s) during and/or after Hurricane Ian?				
Answer Choices	Responses			
	English	Spanish	Total	Percentage
Yes, I applied and received all the assistance I needed	8	0	8	1.01%
Yes, I applied and received some assistance	72	5	77	9.67%
Yes, I applied but did not receive assistance	44	3	47	5.90%
No, I did not	645	19	664	83.42%
Total Answered	**769**	**27**	**796**	**100%**

Table 54. Orange County CDBG-DR Citizen Participation Survey – Question 9

Question 10: Were you able to continue living in your home/place of residence following Hurricane Ian?				
Answer Choices	Responses			
	English	Spanish	Total	Percentage
Yes, my residence is safe	642	17	659	82.89%
Yes, but my residence is still not safe	39	5	44	5.53%
No, I had to move/leave my place of residence	48	3	51	6.42%
N/A	39	2	41	5.16%
Total Answered	**768**	**27**	**795**	**100%**

Table 55. Orange County CDBG-DR Citizen Participation Survey – Question 10

Question 11: Is your community continuing to experience any of the following because of Hurricane Ian?				
Answer Choices	Responses			
	English	Spanish	Total	Percentage
Ongoing flooding/street drainage concerns	247	9	256	54.70%
Unusable public spaces, such as parks, bridges, trails, playgrounds etc.	15	0	15	3.21%
Abandoned homes/buildings	27	2	29	6.20%
Business closures and/or relocation of key businesses	17	1	18	3.85%
Trash and debris removal/clean up needs	36	3	39	8.33%
Other (please specify)	105	6	111	23.71%
Total Answered	**447**	**21**	**468**	**100%**

Table 56. Orange County CDBG-DR Citizen Participation Survey – Question 11

The figure below further highlights the community's desire to prioritize infrastructure, housing, and mitigation activities to build more resilient and sustainable communities. Detailed survey results can be found on the CDBG-DR Program website: www.ocfl.net/CDBG-DR.

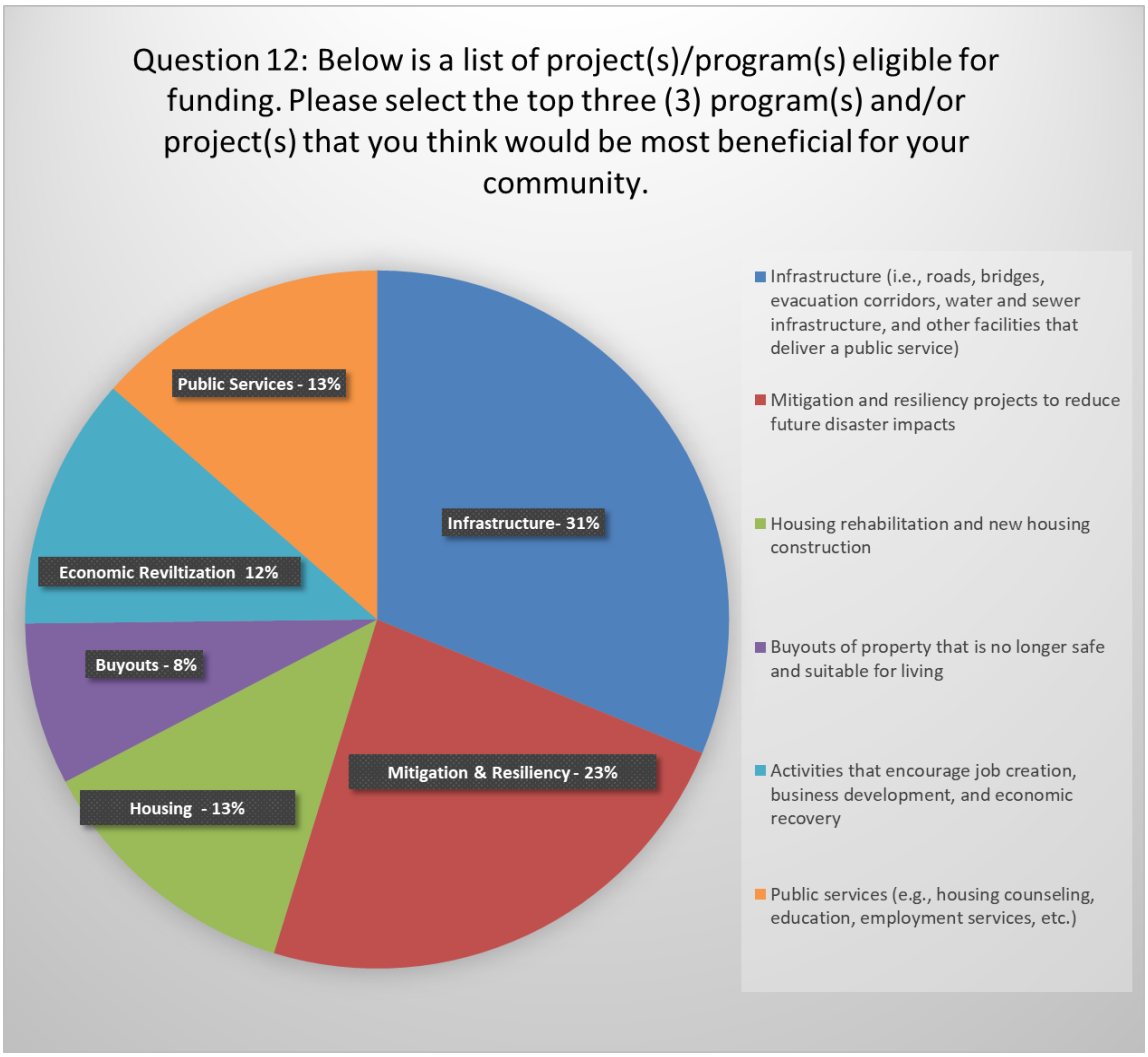

Figure 29. Orange County CDBG-DR Citizen Participation Survey – Question 12

3.1.1.12. Additional Outreach and Engagement

In addition to the outreach above, Orange County supported our local advocacy groups and organizations in engaging residents in the CDBG-DR action planning process. One in particular was a local coalition of Orange County nonprofit agencies and community-based organizations led by Central Florida Jobs with Justice. The organization developed a tool to engage residents to create a low-impact, easily accessible information collection alternative that goes directly to individual members of the organizations to get quick feedback on how the CDBG should be implemented. The tool, called "The People's Phone Booth," was taken to four locations in the County. Community members were asked to

leave voicemails at a Google Voice number following the prerecorded prompts. Voice messages were then provided to County staff for transcribing.

3.1.2. Public Hearings

Orange County made every effort to solicit input regarding the proposed use of CDBG-DR funds from residents, community stakeholders, and other entities. As part of these efforts, Orange County made a draft CDBG-DR Action Plan available for review and comments and held a BCC work session and a required public hearing on the Plan prior to transmitting the Action Plan to HUD for approval.

It should be noted that communication requirements of the CDBG-DR Action Plan are outlined in great details in the Citizen Participation Plan (CPP). Specifically, the CPP outlines efforts to accommodate participation for persons with disability, Limited English Proficiency (LEP) persons, and others requiring accessibility accommodations to ensure effective communication. The CPP further specifies how requests for reasonable accommodations or language access can be made.

3.1.2.1. Draft CDBG-DR Action Plan and Public Comments

In accordance with Orange County Citizen Participation Plan, which was updated on November 28, 2023 to include additional requirements pertaining to the CDBG-DR Program, before submission to HUD, a draft of the Action Plan was posted on the CDBG-DR Program website (www.ocfl.net/CDBG-DR) for a required 30-day public comment period. The public comment period began on Monday, December 11, 2023, and it ended on Thursday, January 11, 2024. Notification of the availability of the draft Action Plan for public review and comment was posted in La Prensa (Spanish newspaper of general circulation) on Thursday, December 7, 2023, and in Orlando Sentinel (newspaper of general circulation) on Sunday, December 10, 2023. Copies of both notices were also uploaded on the County's CDBG-DR program website.

An electronic copy of the draft CDBG-DR Action Plan was posted on the Program website, along with executive summaries of the Plan available in English, Spanish, and Haitian Creole. Physical copies of the draft Plan were made available to the public at the Orlando Public Library main branch, Community Relations Department, Third Floor, located at 101 East Central Boulevard, Orlando, Florida 32801; and at the Orange County Housing and Community Development Division's office located at 525 East South Street, Orlando, FL 32801. The County offered to make a reasonable number of copies of the draft CDBG-DR Action Plan available to citizens and groups that request it, including copies to persons who are homebound.

No updates or changes were made to the draft CDBG-DR Action Plan in response to public comments. A summary of comments received, and Orange County's response to each comment addressing the substance of the comment, were included in the final version of the CDBG-DR Action Plan that was uploaded in the DRGR system. The summary of comments and responses was also posted on the CDBG-DR Program website.

3.1.2.2. CDBG-DR Action Plan Public Hearing

In accordance with the updated Orange County Citizen Participation Plan, the County must hold at least one public hearing to gather input regarding the CDBG-DR Action Plan. The public hearing must be held after the County's proposed CDBG-DR Action Plan has been published on its website for public comment and before submittal of the CDBG-DR Action Plan to HUD. As part of the public hearing process, all efforts will be made to accommodate participation for individuals with disabilities and/or limited English proficiency individuals with appropriate auxiliary aids and services offered to ensure effective communication.

Orange County held a work session in front of the Board of County Commissioners on the requirements of the CDBG-DR Program and the action planning process on Tuesday, December 12, 2023. Additionally, an update on the draft plan was presented on Wednesday, December 13, 2023, to the Community Development Advisory Board that provides an oversight on the County's consolidated programs. A public hearing on the CDBG-DR Action Plan was held on Tuesday, January 9, 2024, prior to the conclusion of the public comment period. The public hearing was televised on Orange TV in real time. A separate notice providing additional details on the public hearing was published by the County.

During the public hearing, Orange County provided an opportunity for citizens to submit comments orally or in writing. The County treats written and oral comments equally and incorporates both in the response document submitted to HUD with the CDBG-DR Action Plan. Materials presented at the CDBG-DR public hearing, to include the meeting presentation, were made available on the County's CDBG-DR website. A recording of public hearings can be made available upon an advance request by sending an email to housing@ocfl.net. Questions received and answers provided were made available to the CDBG-DR Program website and included in the Summary of Comments.

Date	Activity Description
December 7 & 10, 2023	Notice announcing the 30-day public comment period of draft CDBG-DR Action Plan published in La Prensa (Spanish) and Orlando Sentinel (English)
December 11, 2023	30-day public comment period for the draft CDBG-DR Action Plan starts
December 12, 2023	BCC work session to get on overview of the CDBG-DR Program and action planning process
December 13, 2023	Update on the draft CDBG-DR Action Plan to the Community Development Advisory Board
January 9, 2024	BCC public hearing on the final CDBG-DR Action Plan
January 11, 2024	30-day public comment period for the draft CDBG-DR Action Plan ends
January 17, 2024	Submission of the CDBG-DR Action Plan to HUD

Table 57. CDBG-DR Action Plan: Public Comments and Public Hearing Timeline

3.1.3. Complaints

Orange County strives to help meet the needs of all grant beneficiaries and subrecipients while following the applicable federal, state, and/or local County regulations and guidelines governing each program. However, there may be instances in which a subrecipient or beneficiary wishes to file a complaint. A complaint is defined as a written or verbal statement or grievance that a situation or behavior is unsatisfactory or unacceptable: (1) a Fair Housing or other discriminatory allegation; (2) an allegation of fraud, waste, or abuse; and/or (3) communication of dissatisfaction of a program and/or personnel. It is the policy of Orange County to provide a clear and fair process for beneficiaries and sub-recipients to file a complaint regarding their service or appeal a decision regarding their case.

Beneficiaries or subrecipients have the right to discuss their concerns regarding the eligibility determination, delivery of service, staff actions, and/or perceived violation of their rights in a constructive manner.

When appropriate, Orange County encourages applicants or subrecipients to try to resolve their concerns or disputes directly with a staff person before engaging in a grievance process. If those efforts do not resolve the issue, they may engage in the formal complaint procedure. Concerns that are sensitive in nature where the applicant or subrecipient is afraid to address the issue directly with a staff person, should go directly to the Orange County Housing and Community Development Division Manager. Beneficiaries and subrecipients may express their concerns in writing to the email or mailing address below.

Orange County staff will investigate the complaint and provide a written response to the beneficiary or subrecipient within fifteen (15) working days after receipt of the complaint; where applicable, responses will be provided via email.

Complaints will be handled sensitively and fairly. A thorough review of any applicable program documentation and contractual agreements will be conducted, as well as careful implementation of policies and procedures, and clear and respectful methods of communication will be used to help prevent and resolve complaints. A record of complaints received will include the nature of the complaint, referrals made, and the final disposition. If applicable, this record will be included with the final document submitted to HUD.

Complaints should be submitted to the Housing and Community Development Division, which will be administering federal funding from the CDBG-DR Program. The public may submit complaints related to CDBG-DR-funded activities through any of the following means:

Via email at: Disaster.Recovery@ocfl.net
Online at: www.ocfl.net/CDBG-DR
Mailed to: Orange County Housing and Community Development Division
Attn: CDBG-DR Program
525 E. South Street
Orlando, FL 32801

The complaint will clearly state what the activity and associated program is, the nature of the complaint or grievance, and the name, address, and day and evening telephone numbers of the person filing the complaint. Upon receipt of a complaint, County staff will prepare a written substantive response to the complainant within fifteen (15) working days. If necessary, complaints or grievances will be heard in a timely fashion by the Division Manager or Assistant Division Manager.

Fair housing complaints can be submitted directly to the Office of Fair Housing and Equal Opportunity (FHEO), as follows:

FHEO Region IV Office: (800) 440-8091
Email: complaintsoffice04@hud.gov

The process for complaints regarding fraud, waste, or abuse of government funds will be published on the CDBG-DR Program website: www.ocfl.net/CDBG-DR. Complaints alleging violation of fair housing laws will be reviewed using the County-established

process and directed to HUD for review when required. Complaints regarding fraud, waste, or abuse of government funds should be forwarded to the HUD office of Inspector General Fraud Hotline (phone: 1–800–347–3735 or email: hotline@hudoig.gov).

To maintain accountability for the use of public funds, the Orange County Comptroller has established the County Audit Division (County Audit) to review allegations of fraud, waste, and abuse of County property and resources. Orange County's citizens or County employees may contact the County Audit Division's Fraud Hotline in instances where fraud, waste, or abuse of County assets or resources are suspected. Individuals are not required to provide their name.

Orange County Fraud Hotline: (407) 836-5775

Allegations of fraud, waste, abuse, mismanagement or Whistleblower related matters within the U.S. Department of Housing and Urban Development (HUD) and HUD Funded programs to the Office of Inspector General (OIG) can be submitted as follows:

HUD OIG Fraud Hotline: (800) 347-3735 or (800) 877-8339 TTY/ASCII

Appeals: An appeal is a written dispute requesting a reversal or revision of a determination that affects eligibility and/or assistance. Appealable decisions may include determinations of eligibility, award amount, inspection results, and funding requirements.

Policies that have been approved and incorporated by a program, statutory and regulatory requirements/guidelines, may not be appealed. Orange County will implement an appeal process for beneficiaries and subrecipients related to program eligibility and the program application process as part of the program development. Details of the point of contact and procedure for submitting the appeal will be specified in the appropriate program policies and procedures.

3.2. Public Website

Orange County, FL will maintain a public website that provides information accounting for how all CDBG-DR funds are used, managed, and administered, including links to the disaster recovery action plan, action plan amendments, program policies and procedures, performance reports, citizen participation requirements, activity and program information described in this plan, and details of all contracts and ongoing procurement processes.

These items are made available through the CDBG-DR Program website (www.ocfl.net/CDBG-DR). Specifically, Orange County, FL will make the following items available:

- CDBG-DR Action Plan created using the DRGR system;
- Any amendments to the CDBG-DR Action Plan;
- Citizen Participation Plan;
- Procurement policies and procedures;
- Vital documents that are critical for ensuring meaningful access by beneficiaries or potential beneficiaries generally, and limited English proficiency (LEP) persons specifically;
- All executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts);
- Environmental reviews that require an Authorization to Use Grant Funds;
- Summary description and the procurement status of all services or good being procured by Orange County and its subrecipients using CDBG-DR funds (e.g., phase of the procurement, requirements for proposals, etc.); and
- within three (3) days of submission to HUD, a version of the quarterly performance report that omits personally identifiable information.

Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted to a grantee's website.

In addition, the Program website will include information regarding all disaster recovery activities assisted with CDBG-DR funds. The website will be updated in a timely manner to reflect the most up-to-date information about the use of funds and any changes in policies and procedures, as necessary. At a minimum, updates will be made quarterly by the Orange County Housing and Community Development Division, in accordance with the requirements of the Federal Register notice.

The website is navigable by all interested parties from the Orange County homepage (www.ocfl.net) via link to Resources/Long-Term Storm Recovery, and direct links to the CDBG-DR Program website.All materials uploaded onto the Program website will be published in a form accessible to persons with disabilities and limited English proficiency (LEP) individuals The documents being uploaded onto the CDBG-DR Program website are translated in accordance with Orange County's Citizen Participation Plan, Orange County Title IV Nondiscrimination Policy, and Plan (Language Access Plan), and Language Access Plan Addendum fort federal programs. All documents pertaining to citizen access to information (latest updates/versions) are posted on the CDBG-DR Program website (www.ocfl.net/CDBG-DR), under the "Community Engagement" tab.

The County website can also be translated into a variety of languages, including Spanish, using one-click translation at the top of each page. The website is maintained in a manner that is accessible to persons with disabilities, in accordance with 24 CFR 8.6, and Orange County's ADA policies that can be found here: https://www.ocfl.net/FamiliesHealthSocialSvcs/DisabilityServicesReferrals.aspx.

3.3. Amendments

The CDBG-DR Action Plan may require changes, as the implementation of planned activities and strategies develops over time. Thus, Orange County will amend the CDBG-DR Action Plan as often as necessary to best address our long-term recovery needs and goals. Every amendment to the CDBG-DR Action Plan will follow the amendment process established in the Orange County Citizen Participation Plan, as updated. Amendments must be defined as either a substantial or a non-substantial amendment, based on the criteria listed below.

3.3.1. Substantial Amendment

Orange County will consider the following changes to be substantial amendments to the CDBG-DR Action Plan and subject to the approved citizen participation process, in accordance with its Citizen Participation Plan and 24 CFR 91.505. A substantial change is defined as one of the following occurrences:

- A change that adds a new priority/program objective;
- A change in program benefit or eligibility criteria;
- The addition or deletion of an activity;
- A proposed reduction in the overall benefit requirement; or
- The allocation or re-allocation of more than 25 percent of the total allocation from HUD.

Substantial amendments will include language and/or tables showing:

- The content that is being added, deleted, or changed shown as a "redline" version;
- A chart or a summary table that clearly illustrates the proposed changes, to include where funds are coming from and where they are moving to, and
- A revised budget allocation table that reflects the entirety of all funds, if applicable to the amendment.

Substantial amendments are subject to the citizen participation process and all citizen participation elements specified in the Citizen Participation plan, for the original CDBG-

DR Action Plan, must be followed for a substantial amendment except for stakeholder consultation and public hearings. Therefore, a public notice of the proposed substantial amendment will be issued and will allow for a thirty (30)-day public comment period. Notice of the amendments will be posted on the Orange County CDBG-DR Program website (www.ocfl.net/CDBG-DR) and communicated through other means, to include a public notice in a newspaper(s) of general circulation and email distribution. The public notice will encourage all interested parties to participate and provide their comments and input on the proposed substantial amendment. Upon request, the County will also make copies of the proposed substantial amendment available to citizens and groups. Comments or views received orally or in writing will be considered in preparing the substantial amendment.

All comments received during the established public comment period will be considered in preparing the final substantial amendment. A summary of any accepted comments or views, and a summary of any comments or views not accepted and the reasons for, will be submitted along with the substantial amendment as an attachment.

Once the public comment period concludes, the substantial amendment will be presented to the Board of County Commissioners for approval, and then submitted to the U.S. Department of Housing and Urban Development (HUD) in the DRGR system.

3.3.2. Non-Substantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections, clarifications, and/or budget changes that do not meet the monetary threshold and/or other requirements to be considered a substantial amendment to the plan. In accordance with Orange County's Citizen Participation Plan and 24 CFR 91.505, a non-substantial amendment is defined as:

- Technical corrections or clarifications;
- Budgetary changes that do not meet the monetary threshold for substantial amendments to the Action Plan.

Non-substantial amendments do not require public notices or posting for public comment. However, Orange County will utilize the established reporting system (DRGR) to notify HUD five (5) business days before the change is effective.

Every amendment, substantial or not, will be numbered sequentially, and an amendment chart will be posted on the CDBG-DR Program website (www.ocfl.net/CDBG-DR).

3.4. Displacement of Persons and Other Entities

Orange County plans to minimize the risk of displacing individuals or entities and assist persons or entities displaced as a result of implementing CDBG-DR projects and activities. To minimize the displacement of persons and other entities that may be affected by the activities outlined in the CDBG-DR Action Plan, Orange County will coordinate with all pertinent agencies, subrecipients of funds, implementation vendors, program recipients, or other applicable entities. Should any of the proposed projects or activities cause the displacement of people or entities, the County will develop and adopt a Residential Anti-Displacement Relocation Assistance Plan (RARAP) for the CDBG-DR Program to ensure the requirements of Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended (49CFR Part 24), and Section 104(d) of the Housing and Community Development Act of 1974, as amended, are met.

At a minimum, the RARAP for Orange County's CDBG-DR Program will address the following:

- Description of how the County plans to minimize displacement of members of families and individuals from their homes and neighborhoods as a result of any CDBG-DR assisted activities, including disaster recovery activities where displacement can be prevented.
- Description of how the County plans to minimize the adverse impacts of displacement for CDBG-DR assisted activities where minimizing displacement is not reasonable, feasible, or cost-efficient and would not help prevent future or repetitive loss.
- Description of how the County will plan programs or projects in such a manner that recognizes the substantial challenges experienced by displaced individuals, families, businesses, farms, and nonprofit organizations and develop solutions to minimize displacement or the adverse impacts of displacement.
-

The RARAP will outline policies and procedures to be implemented in the event that proposed projects and/or activities cause the displacement of people or other entities. The regulations and evaluation criteria outlined in the RARAP will apply to both, property owners and tenants.

- Orange County will evaluate the potential to trigger relocation or displacement prior to implementing an activity or project.
- When there is potential to trigger relocation or displacement, Orange County will provide detailed policies and procedures for these activities or projects.

- Orange County will identify funding sources and a budget for relocation or displacement as part of the activity or project.
- Orange County will ensure that assistance and protections afforded under the Uniform Relocation Assistance and Real Property Acquisition Act (URA), Section 104(d) of the Housing and Community Development Act of 1974 are available to persons or entities affected.
- CDBG-DR funds may 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.

  For purposes of this section, public use shall not be construed to include economic development that primarily benefits private entities. Any use of funds for mass transit, railroad, airport, seaport or highway projects, as well as utility projects which benefit or serve the general public including energy related, communication related, water related, and wastewater related infrastructure, other structures designated for use by the general public or which have other common-carrier or public-utility functions that serve the general public and are subject to regulation and oversight by the government, and projects for the removal of an immediate threat to public health and safety or brownfields as defined in the Small Business Liability Relief and Brownfields Revitalization Act (Pub. L. 107–118) shall be considered a public use for purposes of eminent domain.

There are no buyout activities planned/budgeted for in the Action Plan document. In the event this Plan is amended in the future to include a voluntary buyout program for homeowners or tenants located in a floodplain, Orange County will develop policies and procedures to ensure that households are relocated into areas outside of a floodplain, and eligible beneficiaries receive full benefits, as stated in the URA. Homeowners who participate in voluntary buyout are not eligible for the URA benefits.

3.5. Protection of People and Property

Orange County is committed to improve and preserve our housing and community infrastructure by promoting sustainability of all implementation aspects – design, construction, and support programs – in a way that maximizes both environmental and financial sustainability of its projects and community investments. However, Orange County is experiencing tremendous growth in both commercial and residential markets, which increases the vulnerability to hazards after a natural disaster. For this reason, protection of people and property will continue to be an important priority. To be successful in this strategy, all internal and external stakeholders must have a shared understanding of building codes, regulations, and programs that are available to protect people and property from hardship before and after a natural disaster.

The County maintains strong internal systems to ensure that the required building and development standards, to include the Florida Building Code and the Orange County Code of Ordinances, are being properly enforced. These codes address construction quality, resiliency, durability, energy and water efficiency and other sustainability standards. The Orange County Planning Environmental and Development Services Department oversees building and development codes and ordinances, planning, zoning, environmental protection, code enforcement, neighborhood services, and housing and community development programs in Orange County. Other Departments, such as Emergency Management, Fire Rescue, Public Works, Utilities, Health and Family Services, Communications, and many others, work closely in preparing and responding to a disaster.

In addition to the standards presented in this section, Orange County has a comprehensive public information website, social media sites and phone applications that include emergency information in the event of a natural disaster with preparedness guides, recovery assistance information, educational videos, and access to services. The information available at www.ocfl.net/EmergencySafety/EmergencyInformation.aspx will be promoted through our CDBG-DR marketing efforts to ensure additional protections of persons and property.

All applicable County regulations, policies and procedures required by each federal grant are passed on to subrecipients of federal funds, to include CDBG-DR funds.

3.5.1. Elevation Standards

To ensure future resiliency to flooding and safety of County residents, Orange County will require that subrecipients of CDBG-DR funds, to include implementation vendors and contractors, comply with elevation standards established by FEMA and its National Flood Insurance Program (NFIP) defined at 44 CFR 59.1, Insurance and Hazard Mitigation, and 24 CFR 55.2(b)(10).

All programs for new construction and repair of substantially damaged or substantially improved structures will meet the following guidelines:

Residential structures:

- For new construction, reconstruction, rehabilitation of substantial damage, or rehabilitation that results in substantial improvement, as defined in 24 CFR 55.2(b)(10), all structures principally utilized for residential use and located in the 1 percent annual (or 100-year) floodplain must be elevated with the lowest flood,

including the basement, to at least two feet above the 1 percent annual floodplain elevation.

- Mixed-use structures with no dwelling units and no residents below two 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 successor standard, up to at least two feet above base flood elevation.
- If a structure is located in a 500-year floodplain, the structure must be elevated to the higher of the 500-year floodplain elevation or three feet above the 100-year floodplain elevation. All Critical Actions, as defined at 24 CFR 55.2(b)(3), must be elevated or floodproofed to the same elevation standard. Alternatively, if the Critical Action is in the 100-year floodplain, then the structure must be elevated or floodproofed (in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(2)–(3) or successor standard) at least three feet above the 100-year floodplain elevation. Critical Actions are defined as ''any activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons or damage to property.''

The cost of elevation will be included as part of the overall cost of rehabilitation or replacement of a residential unit. The average cost to elevate a home is dependent on several factors, to include the size of the home, the square footage that needs to be elevated, type of foundation, and the unit location, to name a few. In the State of Florida, the average cost to elevate a home is between $35,000 to $115,000 (*Source: State of Florida, FloridaCommerce*). To ensure cost-reasonableness, the cost to elevate a home should not exceed 49% of the home's pre-storm value. Any residential structure that has a total cost of repairs of more than 50% will be considered substantially damaged and will require the entire home to be brought into compliance with building codes.

<u>Non-residential structures:</u>

- All non-residential structures, to include infrastructure, assisted with CDBG–DR funds must be elevated to the standards described in this paragraph or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above the 100-year (or one percent annual chance) floodplain.
- All Critical Actions, as defined at 24 CFR 55.2(b)(3), within the 500-year (or 0.2 percent annual chance) floodplain must be elevated or floodproofed (in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(2)–(3) or successor standard) to the higher of the 500-year floodplain elevation or three feet above the 100-year floodplain elevation. If the 500-year floodplain or elevation is unavailable, and the Critical Action is in the 100-year floodplain, then

the structure must be elevated or floodproofed at least three feet above the 100-year floodplain elevation. (OC note: Critical Actions were already defined in the "residential structures" section).

Activities subject to elevation requirements must comply with applicable federal accessibility mandates. All CDBG-DR projects and activities must also comply with state and local (County/municipality) standards for floodplain management, including elevation, setbacks, and cumulative substantial damage requirements. Orange County's floodplain management requirements are outlined in Chapter 19 of the County's Code of Ordinance and are aligned with requirements of the Florida Building Code.

In the event Orange County intents to use CDBG-DR funds as a non-Federal match in a FEMA-funded project, the County may apply to alternative requirement for the elevation of non-residential structures described in section IV.D.5 of the Federal Register notice.

3.5.2. Flood Insurance Requirements

Property owners who receive assistance with rehabilitation or reconstruction of their residential property using CDBG-DR funds must comply with all flood insurance requirements. HUD-assisted homeowners of a property located in a Special Flood Hazard Area (or 100-year floodplain) must obtain and maintain flood insurance in the amount and duration prescribed by FEMA's National Flood Insurance Program (NFIP). Orange 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 and then that person failed to obtain or allowed their flood insurance to lapse for the property.

Orange County is prohibited by HUD from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if all of the following conditions are met:

- The combined household income is greater than 120% AMI or the national median;
- The property was located in a floodplain at the time of the disaster; and
- The property owner did not obtain flood insurance on the damaged property, even when the property owner was not required to obtain and maintain such insurance.

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

- The combined household income is less than 120% AMI, and there are still unmet recovery needs; or
- The property owner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs.

CDBG-DR funds can be used to assist eligible beneficiaries in the purchase of flood insurance to assist property owners who receive CDBG-DR assistance with rehabilitation or reconstruction of their residential property, subject to cost-reasonableness. Prior to implementation of the CDBG-DR activities related to homeowner rehabilitation, Orange County will have a process in place to verify and monitor for compliance with the requirement of Section 582/requirement to obtain and maintain flood insurance.

More specifically, Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) is a statutory requirement that property owners receiving disaster assistance that triggers the flood insurance purchase requirement have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance and to maintain such written notification in the documents evidencing the transfer of the property, and that the transferring owner may be liable if he or she fails to do so. The County will ensure that all applicable subrecipients of CDBG-DR funds are compliant with the requirement of notifying property owners receiving assistance of their responsibilities under section 582.

3.5.3. Construction Standards

The Division of Building Safety staff reviews plans, issues building permits and performs inspections to ensure compliance with the Florida Building Code, the National Electrical Code and Orange County's Construction Regulations. Proper code compliance ensures the life-safety, structural integrity and accessibility of new construction, alterations, and repairs as well as the safe installation and function of electrical, solar, plumbing, fuel gas, heating and air conditioning systems.

The County requires quality inspections and code compliance inspections on all projects and places an emphasis on high-quality, durable, sustainable, and energy-efficient construction methods and materials. Site inspections will be required on all CDBG-DR projects to ensure quality and compliance with building codes.

All rehabilitation, reconstruction, or new construction of residential structures assisted with CDBG-DR funds must meet an industry-recognized construction standard., as specified below.

Green and resilient building standard for: (1) new construction and reconstruction of housing and (2) all rehabilitation activities of substantially damages residential buildings, including changes to structural elements, can be achieved through one or more of the following certifications:

- Enterprise Green Communities;
- LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance or Neighborhood Development);
- ICC-700 National Green Building Standard or NGBS Green + Resilience;
- Living Building Challenge; or
- Any other equivalent comprehensive green building standard program acceptable to HUD.

Additionally, all such covered construction must achieve a minimum energy efficiency standard, which could include one or more of the following:

- ENERGY STAR (Certified Homes or Multifamily High-Rise);
- DOE Zero Energy Ready Home;
- EarthCraft House, EarthCraft Multifamily;
- Passive House Institute Passive Building or EnerPHit certification from the Passive House Institute US (PHIUS), International Passive House Association;
- Greenpoint Rated New Home, Greenpoint Rated Existing Home (Whole House or Whole Building label);
- Earth Advantage New Homes; or
- Any other equivalent energy efficiency standard acceptable to HUD.

Furthermore, Orange County requires that the standards for new affordable rental housing construction meet, at a minimum, one of the following Green Building certifications: Leadership in Energy and Environmental Design (LEED); Florida Green Building Coalition (FGBC); or ICC-700 National Green Building Standard (NGBS). Orange County will identify, in each project file, which of the Green and Resilient Building Standards listed above will be used for any building subject to these requirements.

For rehabilitation of non-substantially damaged residential structures, 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. Similar to the County-managed Homeowner Rehabilitation Program standards, activities related

to rehabilitation or reconstruction of existing residential structures using CDBG-DR funds will be implemented to ensure maximum compliance with energy-efficiency and water-efficiency standards. Examples include utilization of the following features: energy-efficient doors, windows, HVAC units, and improved insulation; water-efficient facets, shower heads and toilets.

For infrastructure projects, Orange County will encourage, to the extent practicable, implementation of one of the above listed industry-recognized standards during design, procurement and construction.

Orange County will incorporate mitigation measures in construction, reconstruction or rehabilitation of residential and non-residential structures being carried out using CDBG-DR funds. More specifically, mitigation measures will be incorporated into CDBG-DR activities as a construction standard to ensure that Orange County communities and neighborhoods become more resilient to the impacts of natural disasters and climate changes as a result of implementation of the CDBG-DR Program. Specific mitigation measures will be included as part of program policies and procedures that will be developed for various CDBG-DR projects and activities. As part of incorporating the required mitigation measures, the structures should be designed and constructed to withstand the existing and future climate impacts expected to occur over the service life of the project.

3.5.3.1. Cost Controls

Orange County and its subrecipients of CDBG-DR funds will be, at a minimum, required to adhere to the procurement standards outlined in 2 CFR Part 200 (Uniform Administrative Requirements). Additionally, subrecipients of funds will be required to follow all of the County regulations related to procurement.

To ensure that federal funds are spent in the most efficient and compliant manner, the County must follow cost-reasonableness standards for all CDBG-DR funded projects and activities. Per 2 CFR Part 200.404, a cost is considered reasonable “if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.” To ensure that Orange County meets HUD guidelines for determining cost-reasonableness, the following criteria will be used to evaluate projects and activities proposed to be implemented using CDBG-DR funds:

- The cost is generally recognized as ordinary and necessary for the operation of the project, or for proper and efficient performance.

- The cost favorably compares to market prices for comparable goods or services for the geographic area.
- The individuals responsible for incurring the cost acted with prudence.
- The cost has been incurred after following the established practices of the organization, in accordance with the terms and conditions of the award (no significant deviations).

3.5.4. Contractors Standards

All contractors who will be performing work under the CDBG-DR Program will follow the provisions of Orange County's Procurement Manual and the procurement standards under 2 CFR Part 200.318. Subrecipients, implementation vendors and contractors selected 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.

Orange County maintains an extensive network of community organizations that serve low- and very-low-income individuals. Through this network, the County will provide information about employment and training opportunities, and support to facilitate access to these opportunities. Furthermore, public service activities aimed at job training and placement will expand economic development opportunities for qualified individuals, and they could be implemented along with housing and infrastructure activities.

Orange County and its implementation vendors will manage the construction process for the rehabilitation or reconstruction of damaged homes, on behalf of homeowners, including regular inspections to prevent contractor fraud, poor quality work, and associated issues. All contractors will be required to carry the required licenses and insurance coverage(s) for all work performed. Additionally, subrecipients, implementation vendors and contractors will be required to provide bid documentation to demonstrate the fair and open competitive application process when requesting reimbursement for construction related costs.

Contractor standards and warranty periods will be detailed in the applicable policies and procedures developed for specific projects/activities being implemented with CDBG-DR funds, and they will reflect the scale and type of work being performed.

Orange County Housing and Community Development Division has trained staff in the latest Section 3 regulations. Staff regularly provide technical assistance on Section 3 and Davis Bacon Labor Standards requirements at all pre-construction meetings involving federal funding. To help farther the County's Section 3 goals, the following efforts are planned:

- Ensuring that Section 3 requirements are outlined in all applicable subrecipient agreements and contracts;
- Expanding capacity of external stakeholders (to include subrecipients, implementing vendors and contractors) to meet Section 3 standards through technical assistance (beyond pre-construction meetings), education, and provision of information; and
- Designating a Section 3 contact (Housing and Community Development Division staff) to effectively communicate program requirements to internal and external stakeholders and ensure compliance.

Orange County will report Section 3 accomplishments in the DRGR system.

To ensure construction standards are met through the quality of work performed under the CDBG-DR Program, program beneficiaries can report contractor fraud, inferior quality of work, and associated issues through the Complain procedures established in Section 3.1.3 of this document.

3.5.5. Environmental Review of Projects and Activities

To evaluate environmental factors for CDBG-DR funded projects and activities, Orange County, as a Responsible Entity (RE), will ensure compliance with the environmental requirements listed under 24 CFR 58. The environmental review process for federally-funded projects and activities provides a mechanism to identify potential environmental conditions that may impact affected populations. The review also consider means to mitigate adverse impacts or provide alternate assistance in the recovery process.

At a minimum, every project site is inspected and evaluated for potential hazardous materials and contamination, giving specific attention to any proposed site on, or in the general proximity of, industrial corridors, waterways, EPA superfund sites, brownfields, leaking underground storage tanks, etc. In addition, the review will consider proximity to hazardous facilities which store, handle, or process hazardous substances as part of the decision-making and mitigation processes.

Tier 1 Environmental Reviews will be conducted in accordance with 24 CFR 58 for Orange County. Site-specific reviews will be conducted to further evaluate certain factors during the Tier 2 reviews, as outlined in the Tier 1 reviews. For all projects that do not meet the scope of the tiered reviews, separate environmental reviews in accordance with 24 CFR 58 will be conducted. Environmental reviews that require an Authorization to Use Grant Funds will be made available to the public under the "Environmental Reviews" tab of the CDBG-DR Program website (www.ocfl.net/CDBG-DR).

Orange County will utilize resiliency planning methods that incorporate data analyzed and received during the community engagement and outreach completed as part of the action planning process, to strategically target resources to improve community resiliency,.

Orange County will meet the applicable environmental requirements, listed under 24 CFR Part 58, before the use or commitment of fund for each activity. After Orange County, as the Responsible Entity (RE), 1) completes environmental review(s) pursuant to 24 CFR Part 58 and receives from HUD an approved Request for Release of Funds (RROF) and certification (as applicable), or 2) adopts another Federal agency's environmental review, approval, or permit and receives from HUD (or the state) an approved Request for Release of Funds and certification (as applicable), Orange County may draw down funds from the line of credit for an activity.

3.5.6. Preparedness, Mitigation and Resiliency

Orange County has in place an Emergency and Safety Public Information page on its website (https://www.ocfl.net/EmergencySafety.aspx) for citizens to access emergency preparedness information and services in the event of an emergency or natural disaster. The information provided includes storm preparedness checklists, emergency debris removal information, a list of shelters, locations for distribution of sandbags, and specific services. Federal and local disaster recovery resources are also listed for residents in need of assistance in the aftermath of any storm. Preparedness helps ensure that citizens have the information and resources they need before, during and after any severe storm system affects our community.

One of the County's main sustainability initiatives, which is summarized in the Sustainable Orange County: Our Home for Life document, outlines specific incremental and transformative actions for the County to take through 2040. Annual reports are produced to highlight progress on the sustainability measures, and online metrics related to the built environment, civic engagement, natural resources, economic development and other actions are available on the County website:
https://www.ocfl.net/OpenGovernment/CommunityInitiatives.aspx.

Some of the more recent initiatives related to implementation of resilient policies and sustainable land development regulations that address the effects of climate change, such as increased heat, flooding, and disaster-related migration, to name a few, are related to the County updates to its comprehensive plan, known as Vision 2050, and corresponding updates to the land development code regulations (known as Orange Code). Code updates are meant to further promote high quality, durable, sustainable, and energy and water-efficient construction methods, among other items.

Orange County has also adopted the 2030 Orange County Sustainable Operations & Resilience Action Plan, which establishes several goals related to County operations, such

as: 1) energy and climate action; 2) buildings and infrastructure; 3) water use and quality; 4) mobility and fleet; 5) supply chain and materials management; and 6) trees and lands. Some of the Plan goals will align with primary objectives of the CDBG-DR Action Plan and include the following:

- Implement community-wide energy saving programs for all;
- Beginning in FY21, County-funded buildings and infrastructure will meet new high-performance and green building standards;
- Reduce risks for County services and infrastructure based on regional resilience indicators and updated mitigation plans;
- Protect water quality through innovative technology and integrated water management audits at County facilities;
- Improve vehicle, bicycle, and pedestrian roadway safety, resilience, and interoperability through traffic technology retrofits at 300 intersections by 2025;
- Preserve an additional 23,000 acres of environmentally sensitive lands and increase County natural land assets by 2030.

A summary of Orange County's initiatives related to sustainability and resilience can be accessed here: https://www.ocfl.net/OpenGovernment/Sustainability.aspx.

At the regional level, Orange County is committed to enhancing collaboration between our cities and towns around sustainability and resilience efforts. In March 2019, the East Central Florida Regional Resilience Collaborative launched push forward on the vision for a regional approach to Sustainability and Resilience. Local governments and key agencies signed on to a Memorandum of Understanding (MOU) committing to a coordinated and collaborative approach, building on current efforts to best serve the region.

As an example of regional collaboration, the County has participated in an effort of assessing and defining vulnerabilities within all community aspects, to include infrastructure, economic resilience, and health and equity. The effort resulted in the Strategic Resilience Action Plan, which assesses the elements and potential risks to safe and healthy communities, including the effects of extreme weather patterns and climate change. The Plan showed that greater than 21% of Orange County residents live below the poverty line, and 29% of Orange County residents are exposed in three or more of the eleven risk factors identified by the U.S. Census Bureau's Community Resilience Assessment. This confirms that lower income populations are disproportionately at risk of being impacted, long-term, by disasters that affect housing, transportation, food, and traditional economic systems. The Plan goals related to long-term disaster recovery, resiliency and mitigation are listed below:

- Implement infrastructure projects to reduce heat island effect;
- Increase acreage of conservation lands and green space;
- Assess and decrease vulnerabilities to grey, green, blue infrastructure from shocks and stressors;
- Increase the implementation of regionally (cross-jurisdiction significant resilient infrastructure projects;
- Decrease flood impacts across the region;
- Develop a regional list of mitigation projects emphasizing alignment, interactions and strategies;
- Assess available land use tools and integrate land use solutions to mitigate identified risks.

As required by federal guidelines, Orange County has adopted and updated its Local Mitigation Strategy (LMS), which identifies potential hazards that may threaten the County. The LMS identifies hazards that have the ability to impact Orange County and its municipalities, and determines what populations, properties, and areas of the County are most exposed to these various hazards, measures can be taken to help prevent or reduce the vulnerability and/or their impacts. The following hazards and sub-hazards are identified in the LMS and are based on the various natural, technological, and/or human-caused disasters that have been identified as having potential impacts on Orange County: diseases and pandemic; extreme temperatures; floods; severe thunderstorms; sinkholes/land-subsidence; hazardous materials; cyberterrorism; tropical systems; and wildfires. The goals and objectives of the Orange County Local Mitigation Strategy help assist with hazard mitigation efforts, and include the following:

1. Implement an effective comprehensive County-wide hazard mitigation plan.
2. Support County, municipal, and regional mitigation strategies.
3. Increase public, non-profit, and private sector awareness of, support for, and involvement in hazard mitigation.
4. Support mitigation initiatives and policies that protect the County's culture, commerce and economy, tourism, residences, transportation systems, recreation, and natural resources.

Finally, Orange County is working on updating its Floodplain Management Plan to reduce or eliminate the risk to people and property from flood hazards. The latest draft of the Plan (2023) included a hazard risk and vulnerability assessment, which showed that climate change poses a high risk to the County; dam/levee failure, riverine and flash flooding, stormwater/localized flooding, and hurricane and tropical storm each pose a moderate risk to the County; and channel bank erosion poses a low risk to the County.

The draft Plan identifies activities that can be implemented to reduce flood hazards, protect the health and safety of the people of Orange County, and reduce property damage.

The CDBG-DR Action Plan contains a mitigation strategy as part of the grant activities that includes long-term recovery planning, post-disaster evaluation of hazard risks, and other climate related natural hazards, in addition to storms. A minimum of $28,658,000 is set aside for mitigation projects and activities. The mitigation strategy funded under the CDBG-DR Program will add to current efforts under the County's Emergency Management Response, Sustainability Office, and similar community efforts. Under the Planning strategy, CDBG-DR funds will also be available for additional mitigation studies and development of disaster recovery and response planning.

Resilience is defined as a community's ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks. The aftermath of Hurricane Ian revealed there are still information and service delivery gaps that need to be addressed, particularly in low to moderate-income areas, in our efforts to improve our preparedness, mitigation and resilience. Through the CDBG-DR Program, Orange County intends to improve its current information, resources, and service delivery platforms to expand existing disaster recovery resources for residents and entities that are still in need of assistance, and to diminish future impact of natural disasters through the resiliency and mitigation projects and activities, and by incorporating resiliency features into housing and infrastructure activities being implemented under the CDBG-DR Program.

The Federal Register notice requires the County to incorporate mitigation measures when conducting activities to construct, reconstruct, or rehabilitate residential or nonresidential structures with CDBG-DR funds. Such mitigation measures will be incorporated into CDBG-DR activities as a construction standard specified in applicable policies and procedures for specific programs. At a minimum, such mitigation measures should ensure that structures are designed and constructed to withstand existing and future climate impacts expected to occur over the service life of a project. When implementing mitigation measures, the County will ensure that it does the following:

- Estimates the projected risk to the completed activity from natural hazards, including those hazards that are influenced by climate change (e.g., high winds destroying newly built homes);
- Identify mitigation measures that will address the projected risks (e.g., using building materials that are able to withstand high winds); and
- Assess the benefit of the grantee's measures through verifiable data.

In implementation of the CDBG-DR Program, Orange County will require its subrecipients, implementing vendors and contractors to conduct quality inspections and code compliance inspections on all projects.

3.6. Broadband Infrastructure in Housing

Adequate broadband infrastructure and connectivity is essential for communities to thrive in today's economy. This need has been identified as one of Orange County's community development priorities in the Orange County 2022-2026 Consolidated Plan, as well as in the 2021 American Rescue Plan (ARP), as a critical community need. For this reason, Orange County plans to utilize CDBG-DR funds to address the need and cost of installing broadband infrastructure in new construction or substantial rehabilitation activities.

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

- 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.

CDBG-DR funds may be used to install wiring, fiber optic cables, and permanently affixed equipment such as receivers for areas to receive broadband access.

3.7. Cost-Effectiveness

Grantees must follow the "necessary and reasonable" cost principles at 2 CFR 200.403 and 200.404. Grantees must consider factors described at 2 CFR 200.404(a) through (e) when determining which types and amounts of cost items are necessary and reasonable. Orange County follows these cost principles and has adopted contracting procedures under its Procurement Procedures Manual, to determine if a cost is reasonable in the implementation of federal and other County projects. In addition, the Housing and Community Development Division follows guidance established by HUD, including CPD Notice 14-04, to implement risk-based rating systems to evaluate all potential program subrecipients, activities and projects. In developing this risk analysis and cost-effectiveness criteria for each activity or project, a review team uses a rating system to confirm if the project is cost-reasonable or cost-effective, or to recommend alternatives that may serve the same outcome or purpose.

The increasing cost for construction activities and materials requires careful cost-estimation, particularly in the implementation of housing rehabilitation, reconstruction, and new construction activities. In some instances, properties may not be suitable for rehabilitation, and it may be more cost-effective to reconstruct or to provide other replacement housing options for the property owner. To determine when the cost of the rehabilitation or reconstruction of a unit will not be cost-effective relative to other means of assisting the property owner, the following policy from the Orange County's Housing Rehabilitation Program applies:

> "The Demolition and Rebuild program is designed to replace damaged homes that are beyond the scope and program limits of the substantial rehabilitation program. Priority will be given to low-income residents who are most exposed, including the elderly, those with disabilities and families with minor children. The property to be assisted must be free from any liens or judgements and mortgage-free. "

Under the terms and conditions for the CDBG-DR Housing Rehabilitation, Demolition and Rebuild Programs, additional requirements or exceptions may apply and will be provided in detail in the policies and procedures of each program. The applicant must have lived in and owned the homestead property during Hurricane Ian and at the time of application unless the home is no longer suitable for habitation at the time of application. The home must be the primary residence of the applicant, and the actual cost of repairs cannot exceed the established program limits in effect at the time of application.

Nevertheless, all projects are evaluated on a case-by-case basis based on the individual circumstances, maximum award allowed, and additional considerations such as the level of demonstrable hardship, to grant an exception. For the purpose of the CDBG-DR Program, a demonstrable hardship is defined as "the significant, adverse and demonstrable impact on the housing and economic stability of an individual as a result of Hurricane Ian". Examples of a demonstrable hardship may include substantial loss of income or ability to earn an income, loss of a business, loss of an individual's primary housing due to Hurricane Ian, severe illness or disability, injury, death of a spouse, or amount of debt incurred due to damages caused by Hurricane Ian. The hardship cannot be a self-created hardship and must be attributable to Hurricane Ian. An internal committee will evaluate the need to establish exceptions to the maximum assistance allowed if it is determined to be necessary and reasonable. The policies and procedures will include a specific process to request an exception when an individual meets the demonstrable hardship criteria.

3.8. Duplication of Benefits

Section 312 of the Robert T. Stafford Disaster Relief and Emergency Act of 1974 (Stafford Act) prohibits any person, business, or entity from receiving financial assistance for any part of a loss resulting from a major disaster for which the person or entity has received financial assistance under any other program, from insurance or any other source. Orange County must adhere to this requirement and ensure that each activity that provides direct assistance to a person, business or entity complies with this requirement. Accordingly, Orange County will take steps to ensure that duplication of benefits does not occur in the administration of services under CDBG-DR. All staff responsible for implementing projects and activities under CDBG-DR will be required to receive training and adhere to this policy.

In the context of CDBG-DR, a duplication of benefits occurs when the total financial assistance received from more than one source for the same purpose as the CDBG-DR assistance is greater than the applicant's total need. CDBG-DR funds are one of multiple federal sources of disaster recovery assistance, and because CDBG-DR funds are typically the last federal source of funding, funds are often used for the same purposes as other federal funding sources. CDBG-DR subrecipients and implementation vendors will also be required to have adequate policies in place to prevent duplication of benefits when carrying out eligible activities. Requirements for subrecipients will include, but not be limited, to the following:

1. All grant agreements, requests for proposals or applications for services must contain language indicating that any duplication of benefit received will require repayment and will include a signature agreeing to repay any duplicative assistance for the same purpose for which the CDBG-DR award was provided.
2. All proposals or applications considered for CDBG-DR funding will be assessed to determine eligibility, unmet need for CDBG-DR funding, and costs reasonableness prior to awarding assistance.
3. Subrecipients and implementing vendors are responsible for ensuring that the program applicants are eligible, and that duplication of benefits procedures are followed. All checklists, calculations and certifications must be available on file for all beneficiaries.
4. Subrecipients and implementing vendors shall be required to update their policies and procedures to specifically address duplication of benefits.
5. Subrecipients and implementing vendors shall require program applicants to identify all sources of funding received or anticipated with supporting documentation of those sources. Program applicants must attest/certify that the information provided is accurate.
6. To the extent possible, subrecipients will obtain third party verification for the information provided by the program applicant.

7. If activities related to grants or loans are implemented, a subrogation agreement or continuing resolution designed specifically for CDBG-DR loans and grants will be used in accordance with all state law requirements to adequately protect Orange County's interests.
8. Orange County shall require all subrecipients and implementing vendors to report and certify whether additional funds have been received for disaster related expenses, the amount, and when funds were received, before CDBG-DR related expenses are paid or reimbursed.
9. Orange County will verify this information during the regularly scheduled monitoring.

Additional steps must be taken to prevent duplication of benefits related to applicants of services, including:

1. All applications for services must contain language indicating that any duplication of benefit received will require repayment and will include a signature agreeing to repay any duplicative assistance for the same purpose for which the CDBG-DR award was provided.
2. Applicants requesting CDBG-DR funds for housing rehabilitation or similar reconstruction activities must provide supportive documentation in which the insurance company has only provided a portion of the costs needed for repairs, or proof that the insurance company has denied the claim for repairs.
3. Orange County (or subrecipients/implementing vendors) may review receipts, inspections, bank statements, or other reasonable sources of documentation that are determined acceptable and necessary to validate the information.
4. Orange County (or subrecipients/implementing vendors) may also use self-certifications with additional back-up documentation to verify how the assistance was used.
5. Orange County or its subrecipients/implementing vendors should document in the applicant's file that it has completed this verification.

HUD has created worksheets to assist grantees in completing a duplication of benefit analysis for Community Development Block Grant – Disaster Recovery (CDBG-DR) Housing Rehabilitation and Reconstruction programs. Orange County will have adequate forms, and policies and processes in place to prevent duplication of benefits when conducting eligible activities.

4. Grantee Proposed Use of Funds

4.1. Overview

Orange County Housing and Community Development Division is the lead agency and responsible entity for administering $219,712,000 in CDBG-DR funds allocated for disaster recovery.

Based on the unmet and mitigation needs assessment and input from residents of impacted communities and internal and external stakeholders, Orange County has prioritized programs that will assist in meeting short– and long–term recovery needs, and programs that will increase our community's resilience and ability to better withstand similar types of disaster events in the future. The County's analysis indicates that the most severe recovery needs are related to housing and infrastructure. To address the needs identified through the data analysis and community engagement, Orange County plans to utilize CDBG-DR funds to support the following programs and activities:

- Housing
- Infrastructure and Public Facilities
- Mitigation
- Public Services
- Administration
- Planning

Orange County will implement these programs directly, or in partnership with subrecipients or implementation vendors. The County plans to address unmet needs related to economic revitalization through public service activities aimed at job training, job placement, education, technical assistance, etc. Additionally, the County already offers a variety of programs targeted at small businesses and funded with other sources.

It should be noted that Orange County will continue to evaluate information related to unmet needs from Hurricane Ian that might become available at a later date, either through availability of new data or input from municipal partners, community organizations, and other stakeholders. Consequently, additional programs might be added to the proposed CDBG-DR Program budget through a substantial amendment process.

4.2. Program Budget

The proposed budget of $219,712,000 to support CDBG-DR programs, including the required set-asides for mitigation needs and administration, is as follows:

Programs by Category	Budgeted Amount	% of Total Allocation	National Objective	Estimated Outcome
HOUSING				
Homeowner Housing Rehabilitation and Reconstruction	$35,000,000			
Rental Housing Rehabilitation	$4,405,411			
Rental Assistance (Temporary)	$150,000			
New Affordable Housing Construction	$30,00,000			
Sub-Total Housing	**$69,555,411**	31.66%	LMI	TBD
INFRASTRUCTURE AND PUBLIC FACILITIES				
Flood and Drainage Related Repairs and Improvements				
Storm water Management Projects				
Restoration of Damaged Infrastructure				
Rehabilitation of Public Facilities				
Subtotal Infrastructure/Public Facilities	**$102,306,581**	46.56%	LMI	TBD
MITIGATION				
Activities to increase resilience to future disasters and reduce or eliminate long-term risks		13%	LMI	TBD
Subtotal Mitigation	**$28,658,000**			
ECONOMIC REVITALIZATION	$0	0%	N/A	N/A
PUBLIC SERVICES				
Self-sufficiency Services (financial literacy, housing search and counseling, legal assistance)	4,068,702			
Health Services/Mental Health Services	1,697,222			
Job Training/Job Placement Services	0			
Other economic recovery related services	609,741			
Subtotal Public Services	**$6,375,665**	2.90%	LMI	TBD
ADMINISTRATION	**$10,985,600**	5%	N/A	N/A
PLANNING	**$1,830,743**	0.83%	N/A	N/A
TOTAL CDBG-DR	**$219,712,000**	**100%**		

Table 58. CDBG-DR Program Budget

4.3. Connection to Unmet Needs

As required by the Federal Register notice published on May 18, 2023 (Docket No. FR–6393–N–01), Orange County will allocate at least 80 percent of the funds to address unmet needs within HUD-identified "most impacted and distressed" areas. In the case of Orange County, the whole County, to include its thirteen municipalities, was designated as the most impacted and distressed areas. Through the implementation of the proposed programs and associated program requirements, which will be further described in the applicable policies and procedures for each program, Orange County will ensure that at least 70 percent of all program funds will benefit LMI persons or households.

The Orange County CDBG-DR Action Plan includes an assessment of unmet needs related to housing, infrastructure, economic revitalization, and public services, as well as mitigation needs, and it allocates available funds to best meet those needs. The identified needs are summarized below.

Housing Needs: Analysis of FEMA data, specifically claims for individual assistance, indicated that currently $253,300,768 is needed to repair damage to units, primarily owner-occupied units that incurred damage as a result of Hurricane Ian.

More specifically, 9,911 units were damaged, according to the FEMA claims. The majority of claims were reported in the minor-low damage category (4,409 – all unit types), followed by major-low damages (2,864 – all unit types), major-high damages (901 – houses) and minor-high damages (803 – all unit types). Impacts from flooding covered by the National Flood Insurance Program (NFIP) account for 680 claims, with a total impact of more than $48,000,000. These, combined with the FEMA claims, represent the total sum of Orange County's housing losses of more than $243M to 10,591 units, or a modified total of $315.9M when accounting for an additional 30% needed to rebuild more resiliently. The units count includes single-family homes, condominiums and apartments, mobile homes, and other housing types. The total unmet housing need of $253,300,768 was calculated by subtracting the funds made available for recovery and adding an additional 30% in funding needed to support resilient housing features, such as rebuilding to higher standards to minimize damages from future disaster events.

Public housing authorities reported 50 damaged units that are yet to be repaired (20 units – minor damage, 30 units – major damage) and one unit that was destroyed (no dollar amount in unmet needs reported). Additionally, out of 801 respondents to the citizen participation survey, 36.48% reported property damage, but only 1.89% reported they applied for and received all the assistance they needed. Furthermore, 6.42% reported

they had to move as a result of the hurricane, and 5.53% reported their residences are still unsafe. The need for housing rehabilitation programs, special needs housing, and new affordable housing was also highlighted during the community meetings with County residents, and by the community stakeholders that took part in focus group discussions.

Infrastructure Needs: Analysis of FEMA data on public assistance claims, combined with information related to the County's projects submitted as part of the Hazard Mitigation Grant Program (HMGP) and various infrastructure repairs/capacity expansion needs reported by local municipalities, resulted in a total unmet need of $160,700,743 for various infrastructure and public facilities projects. This number accounts for $30,835,935 in non-federal cost share in FEMA public assistance projects (with 30% in resiliency costs added), $11,264,808 in non-federal cost share in projects submitted for the HMGP funding, and $118,600,000 in Hurricane Ian-related projects submitted through the consultation process by various County Departments and Divisions and local jurisdictions. The majority of needed improvements are related to stormwater, drainage, and capacity improvements to existing facilities.

Furthermore, respondents to the citizen participation survey highlighted on-going flooding and street drainage concerns as their main community need (at 54.7%) resulting from Hurricane Ian. The respondents also stated their highest spending priorities were infrastructure improvements and mitigation projects, with 31% and 23% of residents giving these two categories the highest rankings, respectively.

Economic Revitalization Needs: According to the SBA's business loan information pertaining to Hurricane Ian, there were 1,031 business applications issued across Orange County. Of those, 81 applicants had been approved for a loan for damage or economic disruption, 74 applicants had a verified property loss of $7,789,194, and another 950 applicants are either "in-process", have withdrawn, or were declined loans from the program. The losses were combined with known losses from SBA business data to estimate a total initial economic impact to business real property and contents of $15,831,167, or $20,580,517 when accounting for 30% in additional resilience costs on rebuilding damaged structures. After subtracting the SBA payouts to businesses, a total of $13,047,152 in unmet economic revitalization needs remain. This total accounts for resiliency costs.

During the community engagement process, some comments were received related to economic development and recovery. Of the survey respondents, 3.85% reported known business closures and/or relocation of key businesses as a result of Hurricane Ian. Additionally, 12% of respondents indicated a need to fund activities that encourage job creation, business development and economic recovery.

It should be noted that Orange County has recently implemented initiatives to assist businesses with economic recovery. More specifically, nearly 8,000 Orange County small businesses received a total of $80M in small business grants utilizing CARES funding. In addition, the County provided $31.3M in business assistance with funding available through the American Rescue Plan. Using these funds, Orange County established the Small Business BOOST program to provide grants to local small businesses, home-based businesses, and gig workers. The grant funds can be used for business expenses, including wages, mortgages, rent, utilities, payroll, and other costs. Grants are non-repayable and are issued on a "first-come, first-served" basis to qualified applicants. Finally, to help revitalize business zones in designated corridors by improving the aesthetic appeal for shoppers and business owners, Orange County's BANC Program (Business Assistance for Neighborhood Corridors) provides façade grants to small businesses.

Other needs: Additional needs reported during the community engagement and outreach process were related to public services (e.g., housing counseling, job training and placement, mental and health services, etc.), services for special needs populations, to include seniors, persons with disabilities, homeless individuals and families, and needs related to pre-disaster preparation and post-disaster response.

Based on the identified unmet needs and the County's allocation of CDBG-DR funds, the following budget is being proposed in the Action Plan to implement strategies and activities addressing unmet and mitigation needs and to ensure Orange County's long-term recovery from the effects of Hurricane Ian.

Category	Remaining Unmet Needs	% of Unmet Needs	Program Allocation	% of Program Funds
Housing ***(rehab & new housing construction)***	$253,300,768	59.31%	$69,555,411	31.66%
Infrastructure & Public Facilities	$160,700,743	37.63%	$102,306,581	46.56%
Mitigation	$0	N/A	$28,658,000	13%
Economic Revitalization	$13,047,152	3.06%	$0	0%
Public Services ***(includes economic recovery activities)***	-	N/A	$6,375,665	2.90%
Administration	-	N/A	$10,985,600	5%
Planning ***(studies)***	-	N/A	$1,830,743	0.83%
TOTAL	**$427,048,663**	**100%**	**$219,712,000**	**100%**

Table 59. Remaining Unmet Needs and Proposed Funding Allocations

The proposed allocation of funding described in this Action Plan includes housing, infrastructure, and public service activities, as well as the required minimum set aside for mitigation activities and funds for planning and administration.

4.4. Leveraging Funds

To maximize the impact of the CDBG-DR funding allocated to Orange County, there will be an on-going commitment to identify and leverage federal, state, and local funding sources in the implementation of the proposed programs. Leveraging of available funds is especially important to maximize the effectiveness of ongoing recovery efforts and increase our community's ability to mitigate similar disaster events in the future.

In addition to mitigation needs, the CDBG-DR funds will be used to address critical unmet needs that remain after all other sources have been committed and exhausted, to prevent any duplication of benefits. Specific efforts to leverage other funds and programs are listed below.

Housing: Orange County has designed the housing program included in this Action Plan to cover the gap funding needed to support disaster recovery efforts related to Housing. For Homeowner Housing Rehabilitation and Rental Rehabilitation, funds will first be leveraged from insurance, FEMA, SBA, and private and nonprofit entities. Housing rehabilitation programs for both homeowner and rental housing, can also leverage dollars from other federal programs administered by the County, to include Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Program. State funds are available to support rehabilitation through the State Housing Initiatives Partnership (SHIP) Program administered by the County, and SHIP Disaster funding. Rental housing can also be rehabilitated by leveraging State Apartment Incentive Loan (SAIL) funds. Furthermore, Orange County's local Affordable Housing Trust Fund can be leveraged for rehabilitation activities, new affordable housing construction, and rental assistance programs implemented with CDBG-DR funds. Finally, the County has multiple sources of funds dedicated to rental assistance for eligible individuals and families.

It should be noted that, if leveraging funds from other federal programs, such as CDBG and HOME, the County will be required to follow the standard requirements of the URA and Section 104(d) regulations.

Infrastructure and Public Facilities: Orange County will leverage funding to address infrastructure and public facilities unmet needs from other federal sources, such as non-disaster CDBG funding that is regularly used to support infrastructure and improvement projects, FEMA Public Assistance Funding and HMGP funds.

Public Services: The County routinely funds a variety of public services, to include those identified during the unmet needs assessment (financial literacy, housing counseling, mental health services, job training and placement, etc.). These services are often provided in partnership with nonprofit agencies, community organizations, and providers and developers of affordable housing, including public housing authorities. Provision of homeless services is closely coordinated with the local Continuum of Care (known as Central Florida Commission on Homelessness). CDBG-DR public service programs and activities can leverage funds from the non-disaster CDBG, Emergency Solution Grant (ESG), State of Florida SHIP dollars (housing counseling, homeless services), and local Affordable Housing Trust Fund (housing counseling, self-sufficiency, etc.)

4.5. Program Partners

During the implementation of the CDBG-DR Program, Orange County may enlist program partners through formal agreements, such as subrecipient agreements, vendor contracts, memorandums of understanding, interlocal agreements, or informal partnerships. If needed, Orange County will engage a broad array of program partners to ensure that programs are accessible and tailored to equitably meet the unmet needs of disaster-impacted residents and neighborhoods, as well as mitigation needs of our community.

Identified partners will be assessed to ensure they have adequate expertise and financial and organizational capacity to carry out programs and activities of the CDBG-DR Program within the established program guidelines and timelines for completion. Program requirements that are consistent with federal regulations and requirements of the Federal Register notice, to include financial and programmatic performance and reporting procedures, will be included in formal agreements with program partners.

4.6. Distribution of Funds

In order to make the most meaningful impact with the limited funds available, Orange County chose to administer fewer programs while focusing on the housing and infrastructure sectors, with some funding dedicated to addressing the public service needs of the community. Funds were allocated based on the proportion of unmet needs reflected in the unmet needs assessment. While remaining unmet needs have been identified in the economic section, the County chose to address those needs through public service activities.

To ensure that Orange County, as a community, is better equipped to face disaster-type events in the future, the County will strive to incorporate mitigation measures into all rebuilding activities conducted using CDBG-DR funds. Such efforts will contribute to long-

term sustainability, safety and stability for Orange County residents and neighborhoods. Further details describing the inclusion of mitigation measures in each of the funded programs and activities are provided in the program descriptions, with additional details to be provided in applicable policies and procedures for each program. Specific information regarding eligibility criteria, threshold factors, maximum awards and assistance caps, and projected use of CDBG-DR funds is also located in program descriptions specified in the following sections.

In addition to program specifics, all CDBG-DR funded activities must meet the minimum requirements of the program. This means that each activity must:

- Be a CDBG eligible activity;
- Meet a National Objective of the CDBG program; and
- Address a direct or indirect impact of the major disaster in a Presidentially declared area (Hurricane Ian).

Orange County has received a CDBG-DR mitigation set-aside for Hurricane Ian recovery efforts. Unlike general recovery activities where the County must demonstrate a "tie-back" to Hurricane Ian and address a specific unmet recovery need for which the CDBG-DR funds were appropriated, activities funded by the CDBG-DR mitigation set-aside do not require such a "tie-back" to an impact of Hurricane Ian. Instead, each mitigation set-aside activity must:

- Meet the definition of mitigation activities;
- Address the current and future risks as identified in Orange County's mitigation plan;
- Be a CDBG eligible activity; and
- Meet a National Objective of the CDBG program.

HUD requires that 100% of CDBG-DR funding be expended within six years of the signing of the grant agreement, which will provide Orange County access to the federal funds. As such, all CDBG-DR programs and activities must be carried out in a manner that ensures that all grant close out and audit/verification activities are completed within the six-year period.

Orange County will implement program management, monitoring, and oversight standards necessary to ensure compliance with federal and local requirements.

4.7. Program Income

"Program income" is defined as gross income generated from the use of CDBG–DR funds, except as provided in III.E.1.b. of Federal Register notice, and received by a state, local government, Indian tribe receiving funds from a grantee, or their subrecipients. When income is generated by an activity that is only partially assisted with CDBG–DR funds, the income shall be prorated to reflect the percentage of CDBG– DR funds used.

Program income includes, but is not limited to, the following:

- Proceeds from the disposition by sale or long-term lease of real property purchased or improved with CDBG–DR funds.
- Proceeds from the disposition of equipment purchased with CDBG–DR funds.
- Gross income from the use or rental of real or personal property acquired by a local government, or subrecipient thereof with CDBG–DR funds, less costs incidental to generation of the income.
- Gross income from the use or rental of real property owned by a local government, or subrecipient thereof, that was constructed or improved with CDBG–DR funds, less costs incidental to generation of the income.
- Payments of principal and interest on loans made using CDBG–DR funds.
- Proceeds from the sale of loans made with CDBG–DR funds.
- Proceeds from the sale of obligations secured by loans made with CDBG–DR funds.
- Interest earned on program income pending disposition of the income, including interest earned on funds held in a revolving fund account.
- Funds collected through special assessments made against nonresidential properties and properties owned and occupied by non-LMI households, where the special assessments are used to recover all or part of the CDBG–DR portion of a public improvement.
- Gross income paid to a local government, or subrecipient thereof, from the ownership interest in a for-profit entity in which the income is in return for the provision of CDBG–DR assistance.

Some of the activities planned under the Orange County CDBG-DR Action Plan may generate program income. Grantees are required to treat income produced from the implementation of CDBG-DR activities as additional CDBG-DR funds. As with other federal grants, the program income must be drawn and used for grant activities prior to withdrawal of additional funds. Therefore, the funds generated as program income will be recorded and tracked in the County's internal accounting system and on the DRGR system. All program income will be subject to the requirements of applicable Federal Register notices and accounting principles. Subrecipients will also be required to report

program income as part of their monthly or quarterly reports and be subject to other requirements specified in a subrecipient's agreement with Orange County. Upon completion of the CDBG-DR Program, any remaining program income will be transferred to Orange County's CDBG Program or returned to HUD. Program income received by Orange County, or received and retained by a subrecipient, after the closing of the grant, will be transferred to the County's annual CDBG award or returned to HUD.

4.8. Resale or Recapture

Under certain circumstances, an applicant or subrecipient may be required to repay all, or a portion of the CDBG-DR funds received. Orange County will develop specific policies and procedures to address resale and recapture requirements for the activities that will be implemented under the CDBG-DR Program. Below are some examples of reasons for which resale or recapture requirements will apply:

1. An applicant or subrecipient provided false or misleading information in the application for funds.
2. An applicant or subrecipient did not allow or consent to complete the project.
3. An applicant or subrecipient did not disclose income sources or funding received that could have resulted in duplication of benefits, exceeding income limits, or other reasons for disqualification that could have altered the outcome of the application, or the information was disclosed after calculation of the award.
4. An applicant or subrecipient voluntarily or involuntarily relinquished ownership of the property during the established resale and recapture period.
5. Other reasons established in the terms of the contractual agreement entered with the applicant or subrecipient.

In addition, all duplicative funding obtained by a property owner must be remitted to or accounted for by Orange County or its subrecipient or implementing vendor, regardless of when the property owner received such assistance. If property owners receive additional funding for the same purpose(s) for which they were awarded CDBG-DR funding, even after the CDBG-DR award is executed or construction is completed, the property owner or subrecipient is required to report the additional funding to Orange County. The County is obligated to evaluate whether the assistance is duplicative of the CDBG-DR award. Upon receipt of a report that additional benefits have been received, Orange County will recalculate the applicant's award and provide instructions on whether the award will be reduced by such amount, or whether the applicant must remit such amounts to the program as reimbursement (will be considered program income). Responsibilities for reporting additional benefits and related instruments will be specified in applicable policies and procedures.

Affordability restrictions may also trigger the recapture of funds when properties change ownership, change their use or purpose, or are in similar type of non-compliance. Affordability restrictions will be enforceable by deed restrictions, covenants, and similar instruments.

4.9. Program Details

Orange County will prioritize program activities under CDBG-DR addressing the remaining recovery needs from Hurricane Ian identified in the unmet needs analysis. These priorities will include homeowner housing rehabilitation, new housing construction, rental assistance, infrastructure projects, public facilities, and public services connected to economic recovery, self-sufficiency, health, and job training needs. These activities must be aligned to HUD's national objectives, comply with regulatory guidance such as cost reasonableness and public benefit standards (24 CFR 570.209 (b)), and primarily benefit low to moderate-income (LMI) qualified populations. CDBG-DR regulations require that the County meets or exceeds a 70 percent threshold benefiting LMI persons. Therefore, all program activities will prioritize households with incomes not exceeding 80 percent of the Area's Median Income (AMI), as published annually by HUD. Additionally, the County will establish the budgetary set-asides for administration, planning (research and studies) and mitigation activities allowed within the CDBG-DR Program.

Orange County will manage and oversee all program activities under the CDBG-DR Program with the assistance of vendors, qualified contractors, participating jurisdictions, and/or nonprofit organizations and community partners. Applicants will not select their own contractors; all costs will be paid directly to the service providers. Each of the proposed programs will have policies and procedures that will ensure proper implementation and compliance with all applicable regulations. All applicants and program subrecipients will be required to enter into formal agreements with the County setting forth the terms and conditions established in each of the programs. To protect the investment made using CDBG-DR funds, Orange County will require deed restrictions, covenant restrictions, or a similar instrument (as applicable) on properties funded under these programs; the length of such restrictions is determined by the amount of the investment and will decrease each year.

4.9.1. Housing Program(s)

Housing Programs	Budgeted Amount	% of Total Allocation
Single-Family Homeowner Housing Rehabilitation and Reconstruction	$ 35,000,000	
Rental Housing Rehabilitation	$ 4,405,411	
Rental Assistance (*Temporary)*	$ 150,000	
New Affordable Housing Construction	$ 30,000,000	
Total Housing Programs Budget	**$69,555,411**	**31.66%**

Table 60. Budget for Housing Programs

$69,555,411, or 31.66% of the total allocation of CDBG-DR funds, has been budgeted for housing programs, to include Single Family Homeowner Housing Rehabilitation and Reconstruction, Rental Housing Rehabilitation, Rental Assistance, and New Affordable Housing Construction and Development.

Orange County proposes the following housing strategies, based on the primary objectives of the Action Plan, applicable federal requirements, data obtained from federal, state, and local agencies, and input received during the community engagement and outreach process.

4.9.1.1. Homeowner Rehabilitation and Reconstruction Program

Program Description:

Hurricane Ian caused damage to many residential units in Orange County. The program will rehabilitate homes damaged by Hurricane Ian that are still in need of repairs. The program may include bringing the home up to code compliance, elevation of a structure, and/or incorporation of mitigation measures to protect the home against future storm impacts. CDBG-DR funds will be used to assist income-eligible households who can demonstrate hardship when other resources are no longer feasible or available. To be eligible for assistance, participants must meet the following criteria:

- Applicant must have owned the storm-impacted property at the time of the storm, and must still own the property;
- The storm-impacted property must have been the applicant's primary residence at the time of the storm;
- The storm-impacted property must be an eligible housing unit;
- The storm-impacted property must be located within Orange County;
- If there is a mortgage on the property, the mortgage must be in good standing;
- Property taxes must be paid in full or on a payment plan in good standing;
- The storm-impacted property must not be subject to active bankruptcy proceedings; and
- The storm-impacted property must not be located within a regulatory floodway.

The County's Residential Anti-Displacement Relocation Assistance Plan (RARAP) will specify the level of the assistance for those required to relocate. Assistance for homeowners required to relocate as a result of the scope of the rehabilitation, who would not otherwise be eligible for URA relocation assistance, will be specified in an Optional Relocation Policy that Orange County will develop and adopt prior to the start of the program implementation or as part of the program policies and procedures.

Orange County staff will develop the application process and criteria that applicants must meet to qualify for benefits under this program. The maximum allowable rehabilitation assistance will be $250,000.

Reconstruction or replacement of a unit involves replacing a structure in a substantially similar manner and on the same site, when feasible. The number of dwellings on the property should not increase. Reconstruction of the property is allowable when the cost to rehabilitate the unit and bring it to livable standards in accordance with applicable building codes exceeds the program rehabilitation award cap of $250,000, or the property is otherwise deemed Not Suitable for Rehabilitation, as will be defined in program guidelines.. Reconstruction of a unit may not exceed a total cost of $375,000.

Orange County may exceed maximum award or benefit amount to provide reasonable accommodations for accessibility needs. For manufactured, modular or mobile homes, the costs for repairs often exceed the value of the property and may not be feasible or cost reasonable. On a case-by-case basis, manufactured, modular or mobile homes will be evaluated to determine if rehabilitation is cost effective. A unit replacement may be an option, not inclusive of additional requirements imposed by local regulations, mobile home parks, homeowners' associations, or accessibility issues. As with other home repairs on owner-occupied properties, there must be documentation of a tieback to Hurricane Ian. The unit must be the primary residence of the owner, the applicant must meet LMI income eligibility, and the replacement of the unit may not exceed $200,000.

Applicants undertaking or completing any of the damage repairs after applying for assistance from Orange County will be ineligible under the Homeowner Housing Rehabilitation and Reconstruction Program. All housing rehabilitation projects are subject to a cost reasonableness evaluation, environmental assessments, and applicant's hardship and duplication of benefits evaluation, among other considerations.

Long-Term Resilience:

Homeowner housing rehabilitation and reconstruction activities must incorporate hazard mitigation measures including green building standards, in the design and reconstruction

of units. The use of more resilient construction materials is encouraged. Rehabilitation and reconstruction measures should aim to reduce the impact of future disasters and increase long-term sustainability and affordability of housing.

Program Tieback to Disaster Unmet Need:
All homeowner housing rehabilitation or reconstruction projects must demonstrate a tieback to Hurricane Ian. Based on the unmet housing needs assessment and feedback received from the community, FEMA and private insurance claims often covered only a portion of the damages, leaving many property owners affected by Hurricane Ian with unsafe homes. Applicants of the homeowner rehabilitation and reconstruction program must provide evidence of a tieback to Hurricane Ian.

Program National Objectives:
All eligible housing rehabilitation or reconstruction activities will be required to meet a national objective under CDBG in accordance with HUD guidelines in 24 CFR 570.208. The program will prioritize LMI households up to 80 percent of the Area's Median Income (AMI).

Urgent Need (UN) is another possible National Objective for housing activities. Qualification under the UN National Objective will require the County to 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. The County must document how each program or activity responds to the urgency, type, scale, and location of the disaster-related impact described in the County's impact an unmet needs assessment.

The third National Objective, Elimination of Slum and Blight, is the least common of the three but can be used in limited circumstances. Qualification under the Elimination of Slum and Blight requires a substantial amendment and prior HUD approval.

Total Budget:
The estimated budget for the Homeowner Housing Rehabilitation and Reconstruction Program is $35,000,000.

Eligible Entities or Applicants:
Orange County will hire through a competitive process a consulting entity with experience administering disaster recovery programs, including housing rehabilitation services. Eligible applicants for the homeowner housing rehabilitation and reconstruction program are LMI homeowners residing in Orange County and its municipalities. The program will prioritize LMI populations up to 80 percent of the Area's Median Income (AMI); however,

on a case-by-case basis exceptions to address unmet needs may occur to allow applicants up to 120 percent AMI to apply.

The housing unit must also be a CDBG-DR eligible property to receive services. To qualify for the CDBG-DR homeowner housing rehabilitation program, the structure must meet the definition of a housing unit and must have remaining needs for repair for damages caused by Hurricane Ian, which have not been compensated by insurance, grants or other resources or sources of assistance. To qualify for reconstruction services, the damaged home must be in a condition beyond the scope and program limits of the single-family rehabilitation program, and the amount and type of assistance will be determined by the condition of the property and the results from a qualified home inspection approved by the program.

Project Selection Overview:

Orange County will be developing additional guidelines and procedures to select a consulting entity to implement the program. Orange County staff will develop the threshold criteria that projects must meet for funding consideration under the program.

Program Estimated Beginning and End Date:

Begin Date: The County expects to begin the program within a reasonable timeframe from grant agreement execution to allow for establishing the program's policies and procedures and preparing the competitive application process to select the consulting entity to implement the CDBG-DR program. The estimate is ninety days after execution of the grant agreement.

End Date: Orange County expects to complete all program activities within the timeline outlined in the Federal Register Notice.

4.9.1.2. Rental Housing Rehabilitation

Program Description:

The number of reported multifamily rental housing units destroyed by Hurricane Ian is considerably low in comparison to residential units. However, damages to existing affordable rental housing units owned by nonprofit and public housing agencies may have a negative long-term effect on Orange County's efforts to preserve affordable housing in our community, as the cost of new rental housing construction is often much higher than rehabilitation cost. Input received from community partners, to include providers of affordable housing and public housing authorities, indicated a significant need to remediate mold and other issues caused by water intrusion during Hurricane Ian, as well as a need for additional disaster mitigation needs.

The CDBG-DR funded Rental Housing Rehabilitation Program will repair or replace damaged affordable rental units serving low-income households. Qualified entities must submit a complete proposal during the established Request for Applications (RFA) period. Affordability restrictions will be enforceable by deed restrictions, agreements and/or similar instruments. The maximum rental rehabilitation assistance to repair damaged rental housing units is $100,000 per unit. The maximum assistance to replace damaged affordable rental units is $200,000 per unit when repairs to the damaged unit are beyond the scope and program limits of the rental rehabilitation program.

Orange County may exceed maximum award or benefit amount to provide reasonable accommodations for accessibility needs.

It should be noted that, if leveraging funds from other federal programs, such as CDBG and HOME, to undertake rental housing rehabilitation activities using CDBG-DR funds, the County will be required to follow the standard requirements of the URA and Section 104(d) regulations.

Long-Term Resilience:
Rental housing rehabilitation activities must incorporate hazard mitigation measures and use of more resilient construction materials to reduce the impact of future disasters and increase long-term affordability of housing. Long-term affordability restrictions will apply and be enforced through land use restrictive agreements, deed restrictions, or similar instruments.

Program Tieback to Disaster Unmet Need:
All projects or activities must demonstrate a tieback to Hurricane Ian or meet the definition of mitigation. Projects also must meet an identified need in the CDBG-DR Action Plan.

Program National Objectives:
All eligible projects or activities will be required to meet a national objective under CDBG in accordance with HUD guidelines in 24 CFR 570.208. Orange County will only consider projects that benefit low to moderate-income persons (LMI) or LMI areas.

Urgent Need (UN) is another possible National Objective for housing activities. Qualification under the UN National Objective will require the County to 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. The County must document how each program or activity

responds to the urgency, type, scale, and location of the disaster-related impact described in the County's impact an unmet needs assessment.

The third National Objective, Elimination of Slum and Blight, is the least common of the three but can be used in limited circumstances. Qualification under the Elimination of Slum and Blight requires a substantial amendment and prior HUD approval.

Total Budget:
The total estimated budget for rental housing rehabilitation activities is $4,405,411.

Eligible Entities or Applicants:
Eligible entities will include private and nonprofit organizations, and public housing authorities providing affordable housing to LMI persons.

Project Selection Overview:
Funding for rental housing rehabilitation projects will be awarded to eligible applicants for eligible projects based on a competitive selection process. Orange County will require the submission of project proposals in response to competitive Request for Proposals (RFPs) and Request for Applications (RFAs) for for-profit and nonprofit organizations, respectively. Orange County will be developing the applicable guidelines, policies and procedures for these projects. All housing projects will be required to meet affordability requirements, which will be enforced through land use restrictive agreements, deed restrictions, or similar instruments. Project selection must also adhere to the procurement standards outlined in 2 CFR Part 200, HUD guidelines for determining cost-reasonableness, and follow all of the County regulations related to procurement.

Program Estimated Beginning and End Date:
Begin Date: The County expects to begin the program within a reasonable timeframe from the grant agreement execution date to allow for establishing the program, preparing policies and procedures, and finalizing the competitive application process. The estimate is ninety days after execution of the grant agreement.

End Date: Various rental housing rehabilitation projects will have different completion dates. The County expects to complete all program activities within the timeline outlined in the Federal Register for CDBG-DR.

4.9.1.3. Rental Assistance Program

Program Description:
Orange County's CDBG-DR Program will limit the amount of temporary relocation assistance available to homeowners who need to vacate their property during repairs or

reconstruction, as these are voluntary programs. However, temporary rental assistance may be critical for very low-income households (households at or below 50% AMI) and similar households, such as households of persons with disabilities and elderly households, who may risk housing stability during the rehabilitation process. The program may assist clients receiving homeowner rehabilitation or rental housing rehabilitation services with temporary rental assistance to ensure housing stability while their housing is being repaired, replaced, or reconstructed. This program can only assist when other resources, such as FEMA or insurance payments, are no longer available. CDBG-DR staff will be assessing the need to provide services under this program on a case-by-case basis.

The County's Residential Anti-Displacement Relocation Assistance Plan (RARAP), as well as an Optional Relocation Policy, will specify the levels of the assistance for those required to relocate, to include homeowners and tenants. Additional details will also be included in the program policies and procedures. Once implementation of CDBG-DR assisted programs and activities begins, Orange County might amend the CDBG-DR Action Plan to increase the amount of funds allocated to the Rental Assistance Program, if needed.

Long-Term Resilience:
The rental assistance program is a temporary program that will serve as a bridge to permanent housing stability for eligible individuals who may risk housing stability during the rehabilitation process.

Program Tieback to Disaster Unmet Need:
All activities must demonstrate a tieback to Hurricane Ian, including the need to receive temporary rent assistance as a direct or indirect result from Hurricane Ian.

Program National Objectives:
All eligible projects or activities will be required to meet a national objective under CDBG in accordance with HUD guidelines in 24 CFR 570.208. Orange County will prioritize very low to low-income persons (LMI) to receive temporary rental assistance.

Urgent Need (UN) is another possible National Objective for housing activities. Qualification under the UN National Objective will require the County to 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. The County must document how each program or activity responds to the urgency, type, scale, and location of the disaster-related impact described in the County's impact an unmet needs assessment.

The third National Objective, Elimination of Slum and Blight, is the least common of the three but can be used in limited circumstances. Qualification under the Elimination of Slum and Blight requires a substantial amendment and prior HUD approval.

Total Budget:
The estimated budget for temporary rental assistance is $150,000.

Eligible Entities or Applicants:
Eligible applicants are low-income households (households at or below 80 percent AMI) with priority to very low-income (up to 50 percent AMI). The program will target exposed households, such as persons with disabilities and elderly households who may risk housing stability during the process of receiving housing rehabilitation services, including rental rehabilitation. The assistance will be paid to the entity providing temporary housing (i.e. hotel or management company of the temporary residence). The assistance may not exceed six months or $15,000 per applicant.

Project Selection Overview:
Orange County staff will develop the threshold criteria that applications must meet for funding consideration under the temporary rental assistance program, including determining rent-reasonableness.

Program Estimated Beginning and End Date:
Begin Date: The County expects to begin the program within a reasonable timeframe from the grant agreement execution date to allow for establishing the program policies and procedures. The estimate is ninety days after execution of the grant agreement.

End Date: Rental assistance activity under this program will have different completion dates but assistance to the individual may not exceed six months from the time the first rental assistance payment is distributed on behalf of the individual. The County expects to complete all program activities within the timeline outlined in the Federal Register Notice.

4.9.1.4. New Affordable Housing Construction

Program Description:
Hurricane Ian had a very large impact on Orange County's existing housing stock. This was evident in our unmet needs analysis, as housing was the largest unmet need. Orange County was already in an extremely tight housing market with very low vacancy rates and low inventory of homes for sale. Hurricane Ian exacerbated our already existing housing crisis, particularly as it relates to affordable housing, to include housing for special needs individuals, such as seniors, persons with disabilities and those who are homeless.

The New Affordable Housing Construction Program under the CDBG-DR will include the following activities:

- Construction of affordable homeownership and rental housing units targeting workforce segments impacted by Hurricane Ian.
- Housing for exposed populations such as seniors, homeless, and individuals at risk of homelessness.
- Expansion of housing for special needs populations, including permanent supportive housing.
- Affordable housing preservation

It should be noted that, if leveraging funds from other federal programs, such as CDBG and HOME, for new affordable housing construction activities using CDBG-DR funds, the County will be required to follow the standard requirements of the URA and Section 104(d) regulations. Additionally, if land is acquired for the new construction activities, the County and its subrecipients (as applicable) must document and comply with the applicable URA acquisition requirements (49 CFR 24.101 or 49 CFR 24.102). Additional details are to be provided in policies and procedures for the program.

Long-Term Resilience:
New housing development and preservation activities must incorporate hazard mitigation measures and green building standards in the design and construction. The use of more resilient construction materials is encouraged. All our resiliency measures aim to reduce impacts of future disasters and increase long-term affordability of housing.

Program Tieback to Disaster Unmet Need:
All projects or activities must demonstrate a tieback to Hurricane Ian or meet the definition of mitigation. The construction of new affordable housing, especially for exposed populations, addresses our housing unmet needs identified in the Action Plan and is both a direct and indirect result of Hurricane Ian.

Program National Objectives:
All eligible projects and activities must benefit low to moderate-income persons, in accordance with HUD guidelines in 24 CFR 570.208 and of LMI housing requirements.

Urgent Need (UN) is another possible National Objective for housing activities. Qualification under the UN National Objective will require the County to 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. The County must document how each program or activity responds to the urgency, type, scale, and location of the disaster-related impact described in the County's impact an unmet needs assessment.

The third National Objective, Elimination of Slum and Blight, is the least common of the three but can be used in limited circumstances. Qualification under the Elimination of Slum and Blight requires a substantial amendment and prior HUD approval.

Total Budget:
The estimated budget for affordable housing new construction is $30,000,000.

Eligible Entities or Applicants:
Eligible entities or applicants will include for-profit and nonprofit organizations, to include public housing authorities.

Project Selection Overview:
Funding for new affordable housing construction and development will be awarded to eligible applicants for eligible projects based on a competitive selection process. Orange County will require the submission of project proposals in response to competitive Request for Proposals (RFPs) and Request for Applications (RFAs) for nonprofit and for-profit organizations. Orange County will be developing the guidelines, criteria, and procedures for these projects. All housing projects will be required to meet affordability requirements that will be enforced through land use restrictive agreements, deed restrictions, or similar instruments. Project selection must also adhere to the procurement standards outlined in 2 CFR Part 200, HUD guidelines for determining cost-reasonableness, and follow all of the County regulations related to procurement.

Program Estimated Beginning and End Date:
Begin Date: Orange County expects to begin the program within a reasonable timeframe from the grant execution date. Orange County anticipates beginning programming within 90 days of execution of the grant agreement.

End Date: Orange County expects to complete all projects within the timeline outlined in the Federal Register for CDBG-DR.

4.9.2. Buyout Program(s)

Buyout programs are used to acquire properties in flood-prone areas that were damaged as a result of a disaster event. Based on the housing unmet needs assessment, which included analysis of available data and community engagement and outreach, Orange County does not anticipate implementing buyout programs. Should the needs change as

new information becomes available, Orange County can add a Buyout Program through a substantial amendment to the Action Plan process.

4.9.3. Infrastructure and Public Facilities Program(s)

Infrastructure and Public Facilities Programs	Budgeted Amount	% of Total Allocation
Flood and Drainage Related Repairs and Improvements	$102,306,581	46.56%
Stormwater Management Projects		
Restoration of Damaged Infrastructure		
Rehabilitation of Public Facilities		

Table 61. Budget for Infrastructure and Public Facilities Programs

Program Description:

The infrastructure and public facilities program allocation of CDBG-DR funds is $102,306,581, or 46.56% of the total allocation based on results from the unmet needs analysis. Additionally, Orange County collected information submitted by the County Departments and local municipalities as it relates to the infrastructure projects needed to address the impacts of Hurricane Ian. Long-term resilience measures and infrastructure improvements are critical to the on-going recovery of Orange County. The program will provide CDBG-DR funds to municipalities and Orange County to carry out eligible projects. Project activities may include, but not be limited to, stormwater and sewer improvements, drinking water infrastructure, emergency shelters, rehabilitation of public facilities, and broadband needs.

Orange County will invest in the restoration of infrastructure and long-term recovery needs within the historically underserved communities, which lacked adequate investment in housing, water, and wastewater infrastructure prior to the disaster. One of the infrastructure-related impediments identified in Orange County's 2022–2026 Analysis of Impediments to Fair Housing Choice (AI) was a need for fiber infrastructure for broadband access in the Four Corners area located in the southwest corner of Orange County. Other areas that have a need for fiber infrastructure include northwest Orange County, in cities such as Apopka, and in the northeastern corner of the County, in rural areas such as Bithlo and Christmas.

The AI also noted that greater access to supplementary resources, which are described in more details below, would also aid in increasing broadband access. Similarly, during the CDBG-DR community engagement and outreach, residents raised concerns regarding infrastructure improvements related to the broadband access, flood-prone areas, and drainage (see Section 3.1.1.10 of the CDBG-DR Action Plan). Additional areas of supplementary resources noted by the residents included technology upgrades and

computer labs for seniors and persons with disabilities, digital and broadband literacy campaigns targeting these populations, and free public Wi-Fi to reduce fixed costs for low-income renters and homeowners. Overall, the needs analysis indicates that a lack of access to high-quality neighborhood facilities, infrastructure, and services in certain areas of the County restricts access to fair housing choice by limiting opportunity for residents.

To address identified disparities in neighborhood resources and the associated lack of access to opportunity, the County will continue to meet with residents and stakeholders to assess the need for continued investment in neighborhood services, facilities, and infrastructure. Orange County will aim to utilize CDBG-DR, as well as other available funding, to undertake projects that develop, expand, or improve public facilities, infrastructure, and other related services in low- and moderate-income census tracts, and particularly in R/ECAP census tracts. Additional evaluation criteria might be used to select projects that address equal and equitable access to public resources and provide opportunities to historically disadvantaged communities in Orange County.

It should be noted that, if real property needs to be acquired for infrastructure improvements or other projects and activities assisted with CDBG-DR funds as part of the Infrastructure and Public Facilities Program, the project may require conformance with the 49 CFR 24.102(a) basic acquisition policies to access and facilitate the construction of a public improvement. Additional details are to be provided in policies and procedures for the program.

Long-Term Resilience:
Orange County recognizes the importance of resiliency against future storms. All CDBG-DR infrastructure activities must be designed and constructed in a manner to withstand extreme weather events and impacts of climate change. Infrastructure activities will be designed to reduce the risks associated with floodwater. Mitigation improvements will focus on creating more resilient infrastructure systems to withstand the increased intensity of storms. The maximum award for infrastructure projects will be $15,000,000.

Orange County may exceed maximum award or benefit amount to provide reasonable accommodations for accessibility needs.

Program Tieback to Disaster Unmet Need:
All projects or activities must demonstrate a “tie-back” to Hurricane Ian or meet the definition of mitigation. Projects also must meet an identified need in the CDBG-DR Action Plan.

Program National Objectives:

All eligible projects or activities will be required to meet a national objective under CDBG in accordance with HUD guidelines in 24 CFR 570.208. Orange County will consider projects or activities that can meet criteria for any of the three national objectives – activities benefiting low- and moderate-income persons (LMI), activities which aid in the prevention or elimination of slum and blight (Slum & Blight), and activities designed to meet community development needs having a particular urgency (Urgent Need).

In order to utilize the Urgent Need National Objective, the County must 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. County must document how each program or activity responds to the urgency, type, scale, and location of the disaster-related impact described in the County's impact an unmet needs assessment.

The Slum and Blight National Objective is rarely used in CDBG DR programs, but may be utilized in future iterations of the Action Plan if warranted.

Total Budget:

The estimated budget for infrastructure projects and public facilities is $102,306,581.

Eligible Entities or Applicants:

Eligible entities will include all municipalities in Orange County, nonprofit organizations providing services to LMI persons, and Orange County government.

Project Selection Overview:

The County will be providing funding available for infrastructure and public facilities to be undertaken by the County, local municipalities, and nonprofit organizations. Orange County will be developing additional guidelines and procedures but will use Notice of Funding Availability (NOFA) packages to solicit projects and gather information necessary to assess each project and potential subrecipient. Orange County staff will develop the threshold criteria that applications must meet for funding consideration under any NOFA, such as: is the proposed activity eligible under CDBG-DR, does it meet a national objective, or does the applicant have the capacity to carry out the activity. Additional evaluation criteria might be used to select projects that address equal and equitable access to public resources and provide opportunities to historically disadvantaged communities in Orange County. Project selection must also adhere to the procurement standards outlined in 2 CFR Part 200, HUD guidelines for determining cost-reasonableness, and follow all of the County regulations related to procurement.

Program Estimated Beginning and End Date:

Begin Date: The County expects to begin the program within a reasonable timeframe from the grant agreement execution date to allow for establishing the program, preparing NOFA applications, and developing policies and procedures. The estimate is ninety days after execution of the grant agreement.

End Date: Various infrastructure projects will have different completion dates. The County expects to complete all program activities within the timeline outlined in the Federal Register for CDBG-DR.

4.9.4. Economic Revitalization Program(s)

Most of the negative impacts caused by Hurricane Ian were felt in the areas of residential housing and public infrastructure. Data obtained from federal, state, and local agencies showed limited negative impact (3% of unmet needs) to local businesses and the economy. Orange County recently released funds for local businesses under the Small Business BOOST Program to provide grants to local small businesses, home-based businesses, and gig workers. The program is in limited demand.

As a result of the unmet needs assessment and considering the availability of other funds for economic development and revitalization of businesses, Orange County does not anticipate instituting an Economic Revitalization Program under CDBG-DR and will not include this strategy as a priority in the CDBG-DR Action Plan.

Orange County anticipates that, through the implementation of housing and infrastructure activities under CDBG-DR, local businesses will benefit from contracting opportunities and job creation. Additionally, public service activities to be implemented with CDBG-DR funds will include job training, job placement, and educational opportunities. The County anticipates that economic-related public service activities, in combination with the small business assistance programs already being offered by Orange County, will sufficiently address economic revitalization needs of the community. Should the needs change, as new information becomes available, Orange County can add an Economic Revitalization Program through a substantial amendment to the Action Plan.

4.9.5. Public Services Program

Public Services Program and Activities	Budgeted Amount	% of Total Allocation
Self-sufficiency Services (i.e. financial literacy, housing search and counseling, legal assistance)	$4,068,702	
Health Services/Mental Health Services	$1,697,222	
Job Training/ Job Placement Services	$0	
Other economic recovery related services	$ 609,741	
Total Public Services Program and Activities	**$6,375,665**	**2.90%**

Table 62. Budget for Public Services Program

Program Description:

The Public Services Program will assist LMI households and communities with essential services to secure economic recovery, housing stability, and resiliency to overcome future disasters. CDBG-DR public services funding will be targeted to support the delivery of essential services to households in areas most impacted by Hurricane Ian. The allocation will be distributed, as needed, to qualified local nonprofit service providers for the following: self-sufficiency services (such as financial literacy, housing search and counseling, and legal services), health and mental health services, job training and placement, and other economic recovery related services such as disaster planning tools for small businesses in disaster prone areas.

Public service activities should complement other programs funded under CDBG-DR. Therefore, public services funding will be awarded competitively throughout a period of five years. The maximum award will be $500,000 per agency.

Long-Term Resilience:

Public services will be implemented in partnership with qualified nonprofit organizations to create more resiliency and offer County residents tools to better prepare for and recover from natural disasters.

Program Tieback to Disaster Unmet Need:

The need for a public services program under CDBG-DR was supported by the unmet needs assessment, which primarily included input received during the community engagement and outreach process (focus group discussions, community meetings, citizen participation, and survey results). The specific services recommended for funding are the result of the input received from these meetings and discussions. The need for mental health counseling was raised frequently by attendees at our local community meetings, thus this a top priority within the Public Services Program allocation.

Program National Objectives:
All public service activities must benefit low to moderate-income persons in accordance with HUD guidelines in 24 CFR 570.208 and CDBG-DR requirements.

Orange County will consider projects or activities that can meet criteria for any of the three national objectives – activities benefiting low- and moderate-income persons (LMI), activities which aid in the prevention or elimination of slum and blight (Slum & Blight), and activities designed to meet community development needs having a particular urgency (Urgent Need).

In order to utilize the Urgent Need National Objective, the County must 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. County must document how each program or activity responds to the urgency, type, scale, and location of the disaster-related impact described in the County's impact an unmet needs assessment.

The Slum and Blight National Objective is rarely used in CDBG DR programs, but may be utilized in future iterations of the Action Plan if warranted.

Total Budget:
Orange County will allocate $6,375,665, or 2.9% of CDBG-DR funds, over the timeline of the CDBG-DR grant, to support public service activities to benefit LMI households in Orange County.

Eligible Entities or Applicants:
Eligible entities are qualified local nonprofit organizations with the ability to deliver the specified services to LMI populations and in Hurricane Ian's impacted areas. The entities will be selected through a competitive process that includes a project risk assessment, evaluation of the organization's financial capacity, and other standards outlined in 2 CFR Part 200 and HUD guidelines.

Project Selection Overview:
Funding for public services will be awarded to qualified nonprofit organizations through a competitive selection process. Orange County will require the submission of public service project proposals in response to a competitive Request for Applications (RFAs) for local nonprofit organizations. Orange County will be developing the guidelines, criteria, and procedures for these CDBG-DR projects. Project selection must also adhere to the

financial standards outlined in 2 CFR Part 200 and HUD guidelines for determining the organization's capacity and the cost-reasonableness of the project.

Program Estimated Beginning and End Date:
Begin Date: The County expects to prepare policies and procedures for public services, and the competitive application process within a reasonable timeframe from the grant agreement execution date. The estimate is ninety days after execution of the grant agreement to begin soliciting public services project proposals.

End Date: Public service agreements with nonprofit organizations will have different completion dates. The County expects to complete all public service activities within the timeline outlined in the Federal Register for CDBG-DR.

4.9.6. Mitigation Program

Mitigation Program	Budgeted Amount	% of Total Allocation
Activities to increase resilience to future disasters and reduce or eliminate long-term risks	$28,658,000	$13%

Table 63. Budget for Mitigation Program

Orange County has received a CDBG-DR mitigation set-aside totaling $28,658,000, for Hurricane Ian recovery efforts. The Mitigation Program will ensure that Orange County, as a community, is better equipped to face disaster-type events in the future and to provide long-term sustainability for Orange County residents and neighborhoods. The County will strive to incorporate mitigation measures into all rebuilding activities conducted using CDBG-DR funds. The set-aside must also meet the eligibility for low to moderate-income households or low to moderate-income areas.

Consistent with the mitigation needs assessment, Orange County will undertake mitigation activities to increase resilience to future natural disasters. These activities will be centered on strengthening existing housing and public infrastructure, flood diversion and prevention, efforts to diminish the risk of damage and loss of property, and other improvements, in addition to the proposed housing and infrastructure programs.

The Mitigation Program complements all disaster relief programs and activities included in the CDBG-DR budget.

It should be noted that all housing and infrastructure activities assisted with CDBG-DR funds, to include projects and activities that are part of the Mitigation Program, are subject to the URA requirements.

4.9.7. Planning

A total of $1,830,743 (.83%) will be used for planning activities. This funding will be available to Orange County Departments and Divisions, as well as municipal governments and quasi-governmental agencies, to fund studies, analysis and additional planning efforts that may result in the establishment of additional recovery and resiliency priorities and activities or support the design and implementation of the currently described CDBG-DR programs. Planning funds can also be used to cover expenses associated with development/updates to the Unmet Needs Assessment portion of the CDBG-DR Action Plan.

4.9.8. Administration

An allowable 5% of the overall CDBG-DR allocation, or $10,985,600, will be used for administration of the CDBG-DR Program. Funding has been allocated to administration to fund the necessary costs of planning, implementing, and managing the CDBG-DR recovery programs, including compliance monitoring, performance tracking, management of the DRGR system, fiscal management, and reporting. Program Administrative Cost (PAC) for Hurricanes Ian (PL 117-328, FR-6393-N-01) and Hurricane Milton (PL 118-158, FR-6512-N-01) are interchangeable in accordance with Public Laws 116-20 and 117-43, and in accordance with CDBG Policy Bulletin 23-06.

5. Appendix

5.1. Certifications

a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with 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:

   I. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, 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.).

   II. 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 in a manner that ensures that at least 70 percent of the grant amount is expended for activities that benefit such persons.

III. 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. State and local government grantees certify 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:

i. 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

ii. 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.

_____ _____

Signature of Authorized Official Date

Orange County Mayor_____

Title

(Signed version will be submitted to HUD)

5.2. Waivers

Orange County is not requesting any waivers with the initial submission of the CDBG-DR Action Plan, outside of those waivers and flexibilities that are provided in the applicable Federal Register notice.

Orange County may request additional waivers and alternative requirements from the Department of Housing and Urban Development (HUD) as needed to address specific needs related to the County's recovery and mitigation activities. Any waivers requested by the County after the initial submission of the Action Plan will be listed in this section. For each waiver requested, a description of the approved waiver will be provided along with other applicable details.

The Appropriations Acts authorize the Secretary of HUD to waive or specify alterative requirements for any provision of any statute or regulation. For each waiver and alternative requirement, the Secretary of HUD has to determine that good cause exists, and the waiver or alternative requirement is not inconsistent with the overall purpose of the Housing and Community Development Act. Waivers cannot conflict with cross-cutting requirements related to related to fair housing, nondiscrimination, labor standards, and the environment.

5.3. Summary and Response of Public Comments

The draft CDBG-DR Action Plan was made available for public review and comments from Monday, December 11, 2023, through Thursday, January 11, 2024. A summary of public comments received during the required 30-day public comment period, as well as responses provided, will be added following the completion of the public comment period and included with the final submission of the CDBG-DR Action Plan to HUD.

5.4. Data Sources/Methodologies

Owner Occupied Households:

- ***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 $28,800 of FEMA inspected real property damage
- ***Severe:***
  - Greater than $28,800 of FEMA inspected real property damage

Renter Occupied Households:

- ***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:***
  - $3,500 to $4,999 of FEMA inspected personal property damage
- ***Major-High:***
  - $5,000 to $8,999 of FEMA inspected personal property damage
- ***Severe:***
  - Greater than $9,000 of FEMA inspected personal property damage

5.5. Important Definitions and Terms

Acronyms:

AMI: Area **Median Income**

AFFH: Affirmatively Furthering Fair Housing

CBDO: Community Based Development Organization

CDBG: Community Development Block Grant

CDBG-DR: Community Development Block Grant – Disaster Recovery

CFR: Code of Federal Regulations

CO: Certifying Officer

CoC: Continuum of Care

CPP: Citizen Participation Plan

DOB: Duplication of Benefits

DRGR: Disaster Recovery and Grant Reporting System

FEMA: Federal Emergency Management Agency

FHFC: Florida Housing Finance Corporation

HCD Act: Housing and Community Development Act of 1974, as amended

HCV: Housing Choice Voucher

HMGP: Hazard Mitigation Grant Program

HQS: Housing Quality Standards

HUD: The United States Department of Housing and Urban Development

IA: (FEMA) Individual Assistance

LAP: Language Access Plan

LEP: Limited English Proficiency**LIHTC:** Low-Income Housing Tax Credit

LMI: Low and moderate-income

MID: Most Impacted and Distressed Area

NFIP: National Flood Insurance Program

NGO: Non-governmental organizations

PA: (FEMA) Public Assistance

RE: Responsible Entity

RECAP: Racially or Ethnically Concentrated Areas of Poverty

RFA: Request for Applications

RFP: Request for Proposals

SBA: U.S. Small Business Administration

SFHA: Special Flood Hazard Area

SHIP: State Housing Initiatives Partnership Program

UGLG: Unit of general local government

URA: Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended

USACE: U.S. Army Corps of Engineers

5.6. Standard Form 424

The final submission of the CDBG-DR Action Plan to HUD will include a completed and executed Federal Form SF-424 (Application for Federal Assistance).