Substantial Amendment to 2022-2026 Orange County Consolidated Plan
Community Development Block Grant – Disaster Recovery (CDBG-DR) Funding

1. Background Information

Orange County, FL receives federal funds from the U.S. Department of Housing and Urban Development (HUD) through the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) Program, and Emergency Solutions Grant (ESG). As a recipient of federal funds, the County is required to develop a five-year strategic plan for housing and community development activities, as well as annual action plans. The last five-year plan, known as a Consolidated Plan, was adopted by the Board of County Commissioners on August 9, 2022, and it covered 2022-2026 fiscal years.

On April 1, 2026, the U.S. Department of Housing and Urban Development (HUD) issued Notice CPD-26-05, which provided additional guidance on submitting consolidated plans and annual action plans for HUD formula grant programs. As part of this HUD guidance, the CDBG entitlement grantees that are awarded CDBG-Disaster Recovery (CDBG-DR) grants are required to incorporate these grants into their consolidated plans within a specified timeframe by submitting a substantial amendment to their existing annual action plan within 24 months of the applicable Allocation Announcement Notice (AAN). Orange County received two allocations of CDBG-DR funds – for Hurricane Ian ($219,712,000 – AAN issued on March 15, 2023) and Hurricane Milton ($33,357,000 – AAN issued on January 16, 2025).

In accordance with requirements of the Citizen Participation Plan and 24 CFR Part 91.505, the County is submitting a substantial amendment to 2022-2026 Orange County Consolidated Plan to incorporate CDBG-DR funds from both disaster events, as required by HUD. The CDBG-DR Action Plan is a comprehensive assessment of unmet needs resulting from the applicable disaster events, and it outlines proposed recovery programs and projects to support long-term recovery efforts throughout Orange County. The County completed CDBG-DR Action Plans for both, Hurricane Ian and Hurricane Milton, and the plans are available on the County's website at: https://www.ocfl.net/NeighborsHousing/OCDisasterRecovery.aspx.

As part of this proposed amendment, the following sections of 2022-2026 Consolidated Plan have been updated to reflect the identified disaster recovery needs and the anticipated CDBG-DR initiatives:

- NA-10 – Housing needs
- NA-40 – Homeless needs
- NA-50 – Infrastructure and economic development needs
- MA-10 – Number of Housing units
- MA-15 – Cost of Housing
- MA-20 – Condition of Housing
- MA-50 – Needs and Market Analysis Discussion
- SP-35/SP-36 – Anticipated Resources
- SP-45 – Goals

2. Proposed Changes to FY 2022-2026 Orange County Consolidated Plan

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c) (note: new language)

CDBG-DR Housing Unmet Needs

CDBG-DR (Hurricane Ian): The unmet needs analysis identified a total housing unmet recovery need of $253,300,768. FEMA Individual Assistance claims indicate that 9,911 units were damaged, with the majority in the minor-low category (4,409 units), followed by major-low (2,864), major-high (901 houses), and minor-high (803). An additional 680 claims for flood-related damage covered by the National Flood Insurance Program (NFIP) total more than $48,000,000. Combined, FEMA and NFIP data show total housing losses of $243,070,375 to 10,591 units, or $315,991,487 when accounting for an additional 30 percent needed to rebuild more resiliently. The total unmet housing need was calculated by subtracting the $62,690,719 in FEMA and NFIP assistance received from this resilient rebuilding cost.

Housing needs will receive $69,555,411 in CDBG-DR funds, or 31.66 percent of all Hurricane Ian CDBG-DR funds allocated to Orange County. With that money the County will address and support single-family homeowner rehabilitation and reconstruction, rental housing rehabilitation, temporary rental assistance for households displaced during repairs, and new affordable housing construction, particularly for special needs populations.

CDBG-DR (Hurricane Milton): The unmet needs analysis identified a total housing unmet recovery need of $151,894,856, or 77 percent of all unmet recovery needs from the storm. FEMA received 55,770 Individual Assistance applications from Orange County residents (59 percent renters and 41 percent owners), and inspections found damage to 1,287 owner-occupied and 1,861 renter-occupied units, concentrated in west and southwest Orange County. Applying HUD's methodology, the County estimates total housing losses of $120,864,442 across 3,665 units, or $157,123,775 including a 30 percent resiliency cost, less $5,228,919 in FEMA repair payments.

Housing needs will receive $20,000,000 in CDBG-DR funds, or 60 percent of all Hurricane Milton CDBG-DR funds allocated to Orange County. With that money the County will address and support homeowner rehabilitation (including mobile/manufactured homes), rental housing rehabilitation, and new affordable housing construction for workforce households and special needs populations.

NA-40 Homeless Needs Assessment – 91.205(c) (note: new language)

CDBG-DR Homelessness Unmet Needs

CDBG-DR (Hurricane Ian): Unhoused individuals in Orange County can be presumed to have experienced detrimental impacts from Hurricane Ian because of the severity and extent of the storm. The 2023 Point-in-Time count identified 1,626 homeless persons in Orange County (831 in emergency shelter, 464 in transitional housing, and 331 unsheltered). Immediately after the storm, many families were displaced with insufficient resources, and shelters and service agencies reported power outages, flooding, and roof damage that limited their ability to assist homeless families and individuals. CDBG-DR funding related to housing, public facilities, and public services will also be used to support persons who are homeless or at risk of homelessness, including expanding emergency shelter and bridge housing capacity and creating new affordable and special needs housing.

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.

CDBG-DR (Hurricane Milton): Unhoused individuals in Orange County can be presumed to have experienced detrimental impacts from Hurricane Milton because of the severity and extent of the storm. The 2023 Point-in-Time count for the Orlando/Orange, Osceola, and Seminole Counties Continuum of Care (FL-507) identified 2,258 persons experiencing homelessness, including 587 unsheltered.

Unmet needs for the homeless remain because of Hurricane Milton. 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.

NA-50 Non-Housing Community Development Needs – 91.215 (f) (note: new language)

CDBG-DR Infrastructure and Economic Development Unmet Needs

CDBG-DR (Hurricane Ian): The unmet needs analysis identified a total infrastructure unmet recovery need of $160,700,743. Hurricane Ian caused widespread flooding and damage to roadways, stormwater systems, water and wastewater treatment systems, flood mitigation systems, public facilities, schools, homeless shelters, and senior centers. Many neighborhood streets, including in the City of Orlando, were impassable, preventing residents from leaving flooded homes and making it dangerous for emergency services to reach them. The infrastructure and public facilities program will receive $102,306,581 of the allocated CDBG-DR funds, approximately 47 percent of all funds allocated to Orange County.

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.

Likewise, the unmet needs analysis identified a total economic unmet recovery need of $13,047,152. Orange County has determined that, given the availability of other small business assistance programs, the most effective means of supporting economic recovery is through public service activities such as job training, job placement, and other economic recovery services. However, the County will continue to evaluate information related to unmet needs and could add an economic revitalization program to the CDBG-DR Action Plan through a future substantial amendment.

CDBG-DR (Hurricane Milton): The unmet needs analysis identified a total infrastructure unmet recovery need of $7,293,371, most of it ($6.33 million) related to utilities. FEMA Public

Assistance data show $25,061,639 in damage across 86 sites, and many streets in west and southwest Orange County, including in Winter Park and Orlando, were impassable during and after the storm. The infrastructure and public facilities program will receive $3,138,150, approximately 9 percent of the allocation.

Orange County's CDBG-DR allocation includes as a required set-aside of $4,351,000 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.

Likewise, the unmet needs analysis identified a total economic unmet recovery need of $37,006,862, or 19 percent of total unmet needs. SBA data show $82,687,615 in verified business losses, and 149 of the most severely impacted businesses were declined for SBA loans. Similar to Hurricane Ian's approach, the County has identified public services as the most effective method of supporting economic recovery and will continue to evaluate economic recovery needs as necessary.

MA-10 Number of Housing Units – 91.210(a)&(b)(2) (note: new language)

CDBG-DR Number of Housing Units Unmet Needs

CDBG-DR (Hurricane Ian): 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. A total of 4,409 housing units received minor-low damages, 803 units – minor-high damages, and 2,894 units – major-low damages. 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. Based on the data provided by two public housing agencies with public housing units within Orange County, 51 units total were damaged. Overall, 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.

CDBG-DR (Hurricane Milton): The unmet needs analysis for Hurricane Milton states that FEMA received 55,770 Individual Assistance applications, including 29,395 from houses and duplexes, 15,445 from apartments, and 2,995 from mobile homes. Applying HUD's damage categories, the County identified 3,665 damaged units (2,129 minor-low, 1,010 minor-high, 401 major-low, 96 major-high, and 29 severe), including 530 mobile homes, with total estimated losses of $120,864,442. The County's public housing authorities did not report significant damage.

MA-15 Housing Market Analysis: Cost of Housing – 91.210(a) (note: new language)

CDBG-DR Cost of Housing Unmet Needs

CDBG-DR (Hurricane Ian): The unmet needs analysis stated that Orange County was already in the midst of an affordable housing crisis before the storm. The average home sales price County-wide doubled from about $204,000 to $460,000 between 2013 and 2022 while inventory

declined, the median gross rent reached $1,553, and an estimated 104,839 households were cost burdened and 92,698 severely cost burdened. Rising land, construction material, mortgage, and insurance costs, compounded by the storm, made rental housing more expensive and homeownership increasingly unattainable for most households.

The Action Plan estimates total housing losses of $315,991,487 to rebuild resiliently. The unmet needs analysis calculated the total housing unmet need by taking this estimated loss and subtracting $62,690,719 in FEMA and NFIP assistance received, for an estimated $253,300,768 in unmet housing need. To expand the supply of affordable units, the County will dedicate

CDBG-DR (Hurricane Milton): The unmet needs analysis stated that unaffordable housing costs remain the County's primary housing challenge: about 31 percent of households are cost burdened, and 65 percent of households earning less than 30 percent of HAMFI are severely cost burdened. Hurricane Milton damaged thousands of homes only two years after Hurricane Ian, while new rental supply remains limited, with only 3,403 of the County's 175,053 renter-occupied units built in 2020 or later.

The Action Plan estimates total housing losses of $157,123,775, including resiliency costs. The unmet needs analysis calculated the total housing unmet need by subtracting $5,228,919 in FEMA repair payments, for an estimated $151,894,856 in unmet housing need. The County will dedicate $10,000,000 of its housing allocation to New Affordable Housing Construction to expand the affordable rental supply.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a) (note: new language)

CDBG-DR (Hurricane Ian): The unmet needs analysis states that homes in low-lying areas or near bodies of water experienced flooding that caused structural damage and rendered some homes uninhabitable. Nearly 29 percent of the County's 554,517 housing units were built before 1980, FEMA inspections identified 158 units with severe damage, and almost a quarter of the County's mobile homes were impacted. The Winter Park Housing Authority reported 50 damaged units and the Orlando Housing Authority one destroyed unit, and affordable housing providers reported significant mold and water-intrusion problems. Addressing these damaged units through rehabilitation and reconstruction that incorporates resilient construction standards will be a focus for the County in its use of CDBG-DR funding.

CDBG-DR (Hurricane Milton): The unmet needs analysis states that hundreds of homes sustained damage such as roof breaches, flood intrusion, and compromised walls, rendering many units uninhabitable. FEMA inspections found real property damage to 1,287 owner-occupied units and damage in 1,861 renter-occupied units, and 530 mobile homes were among the 3,665 damaged units identified. The County's rental stock is also aging, with 58,039 of 175,053 renter-occupied units built before 1980. Repairing these units through the Homeowner Rehabilitation and Rental Housing Rehabilitation programs, using hazard-resistant construction techniques and materials, will be a focus for the County in its use of CDBG-DR funding.

MA-50 Needs and Market Analysis Discussion (note: new language)

CDBG-DR (Hurricane Ian): According to the Hurricane Ian CDBG-DR Action Plan, as amended October 2026, the entire County, including its 13 municipalities, was designated a Most Impacted and Distressed (MID) area. Damage was most concentrated in low-lying neighborhoods and areas near water, with FEMA data pointing to west and east central Orange

County and multi-family damage concentrated in the Alafaya/University corridor. Low- and moderate-income persons make up 42.85 percent of the County's population, and the storm compounded an affordable housing crisis that was already underway. The unmet needs analysis identified $427,048,663 in total unmet needs: housing (59.31 percent), infrastructure and public facilities (37.63 percent), and economic revitalization (3.06 percent).

CDBG-DR (Hurricane Milton): According to the Hurricane Milton CDBG-DR Action Plan, Version 3, the entire County is again the HUD-identified MID area, with the most significant impacts in west and southwest Orange County. About 47 percent of residents (629,355 persons) are LMI, and many households were still recovering from Hurricane Ian when Milton struck. The unmet needs analysis identified $196,195,089 in total unmet needs: housing (77 percent), economic revitalization (19 percent), and infrastructure (4 percent).

In summary, two major hurricanes in two years have made an already strained housing market even more unattainable and unaffordable for low- and moderate-income households. Orange County intends to use CDBG-DR funds to focus on housing recovery and resilient infrastructure, will spend at least 70 percent of each grant to benefit LMI persons, and, in an effort to address unmet needs, will implement the following programs under one or both grants:

- Homeowner Housing Rehabilitation and Reconstruction (Ian and Milton)
- Rental Housing Rehabilitation (Ian and Milton)
- New Affordable Housing Construction (Ian and Milton)
- Rental Assistance – Temporary (Ian)
- Infrastructure and Public Facilities (Ian and Milton)
- Mitigation (Ian and Milton)
- Public Services (Ian and Milton)

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2) (note: new language)

Table 1 - Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
Other – CDBG-DR	Public – Federal	Admin and Planning Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab Public Improvements Public Services	**$43,942,400**	$0	$0	$43,942,400	$175,769,600	A total of $219,712,000 in funding to support long-term recovery efforts following Hurricane Ian (FEMA Disaster No. 4673). Funding to be spent on housing, mitigation, infrastructure & public facilities, public services, planning and administration activities.
Other – CDBG-DR	Public - Federal	Admin and Planning Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab Public Improvements Public Services	**$6,671,400**	$0	$0	$6,671,400	$26,685,600	A total of $33,357,000 in funding to support long-term recovery efforts following Hurricane Milton (DR-4834-FL). Funding to be spent on housing, mitigation, infrastructure & public facilities, public services, planning and administration activities.

SP-45 Goals Summary – 91.215(a)(4) (note: new language)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Ensure long-term recovery from the current disaster events and resiliency in preparing for any future disasters	2022	2026	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Countywide	Housing Affordability and Condition Capital Improvements Public Services Homeless Services Program Administration	CDBG-DR (Ian): $219,712,000 CDBG-DR (Milton): $33,357,000	Public facility or infrastructure activity other than low/moderate income housing benefit: TBD persons assisted Public service activity other than low/moderate income housing benefit: TBD persons assisted Rental units constructed: TBD housing units Rental units rehabilitated: TBD housing units Homeowner housing rehabilitated: TBD housing units

Goal Descriptions

<u>Goal 5</u>: Ensure long-term recovery from the current disaster events and resiliency in preparing for any future disasters

Long-term recovery efforts that ensure preservation of existing housing stock and expansion of sustainable and affordable housing opportunities for the County residents; strengthening of neighborhoods impacted by the disaster events; and enhancing community resiliency and economic stability by proving access to services.

3. Summary of Citizen Participation and Consultation Process

To comply with requirements of the Citizen Participation Plan, the County posted a public notice summarizing the proposed changes and noting a 30-day review and comment period on its website and in a newspaper of general circulation. Upon request, the County will also make copies of the proposed substantial amendment available to citizens and groups. All comments received in writing 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 attached to the substantial amendment. The substantial amendment must also be submitted to the Board of County Commissioners (BCC) for approval and then submitted to HUD through the IDIS for the final approval. The proposed amendment is scheduled for the December 15, 2026 BCC agenda.

A public notice of the proposed substantial amendment was posted on the Orange County Housing and Community Development website and published in Orlando Sentinel, a newspaper of general circulation, on November 15, 2026. The public comment period for the proposed amendment began on November 16, 2026, and it will end on December 17, 2026.