STATE OF FLORIDA

ACTION PLAN *for* DISASTER RECOVERY

FLORIDA DEPARTMENT of ECONOMIC OPPORTUNITY

Submitted to the U.S. Department of Housing and Urban Development (HUD) in fulfillment of requirements for the Community Development Block Grant-Disaster Recovery (CDBG-DR) program for recovery from Hurricane Michael.

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List of Acronyms

- ADA – Americans with Disabilities Act
- AFN – Access and Functional Needs
- AFFH - Affirmatively Furthering Fair Housing
- AMI – Area Median Income
- CAH – Critical Access Hopsital
- CDBG – Community Develoment Block Grant
- CDBG-DR – Community Development Block Grant – Disaster Recovery
- CMS – Centers for Medicare and Medicaid Services
- CoC – Continuum of Care
- D&B – Dunn and Bradstreet
- DEO – Florida Department of Economic Opportunity
- DOB – Duplication of Benefits
- DRGR – Disaster Recovery Grant Reporting System
- DSS – Decent, Safe and Sanitary
- EDA – U.S. Economic Development Administration
- FDEM – Florida Division of Emergency Management
- FEMA – Federal Emergency Management Agency
- FEMP – Federal Emergency Management Program
- FHFC – Florida Housing Finance Corporation
- FIDA – FEMA Information Data and Analysis
- FVL – Full Verified Loss
- GSA – Government Services Agency
- HA – Housing Assistance
- HCD – Housing and Community Development Act of 1974
- HCV – Housing Choice Voucher
- HGA – Homeowner Grant Agreement
- HMGP – Hazard Mitigation Grant Program
- HQS – Housing Quality Standards
- HUD - The United States Department of Housing and Urban Development
- IA – Individual Assistance Program
- LEP – Limited English Proficiency
- LMI – Low to Moderate Income
    - LMI 30 refers to those individuals/families making less than 30% of the Area Median Income (AMI).
    - LMI 50 refers to those individuals/families making less than 50% of the Area Median Income (AMI).
    - LMI 80 refers to those individuals/families making less than 80% of the Area Median Income (AMI).
    - Above LMI 80 refers to those individuals/families making more than 80% of the Area Median Income (AMI).

- MID – Most Impacted and Distressed Area
- MHU – Manufactured Housing Unit
- NFIP – National Flood Insurance Program. NFIP Zone A refers to those applicants within the 100-year flood zone. NFIP Zone V refers to those applicants within the 100-year flood zone with velocity (coastal storm surge risk). NFIP Zone X refers to those applicants outside of the 100-year flood zone.
- NGO – Non-governmental organizations
- PA – Public Assistance Program
- PBRA – Project-Based Rental Assistance
- PHA – Public Housing Authority
- PNP – Private Non-profit Organizations
- RARAP – Residential Anti-displacement and Relocation Assistance Plan
- SBA – Small Business Administration
- SBDC – Small Business Development Corporation
- SHIP – State Housing Initiatives Partnership Program
- TAB – Title Assistance Benefit
- THAB – Temporary Housing Assistance Benefit
- TSA – Transitional Sheltering Assistance
- UGLG – Units of General Local Government
- URA – Uniform Relocation Assistance
- VOAD – Volunteer Organizations Active in Disaster

I. INTRODUCTION AND BACKGROUND

The state of Florida is required by the United States Department of Housing and Urban Development (HUD) to document the impacts and unmet needs due to Hurricane Michael in order for the state to receive federal Community Development Block Grant – Disaster Recovery (CDBG–DR) funds. The assessment identifies impacts and unmet needs in three sectors: Housing, Economic Development and Infrastructure. Identifyng these three sectors will help guide recovery program development aimed at supporting successful recovery for the Most Impacted and Distressed (MID) areas.

Hurricane Michael caused unprecedented damage to housing, business and infrastructure in Florida's Panhandle. The impacts of Hurricane Michael demonstrated the need for an effective, comprehensive long-term recovery plan that would address and meet the remaining needs of Floridians after catastrophe struck in October of 2018.

HUD announced that the state of Florida will receive $735 million in funding to support the long-term recovery efforts following Hurricane Michael through the Florida Department of Economic Opportunity (DEO). This funding is designed to address needs that remain after all other assistance has been exhausted, including federal assistance as well as private insurance. DEO is the lead state agency and responsible entity for administering CDBG-DR funds allocated to the state. The State Action Plan for disaster recovery is part of the process to long-term recovery and will describe how the federal funding, along with subsequent allocations, will be distributed to address the remaining unmet needs in Florida's panhandle. The State Action Plan was developed after having received extensive input from state agencies, impacted communities and stakeholder groups.

Hurricane Michael devasted the Panhandle, damaging or destroying over 340,000 homes. Of those homes that suffered major to severe damage, approximately 21,770 (over 56%) Florida homeowners were low-to-moderate income (LMI) families. Many of these homes will require elevation above base flood elevation, adding significant costs to the recovery phase. Many families have been displaced from their homes and are seeking temporary housing assistance, which is limited due to the storm's impact.

The unmet needs assessment provided evidence that Hurricane Michael left devastating impacts on the state of Florida. Businesses have suffered, tourism has declined and labor markets were impacted as well. Hurricane Michael also caused substantial damage to commercial and residential properties.

The state of Florida has developed and proposed activities within this State Action Plan to address the extensive needs identified by data within the housing, economic development and infrastructure sectors. The state of Florida is committed to helping the communities impacted by Hurricane Michael to rebuild their lives, homes, businesses and infrastructure.

Background and Process

Unmet needs are calculated for each of the three sectors (Housing, Economy, Infrastructure) based on guidance provided previously by HUD in 83 FR 40314 (pages 40324-40325). This document and 83 FR 5844 - Federal Register/ Vol. 83, No. 28 / Friday, February 9, 2018 provide HUD's guidance on how to complete an impact and unmet needs assessment including appropriate data sources, methodological processes and rebuilding costs for structures identified as impacted by Hurricane Michael. An account of the impacts to individuals and residences, businesses and economic sectors and public infrastructure is measured against all available funds for recovery from the Federal Emergency Management Agency (FEMA), the

Small Business Administration (SBA), Public Housing Programs and other sources. Residual impacts, after accounting for all support, represent unmet needs, which are eligible for CDBG-DR grant funding for recovery. Specific methods utilized in this assessment are detailed in Appendix 1 sections 1.4 (Housing), 1.5 (Economy) and 1.6 (Infrastructure).

Summary of Impact and Unmet Needs

HUD defines “unmet needs” as those financial resources necessary to recover from a disaster that are not likely to be addressed by other sources of funds by accounting for the various forms of assistance available to, or likely to be available to, affected communities (e.g., projected FEMA funds) and individuals (e.g., estimated insurance) and use the most recent available data to estimate the portion of need unlikely to be addressed by insurance proceeds, other Federal assistance, or any other funding sources (thus producing an estimate of unmet need).[1] Florida’s current unmet needs across HUD defined focus areas (housing, economy and infrastructure) are detailed in sections 1.4 (Housing), 1.5 (Economy), and 1.6 (Infrastructure) of this action plan in Appendix 1. Findings show substantial unmet recovery needs in the economic sector with significant needs remaining in the infrastructure and housing sectors.

Table 1: Estimate of unmet needs

Estimated Impact of and Unmet Needs				
Summary of Impacts/Support	**Housing**	**Economy**	**Infrastructure**	**Total**
Amount of Estimated Impact	$4,129,466,933	$9,697,091,752	$3,883,474,420	$17,710,033,106
Amount of Funds Available	$424,449,929	$3,420,357,451	$3,438,110,542	$7,282,917,922
Unmet Needs	$3,705,017,005	$6,276,734,301	$445,363,878	$10,427,115,184
Percent of Total Unmet Needs	**35.53%**	**60.20%**	**4.27%**	**100%**

[1] HUD, Retrieved from https://www.govinfo.gov/content/pkg/FR-2018-02-09/pdf/2018-02693.pdf

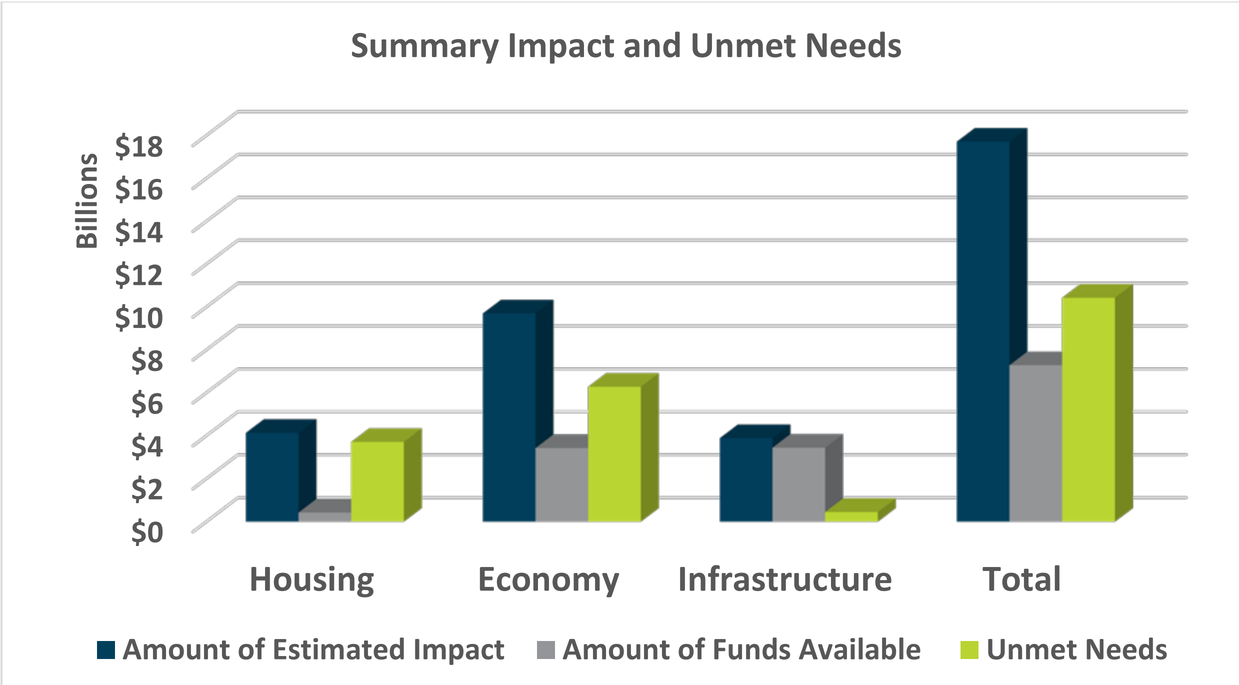

Figure 1: Overall Unmet Needs

Conclusions and Recommendations

Substantial impacts from Hurricane Michael have produced significant unmet needs across Florida's panhandle. Although each county within the presidentially declared disaster area is still recovering, those directly impacted by Hurricane Michael's storm surge at landfall (Bay, Gulf and Jackson counties) appear to have the largest impacts and remaining unmet needs. Unlike the hurricanes of 2016 and 2017, which largely affected households, Hurricane Michael's strength also took a heavy toll on the region's infrastructure and economy. Significant resources will be required to rebuild and replace damaged homes and communities and ensure their resiliency to future natural disasters.

II. GENERAL ACTION PLAN REQUIREMENTS

1. Connection Between Needs and Allocation of Funds

Federal Register/Vol. 85, No. 17/Monday, January 27, 2020, Section II, Use of Funds, states: "The Appropriations Act requires that prior to the obligation of CDBG-DR funds a grantee shall submit a plan detailing the proposed use of all funds, including criteria for eligibility and how the use of these funds will address long-term recovery and restoration of infrastructure and housing and economic revitalization in the most impacted and distressed areas."

The programs and funding outlined in this State Action Plan were informed by the findings of the unmet needs assessment along with meetings and feedback from communities impacted by Hurricane Michael, as required by HUD. As outlined in the assessment, the largest portion of unmet needs resulting from Hurricane Michael are related to business recovery and the need to bolster workforce sectors that will support long-term recovery. In addition, there are unmet needs associated with housing, particularly to repair single family homes and reduce vulnerability through buyout programs. There are also infrastructure needs that will address destruction from Hurricane Michael and increase the resiliency of neighborhoods and other areas within communities in the future.

In compliance with the use of funds required by the Federal Register and informed by the unmet needs assessment, the allocation of CDBG-DR funds primarily considers and addresses unmet housing needs. Any economic revitalization and infrastructure activities approved by DEO will have documented contributions to the long-term recovery and restoration of housing in the Most Impacted and Distressed (MID) areas.

2. Public Housing, Affordable Housing and Housing for Vulnerable Populations

Public Housing is an integral piece of the state's housing resources for low- and moderate- income persons. DEO will identify and address the rehabilitation, reconstruction and replacement of the following types of housing affected by the disaster:

- Low- and moderate- income (LMI) housing units,
- Public housing authority housing stock, including HUD-assisted housing,
- Private market units receiving project-based assistance or with tenants participating in the Section 8 Housing Choice Voucher Program, and
- Affordable housing, including housing for the homeless, emergency shelters, transitional and permanent housing.

No funding is currently allocated in the state's Action Plan for new construction of any type of housing.

DEO sought input from Public Housing Authorities (PHA) located in the Most-Impacted and Distressed (MID) areas and agencies dedicated to serving vulnerable populations as part of the State Action Plan development. A PHA as defined by HUD includes, "any state, county, municipality or other governmental entity or public body or agency or instrumentality of these entities that is authorized to engage or assist in the development or operation of low-income housing under the U.S. Housing Act of 1937." As part of DEO's outreach efforts, DEO requested that each identified PHA provide information about the number of housing units that sustained damage from Hurricane Michael and the current status of the damaged units. The table below summarizes the PHAs consulted and the outcome/result of the consultation.

Date of Outreach	Public Housing Authority	Number of Damaged Units	Outcome/Result
2/25/20 and 3/4/20	Chipley Housing Authority	2	Units have been completely repaired
2/24/20	Springfield Housing Authority (Panama City)	20 PHA duplexes sustained damage; 12 experienced substantial damage	FEMA funding is being used to repair damaged units
2/24/20 and 2/25/20	Marianna Housing Authority	80	Units have been completely repaired
2/24/20 and 2/25/20	North West Florida Regional Housing Authority	2	Units have been completely repaired and are occupied
2/24/20	Panama City Housing Authority	No response	No response received

In addition to the direct outreach made to PHA's in the Hurricane Michael impacted region, in May of 2019, DEO launched a long-term recovery survey asking communities to provide their input on the damage sustained by Hurricane Michael, which closed nearly one year later. To maximize public input from Hurricane Michael impacted communities, DEO conducted nine community workshops across the Panhandle and hosted a webinar for Floridians to provide input on the development of the State Action Plan for Hurricane Michael recovery projects. The state also developed and distributed information regarding the CDBG-DR process to PHAs located in MID areas of Florida and requested their input on their remaining unmet needs.

DEO met with Most Impacted and Distressed (MID) communities identified by HUD under the allocation and discussed the remaining unmet needs and program designs that would best help their recovery process.

DEO will coordinate with FDEM and local governments, including county emergency management officals, located in the MID areas to identify emergency shelters in those communities that are in need of rehabilitation, reconstruction or replacement. DEO's coordination with local MID communities will, at a minimum, include the use of a survey instrument to collect relevant data regarding the status, including damage estimates, of emergency shelters in the MID communities. Data gathered through these coordination efforts will inform DEO's efforts to rehabilitate, reconstruct or replace emergency shelters in the MID areas.

DEO will identify and coordinate with service providers that work with the homeless, including the Florida Coalition to End Homelessness, Florida's Council on Homelessness and the homeless shelters located in the MID areas to determine the current needs of those served. DEO's coordination will, at a minimum, include the use of survey instruments to collect relevant data regarding the needs of the homeless individuals served and potential services to those individuals that would benefit from the use of CDBG-DR funding. Data gathered through these coordination efforts will be used to formulate DEO's approach to assisting homeless individuals impacted by Hurricane Michael.

DEO will ensure ongoing coordination with service providers that work with vulnerable populations to ensure that any remaining or ongoing storm-related impact is brought to DEO's attention for a coordinated approach. In addition, any vulnerable populations brought to DEO's attention who are not served under current DEO programs may be referred to specialized service providers for assistance.

DEO and grant subrecipients will develop policies and procedures for compliance with Affirmatively Furthering Fair Housing (AFFH) requirements during the implementation of this State Action Plan. Such policies and procedures will involve a review that will include an assessment of the proposed housing project area's demography, socio-economic characteristics, environmental hazards or concerns and other factors material to the AFFH determination. Applications should show that housing projects are likely to lessen area racial, ethnic and low-income concentrations and/or promote affordable housing in low-poverty, non-minority areas in response to natural hazard-related impacts. The findings of this review will be used to inform the selection of projects for funding, in accordance with the Federal Register Notice requirements and the grantee's certification to AFFH. The state will remain highly agile throughout the planning and implementation phases of each program to ensure the process and program design is consistent with HUD's direction to AFFH.

Application and outreach materials will be made available in other languages. DEO acknowledges that persons with disabilities may have special needs and will make every effort to accommodate those needs as they arise.

3. Minimize or Address Displacement

The state and its subrecipients plan to minimize displacement of persons or entities and assist persons or entities displaced as a result of implementing a project with CDBG-DR funds. Should any projects cause displacement, DEO will follow the Uniform Relocation Assistance (URA) and the Real Property Acquisition Policies Act to ensure tenants are relocated to safe and sanitary locations. The state's policies and procedures plan, which will be updated to reflect Hurricane Michael activities, will ensure subrecipients minimize displacement. In the event of a voluntary buyout, when homeowners or tenants are located in a flood plain to prevent future loss, DEO will require subrecipients to develop policies and procedures to make sure this population is relocated into areas outside of floodplain and will receive full benefits as stated in the URA. The URA provides certain displaced persons with the right to benefits for moving expenses, housing counseling services, rental assistance payment and/or housing replacement costs depending upon the nature of the circumstances requiring relocation.

The relocation assistance requirements at section 104(d)(2)(A) of the Housing and Community Development Act and 24 CFR 42.350 are waived to the extent that they differ from the requirements of the URA and implementing regulations at 49 CFR part 24, as modified by the notice, for activities related to disaster recovery. Without this waiver, disparities exist in relocation assistance associated with activities typically funded by HUD and FEMA (e.g., buyouts and relocation). Both FEMA and CDBG funds are subject to the requirements of the URA; however, CDBG funds are subject to Section 104(d), while FEMA funds are not. The URA provides that a displaced person is eligible to receive a rental assistance payment that covers a period of 42 months. By contrast, Section 104(d) allows a lower-income displaced person to choose between the URA rental assistance payment and a rental assistance payment calculated over a period of 60 months. This waiver of the Section 104(d) requirements assures uniform and equitable treatment by setting the URA and its implementing regulations as the sole standard for relocation assistance under the Federal Register Notice. If CDBG-DR is matched with any other HUD funding sources, it will be subject to standard URA or Section 104(d) of the Housing and Community Development Act requirements.

Consistent with the goals and objectives of activities assisted under the Housing and Community Development Act of 1974, DEO will take the following steps to minimize the direct and indirect displacement of persons from their homes: (DEO will determine the full list of actions it will take based on local needs and priorities and will develop the Residential Anti-displacement and Relocation Assistance Plan (RARAP) at a later date in accordance with the [HUD Handbook 1378: Tenant Assistance, Relocation and Real Property Acquisition].)

- Arrange for facilities to house persons who must be relocated temporarily during rehabilitation;
- The affordability periods for single family rental units will be a minimum of five years, unless local governments have established longer affordability periods;
- Ensuring that rehabilitated or reconstructed multifamily rental housing with eight or more units remains affordable for a minimum of 15 years; and
- Where feasible, rehabilitate housing, as opposed to demolition, to avoid displacement.

4. Maximum Assistance and Cost Reasonableness Assessment

DEO follows a cost analysis process as part of standard contracting procedures, which includes a review of each cost element to determine allowability, reasonableness and necessity. Maximum assistance available to housing beneficiaries, as well as cost-effectiveness relative to other means of assistance, will be outlined in the DEO Disaster Recovery Program Housing Guidelines. Maximum assistance per beneficiary for infrastructure will be set by the applicant jurisdictions as part of the project submittal to DEO and will be considered by DEO upon review.

Additionally, the Florida State Housing Initiatives Partnership program (SHIP), provides funds to local governments as an incentive to create partnerships that produce and preserve affordable homeownership and multifamily housing. Many local governments have participated in the program and have established local housing assistance plans, which include items such as housing incentive strategies, local policies to implement the incentive strategies and partnerships to reduce housing costs. To ensure that housing assistance amounts are cost reasonable, the maximum amount of CDBG-DR assistance available for any single housing unit under Hurricane Michael recovery programs is $350,000. In cases of demonstrable hardship or where local housing markets warrant an increase of the cap, beneficiaries may propose an alternative cap to DEO for review and approval. An increased cap may also be used to provide funding for difficult or unexpected repairs above and beyond the housing caps. DEO will establish methods of cost reasonableness by conducting research on the services sought and procured. DEO will consult industry accepted trade organizations, past programs and other regional grantees for input on costs for services being procured.

DEO will define “demonstrable hardship” as exceptions to program policies for applicants who demonstrate undue hardship. Applicants in this situation will be reviewed on a case by case basis by the

DEO Policy Exceptions Review Panel to determine whether assistance is required to alleviate such hardship. Demonstrable hardship may include, but is not limited to, excessive amounts of debt due to a natural disaster, disability, etc. With documentation, DEO may allow for persons with disabilities to exceed the $350,000 cap on a case by case basis and if cost reasonable.

The policy exception process is detailed in the Office of Disaster Recovery's policies and procedures manual. The DEO Policy Exceptions Review Panel can only review and allow/refuse alternate documentation supporting eligibility or award issues. The panel cannot circumvent program policy or requirements and therefore, any file submitted where policy clearly addresses the issue raised will be rejected by the DEO Policy Exceptions Review Panel.

5. Elevation Standards

DEO will develop and implement resilient home construction standards, including design standards for all structures designed principally for residential use and located in the 100-year (or one percent annual chance) floodplain that receive assistance for new construction, repair of substantial damage or substantial improvement, as defined at 24 CFR 55.2(b)(10). DEO will require elevation of these structures such that the lowest floor, including the basement, is at least two feet above the base flood elevation which is the minimum height requirements set forth in the February 9, 2018, Federal Register Notice. DEO will comply with local building codes where higher elevation standards are required. DEO may elevate up to three feet above the base flood elevation for the subject property so that it qualifies for National Flood Insurance Program (NFIP) flood insurance premium discounts when it is cost reasonable for the state to do so and when it does not create other conflicts.

Mixed use structures with no dwelling units and no residents below two feet above the one percent annual floodplain must be elevated or flood proofed in accordance with FEMA flood-proofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above the one percent annual floodplain.

Property owners assisted through the recovery program will be required to acquire and maintain flood insurance if their properties are located in a FEMA designated floodplain. This requirement is mandated to protect the safety of residents and their property and the investment of federal dollars. Florida will ensure adherence to Section 582 of the National Flood Insurance Reform Act regarding the responsibility to inform property owners receiving disaster assistance that triggers the flood insurance purchase requirement that they have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance, and that the transferring owner may be liable if he or she fails to do so. Additional Florida State Building Code requirements may apply in addition to local codes, as applicable.

Nationally, the average cost to elevate a home is between $30,000 and $100,000. The average cost to elevate a home is dependent upon several factors including, but not limited to: the size of the home, the number of feet it must be elevated and the location of the home. Based on preliminary research, the average cost to elevate a home in Florida is anywhere between $35,000 and $115,000. However, the cost to elevate can be greater or less depending on the value of the home and the factors mentioned above. The cost to elevate a home should not exceed 49 percent of the home's pre-storm value. Any building that has a total cost of repairs greater than 50 percent is considered substantially damaged and will require the entire home to be brought into code compliance.

6. Planning and Coordination

DEO consulted with and will continue to coordinate with our planning, preparation and response partners throughout the impacted areas of the state. In addition to working with communities, DEO coordinated with partner agencies including the Florida Division of Emergency Management (FDEM). DEO continues to work with FDEM as these recovery support strategies are implemented to help address the unmet needs of communities.

DEO plays a vital role in coordinating economic recovery following a disaster by serving as the primary agency for Emergency Support Function 18: Business, Industry and Economic Stabilization. In addition, the agency coordinates closely with the U.S. Department of Commerce, Economic Development Administration (EDA) and Florida Small Business Development Centers (SBDC) Network to provide loans and other types of assistance, ensuring that businesses can open as quickly as possible and have the resources needed to recover. DEO has a unique perspective on some of the unmet needs and challenges related to business economic recovery and how CDBG-DR funding might be used to support these recovery efforts.

Through the state's response and recovery structure, coordination at the Joint Field Office, existing partnerships and participation in the National Disaster Recovery Framework, the State of Florida is cooperatively implementing robust recovery efforts.

7. Infrastructure Activities

DEO will encourage subrecipients to consider the costs and benefits of the project when selecting CDBG-DR eligible projects. This will be completed by requiring subrecipients to perform a self-assessment of each proposed project and selecting the project(s) that provide(s) the greatest impact within the confines of the budgeted grant amount. DEO will encourage subrecipients to identify and select storm water infrastructure improvement projects that address remaining unmet needs.

All projects proposed to DEO will undergo Affirmatively Furthering Fair Housing (AFFH) review before approval. Such review will include an assessment of the proposed project area's demography, socio-economic characteristics, environmental hazards or concerns and other factors material to the AFFH determination. Applications should show that projects are likely to lessen area racial, ethnic, and low-income concentrations and/or promote affordable housing in low-poverty, non-minority areas in response to natural hazard-related impacts. DEO will monitor each program during implementation phase and will perform additional analysis through program implementation to ensure all protected classes are adequately served. All subrecipients will certify that they will affirmatively further fair housing in their grant agreements.

DEO will rely on professional engineers, procured by the subrecipients, to employ adaptable and reliable technologies to guard against premature obsolescence of infrastructure and ensure that the construction or rehabilitation of storm water management systems in flood areas will mitigate future flood risk.

8. Leveraging Funds

DEO will encourage subrecipients to leverage CDBG-DR funds with funding provided by other federal, state, local, private and nonprofit sources to utilize the limited CDBG-DR funds. This will be specifically encouraged for the homeowner buyout programs as well as infrastructure programs. By encouraging local governments to use CDBG-DR as match for the FEMA Hazard Mitigation Grant Program and Public Assistance Mitigation program, communities will be able to better utilize both funding sources. Often local governments cannot afford match for HMGP and Public Assistance (PA) mitigation programs, and CDBG-DR funding can go further if not funding a project fully. DEO will report on leveraged funds in the Disaster Recovery and Grant Reporting (DRGR) system. When leveraging funds, in accordance with the Robert T. Stafford Act, as amended, the state will implement policies and procedures to ensure no individual receives duplication of benefits for the same purpose and/or effect to recover from Hurricane Michael.

9. Protection of People and Property; Construction Methods

The housing assistance provided under DEO will be built with emphasis on high quality, durable, sustainable and energy efficient construction methods and materials.

These include the following minimum standards:

- Construction standards will be based on the Florida Building Code and must meet or exceed applicable requirements.
- Construction will comply with the Green Building Standard for all new construction of residential buildings and for all replacement of substantially damaged residential buildings (i.e., where repair costs exceed 50 percent of replacement cost).
- For rehabilitation construction, the state will follow the Green Building Retrofit Checklist to the extent applicable to the rehabilitation work undertaken, including the use of mold resistant products when replacing surfaces such as drywall. When older or obsolete products are replaced as part of the rehabilitation work, rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program (FEMP)-designated products and appliances, or other equivalent.

DEO has established compliant standards for construction. Construction contractors will be qualified through an invitation to bid process. To ensure full and open competition, through an invitation to bid process, DEO will follow 24 CFR 570.489(g) at a minimum and all state procurement laws. Contractors will comply with Section 3 of the Housing and Urban Development Act of 1968 (12. U.S.C. 1700lu), and implementing regulations at 24 CFR part 153. Contractors selected under DEO will ensure, to the greatest extent feasible, that employment and other economic opportunities are directed to low-and very low-income persons, particularly local residents and businesses that meet the qualifications of the project. Contractors will make every effort to recruit, target and direct opportunities to Section 3 residents and businesses as well as notifying Section 3 residents about training opportunities. DEO will provide Contractors with helpful resources to maximize these efforts including, but not limited to, a Section 3 Business Registry, and examples of training and employment opportunities. Contractor procurement procedures will be monitored by DEO.

Contractors, subcontractors, material suppliers, laborers and professionals have a right to enforce claims for payment of unpaid labor, materials and/or services against the real property improved, according to Florida law (Chapter 713, Part I of the Florida Statutes). This claim is known as a construction lien and cannot be waived in advance pursuant to Florida law. If a legally enforceable construction lien against an applicants' primary residence results from any construction project under DEO, the Department will provide for release and satisfaction of the resulting legally enforceable construction lien through bonding and/or repayment of the lien on behalf of the property owner.

As stated in the Federal Register, CDBG-DR funds are prohibited from being used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. DEO will ensure that if subrecipients use CDBG-DR funds for levees and dams, the subrecipients will (1) register and maintain entries regarding such structures with the U.S. Army Corps of Engineers National Levee Database or National Inventory of Dams, (2) ensure that the structure is admitted in the U.S. Army Corps of Engineers PL 84–99 Program (Levee Rehabilitation and Improvement Program) and (3) ensure the structure is accredited under the FEMA National Flood Insurance Program. DEO will upload into the DRGR system the exact location of the structure and the area served and protected by the structure and maintain file documentation demonstrating that the grantee has conducted a risk assessment prior to funding the flood control structure and that the investment includes risk reduction measures.

10. Program Income

The state anticipates it may generate program income as part of the activities allowed under this allocation. Should any funds be generated, recovery of funds including program income, refunds and rebates will be used before drawing down additional CDBG–DR funds. These amounts will be recorded and tracked in the state accounting systems and recorded in the DRGR system. The DRGR system requires grantees to use program income before drawing additional grant funds and ensures that program income retained by one will not affect grant draw requests for other subrecipients. Subrecipients will be required to report program income quarterly and will be subject to applicable rules, regulations and HUD guidance. Retention of program income will be in compliance with the sub-grant agreements.

11. Monitoring Standards and Procedures

The state has adopted monitoring standards, including procedures to (1) ensure program requirements (including non-duplication of benefits) are met, and (2) provide for continual quality assurance and adequate program oversight. These standards and procedures are included in the pre-award Implementation Plan as required by the Federal Register. Monitoring will be conducted by DEO who will be supported by an external vendor procured through competitive solicitation to ensure that program activities progress toward timely completion and to allow for the early identification of potential issues and problems so they can be prevented or corrected.

Monitoring will also include environmental compliance under 24 CFR Part 58. DEO currently has staff that will oversee environmental compliance. Additionally, the current staff will be augmented by external vendors procured through competitive solicitation.

DEO's monitoring program includes desk monitoring and onsite monitoring with priority and frequency based on the results of a risk assessment of each subrecipient. The purpose of the risk assessment is to define the scope and focus of the monitoring efforts, including establishing a framework for determining the appropriate level of monitoring consistent with available resources. In addition, the risk assessment will be required each state fiscal year to guarantee continuous review of risks. DEO monitoring is based on criteria consistent with HUD guidance in assessing program risk. The risk assessment provides the basis for developing individual monitoring strategies and documents the decisions and recommendations regarding where to apply staff and travel resources for monitoring, training, and/or technical assistance.

The Florida Auditor General and staff will act as the state's independent external auditor and conduct financial audits of the accounts and records of state agencies. Where applicable, accounting policies and procedures of DEO should mirror the requirements of the Office of the Auditor General.

The State of Florida is dedicated to the prevention of fraud, waste and abuse. DEO's Office of the Inspector General serves as DEO's internal auditor. Internal audit functions associated with Disaster Recovery funding may be supported by external vendors procured through competitive solicitation.

DEO's constituents, employees and contractors may report suspected fraud, waste or abuse by contacting Constituent Management Services staff, submitting information via the Report Fraud, Waste or Abuse online form http://floridajobs.org/rebuildflorida/report; (all contact information fields are optional to allow for anonymity) or by sending an e-mail to cdbgdr_antifraudwasteabuse@deo.myflorida.com.

All suspected cases of fraud will be taken seriously, and fraud complaints will be reported to DEO's Compliance and Reporting Manager and DEO's Office of the Inspector General at OIG@deo.myflorida.com.

If DEO's OIG determines that it is appropriate, it will coordinate its investigation with agencies such as the Florida Office of the Inspector General, the Florida Office of the Attorney General or the Florida Department of Business and Professional Regulation.

All substantiated cases of fraud, waste, or abuse of government funds will be forwarded to the United States Department of Housing and Urban Development (HUD), Office of Inspector General (OIG) Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov) and DEO's HUD Community Planning and Development (CPD) Representative.

12. Broadband Infrastructure

The rehabilitation of housing with four or more rental units in a building may be funded under this Action Plan. Should such activity become awarded under the state's program, DEO confirms that broadband infrastructure shall be installed, as required.

13. Long-Term Disaster Recovery and Response Planning

CDBG-DR funding will not be allocated for the development of disaster recovery and response planning. FDEM is the state entity responsible for coordinating the state's overall long-term mitigation strategy, including pre- and post-disaster hazard mitigation. Florida has an Enhanced State Hazard Mitigation Plan (SHMP) that is approved by FEMA until 2023. This plan is intended to reduce death, injuries and property losses caused by natural hazards in Florida. The plan also identifies hazards based on the history of disasters within the state and lists the goals, objectives, strategies and actions for reducing future losses.

III. PROJECTS AND ACTIVITIES

1. Method of Distribution

Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of housing, infrastructure and economic revitalization resulting from Hurricane Michael as declared in DR-4339.

To prioritize limited funding in areas with highest damage, DEO assistance outlined in this State Action Plan will be limited to counties (and municipalities within those counties) that received FEMA Individual Assistance (IA) declarations in addition to their Public Assistance (PA) declaration. Receiving an IA declaration in addition to a PA declaration indicates that the county had a significant amount of damage to housing in addition to public infrastructure. The following counties received both IA and PA assistance:

Table 2: FLORIDA IA AND PA DECLARED COUNTIES

Florida IA and PA Declared Counties			
Bay	Gadsden	Jackson	Taylor
Calhoun	Gulf	Leon	Wakulla
Franklin	Holmes	Liberty	Washington

As required by Federal Register, Vol. 85, No. 17, Monday, January 27, 2020, DEO will use 80 percent of the allocation to address unmet needs within the HUD-identified Most Impacted and Distressed (MID) areas. The communities to receive 80 percent of the funds include: Bay, Calhoun, Gulf and Jackson counties; 32321 (Liberty), 32327 (Wakulla), 32328 (Franklin), 32346 (Wakulla and Franklin), 32351 (Gadsden), 32428 (Washington) ZIP codes and the jurisdictions within the counties. DEO will ensure, as required and identified in the Federal Register, that at least 70 percent of the entire CDBG-DR funds will be used for activities benefiting low-to-moderate income (LMI) persons.

2. Program Budget

DEO is the lead state agency and responsible entity for administering $735,553,000 through the Community Development Block Grant - Disaster Recovery (CDBG–DR) funds allocated to Florida for recovery. In accordance with the Federal Register, DEO's aggregate total for indirect costs, administrative and technical assistance expenditures will not exceed five percent of its total grant ($36,777,650) plus program income. DEO will limit spending to a maximum of 10 percent of its total grant amount on a combination of planning, indirect and program administration costs. Planning costs are subject to the 15 percent cap ($110,332,950) defined in 42 U.S.C. 5305(a)(12). State and local administration costs are capped at 5 percent in aggregate by federal regulations. The state will provide additional guidance to subrecipients regarding the amount of administrative funds available to them. Eligible project delivery costs are presumed included as a portion of the overall CDBG-DR grant funding allocation provided to each subrecipient. Subrecipients will be responsible for properly tracking and monitoring these expenses that may not be included as part of the overall grant award to each individual project or individual applicant as applicable.

The program budget outlined is as follows:

Table 3: Program Budget

Program	Total Budget	80%	20%	Estimated LMI Benefit	Max Award per unit	Estimated Unit Benefit
Housing Activities						
Housing Repair and Replacement Program	$ 246,263,144	$ 197,010,516	$ 49,252,629	90%	$ 350,000	6,743
Voluntary Home Buyout Program	$ 27,362,572	$ 21,890,057	$ 5,472,514	75%	$ 5,000,000	205
Economic Revitalization						
Hometown Revitalization Program	$ 60,406,429	$ 48,325,143	$ 12,081,286	70%	$ 15,000,000	N/A
Workforce Recovery Training Program	$ 8,000,000	$ 6,400,000	$ 1,600,000	70%	$ 3,000,000	N/A
Infrastructure						
General Infrastructure Program[2]	$ 342,032,145	$ 273,625,716	$ 68,406,429	70%	N/A	N/A
Administrative and Planning Costs						
Administration	$ 35,777,650	$ 28,622,120	$ 7,155,530	N/A	N/A	N/A
Technical Assistance	$ 1,000,000	$ 800,000	$ 200,000	N/A	$ 100,000	N/A
Planning	$ 14,711,060	$ 11,768,848	$ 2,942,212	N/A	N/A	N/A
Total	**$ 735,553,000**	**$ 588,442,400**	**$ 147,110,600**			

[2] DEO will maximize the benefit achieved through the expenditure of CDBG-DR funds by allocating $109,000,000 of the General Infrastructure Repair Program's budget to match the FEMA's Hazard Mitigation Grant Program (HMGP) to complete resilience projects. DEO is also allocating $10,000,000 of the General Infrastructure Repair Program's budget to reconstruct the Calhoun-Liberty Hospital, a Critical Access Hospital significantly damaged by Hurricane Michael.

At least 80 percent of the program allocation will be spent within HUD-identified Most-Impacted and Distressed (MID) communities, which include: Bay, Calhoun, Gulf and Jackson counties; 32321 (Liberty), 32327 (Wakulla), 32328 (Franklin), 32346 (Wakulla and Franklin), 32351 (Gadsden), 32428 (Washington) ZIP codes and the jurisdictions within the counties. Per FR-6182-N-01, where HUD identified specific zip codes as MID communities, DEO intends to expand program operations and eligibility to the whole county. The remaining 20 percent can be spent in state-identified MID communities, which are identified in the map below.

Figure 2: State and HUD Identified MID Communities

*The estimated number of units is calculated based upon the assumption that the award amount per unit will vary from the average estimated award to a maximum estimated award of $350,000. The estimated number of units has been rounded in this project budget to allow for flexibility and any imprecision in our estimates. Once DEO receives more accurate data, the program budget will be updated to accurately reflect the true cost and units. These adjustments will be included in future State Action Plan amendments.

The program descriptions will provide further detail on how each program will distribute funding and meet HUD National Objectives. DEO will implement program management, monitoring and oversight standards necessary to ensure compliance with state and federal requirements.

3. Basis for Allocation

In consideration of the unmet needs assessment and HUD requirements and in order to prioritize limited funding in areas with highest damage, DEO assistance outlined in this State Action Plan will be limited to homeowners, small rental property owners, Public Housing Authorities and local governments within counties (and cities within those counties) that received FEMA Individual Assistance (IA) declarations in addition to their Public Assistance (PA) declaration. Program thresholds outlined in Section 16 state that projects or programs must primarily support LMI housing.

4. Program Details

Housing Activities

The unmet housing needs in Florida due to Hurricane Michael are greater than housing assistance dollars available. The federal notice (85 FR 4681) requires states to primarily consider and address unmet housing needs. To address these needs, DEO proposes the following programs which are described in more detail below:

- Housing Repair and Replacement Program; and
- Voluntary Home Buyout Program

HUD requires DEO to define what would constitute a housing unit "not suitable for rehabilitation." DEO defines "not suitable for rehabilitation" as one of the two following definitions:

1. Residential properties that have experienced repetitive losses under FEMA's National Flood Insurance Program (NFIP); or
2. Dwellings that are considered substandard and do not meet the recovery program's housing rehabilitation standards and/or federal, state, local code requirements shall not be deemed suitable for rehabilitation, as determined by the program and consistent with program guidelines. A structure is not suitable for rehabilitation if the cost of repair is unreasonable based on program standards as specified in the Housing Repair and Replacement Program Guidelines for Single Family Housing and Rental Properties.

As DEO identifies project sites with counties and communities, DEO will coordinate with Voluntary Organizations Active in Disaster (VOADs) and other Housing Counseling Agencies (HCAs) to provide additional support and services as needed by homeowners and renters. DEO will ensure outreach with HCAs to ensure that anyone that needs assistance will receive it.

Cost Verification

As a recipient of federal funds, DEO is charged with ensuring that the costs of its activities are reasonable and necessary. Properties with repair and/or elevation cost estimates that meet or exceed 75 percent of a comparable reconstruction or replacement house, as determined by standard operating procedures and policies, will provide homeowners the option to select a reconstructed or replacement house. Properties with repair and/or elevation cost estimates that meet or exceed a comparable reconstruction or replacement house will be limited to reconstruction or replacement as a more cost reasonable option. Situations where replacement, reconstruction and/or elevation will be required include, but are not limited to:

- Homes that have already been demolished may be replaced or reconstructed;
- Homes that are condemned (red tagged) by the local jurisdiction may be replaced or reconstructed;
- Homes that are structurally unsafe or that have other conditions that make interior inspection by program staff unsafe or impossible may be replaced or reconstructed;
- As stated in the State Action Plan, repair of a Mobile/Manufactured Housing Unit (MHU) greater than five years old and/or with more than $15,000 worth of Hurricane Michael repairs is not feasible and replacement is warranted;
- If a local jurisdiction has issued a substantial damage determination for a home located inside the 100-year floodplain, the home will be reconstructed and elevated;
- If the local jurisdiction has issued a substantial improvement determination for a home located inside the 100-year floodplain, the home must be elevated;
- Slab-on-grade homes that require elevation will be reconstructed and elevated. Repair will not be an option; and
- Mobile home units that will require elevation in addition to the standard installation height will be replaced with a modular housing unit elevated to program standards.

Rental properties with five or more units are considered multifamily projects. DEO will assess the entire project for cost-reasonableness to determine whether rehabilitation or reconstruction of the property is necessary. The property owner may be required to provide additional documentation such as disclosure of planned future development, along with cost projections, engineering reports or other documentation necessary to make this determination.

Cost-effectiveness will be considered for all residential rehabilitation, reconstruction and/or new construction housing projects of eight units or more. DEO and its recipients will establish policies and procedures to assess the cost-effectiveness of each proposed project undertaken to assist a household under any residential rehabilitation, reconstruction or new construction program. The policies and procedures will address criteria for determining when the cost of rehabilitation, reconstruction or new construction of the unit will not be cost-effective relative to other means of assisting the property. These policies and procedures will follow the Federal Register Vol. 83, No 157 regarding Rehabilitation and Reconstruction Cost-Effectiveness.

Housing Repair and Replacement Program

The Housing Repair and Replacement Program (HRRP) is a centralized housing rehabilitation, reconstruction or replacement program for low-to-moderate income (LMI) families impacted by Hurricane Michael. DEO will manage and complete the construction process for the rehabilitation or reconstruction of damaged homes on behalf of eligible applicants. With the assistance of staff and vendors, the state will work with a pool of qualified contractors assigned to repair, reconstruct or replace damaged properties. The program will pay contractors directly and no funds will be paid to homeowners. Applicants will not select their own contractors. Applicants will be required to enter into agreements with the state setting forth the terms and conditions of the program. This program is open to homeowners and owners of rental properties with the condition that it is agreed upon to meet affordability requirements. Rental units must be affordable as prescribed in the Federal Register notice. If currently occupied, the tenants will have the opportunity to move back into the unit or units created with other CDBG-DR activities.

DEO proposes the following housing assistance activities under this program:

- Repairs to, reconstruction or replacement of housing units damaged by Hurricane Michael, which may include bringing the home into code compliance and mitigation against future storm impacts, including elevation;
- The completion of work to homes that have been partially repaired;
- Repairs to, or replacement of, manufactured, modular and mobile homes impacted by Hurricane Michael;
- Temporary Housing Assistance based on an individual homeowner's needs and their participation in the HRRP;
- Temporary Housing Assistance based on individual tenant needs and their participation in the HRRP;*
- Title Assistance based on an individual homeowner's needs and their participation in the HRRP;
- Acquisition of substantially-damaged housing units for housing redevelopment or buyouts of substantially-damaged properties may also be considered.

* The state plans to minimize displacement of persons or entities and assist those displaced as a result of implementing a project with CDBG-DR funds. Should any projects cause displacement, DEO will follow the Uniform Relocation Act (URA) and the Real Property Acquisition Policies Act to ensure tenants are relocated to safe and sanitary locations. The state's policies and procedures plan, which will be updated to reflect Hurricane Michael activities, will ensure that subrecipients will minimize displacement. In the event of a voluntary buyout, when homeowners or tenants are located in a flood plain to prevent future loss, DEO will require subrecipients to develop policies and procedures to make sure this population is relocated into areas outside of floodplain and will receive full benefits as stated in the URA. The URA provides at 49 CFR 24.402(b) that a displaced person is eligible to receive a rental assistance payment that covers a period of 42 months.

In the event that a homeowner requests housing counseling services or displaced tenants wish to become homeowners, housing counseling services will be made available by a HUD-certified housing counseling agency. DEO will contact Housing Counseling Service Agencies to coordinate on this portion of the State Action Plan.

The HRRP is a grant program and requires applicants to be the primary resident homeowners or property owners of rental property at the time during Hurricane Michael. HUD's regulations regarding the use of grant funding for Hurricane Michael recovery state that an alternative requirement for housing rehabilitation is assistance for second homes. HUD is instituting an alternative requirement to the rehabilitation provisions at 42 U.S.C. 5305(a)(4) as follows: Properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation assistance or housing incentives. A second home is defined under this notice as a home that is not the primary residence of the owner, a tenant or any occupant at the time of the storm or at the time of application for assistance. DEO may adopt policies and procedures that provide for limited exceptions to providing assistance to a second home in order to meet specific disaster recovery needs (e.g., adding affordable housing capacity); provided however that such exceptions are developed in consultation with and approved by HUD prior to implementation. DEO can verify a primary residence using a variety of documentation including, but not limited to, voter registration cards, tax returns, homestead exemptions, driver's licenses and rental agreements. Additionally, seasonal, short-term and vacation rental properties are not eligible for assistance.

DEO will implement construction methods that emphasize quality, durability, energy efficiency, sustainability and mold resistance. All rehabilitation, reconstruction and new construction work will be designed to incorporate principles of sustainability, including water and energy efficiency, resilience and mitigation against the impact of future disasters. DEO will implement and monitor construction results to ensure the safety of residents and the quality of homes assisted through the program. All housing units repaired or replaced must comply with the current HUD Housing Quality Standards (HQS). The housing assistance provided under the HRRP will be built with emphasis on high quality, durable, sustainable and energy efficient construction methods and materials. These methods and materials will include the following minimum standards:

- Construction standards will be based on the Florida Building Code and must meet or exceed applicable requirements;
- Construction will comply with the Green Building Standard for all new construction of residential buildings and for all replacement of substantially damaged residential buildings (i.e., where repair costs exceed 50 percent of replacement cost) under the Florida Green Building Coalition; and
- For rehabilitation construction, the state will follow the Green Building Retrofit Checklist to the extent applicable to the rehabilitation work undertaken, including the use of mold resistant products when replacing surfaces such as drywall. When older or obsolete products are replaced as part of the rehabilitation work, rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program (FEMP)-designated products and appliances, or other equivalent.

Properties with rehabilitation and/or elevation cost estimates that meet or exceed 75 percent of a comparable reconstruction or replacement house as determined by standard operating procedures and policies will provide homeowners the option to select a reconstructed or replacement house. Properties with rehabilitation and/or elevation cost estimates that meet or exceed a comparable reconstruction or replacement house will be limited to reconstruction or replacement as a more cost reasonable option. Housing Repair Program homeowner-occupant participants household incomes cannot exceed 120 percent Area Median Income (AMI).

<u>Coordinated Outreach</u>

The State's HRRP will have a common outreach strategy, executed by DEO in coordination with storm impacted area stakeholders including but not limited to:

- Florida Division of Emergency Management;
- Florida Housing Finance Corporation (FHFC);
- Local Government Emergency Management, Housing and Community Development Departments;

- Volunteer Organizations Active in Disasters; and
- Other stakeholder groups identified by DEO.

Additionally, the HRRP will have a single communications and branding strategy that will be leveraged in all its communication and public outreach activities. This information will be included in the housing program guidance. To convey the status of applications for the Housing Repair and Replacement Program, within 72 hours of receiving the application, DEO will notify the applicant that the application has been received. Within 72 hours of a decision, letters of approval or denial will be sent to the applicant through the provided email and mailing address. DEO has established protocols for protecting personal information.

<u>Leveraged Programs</u>

Properties that have received rehab or repairs through the Housing Repair Program will not be eligible for assistance under the Voluntary Home Buyout Program. However, on a case-by-case basis, housing units that have been demolished through the Voluntary Home Buyout Program may be eligible for new construction/replacement through the HRRP at DEO's discretion. New development would be on an alternative site that is less at risk of flooding and would be built to building code, elevation standards and meet requirements of CDBG-DR. Properties already enrolled in other FEMA Hazard Mitigation Grant Program (HMGP) home repair and mitigation programs and eligible for Michael CDBG-DR assistance may only be eligible for the required matching funds subject to case-by-case reviews of the HMGP project scope.

<u>Duplication of Benefits</u>

To prevent duplication of benefits, DEO will require that all sources (federal, state, local and private) and amounts of disaster housing assistance received or reasonably anticipated to be received are documented with submission of an application for CDBG-DR funding. Duplication of benefits for housing assistance will only consider other sources of funding pertaining to structural damage caused by Hurricane Michael. Assistance for contents and personal items will not be considered duplication. Prior to program-related construction, applicant awardees must submit any additional funds received for housing damage caused by the presidentially-declared hurricane disaster to the state to avoid duplication of benefits. There will be no duplication of benefits as it is statutorily not allowed. Policies and procedures will dictate the process to prevent duplication. CDBG-DR funding must be the funding of last resort. Any additional funds paid to applicant awardees for the same purpose as the housing assistance award after the state has completed the repair, rehabilitation or replacement of the applicant's housing units must be returned to DEO.

<u>Subrogation</u>

All duplicative funding obtained by a property owner must be remitted to or accounted for by DEO, regardless of when the property owner received such assistance. If property owners receive additional funding for the same purpose as the HRRP award (permanent repair to storm damaged home) even after the HRRP award is executed or construction is completed, the property owner is required to report the additional funding to the program. The program is obligated to evaluate whether the assistance is duplicative of the HRRP award. Upon receipt of a report that additional benefits have been received, the program will recalculate the property owner's award and provide instructions whether the award will be reduced by such amount, whether the property owner must remit such amounts to the program as reimbursement (when additional assistance received after program disbursements) or assignment of payment. Each property owner will execute and be bound by a subrogation agreement that outlines these responsibilities.

Program Priorities

Recognizing that the $246,263,144 allocated for owner-occupied housing and rental properties will likely not address all need, at-risk and vulnerable populations with the greatest needs will be prioritized. At a minimum, 70 percent of program funds meet a low-to-moderate-income national objective. Additionally, households with one or more of the below characteristics will be prioritized and processed in the order that they complete an application:

- Households with seniors age 62 or older;
- Households with children under the age of 18; and
- Households with special needs or special accommodation requirements (disabled).

The HRRP will prioritize, families with members over the age of 62, families with members with disabilities and families with children under the age of 18. The state believes that this adjustment creates a more equitable prioritization system and better serves the spirit and fact of Affirmatively Furthering Fair Housing (AFFH). Furthermore, the state clarifies that prioritization does not "stack". In other words, families with members both elderly and disabled do not receive higher priority than those with only elderly or disability members.

Households with income higher than 120 percent of Area Median Income (AMI) will not be eligible for this program. Additionally, DEO is ensuring access and transportation mobility services are accessible through a comprehensive outreach campaign and a mobile intake center to ensure any and all households have equal opportunity and support to complete an application.

DEO will track and project total obligation of grant funds for each proposed activity. As the projected grant award agreement total value for any activity approaches full obligation, DEO will analyze the remaining potential eligible applicant pipeline to determine the amount of remaining unmet need for prioritized applicants and the remaining balance of funds available to serve those applicants. DEO may choose to place remaining applicants on hold until prioritized household applicants are fully processed and needs most realized. As program applications are monitored, DEO may choose to adjust the percentage of funding or re-allocate additional funding from other programs with less production to maximize assistance for prioritized applicants eligible and seeking assistance.

Basis for Calculating Housing Assistance Awards

If eligible and awarded, housing assistance award calculations may be based on the following factors:

1. In order to ensure that housing assistance amounts are cost reasonable, the maximum replacement amount of CDBG-DR assistance available to a single housing unit under the HRRP is $350,000. In cases of demonstrable hardship or where local housing markets warrant an increase of the cap, DEO may allow projects to proceed that exceed the program cap. This will be determined on a case-by-case basis. The program cap may also be exceeded to provide funding for difficult or unexpected repairs above and beyond the housing cap, when the costs are deemed necessary and reasonable by DEO;
2. A review of all funding received by the applicant from any source to calculate the total previous assistance received by the applicant and to ensure no Duplication of Benefits (DOB);
3. Damage/scope of project work needed; and

4. Reconstruction or Replacement Value.

Housing assistance awards will be determined by first factoring in the inputs listed above and then deducting any Duplication of Benefits (DOB) or qualified offsets for eligible repairs already performed. The pre-determined program assistance amount will then be applied. Funds qualified as DOB may be required in support of the overall construction assistance provided. Awards may include expenses for additional related costs such as green building and mitigations requirements, elevation, insurance, ADA modifications, repair or replacement of water, sewer and utility connection needs.

Cost effective energy measures and improvements that meet local zoning and code, Decent Safe and Sanitary (DSS) or required Housing Quality Standards (HQS), especially those improvements which add enhanced resilience, such as elevation of major electrical components, roof strapping and other items are also eligible. Environmental review and determined required remediation for items such as lead-based paint abatement, asbestos abatement, or other remediation components shall also be eligible.

Elevations will be included for applicants that meet requirements determined by the program, including substantially damaged properties as per locally approved floodplain requirements. Elevation will be evaluated on a case by case basis. Elevations will not be conducted on properties outside of the floodplain, with the possible exception where elevation is required by local ordinance. DEO will follow HUD guidance to ensure all structures, defined at 44 CFR 59.1, designed principally for residential use and located in the one percent annual (or 100-year) floodplain, that receive assistance for new construction, repair of substantial damage or substantial improvement, as defined at 24 CFR 55.2(b)(10), will be elevated with the lowest floor at least two feet above the one percent annual floodplain elevation.

If located in a 100-year floodplain, the applicant will be required to maintain flood insurance and notify future owners of flood insurance requirements. Federal law requires people who live in a floodplain to carry flood insurance in perpetuity on that property. The Robert T. Stafford Disaster Relief and Emergency Assistance Act prohibits the receipt of disaster assistance because of lack of required flood insurance; accordingly, whether a property is subject to this requirement will be reviewed during the eligibility phase of the program. If an applicant is eligible for program assistance, a grant agreement, covenant, deed restriction or similar instrument will be required to be placed on the property requiring that flood insurance be maintained on that property in perpetuity. An award may also include assistance to pay for up to the first two years of flood insurance premiums for eligible program applicants. Such parameters to determine eligibility for assistance with flood insurance premiums shall be further defined in the state's policies and procedures.

Mobile Homes and Manufactured Homes

Mobile homes or manufactured homes may be eligible for rehabilitation under this program. However, to be cost effective, the mobile home to be rehabilitated must be no more than five years old at the time of assistance and the repair costs necessary to rehabilitate the mobile/manufactured home must not exceed $15,000 (hard and soft construction costs). Any mobile/manufactured home that is older than five years old or has an estimated repair cost greater than $15,000 shall require the mobile/manufactured home to be replaced with another mobile/manufactured home. The home must meet HQS upon completion. If local zoning disallows replacement of a mobile home, then DEO will allow code compliant site built or modular units. Offsite replacements to more safe and secure environments will be considered on a case-by-case basis. Replacement is the demolition, removal and replacement of a damaged MHU with a new MHU in substantially the same footprint or at a new location if the original damaged unit was on leased land and the MHU owner must relocate to a new property. Relocation of a new MHU will require additional environmental review.

Summary Eligibility Requirements

The HRRP will serve primary resident homeowners and owners of rental property in HUD and state-identified MID counties. Property owners must prove Hurricane Michael storm damage to qualify for repair, reconstruction or replacement assistance. The following additional eligibility criteria apply:

1. Home was impacted by Michael (DR-4339). The property must have documented damage because of the declared disaster. Home repair needs will be documented by FEMA, SBA and/or a privately contracted inspection.
2. The state will prioritize homeowner applicants earning less than or equal to 80 percent AMI and rental property owners whose rental property serves LMI individuals. If this need is fulfilled, DEO may address applicants earning greater than 80 percent AMI.
3. All applicants must own a single-family home, mobile/manufactured home or rental property located within Bay, Calhoun, Gulf and Jackson counties; and the counties in which the six designated zip codes reside (32321 in Liberty County, 32327 in Wakulla County, 32328 in Franklin County, 32346 in Wakulla and Franklin counties, 32351 in Gadsden County and 32428 in Washington County) prior to the Michael storm event. Note that 80 percent of funding must be spent in the HUD-designated MID counties and ZIP codes. The remaining 20 percent of the funds may be spent outside of the MID-designated areas that also received a Presidential Disaster Declaration.
4. Households that make above 120 percent of the Area Median Income (AMI) and are in the flood zone that failed to maintain flood insurance at the time of the hurricane will not be eligible to receive funding to rehabilitate or rebuild their home.

Accessibility/Disability Accommodations

Reasonable steps will be taken to accommodate accessibility and other special needs to ensure the placement is appropriate to the homeowner and the household members.

Allocation for Activity: $246,263,144

Eligible Applicants: Homeowners and owners of rental properties, including Public Housing Authorities (PHAs), whose primary residence sustained damage from Hurricane Michael and property owners of rental housing, including private market units receiving project-based assistance or with tenants participating in the Section 8 Housing Choice Voucher Program.

Eligibility Criteria: The state will prioritize homeowner applicants earning less than or equal to 80 percent AMI and rental property owners whose rental property serves LMI individuals. If this need is fulfilled, DEO may address applicants earning greater than 80 percent AMI.

CDBG-DR assistance is prohibited under Federal Register (FR-6182-N-01) if:

(a) the combined household income is greater than 120 percent AMI or the national median;

(b) the property was located in a flood plain at the time of the disaster; and

(c) the property owner did not maintain flood insurance on the damaged property, even when the property owner was not required to obtain and maintain such insurance.

Maximum Award (per unit): $ 350,000*

**DEO may increase the $350,000 cap if construction and elevation cost prove to be higher than originally estimated due to Hurricane Michael's impact on the market.*

Responsible Entity for Administering: Florida Department of Economic Opportunity

Eligibility: 105(a)(4)

National Objective: Benefit to low- and moderate-income persons; Meet a need having a particular urgency (urgent need)

Temporary Housing Assistance Benefit (THAB)

As a general rule, the HRRP will not provide temporary relocation costs to applicants who will be required to vacate their property during construction activities. Since this is a voluntary program and applicants are made aware of program policies at the time of application, the temporary relocation requirement will be the applicant's responsibility.

DEO recognizes that some HRRP beneficiaries, particularly those of modest means and with vulnerable household members, may face financial cash flow challenges caused by the additional interim housing costs that may be necessary during the repair or reconstruction process. DEO will provide temporary rental assistance to homeowner applicants experiencing hardship, on a case-by-case basis following excessive time of displacement or other substantiated extenuating circumstances and approval from the DEO Housing Exceptions Panel. This procedure identifies how this process will be implemented to identify appropriate cases to be temporary housing costs.

To avoid displacement and homelessness, DEO has developed the Temporary Housing Assistance Benefit (THAB) to provide additional assistance for HRRP applicants who are experiencing a financial hardship. The THAB will be available, until completion of repairs to the damaged home, for participants who have been approved for rehabilitation or reconstruction assistance and have signed a Homeowner Grant Agreement. The THAB provides assistance under the HRRP for unmet needs related to eligible short-term lodging or rental expenses, for up to 6 months, provided the household is at or below 80 percent AMI and is a beneficiary also receiving assistance for the rehabilitation, reconstruction or replacement of their Hurricane Michael damaged property.

The THAB is a housing assistance benefit not directly resulting in the rehabilitation, replacement or reconstruction of a home. Therefore, THAB does not count against the program cap for rehabilitation, replacement or reconstruction of the home. The program construction cap identified in this Action Plan applies to hard and soft construction costs associated with the Michael repairs. THAB will be capped at a maximum of $20,000.00 in program sponsored payments. Construction delays, for which the DEO assigned construction contractor is responsible, may result in contractor responsibility for provisions of additional housing assistance; and this additional assistance is not limited by the THAB cap.

Homeowners who choose to stay with friends or family in lieu of staying in a hotel or a short-term leased apartment are not eligible for THAB payments. Further, any homeowner who initially utilizes THAB assistance for hotel rental or short-term lease and subsequently abandons the temporary housing situation to stay with friends or family will have all future THAB payments terminated.

The THAB allows short-term lodging in the form of temporary hotel assistance for up to an estimated 90 days, or temporary rental assistance, the total of which cannot exceed six months. This may be available for eligible HRRP homeowners who:

1. Have household incomes at or below 80 percent AMI;
2. Have executed a HRRP grant agreement (in Award status) but construction has not been completed;
3. Require temporary housing due to other circumstances of hardship, as approved by the DEO, including temporary displacement that requires that the damaged home be vacated for safety and other reasonable measures during construction; and
4. Will stay in a hotel, motel or extended stay hotel, unless alternative arrangements are needed due to excessive length of displacement.

<u>Temporary Housing Assistance Benefit (THAB) Eligibility</u>

In addition to the criteria listed above, the following eligibility criteria also applies:

1. The homeowner must be an active applicant in the Housing Repair and Replacement Program. "Active" participants are defined as HRRP homeowners who are post-closing, meaning have executed their Homeowner Grant Agreement (HGA). This means that the THAB will only be provided for applicants in the active construction phase.
2. Homeowner cannot receive concurrent temporary lodging or rental assistance from other governmental or charitable organization that would cause a duplicative benefit.
3. If the homeowner received any rental assistance from FEMA, Tenant-Based Rental Assistance (TBRA), Project-Based Rental Assistance (PBRA), or Section 8 Housing, the funding must have been exhausted prior to provision of CDBG-DR THAB funds.
4. Funds must be used for lodging and cannot be used for any other purpose.

The THAB is not a duplication of benefits to housing rehabilitation, repair or reconstruction funds, as it constitutes a separate and distinct eligible activity.

<u>Temoprary Housing Assistance Benefit (THAB) Assistance Types</u>

THAB is dependent on the homeowner's needs, which will be identified and confirmed by HRRP representatives to determine the best and most reasonable options available to homeowners. The THAB may be provided in the form of temporary lodging in units such as hotels, motels or extended stay hotels, intended not to exceed 90 days. The benefit will be calculated based on the Government Services Agency (GSA) lodging rates for the homeowner's area. GSA rates can be found at https://www.gsa.gov/travel/plan-book/per-diem-rates.

1. <u>Temporary Hotel Assistance:</u> In order to avoid homelessness and undue financial burden, some homeowners need temporary hotel assistance (estimated not to exceed 90 days) to complete construction on their homes. This program will provide funding for temporary hotel lodging for these families for up to an estimated 90 days until construction is complete.
2. <u>Extended Temporary Hotel Assistance:</u> In the event that the construction contractor notifies DEO

that the project will exceed the original schedule and a homeowner will not be able to reoccupy his or her home due to construction timelines that exceed the initial assistance, an extension of benefits may be issued to prevent homelessness or additional undue financial burden. The extension will be granted based on a new estimated timeline from the construction contractor.

3. Alternative Lodging Assistance: In cases where the duration of estimated displacement exceeds 90 days of other extenuation factors, alternative lodging (i.e., lodging alternative to hotel, motel, extended stay hotel) may be approved on a case-by-case basis.

Temporary Housing Assistance Benefit (THAB) Maximum Benefit

The THAB covers 100 percent of the hotel, motel or extended stay daily or monthly rate, as noted below, without a percentage cost share required from the homeowner. The benefit is capped at a maximum of $20,000.00. This maximum may be waived in areas with spiking rates, as defined by the General Services Administration (GSA) publication, with approval on a case-by-case basis.

Extension of Benefit

If the reconstruction or rehabilitation may extend beyond the initial estimate, applicants can apply for an extension of temporary housing. Cusomter service representatives who receive questions about extensions should direct those to temporaryhousing@rebuildflorida.gov.

Termination or Discontinuation of Assistance

THAB is only provided to homeowners who have been evaluated and found to be eligible for the HRRP. DEO does recognize that there may be unforeseen circumstances that cause a homeowner to withdraw, become inactive or later be disqualified, after the eligibility determination and after the homeowner has agreed to proceed in the program. Though rare, these situations may occur.

- Should an eligible homeowner who has received or is receiving THAB assistance withdraw, becomes inactive or disqualified, THAB assistance must cease immediately upon such determination by program staff.
- Acknowledging that there may be extenuating circumstances that result in a homeowner's withdrawal or inactivity subsequent to his or her eligibility determination and agreement to participate in the program, DEO may allow an exception to the repayment policy with documented proof of and acceptance by DEO of the hardship. Policies and procedures for THAB will be updated, as needed, as the program evolves and unforeseen situations arise.
- The program will discontinue temporary housing assistance if a homeowner is post-closing (has executed their grant agreement) fails to move out of the property in a timely manner to allow construction activities to begin.
- If a homeowner fails to check-in to their reservation, the HRRP will attempt to contact the homeowner. If, after 24 hours following the contact attempt, the homeowner has not provided a reasonable cause for missing their check-in date/time, the HRRP may terminate assistance. This will be evaluated on a case-by-case basis to mitigate wasteful spending.

- If a homeowner is negligent or causes damage to the temporary lodging, the HRRP will immediately notify the homeowner and terminate assistance. The homeowner will be responsible for the cost of all damages.
- When the homeowner's home passes final inspection, the homeowner is expected to move out at that time and reoccupy his or her home. No additional payments for THAB will be allowed after the date of a passed final inspection.
- If the homeowner chooses to stay with friends or family in lieu of staying in a hotel, the homeowner is not eligible for THAB payments. Terminating occupancy of a hotel to stay with family or friends will result in termination of payments.

Upon notice of any of the above conditions, THAB recipients should be immediately provided with a Termination of Temporary Housing Notice along with instructions for appeal.

Accessibility/Disability Accommodations

Reasonable steps will be taken to accommodate accessibility and other special needs to ensure the placement is appropriate to the homeowner and the household members.

Title Assistance Benefit (TAB)

There is a significant presence of Heirs Property – land that is jointly owned by descendants of deceased persons whose estate was nevery handled in probate; thesed decendants (heirs) have the right to use the property, but they do not have clear or marketable title to the property because the estate issues have not been resolved. Homeowners must have sufficient ownership rights in the property to authorize DEO to commence recovery activities on the property. To address the presence of Heirs Property, DEO has developed the Title Assistance Benefit (TAB) to provide additional assistance for homeowners who are experiencing a financial hardship that are participating in the Housing Repair and Replacement Proram, where the homeowner would otherwise be eligible for rehabilitation or reconstruction assistance but is unable to move forward due to pending Heirs Proporty title issues. The TAB provides assistance under the HRRP to resolve Heirs Property title issues, provided the household is at or below 120 percent AMI and is a beneficiary also receiving assistance for the rehabilitation, reconstruction or replacement of their Hurricane Michael damaged property.

The TAB is a housing assistance benefit not directly resulting in the rehabilitation, replacement or reconstruction of a home. Therefore, TAB does not count against the program cap for rehabilitation, replacement or reconstruction of the home. The program construction cap identified in this Action Plan applies to hard and soft construction costs associated with the Hurricane Michael repairs. TAB will be capped at a maximum of $25,000.00 in program sponsored payments.

TAB can fund legal services to assist HRRP participants with resolving title issues related to Heirs Property. Reevaluation of assistance to exceed the $25,000.00 cap is available on a case-by-case basis by the DEO Policy Exceptions Review Panel following extenuating circumstances. This may be available for eligible HRRP homeowners who:

1. Have household incomes at or below 120 percent AMI, and
2. Would be eligible for HRRP services if not for the Heirs Property title issues.

Title Assistance Benefit (TAB) Eligibility

In addition to the criteria listed above, the following eligibility criteria also applies:

1. The homeowner must be an active applicant in the HRRP. "Active" participants are defined as HRRP homeowners who are post-application, meaning the homeowner has provided all the information requested by the application but has an unresolved title interest to the property due to the property being shared Heirs Property.
2. The homeowner cannot receive concurrent legal assistance from other governmental or charitable organization that would cause a Duplication of Benefits (DOB).
3. If the homeowner received any legal assistance from another source, such as a non-profit organization or legal aid, the funding must have been exhausted prior to provision of CDBG-DR TAB funds.
4. Funds must be used for title resolution services related to Heirs Property.

The TAB is not a DOB to housing rehabilitation, repair or reconstruction funds, as it constitutes a separate and distinct eligible activity.

Voluntary Home Buyout Program

Reducing the risk of flooding in residential areas is a priority for the state of Florida. The Florida Division of Emergency Management (FDEM) has recommended that all counties focus on acquisition of properties without flood insurance in Special Flood Hazard Areas. Recognizing this great need, DEO will create a Voluntary Home Buyout program to encourage risk reduction through the acquisition of residential property in high flood risk areas. It is the responsibility of subrecipients interested in pursuing the buyout projects to support and provide:

- Appraisals;
- Title and legal services;
- Homeowner counseling services;
- Environmental review; and
- Related buyout processes.

Counties that are interested in participating will have two potential funding options for pursuing home buyout. The first option is to leverage CDBG-DR funding as match for projects that are also eligible for the Hazard Mitigation Assistance (HMA) grant programs. The second option is to work directly with DEO on projects located in LMI areas to buyout residential areas in support of permanent open space supporting green infrastructure or other floodplain management systems.

DEO will prioritize home buyout projects that focus on the acquisition of concentrations of residential areas that meet LMI area requirements. The CDBG-DR driven buyout program will be required to meet a low-moderate area (LMA) benefit for funding.

Cities and counties that are interested in this program will work with DEO to determine feasibility of the project. Once a project is determined feasible, it will be eligible for funding in this program. Local governments are encouraged to leverage matching funds under this program and will also be eligible to include homeowner incentives to encourage relocation.

Additional criteria for both homeowner buyout program options, including a process map for coordination with FDEM will be detailed in the Voluntary Home Buyout Program guidance to be released after the approval of this action plan. DEO will manage subrecipient agreements directly with eligible local governments and coordinate with our partners at FDEM on project application evaluation, required environmental and cultural resource reviews and program implementation, where applicable.

For all properties acquired by subrecipients through the Voluntary Home Buyout Program, a restrictive covenant, in perpetuity (i.e. running with the land), prohibiting all future redevelopment of the site must be recorded upon closing of the transaction. New development would be on an alternative site that is less at risk of flooding and would be built to building code, elevation standards and meet requirements of CDBG-DR. Properties that have received rehab or repairs through the HRRP will not be eligible for assistance under the Voluntary Home Buyout Program. However, on a case-by-case basis, housing units that have been demolished through the Voluntary Home Buyout Program may be eligible for new construction/replacement, in an area other than the buyout zone, through the Housing Repair and Replacement Program at DEO's discretion. No specific site or property needs to be acquired, although DEO may limit its search for alternative sites to a general geographic area. Where DEO wishes to purchase more than one site within a general geographic area on this basis, all owners are to be treated similarly. The property to be acquired is not part of an intended, planned or designated project area where all or substantially all of the property within the area is to be acquired within specific time limits. DEO will not acquire the property if negotiations fail to result in an amicable agreement, and the owner is so informed in writing. DEO will inform the owner in writing of what it believes to be the market value of the property. Florida Licensed Real Estate Appraisers will be used to value property in the Voluntary Home Buyout program. DEO will offer the homeowner the value of the home as appraised prior to the storm. Additionally, DEO will establish policies on resettlement incentives. DEO's policies will ensure that its resettlement incentives comply with applicable Civil Rights and Affirmatively Furthering Fair Housing (AFFH) requirements and that there is no discrimination against a protected class.

Competitive application Cycle Applicants will propose property acquisition projects to DEO for funding in accordance with DEO thresholds and objectives.

The following table contains the criteria and relative importance for the selection of applications.

Criteria	**Relative Importance**
Benefit to LMI households	High
Acquisition of properties in Special Flood Hazard Areas without flood insurance	High
Vulnerability of LMI population served	High
Concentration of LMI residential properties acquired	Medium
Leverage of additional resources	Medium
Benefit to target area	Medium
Cost reasonableness and effectiveness	Medium
Staffing experience and capacity	Low

Allocation for Activity: $27,362,572

Eligible Applicants: Counties and municipalities within those counties that received a declaration of both FEMA IA and PA after Hurricane Michael.

Eligibility Criteria: Buyout areas that result in a feasible project that will meet a LMA benefit.

Maximum Award: $5,000,000

Responsible Entity for Administering: Units of General Local Government (UGLG)

Eligibility: 105(a)(1), 83 FR 5844-35 Housing incentives in disaster-affected communities

National Objective: Benefit to low- and moderate-income persons

Proposed buyout areas will undergo a review of eligibility to ensure that the end use of the properties results in a project service area where at least 51 percent of the residents are LMI.

Creative compatible reuse of the property

DEO will create guidance and best practices for communities to consider on how property that is acquired through this program can be utilized for public benefit that meet HUD requirements for permanent green space. This may include creative storm water design, park space and other examples. Communities that participate in this program will be encouraged to have a plan for how this property will be used in the future to further reduce flood risk and/or serve as a recreational space for the public.

Affordability Periods

Rental property owners, including Public Housing Authorities (PHAs) seeking assistance through the HRRP to repair or reconstruct rental housing units will be required to ensure the rental property is affordable for LMI tenants for a minimum period of time. The minimum required affordability time periods are:

Type of Project	Number of Units	Minimum Required Afforability
Multi-family	less than 8	5 years
	8 or more	15 years
Single Family	1 - 4	5 years, unless local governments have established a longer affordability period.

Affordable Rent

The Landlord will control and provide affordable rent in accordance with HUD guidelines, including but not limited to:

The affordability requirement requires the property owner to lease the units to LMI households earning 80 percent or less of the Average Median Income (AMI) and to lease the units at an affordable rent. Rent must comply with the maximum HUD HOME rent limits. The maximum HUD HOME rent limits are 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
- A rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65 percent of the AMI, as determined by HUD, with adjustments for number of bedrooms in the unit. The HUD HOME rent limits will include average occupancy per unit and adjusted income assumptions.

Recapture

As a condition of receiving housing assistance provided through the CDBG-DR program, applicants must execute an interest-free promissory note, which will place a mortgage/lien on the property for the full amount of the assistance provided. If the applicant complies with the program requirements regarding residency in the home (homeowner occupied) or rental property affordability requirements (rental property owner), the promissory note will be deemed paid in full at the end of the lien period. If the applicant fails to comply with the program affordability requirements, the program will exercise its rights to enforce the terms of the mortgage/lien on the property to recapture the full amount of the assistance provided. The program's policies will set forth the process the program will utilize to enforce the mortgage/lien.

Economic Revitalization Activities

Florida's housing programs will address the significant unmet need for housing recovery across the impacted areas. However, recovery for individuals and communities must include consideration of the businesses and jobs that provide services and employment. As recognized in the unmet needs assessment, businesses and local economies were significantly impacted by Hurricane Michael. Individuals whose jobs or businesses were impacted by the storm may have difficulty obtaining or retaining housing due to lost income. Further, it is anticipated that recovery and redevelopment needs will likely stress the current construction workforce, leading to the need for programs to support the growth of the skilled labor workforce required to sustain housing recovery activities. To ensure the complete recovery of communities, it is essential that the state of Florida supports businesses and the workforce through activities designed to address unmet economic recovery needs.

Florida will prioritize economic revitalization and public assistance activities that support job retention and creation, bolster LMI communities and activities that provide training and support services helping Floridians gain employment and remain employed. The two economic recovery programs described below are designed with the goal of long-term recovery for businesses, the workforce and the entire community.

To address these essential recovery needs, DEO will implement the following economic revitalization and public assistance programs:

- Workforce Recovery Training Program; and
- Hometown Revitalization Program

Workforce Recovery Training Program

Hurricane Michael had a significant impact on the housing supply, creating an increased demand for new construction and home repair activities, with additional impact on commercial construction and repair activities. By addressing the unmet needs in the construction trades, Florida can provide a new labor force to support the increased demands for post-disaster construction, as well as support Floridians looking for new employment in the post-disaster economy.

To ensure there are resources to support the remaining recovery needs, DEO will implement a workforce recovery training program that may include, but may not be limited to, the areas of:

- Roofing;
- Masonry;
- Carpentry;
- Concrete finishing;
- Plumbing;
- HVAC (heating, ventilation and air conditioning);
- Electricity;
- Heavy equipment operations;
- Flooring installation/Carpet laying;
- Glass / window installation;
- Plastering;
- Welding; and
- Customized training tailored to the specific economic revitalization needs of a particular region.

DEO will select entities to deliver workforce training services through a competitive application cycle. DEO will seek proposals from eligible Local Workforce Development Boards, educational institutions, and technical centers, who will describe the services they can provide in the impacted communities. **This program is not a direct grant program. No funds will be paid directly to individuals seeking job training.**

The following table contains the criteria and relative importance for the selection of applications.

Criteria	Relative Importance
Type of training provided	High
Demographic need (LMI, historically underserved areas)	Medium
Career services	Medium
Support services provided	Medium
Graduate placement	Medium
Training timeframe	Low

Allocation for Activity: $8,000,000

Eligible Subrecipients: Local Workforce Development Boards, educational institutions and technical centers

Maximum Award: $3,000,000

Minimum Award: $200,000

Responsible Entity for Administering: DEO, subrecipients

Eligibility: 105(a)(8)

National Objective: Benefit to low- and moderate- income persons

Hometown Revitalization Program

Small businesses are the lifeblood of local economies throughout the state. This can include typical small shops and restaurants in communities' commercial districts, often the central hub of small and rural communities. Wind and flood events can damage structures, destroying the physical location and causing significant financial loss. Impacts on specific businesses may filter throughout the commercial area, as a few businesses unable to reopen after the disaster may reduce visitors to the commercial district, which then impacts the viability of the remaining businesses. Supporting the recovery of commercial areas is essential to ensuring that commercial tenants, customers and jobs are restored. By facilitating the return of commercial districts and businesses to profitability, jobs will be created or retained within the community and residents will continue to have access to the products and services they need within their local community. Recognizing this impact, DEO will create a program for eligible subrecipients to revitalize designated commercial districts damaged by Hurricane Michael. Documentation of impacts from Hurricane Michael will be required to be considered eligible for assistance.

Uses of funds may include, but may not be limited to:

- Public facility improvements, including streetscapes, lighting, sidewalks and other physical improvements to commercial areas;
- Acquisition, demolition, site preparation or rehabilitation of commercial structures carried out by a unit of local government;
- Assistance to small businesses for rehabilitation and physical improvements to their places of business; and
- Façade improvements to private or public structures in commercial areas.

The following table contains the criteria and relative importance for the selection of applications.

Criteria	Relative Importance
Demographic need (LMI, Historically underserved areas)	High
Leverage of additional resources	Medium
Project impact	Medium

Management capacity	Medium
Readiness to proceed	Low
Special designation	Low

Allocation for Activity: $60,406,429

Eligible Subrecipients: Units of general local government (UGLG), state agencies, community revitalization agencies, community development districts, community-based development organizations and non-profits primarily engaged in community redevelopment activities that apply in partnership with their local UGLG or state agencies.

Maximum Award: $15,000,000

Minimum Award: $250,000

Responsible Entity for Administering: DEO, subrecipients

Eligibility: HCDA Sections 105(a)(1), (2), (4), (14), (15), and (17)

National Objective: Benefit to low- and moderate-income persons; Aid in the prevention or elimination of slums or blight; Meeting a need having a particular urgency (urgent need)

Infrastructure Activities

The state of Florida has made significant investments in mitigation to ensure that infrastructure is able to withstand the impacts of wind and flood events. DEO will continue to strengthen the state's infrastructure by creating an Infrastructure Repair Program that allows communities to use CDBG-DR to leverage other funding sources. Some communities are not able to fully utilize these other resources following a disaster because reserve cash funds are exhausted by disaster recovery efforts and they cannot meet local match requirements. Allowing local governments to leverage CDBG-DR funding as match will enable communities, especially smaller and rural local governments, to better utilize all resources available to them.

DEO recognizes the importance of resiliency against future storms and will employ adaptable and reliable technologies to guard against premature obsolescence of infrastructure. DEO will describe the implementation of utilizing these technologies, when applicable, in its program policies and procedures manual.

Hurricane Michael affected many communities' infrastructure systems such as damaging roadways, bridges and state beaches. Funding will be dispersed to communities impacted by Hurricane Michael through a competitive application cycle with priority given to projects that can demonstrate urgent need and that benefit LMI in the community. Where possible, DEO will leverage other sources such as FEMA Public Assistance funding to first address remaining urgent and unmet needs in communities.

General Infrastructure Repair Program

Eligible activities within this program may include, but are not limited to the following:

- Restoration of infrastructure damaged by Hurricane Michael (such as water and sewer facilities, streets, removal of debris, drainage, bridges, etc.);
- Demolition and rehabilitation of publicly or privately owned commercial or industrial buildings;
- Renourishment of protective coastal dunes systems and state beaches;
- Repairs to damaged buildings that are essential to the health, safety and welfare of a community when repairs to these buildings constitutes an urgent need (this can include police stations, fire stations, parks and recreational centers, community and senior centers, hospitals, clinics, homeless shelters, schools and educational facilities and other public properties, including properties serving as emergency shelters); and
- Repairs to water lines and systems, sewer lines and systems, drainage and flood mitigation systems.

Competitive Application Cycle Applicants will select projects or programs to propose to DEO for funding in accordance with DEO thresholds and objectives. These thresholds are:

- Projects must demonstrate tie-back to Hurricane Michael; and
- Projects must not duplicate benefits.

DEO will also consider to what extent proposed projects or programs support the following objectives:

- Projects must support LMI housing needs;
- Projects must primarily serve LMI populations; or
- Demonstrate an urgent need in the community.

DEO will first consider LMI as the national objective for infrastructure projects. The urgent need national objective will only be used if the project is not LMI but is needed to alleviate emergency conditions. When using urgent need as a national objective, DEO will obtain justification from the local government or municipality to certify the urgency of the condition.

Applicants may pursue a range of eligible activities as allowed under CDBG-DR regulations for this appropriation, so long as they are in accordance with DEO threshold requirements and the requirements for the applicable activity as outlined in the State Action Plan and Federal Register. Applicants will be required to meet HUD regulations, such as environmental, duplication of benefits, fair housing and others.

The following table contains the criteria and relative importance for the selection of applications.

Criteria	Relative Importance
Demographic need (LMI, Historically underserved areas)	High
Homeless shelters or facilities serving as emergency shelters	Medium
Stormwater infrastructure	Medium
Leverage of additional resources	Medium
Project impact	Medium
Management capacity	Medium
Readiness to proceed	Low
Special designation	Low

Allocation for Activity: $223,032,145

Eligible Subrecipients: UGLG, state agencies, and other applicants including, but not limited to, non-profits and non-governmental agencies that apply in partnership with their local UGLG or state agencies.

Maximum Award: $223,032,145

Minimum Award: $250,000

Responsible Entity for Administering: DEO, subrecipients

Eligibility: 105(a)(2)

National Objective: Benefit to low- and moderate-income persons; Meeting a need having a particular urgency (urgent need)

Critical Access Hospital Project – Calhoun-Liberty Hospital

A Critical Access Hospital (CAH) is a designation given to eligible rural hospitals by the Centers for Medicare and Medicaid Services (CMS). Congress created the Critical Access Hospital (CAH) designation through the Balanced Budget Act of 1997 (Public Law 105-33) in response to a string of rural hospital closures during the 1980s and early 1990s.

The CAH designation is designed to reduce the financial vulnerability of rural hospitals and improve access to healthcare by keeping essential services in rural communities.

Eligible hospitals must meet the following conditions to obtain CAH designation:

- Have 25 or fewer acute care inpatient beds;
- Be located more than 35 miles from another hospital;
- Maintain an annual average length of stay of 96 hours or less for acute care patients; and
- Provide 24/7 emergency care services.

The Calhoun-Liberty Hospital, a designated CAH, sustained significant damage from Hurricane Michael. The hospital lost 15 of its 25 beds after 80 percent of the roof was torn off due to the extreme winds. The extent of the damage resulted in a mandate by local building officials that the building must be brought back to code, which is cost prohibitive. The repair cost exceeds the value of the current building, which requires a new facility to be constructed.

The Calhoun-Liberty Hospital serves a predominantly LMI population. Without the hospital, residents in the community would have to travel 50 - 65 miles to receive emergency care. The facility is extremely important to the healthcare of Calhoun and Liberty Counties as well as portions of Jackson and Gulf Counties. In addition to healthcare access, Calhoun-Liberty Hospital is an economic driver in the area. Over 500 healthcare related jobs alone directly and indirectly depend on the operation of the hospital.

Allocation for Activity: $10,000,000

Responsible Entity for Administering: DEO

Eligible Subrecipient: Calhoun-Liberty Hospital

Eligible Activities: Reconstruction of the Calhoun-Liberty Hospital

Eligibility: 105 (a)(4)

Eligible National Objectives: Meeting a need having a particular urgency (urgent need)

Use of CDBG-DR as HMGP Match

Long-term resilience measures and infrastructure improvements are critical to the ongoing recovery of the state of Florida following Hurricane Michael. To fortify infrastructure with resilience measures, it will be important to leverage CDBG-DR dollars in conjunction with other funding streams. DEO will maximize the benefit achieved through the expenditure of CDBG-DR funds by allocating $109,000,000 of the General Infrastructure Repair Program's budget to match the FEMA's Hazard Mitigation Grant Program (HMGP) to complete resilience projects. These funds will be administered by the Florida Division of Emergency Management (FDEM).

FEMA-4399-DR-FL
12-Month Lock-in as of 11/1/19

County	Regular Projects HMGP Funding	25% Match Required
Bay	$ 206,400,003.89	$ 68,800,001.30
Calhoun	$ 14,197,149.84	$ 4,732,383.28
Franklin	$ 5,942,563.97	$ 1,980,854.66
Gadsden	$ 7,272,701.38	$ 2,424,233.79
Gulf	$ 22,677,793.80	$ 7,559,264.60
Holmes	$ 3,586,200.62	$ 1,195,400.21
Jackson	$ 24,338,926.69	$ 8,112,975.56
Leon	$ 7,257,047.91	$ 2,419,015.97
Liberty	$ 4,918,433.00	$ 1,639,477.67
Taylor	$ 2,863,835.83	$ 954,611.94
Wakulla	$ 4,722,454.77	$ 1,574,151.59
Washington	$ 6,643,146.30	$ 2,214,382.10
	$ 310,820,258.00	$ 103,606,752.67

Based on NEMIS as of 11/4/19

Figure 3: FEMA 12-Month Lock-In

Any match funding activities must meet CDBG-DR and FEMA eligibility requirements. DEO will coordinate with FEMA and HUD to ensure all eligibility requirements are met for all project applications submitted for Global Match.

Activities may include but are not limited to: buyouts, structural elevation, localized flood risk reduction, infrastructure retrofit and post-disaster code enforcement. Applicants are required to submit applications to the FDEM for the HMGP. Projects must meet both FEMA and HUD requirements to be eligible for funding.

The following table contains the criteria and relative importance for the selection of applications.

Criteria	Relative Importance
Demographic need (LMI, historically underserved areas)	High
Leverage of additional resources	High
Homeless shelters or facilities serving as emergency shelters	Medium
Stormwater infrastructure	Medium
Project impact	Medium

Allocation for Activity: $109,000,000

Responsible Entity for Administering: FDEM

Eligible Subrecipients: Units of General Local Government located in HUD MID and State MID counties

Eligible Activities: All activities allowed under CDBG-DR including but not limited to flood control and drainage improvements, including the construction or rehabilitation of storm water management systems; infrastructure improvements (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.); natural or green infrastructure; communications infrastructure; buyouts or acquisition with or without relocation assistance, down payment assistance, housing incentives and demolition; activities designed to relocate families outside of floodplains; and Hazard Mitigation Plan updates Executing Jurisdiction(s): UGLG subrecipients

Eligibility: 105 (a)(9)

Eligible National Objectives: Benefit to low- and moderate-income persons; Meeting a need having a particular urgency (urgent need)

5. Technical Assistance

DEO wants to encourage and aid eligible applicants to participate in long-term disaster recovery programs for Hurricane Michael. The state of Florida is prioritizing the availability of technical assistance to applicants located in an area that is identified as a HUD or state MID and classified as a Fiscally Constrained County (which are identified in the map below).

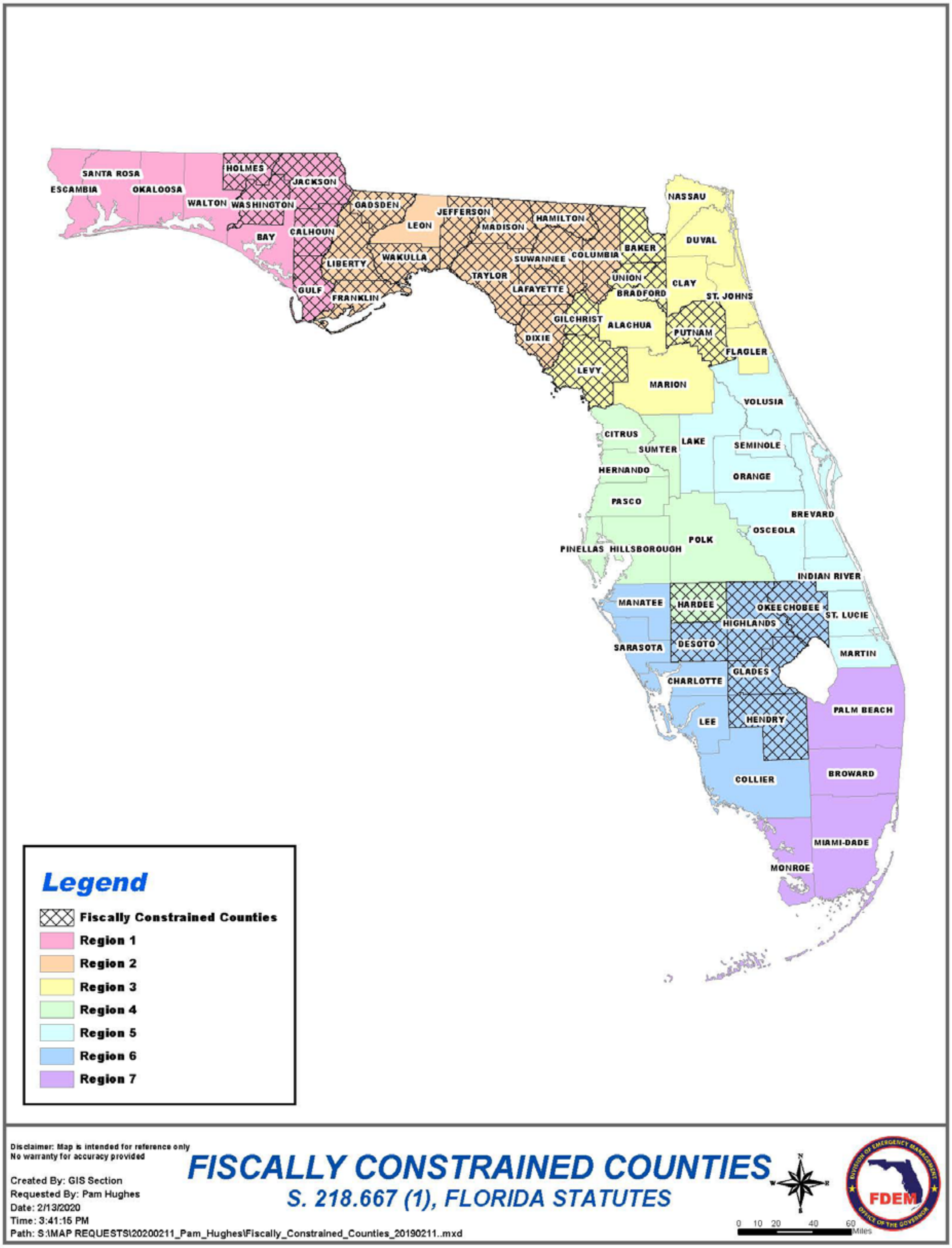

Figure 4: Fiscally Constrained Counties

A contractor will assist eligible applicants for Hurricane Michael in the development of their applications for the General Infrastructure Repair, Voluntary Home Buyout and Commercial Revitalization projects, as well as provide technical assistance to applicants seeking to use CDBG-DR funds as a match for HMGP. The contractor will assist applicants with identifying, determining cost and writing the scope for projects.

6. Ineligible Activities

Ineligible activities, identified in 24 CFR 570.207, include the use of CDBG-DR for forced mortgage payoff, construction of a dam/levee beyond original footprint, incentive payments to households that move to disaster-impacted floodplains, assistance to privately owned utilities, not prioritizing assistance to businesses that meet the definition of a small business, and assistance for second homes and activities.

7. Income Limits

DEO will use the following income limits to determine income eligibility for program funding:

2020 Area Median Income Limits by Family Size and County[3]

IA & PA Declaried County	1 person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Bay County								
30% Limit	$ 14,600	$ 16,650	$ 18,750	$ 20,800	$ 22,500	$ 24,150	$ 25,800	$ 27,500
50% Limit	$ 24,300	$ 27,800	$ 31,250	$ 34,700	$ 37,500	$ 40,300	$ 43,050	$ 45,850
80% Limit	$ 38,850	$ 44,400	$ 49,950	$ 55,500	$ 59,950	$ 64,400	$ 68,850	$ 73,300
Calhoun County								
30% Limit	$ 11,100	$ 12,700	$ 14,300	$ 15,850	$ 17,150	$ 18,400	$ 19,700	$ 20,950
50% Limit	$ 18,500	$ 21,150	$ 23,800	$ 26,400	$ 28,550	$ 30,650	$ 32,750	$ 34,850
80% Limit	$ 29,600	$ 33,800	$ 38,050	$ 42,250	$ 45,650	$ 49,050	$ 52,400	$ 55,800
Franklin County								
30% Limit	$ 11,650	$ 13,300	$ 14,950	$ 16,600	$ 17,950	$ 19,300	$ 20,600	$ 21,950
50% Limit	$ 19,400	$ 22,200	$ 24,950	$ 27,700	$ 29,950	$ 32,150	$ 34,350	$ 36,600
80% Limit	$ 31,050	$ 35,450	$ 39,900	$ 44,300	$ 47,850	$ 51,400	$ 54,950	$ 58,500
Gadsden County								
30% Limit	$ 15,300	$ 17,450	$ 19,650	$ 21,800	$ 23,550	$ 25,300	$ 27,050	$ 28,800
50% Limit	$ 25,450	$ 29,100	$ 32,750	$ 36,350	$ 39,300	$ 42,200	$ 45,100	$ 48,000
80% Limit	$ 40,750	$ 46,550	$ 52,350	$ 58,150	$ 62,850	$ 67,500	$ 72,150	$ 76,800
Gulf County								
30% Limit	$ 12,350	$ 14,100	$ 15,850	$ 17,600	$ 19,050	$ 20,450	$ 21,850	$ 23,250
50% Limit	$ 20,550	$ 23,500	$ 26,450	$ 29,350	$ 31,700	$ 34,050	$ 36,400	$ 38,750

[3] HUD HOME Rent and Income Limits Fiscal Year 2020; https://www.hudexchange.info/resources/documents/HOME_AllLimits_2020.xlsx

80% Limit	$ 32,900	$ 37,600	$ 42,300	$ 46,950	$ 50,750	$ 54,500	$ 58,250	$ 62,000
Holmes County								
30% Limit	$ 11,100	$ 12,700	$ 14,300	$ 15,850	$ 17,150	$ 18,400	$ 19,700	$ 20,950
50% Limit	$ 18,500	$ 21,150	$ 23,800	$ 26,400	$ 28,550	$ 30,650	$ 32,750	$ 34,850
80% Limit	$ 29,600	$ 33,800	$ 38,050	$ 42,250	$ 45,650	$ 49,050	$ 52,400	$ 55,800
Jackson County								
30% Limit	$ 11,100	$ 12,700	$ 14,300	$ 15,850	$ 17,150	$ 18,400	$ 19,700	$ 20,950
50% Limit	$ 18,500	$ 21,150	$ 23,800	$ 26,400	$ 28,550	$ 30,650	$ 32,750	$ 34,850
80% Limit	$ 29,600	$ 33,800	$ 38,050	$ 42,250	$ 45,650	$ 49,050	$ 52,400	$ 55,800
Leon County								
30% Limit	$ 15,300	$ 17,450	$ 19,650	$ 21,800	$ 23,550	$ 25,300	$ 27,050	$ 28,800
50% Limit	$ 25,450	$ 29,100	$ 32,750	$ 36,350	$ 39,300	$ 42,200	$ 45,100	$ 48,000
80% Limit	$ 40,750	$ 46,550	$ 52,350	$ 58,150	$ 62,850	$ 67,500	$ 72,150	$ 76,800
Liberty County								
30% Limit	$ 11,100	$ 12,700	$ 14,300	$ 15,850	$ 17,150	$ 18,400	$ 19,700	$ 20,950
50% Limit	$ 18,500	$ 21,150	$ 23,800	$ 26,400	$ 28,550	$ 30,650	$ 32,750	$ 34,850
80% Limit	$ 29,600	$ 33,800	$ 38,050	$ 42,250	$ 45,650	$ 49,050	$ 52,400	$ 55,800
Taylor County								
30% Limit	$ 11,100	$ 12,700	$ 14,300	$ 15,850	$ 17,150	$ 18,400	$ 19,700	$ 20,950
50% Limit	$ 18,500	$ 21,150	$ 23,800	$ 26,400	$ 28,550	$ 30,650	$ 32,750	$ 34,850
80% Limit	$ 29,600	$ 33,800	$ 38,050	$ 42,250	$ 45,650	$ 49,050	$ 52,400	$ 55,800
Wakulla County								
30% Limit	$ 14,700	$ 16,800	$ 18,900	$ 20,950	$ 22,650	$ 24,350	$ 26,000	$ 27,700
50% Limit	$ 24,450	$ 27,950	$ 31,450	$ 34,900	$ 37,700	$ 40,500	$ 43,300	$ 46,100
80% Limit	$ 39,100	$ 44,700	$ 50,300	$ 55,850	$ 60,350	$ 64,800	$ 69,300	$ 73,750
Washington County								
30% Limit	$ 11,100	$ 12,700	$ 14,300	$ 15,850	$ 17,150	$ 18,400	$ 19,700	$ 20,950
50% Limit	$ 18,500	$ 21,150	$ 23,800	$ 26,400	$ 28,550	$ 30,650	$ 32,750	$ 34,850
80% Limit	$ 29,600	$ 33,800	$ 38,050	$ 42,250	$ 45,650	$ 49,050	$ 52,400	$ 55,800
IA & PA Declaried County	**1 person**	**2 Person**	**3 Person**	**4 Person**	**5 Person**	**6 Person**	**7 Person**	**8 Person**

IV. Location, Mitigation Measures and Urgent Need

1. Presidentially-Declared County

All activities must be in a presidentially-declared county that is eligible for assistance under FEMA declaration 4399 for Hurricane Michael, as outlined in this action plan.

2. Mitigation Measures

DEO will encourage subrecipients to incorporate preparedness and mitigation measures for rebuilding activities. This helps to ensure that communities build back safer and stronger than before the disaster. Incorporation of these measures also reduces costs in recovering from future disasters. Mitigation measures that are not incorporated into those rebuilding activities must be a necessary expense related to disaster relief, long-term recovery and restoration of infrastructure.

3. Use of Urgent Need

The Unmet Needs Assessment documents the unmet need in housing, infrastructure and economic development throughout the impacted areas. The state will seek to meet the requirement that 70 percent of funds are utilized for LMI families. Program activities are presumed to meet the use of Urgent Need as a national objective if they occur in the sectors and regions, particularly for housing and infrastructure activities, that were impacted as documented in the Unmet Needs Assessment. However, the state will first seek to determine if the activity meets the LMI national objective before utilizing the Urgent Need national objective.

Pursuant to the Federal Register, Volume 85, No. 17, January 27, 2020, the CDBG certification requirements for documentation of urgent need, located at 24 CFR 570.208(c), are waived. Formal certification statements to qualify an activity as meeting the urgent need national objective is no longer needed. Instead DEO and subrecipients will document how each program and/or activity funded under the urgent need national objective responds to a disaster-related impact.

V. Citizen Participation

The Citizen Participation Plan for the Hurricane Michael allocation will provide a reasonable opportunity of at least 30 days for citizen comment and ongoing citizen access to information about the use of grant funds. Before DEO adopts this action plan or any substantial amendment to this plan, DEO will publish the proposed plan or amendment on www.floridajobs.org/cdbg-dr, DEO's main website. DEO and/or subrecipients will notify affected citizens through electronic mailings, press releases, statements by public officials, media advertisements, public service announcements, newsletters, contacts with neighborhood organizations and/or through social media. DEO will ensure that all citizens have equal access to information about the programs, including persons with disabilities (vision and hearing impaired) and limited English proficiency (LEP). A Spanish version of the State Action Plan will be available. DEO's website includes an Interpretive Translation Notice informing citizens in 15 different languages that translation services are available upon request. DEO consulted the "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI, Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons," published on January 22, 2007, in the Federal Register (72 FR 2732), in order to comply with citizen participation requirements. Upon subsequent publication of the State Action Plan or substantial amendments, DEO will provide a reasonable opportunity of at least 30 days and have a method for receiving comments.

DEO will take comments via mail or email at:

Attention: Rebuild Florida Constituent Management Services
Florida Department of Economic Opportunity
Office of Disaster Recovery
107 East Madison Street
The Caldwell Building, MSC 160
Tallahassee, Florida 32399-2100
cdbg-dr@deo.myflorida.com

Publication

Before its adoption, the proposed State Action Plan was published on the DEO website, www.floridajobs.org/CDBG-DR, for a 30-day citizen comment period. DEO incorporated and addressed citizen comments received during that period into the final Action Plan.

1. Public Website

DEO has a public website providing access to information and programs administered by the state. DEO has a separate and distinct webpage on its website entitled "Disaster Recovery Programs" at www.floridajobs.org/cdbg-dr that includes information on disaster recovery activities assisted with CDBG-DR and CDBG-MIT funds. The creation and maintenance of the public website is one component of HUD's certification that DEO has proficient financial controls and procurement processes as required in the Federal Register.

The Disaster Recovery Programs' webpage will include links to action plans, action plan amendments, citizen participation requirements, and activity/program information for activities described in the action plan, including details of all contracts and ongoing procurement policies. It will also store every HUD Quarterly Performance Report (QPR), with information accounting for how funds are being used and managed.

2. Consultation

Seeking input from stakeholders and communities around the state is a very important part of the planning process. DEO used a variety of methods to understand unmet needs and to get feedback on how to craft programs that will meet the needs of communities as quickly as possible. In addition to gaining feedback, this helped local stakeholders understand what to expect from CDBG-DR funding and allowed them to play a key role in shaping the outcomes of this plan. The outreach methods, along with the feedback obtained, is included below.

Webinar

Over the course of the planning period, DEO conducted a webinar to keep stakeholders informed of the process and solicit feedback. The first webinar was held on February 21, 2020. The purpose of this webinar was to provide an orientation to the disaster recovery planning and implementation process for the Hurricane Michael CDBG-DR program.

Hurricane Michael Long-Term Recovery Community Stakeholder Survey

The unmet need assessment summarizes Hurricane Michael impacts and the remaining recovery need for housing, infrastructure and economic development by compiling, analyzing and interpreting more than 20 state and federal government data sources. DEO developed a survey to capture feedback from communities within the HUD and State-identified MID areas to allow for additional input from communities on unmet recovery needs and long-term recovery priorities.

The survey mirrored the feedback from the stakeholder meetings by asking for an anecdotal account of remaining housing, economic revitalization and infrastructure unmet needs. In addition, survey respondents were asked to rank the various program ideas that came out of stakeholder workshops. Respondents to the survey were also given an opportunity to suggest additional program ideas. The survey was launched on May 3, 2019 and closed on March 5, 2020. The survey results from 174 respondents are displayed in Figures 5-8.

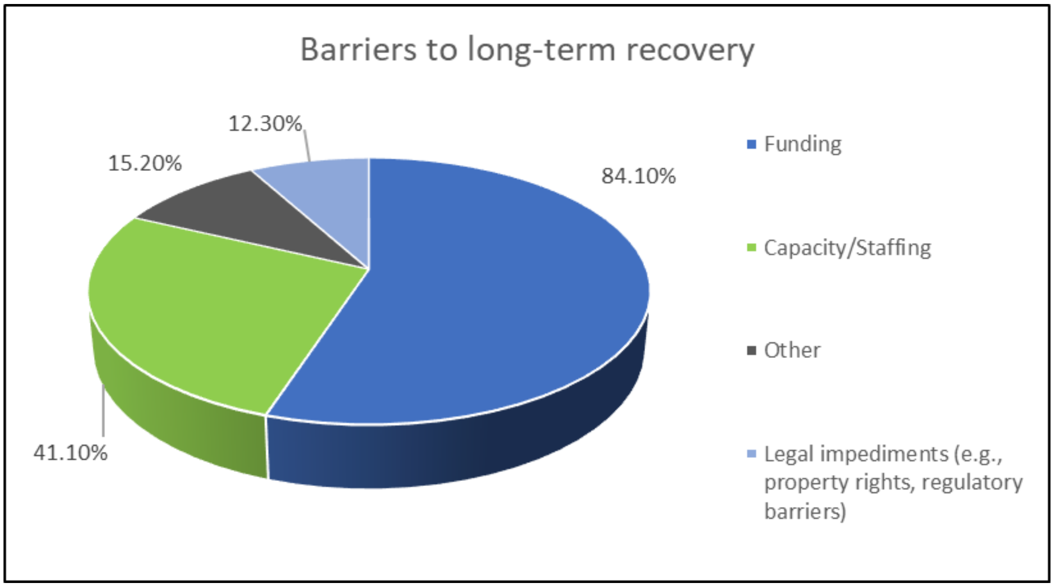

Figure 5: Barriers to long-term recovery

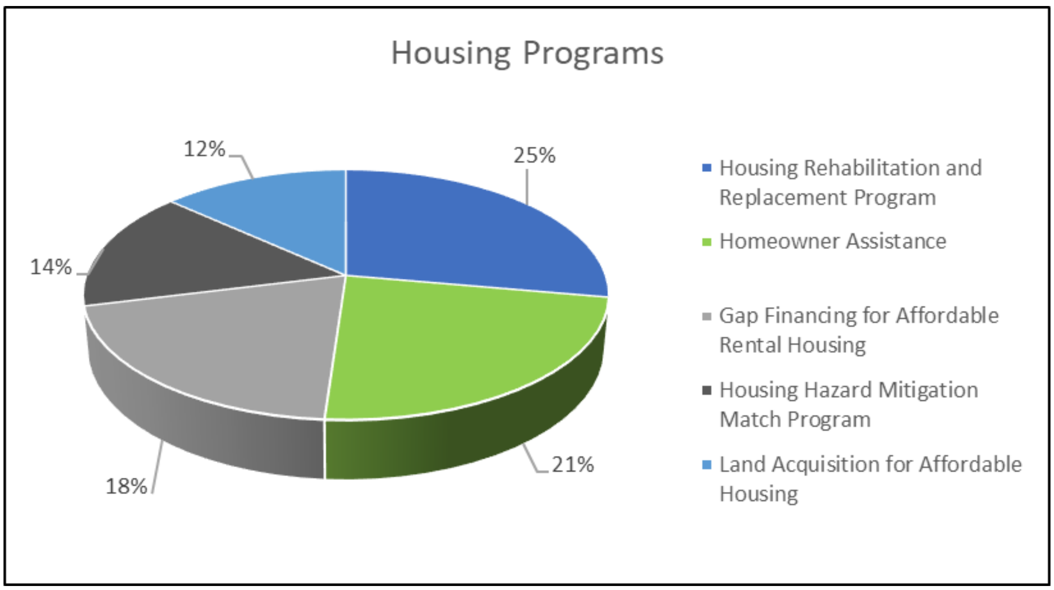

Figure 6: Housing Programs

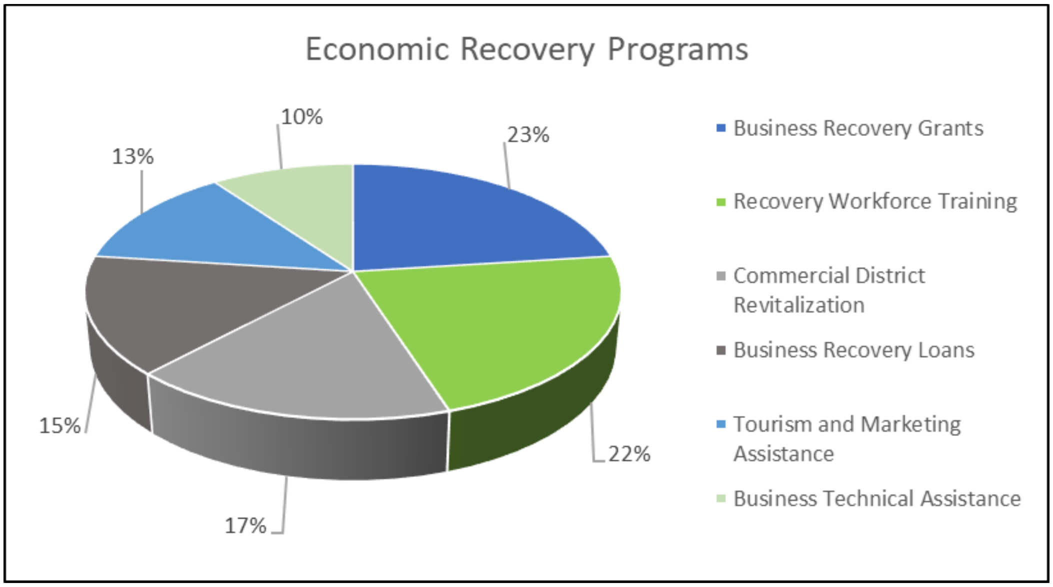

Figure 7: Economic Recovery Programs

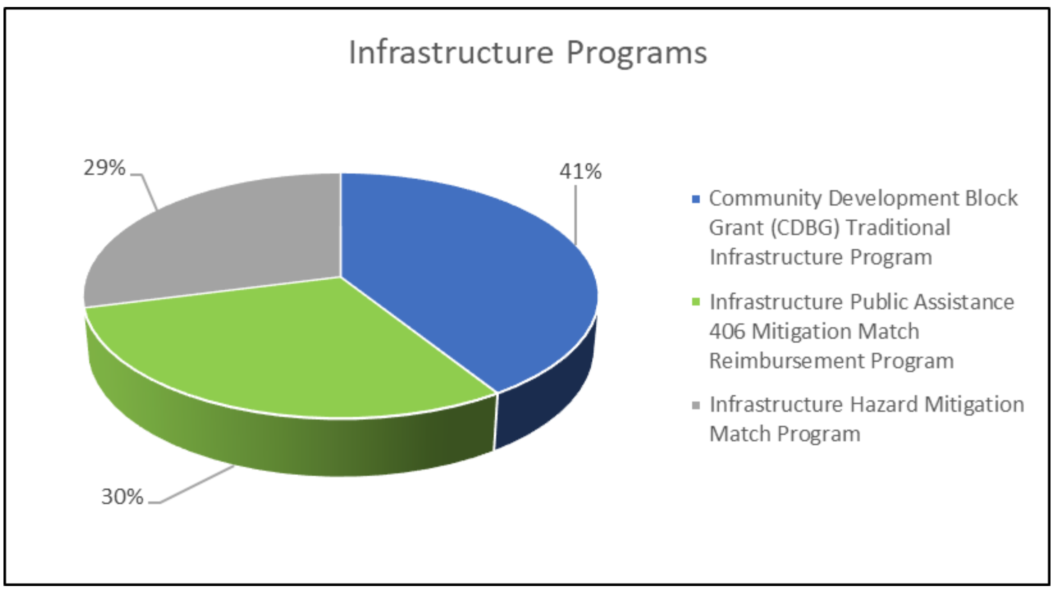

Figure 8: Infrastructure Programs

Community Workshops

DEO, FDEM and HUD traveled around the state and visited HUD-identified MID areas. At these meetings, participants were given a brief overview of the program with an opportunity to ask any questions they may have of staff. Most of the meeting was open dialogue with local government staff asking questions and DEO and HUD staff providing responses. Community members offered suggestions under the categories of housing, economic revitalization and infrastructure. In addition to meetings in the impacted areas, DEO leadership met individually with various local governmental officials and received input through the submission of Long-Term Recovery Plans and any other documentation that was available from the local governments.

The table below contains the dates for each of the public outreach meetings.

Stakeholder Meetings with HUD-Identified Most Impacted and Distressed Areas	
Location	**Date**
Bay County	February 14, 2020 (Panama City) & February 19, 2020 (Mexico Beach)
Calhoun County	February 13, 2020
Gulf County	February 12, 2020
Jackson County	February 19, 2020
Liberty County (32321)	February 20, 2020
Wakulla County (32346)	N/A
Franklin County (32328)	February 13, 2020
Wakulla and Franklin Counties (32346)	N/A
Gadsden County (32351)	February 14, 2020
Washington County (32428)	February 12, 2020

Stakeholder Meetings with State-Identified Most Impacted and Distressed Areas	
Location	**Date**
Holmes County	N/A
Leon County	N/A
Taylor County	N/A

Table 4: Dates for each of the public outreach meetings

Website

DEO posted important information on the CDBG-DR program on its website at www.floridajobs.org/CDBG-DR. This includes links to the federal register, short summaries and overviews and webinar recordings for individuals who could not participate or may want a refresher on the program.

Additional Outreach

In addition to the outreach above, DEO had many discussions with community members over the phone, sent out emails with summaries of the federal register and other information and participated in the following discussions:

- Housing Recovery Support Function Calls
- Community Place-based Recovery Support Team calls
- Community Planning and Capacity Building Recovery Support Function Calls
- Economic Recovery Support Function Calls

DEO will continue to conduct outreach with communities throughout the implementation of this action plan to ensure that all stakeholders are aware of the opportunities that exist and can provide feedback along the way.

During intake and eligibility operations of the HRRP, DEO plans to provide options for mobile application intake to accommodate any resident who has a transportation disadvantage or has special needs.

3. Accessibility

The State Action Plan was made available in English and Spanish, and was posted on the DEO website, which has embedded technology to provide accessibility to the visually impaired. DEO's website includes an Interpretive Translation Notice informing citizens in 15 different languages that translation services are available upon request.

4. Receipt of Comments

DEO provided a 30-day timeframe for receiving public comments to the State Action Plan and obtained comments through an email address published on the disaster recovery website.

5. Substantial Amendment

DEO will engage citizens throughout the disaster recovery program to maximize the opportunity for input on proposed program changes that result in a substantial amendment. Program changes result in a substantial amendment when there is:

1. A change in program benefit or eligibility criteria;
2. The addition or deletion of an activity; or
3. The allocation or reallocation of more than 25 percent of the total current allocation(s) from HUD.

Citizens will be provided 30 days to review and provide comments on proposed substantial changes. A summary of all comments received will be included in the final Substantial Amendment submitted to HUD for approval.

DEO will notify HUD, but is not required to undertake public comment, when it makes any plan amendment that is not substantial. HUD will be notified at least five business days before the amendment becomes effective.

Every amendment to the action plan (substantial and non-substantial) will be numbered and posted on the DEO website.

6. Summary of Public Comments

A summary of public comments submitted on the draft Action Plan, as well as DEO's response to each comment, are included in Appendix 4.

7. Citizen Complaints

DEO will handle citizen complaints received by the state, its subrecipients, vendors and/or other program sources by:

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

The goal of the state is to provide an opportunity to resolve complaints in a timely manner, usually within 15 business days as expected by HUD, if practicable, and to provide the right to participate in the process and appeal a decision when there is reason for an applicant to believe its application was not handled according to program policies. All applications, guidelines and websites will include details on the right to file a complaint or appeal, and the process for filing a complaint or beginning an appeal.

Applicants can appeal program decisions related to one of the following activities:

1. A program eligibility determination;
2. A program assistance award calculation; and
3. A program decision concerning housing unit damage and the resulting program outcome.

Citizens may file a written complaint or appeal through the Disaster Recovery email at CDBG-DR@deo.myflorida.com or submit by postal mail to the following address:

Attention: Rebuild Florida Constituent Management Services
Florida Department of Economic Opportunity
Office of Disaster Recovery
107 East Madison Street
The Caldwell Building, MSC 160
Tallahassee, Florida 32399

If the applicant is not satisfied by the subrecipient determination or DEO's response, the applicant may file a written appeal by following the instructions issued in the letter of response. If after the appeals process the applicant has not been satisfied with the response, a formal complaint may then be addressed directly to the regional Department of Housing and Urban Development (HUD) at:

Department of Housing & Urban Development
Charles E. Bennett Federal Building
400 West Bay Street, Suite 1015
Jacksonville, FL 32202

The Florida Disaster Recovery Program operates in accordance with the Federal Fair Housing Law (The Fair Housing Amendments Act of 1988). Anyone who feels that he or she has been discriminated against may file a complaint of housing discrimination: 1-800-669-9777 (Toll Free) or www.hud.gov/fairhousing.

VI. Certification and Risk Analysis Documentation

The State of Florida DEO submitted the Certification and Risk Analysis Documentation to HUD on May 14, 2020.

1. CDBG-DR Certifications

24 CFR 91.225 and 91.325 are waived. Each grantee receiving a direct allocation under this notice must make the following certifications with its action plan:

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 funding under the CDBG program.

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 and this notice. The grantee certifies that activities to be undertaken with funds under this notice are consistent with its action plan.

d. 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, except where waivers or alternative requirements are provided for in this notice.

e. 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 135.

f. 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 notices providing waivers and alternative requirements for this grant). 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 notices providing waivers and alternative requirements for this grant).

g. State grantee certifies that it has consulted with affected local governments in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including the method of distribution of funding, or activities carried out directly by the State.

h. The grantee certifies that it is complying with each of the following criteria: (1) Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2018 pursuant to the Robert T. Stafford

Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.). (2) With respect to activities expected to be assisted with CDBG–DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families. (3) The aggregate use of CDBG–DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver published in an applicable Federal Register notice) of the grant amount is expended for activities that benefit such persons. (4) The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG–DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) Disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

i. The grantee certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601– 3619), and implementing regulations, and that it will affirmatively further fair housing.

j. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, must certify that they will require local governments that receive grant funds to certify that they have adopted and are enforcing: (1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and (2) A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

k. 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 of this notice. The grantee certifies to the accuracy of its Public Law 115–56 Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced at A.1.a. under section VI and its Implementation Plan and Capacity Assessment and related submissions to HUD referenced at A.1.b. under section VI.

l. 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.

m. 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.

n. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.

o. The grantee certifies that it will comply with applicable laws.

The Florida Department of Economic Opportunity hereby certifies the above, as authorized by the Executive Director.

______________Signed version submitted to HUD___________________

2. SF-424

DEO submits this Action Plan to HUD along with a completed and executed Federal Form SF-424.

VII. CONCLUSION

1. Complete and Compliant

This plan will be reviewed for completeness and compliance by HUD as part of the approval process.

2. Pre-Award, Pre-Agreement and Reimbursement

The provisions of 24 CFR 570.489(b) and 570.200 (h) permits a state to reimburse itself for otherwise allowable costs incurred by itself or its recipients sub grantees or sub recipients on or after the incident of the covered disaster. The provisions at 24 CFR 570.200(h) and 570.489(b) apply to grantees reimbursing costs incurred by itself or its recipients or subrecipients prior to the execution of a grant agreement with HUD. This includes but is not limited to activities supporting program development, action plan development and stakeholder involvement support, and other qualifying eligible costs incurred in response to an eligible disaster covered under Public Law 115-56.

Florida's Department of Economic Opportunity (DEO) incurred pre-award costs and is seeking reimbursement for these costs that are reasonable and allowable under this regulation. DEO intends to recover the pre-award costs consistent with the authority cited in this section. These costs include the cost for salary, employer fringe benefits and direct operating cost for each employee based on their individual percentage of time spent on the planning of the CDBG-DR program during a pay period. Any cost associated with the disaster recovery efforts will be allocated based on the total time spent on CDBG-DR activities versus other duties for a particular month. The total cost of the contractors to assist with disaster recovery research and analysis to help DEO prepare the unmet needs assessment and action plan and other costs associated with meetings, community outreach and any other direct costs associated with the State Action Plan will be reimbursed by this CDBG-DR grant. Additionally, once contracted, DEO may allow the drawdown of pre-agreement costs associated with eligible disaster recovery activities dating back to the date of the disaster(s) for subrecipients and DEO with appropriate documentation.

3. Uniform Relocation Act

DEO plans to minimize displacement of persons or entities and assist persons or entities displaced as a result of implementing a project with CDBG-DR funds. This is not intended to limit the ability of DEO to conduct buyouts or acquisitions for destroyed and extensively damaged units or units in a floodplain. DEO will ensure that the assistance and protections afforded to persons or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), and Section 104(d) of the Housing and Community Development Act (HCD) of 1974 are available. DEO plans to exercise the waivers set forth in Federal Register/Vol. 83, No. 28/Friday, February 9, 2018 pertaining to URA and HCD Acts given its priority to engage in voluntary acquisition and optional relocation activities to avert repeated flood damage and to improve floodplain management.

In addition, HUD requires DEO to define "demonstrable hardship" and how it applies to applicants. DEO will define "demonstrable hardship" as exceptions to program policies for applicants who demonstrate undue hardship. Applicants in this situation will be reviewed on a case by case basis to determine whether assistance is required to alleviate such hardship. Demonstrable hardship may include, but is not limited to, excessive amounts of debt due to a natural disaster, disability, etc.

4. Disaster Recovery Program Implementation

A copy of the Florida Disaster Recovery Program Implementation Timeline will be posted to DEO's website at the following location: www.floridajobs.org/CDBG-DR once the State Action Plan has been approved.

5. Citizen Participation and Applications for Assistance

Local governments are responsible for notifying citizens of planned or proposed disaster recovery activities and for obtaining citizen input in accordance with their Citizen Participation Plan. All beneficiaries applying for direct assistance must qualify as LMI as defined by HUD. Citizens can access the data via the HUD User Internet website at the following location: https://www.huduser.gov/portal/datasets/il.html.

APPENDICES AND SUPPORTING DOCUMENTATION

Appendix 1: Impact and Unmet Needs Assessment

1.0 Introduction, Background and Purpose

This unmet needs assessment summarizes damage from Hurricane Michael across twelve presidentially declared counties eligible for Individual Assistance (IA) in the Florida Panhandle area (Table 5 and Figure 9). Included in this report are: first, a description of socio-demographic information about each affected county/city, and second an accounting of impacts to housing, economy and infrastructure. This report aims to provide planners and decision makers with information to identify the most impacted and distressed areas.

HUD requires grantees to assess community impacts and unmet needs quantifying the need for additional recovery funding for impacted areas.[4] This assessment follows the process, described in detail in Federal Register/ Vol. 83, No. 157 / Tuesday, August 14, 2018 and further amended to include additional guidance on assessing impacts and unmet needs by 83 FR 5844 - Federal Register/ Vol. 83, No. 28 / Friday, February 9, 2018. This assessment summarizes impacts and remaining needs across three sectors: (1) Housing, (2) the economy and (3) infrastructure. Results from the unmet needs assessments are used to determine “who” and “where” the highest impacts are across the impact area and form the basis from which targeted recovery program development takes place. Assessments meeting these criteria have been prepared previously for the state of Florida including CDBG-DR Impact and Unmet Needs Assessments for: 2016’s Hurricanes Hermine and Matthew[5], and 2017’s Hurricane Irma[6]. These and similar assessments have identified impacts and unmet needs to housing, economy and infrastructure utilizing HUD provided methods and each has been approved by HUD and implemented to support disaster recovery across the state.

A summary of Federal Emergency Management Agency (FEMA) and Small Business Administration (SBA) derived impacts for the entire presidentially declared area and each county are provided in the following pages. Both FEMA and SBA data with ancillary impact data are provided in Appendix 1 (Housing) and Appendix 2 (Economy) for each county.

Table 5: Hurricane Michael presidentially declared Individual Assistance (IA) counties

Presidentially Declared Individual Assistance Counties	
Bay	Jackson
Calhoun	Leon
Franklin	Liberty
Gadsden	Taylor
Gulf	Wakulla
Holmes	Washington

[4] https://www.govinfo.gov/content/pkg/FR-2018-08-14/pdf/2018-17365.pdf

[5] http://www.floridajobs.org/docs/default-source/2015-community-development/community-revitalization/dr/hcpafloridaactionplanhudapproved.pdf?sfvrsn=2

[6] http://www.floridajobs.org/docs/default-source/2015-community-development/community-revitalization/dr/stateofflactionplanfordr.pdf?sfvrsn=2

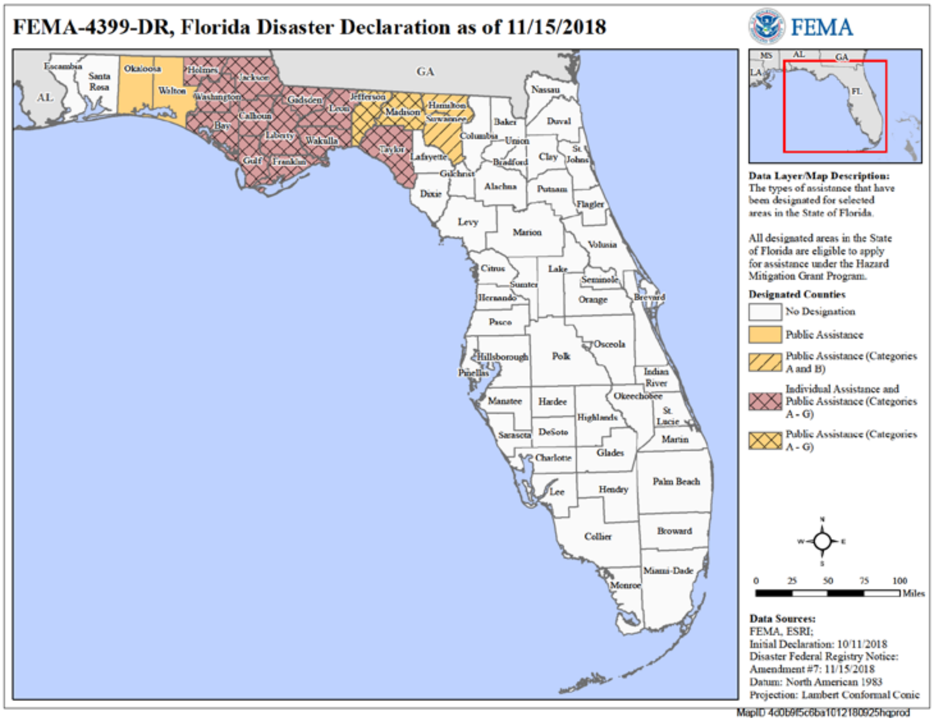

Figure 9: Florida's Hurricane Michael presidentially declared counties

Demographic and impact data for this report was generated using 2017 American Community Survey 5-Year Survey data, FEMA Individual Assistance (January 9, 2019), and SBA Home Loan Program data (March 12, 2019). A variety of data sources is used in determining Hurricane Michael's impacts and unmet needs, including information from several state and federal government data sources (Table 6).

Table 6: Data sources utilized in this assessment

Theme	Data	Source (and URL where available)
Impact Guidance	83 FR 40314	Housing and Urban Development - https://www.govinfo.gov/content/pkg/FR-2018-08-14/pdf/2018-17365.pdf
Demographics	United States Census Data	https://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t
Demographics	HUD Income Limit Data	https://www.huduser.gov/portal/datasets/il.html#2018
Demographics	United States Census Households over 65 Living Alone	https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_S1101&prodType=table
Demographics	United States Census Median Family Income	https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_S1903&prodType=table
Demographics	United States Census Race	https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_B02001&prodType=table
Demographics	United States Census County Quick Facts	https://www.census.gov/quickfacts/fact/table/fl/HSG010217

Demographics	Homelessness	National Homeless Information Project; Florida Coalition for the Homeless - https://www.nhipdata.org/local/upload/file/Florida%20Homeless%20Report%202016%20%2009_30_16%20-%20final%20report.pdf
Economic Impacts	Small Business Administration Home Loan Report	Small Business Administration
Economic Impacts	Small Business Administration Business Loan Report	Small Business Administration
Economic Impacts	Business Locations and Industry Classification	Dunn and Bradstreet - Hoovers Business Data
Economic Impacts	Hurricane Michael Insurance Payouts	https://www.floir.com/Office/HurricaneSeason/HurricaneMichaelClaimsData.aspx
Event Impacts	Shelter Needs	Red Cross, FDEM
Event Impacts	Hurricane Wind Speeds	ARA Windfield data https://disasters.geoplatform.gov/publicdata/NationalDisasters/HurricaneMichael/Data/ARA_WindModel/
Event Impacts	Storm Survey Data	Federal Emergency Management Agency - https://www.fema.gov/hurricane-michael
Event Impacts	Presidential Disaster Declaration Areas	https://www.fema.gov/disaster/4399
Housing Impacts	Low - Mod Income data	https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-block-groups-places/
Housing Impacts	FEMA Applicant Data - Homeowners	https://www.fema.gov/openfema-dataset-housing-assistance-data-owners-v1
Housing Impacts	FEMA Applicant Data - Renters	https://www.fema.gov/openfema-dataset-housing-assistance-data-renters-v1
Housing Impacts	FEMA Disaster Declaration Summaries	https://www.fema.gov/openfema-dataset-disaster-declarations-summaries-v1
Housing Impacts	FEMA FIDA 33919	Federal Emergency Management Agency
Infrastructure Impacts	Hurricane Michael Damages	Florida Division of Emergency Management

1.1 Hurricane Michael's Impact to Coastal Florida

Hurricane Michael made landfall at 2 pm EDT October 10, 2018 near Mexico Beach, FL with top sustained winds of 155 mph and a central pressure of 919 millibars. This makes Michael the strongest land falling mainland U.S. hurricane (by pressure) since Camille of 1969, and the strongest by wind speed since Hurricane Andrew of 1992, which had 165 mph winds. Notably, Hurricane Maria hit Puerto Rico with winds of 155 mph and a central pressure of 920 millibars, making it virtually identical in intensity to

Hurricane Michael.[7] Hurricane-force wind gusts (Figure 10), torrential rains causing flooding in many low lying areas (Figure 11), and a massive storm surge (Figure 12) affected Florida's Panhandle as Michael moved inland after landfall. Hurricane Michael continued intensifying, with sustained winds of 150 mph and a central pressure of 919 millibars after landfall, which inundated many escape routes. Michael was one of the most intense hurricanes on record to make landfall in the U.S.

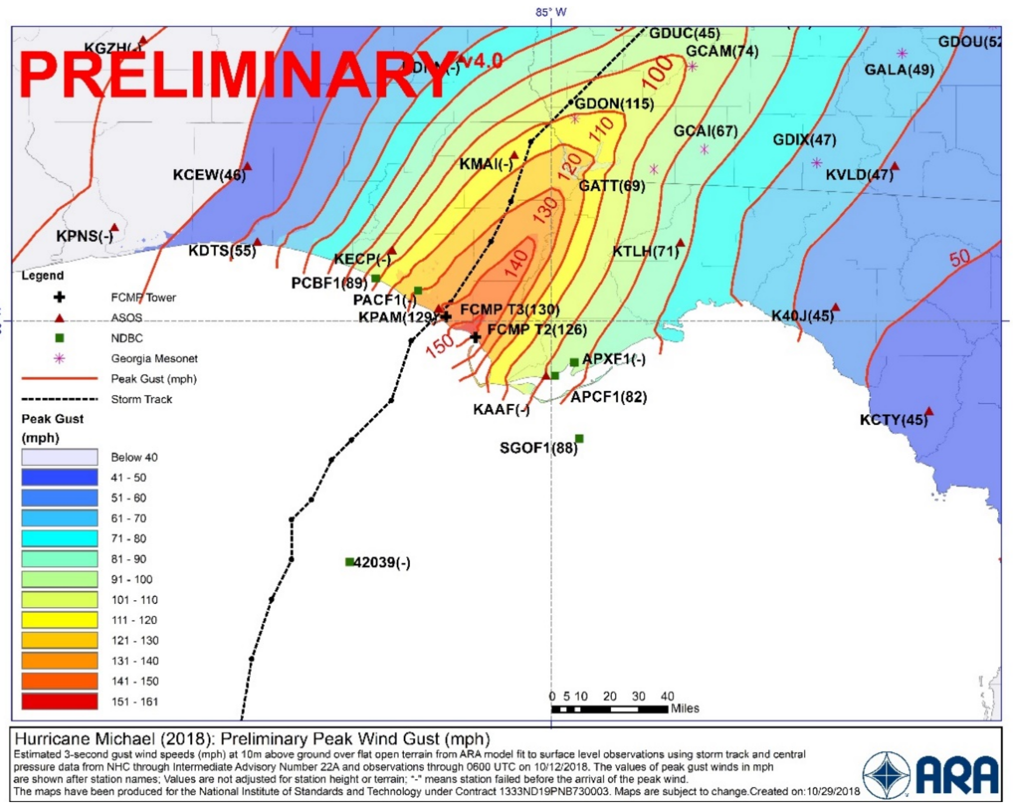

Figure 10: Hurricane Michael wind field[8]

[7] https://www.wunderground.com/cat6/Potentially-Catastrophic-Hurricane-Michael-Nearing-Landfall-Florida-Panhandle

[8] https://disasters.geoplatform.gov/publicdata/NationalDisasters/HurricaneMichael/Data/ARA_WindModel/

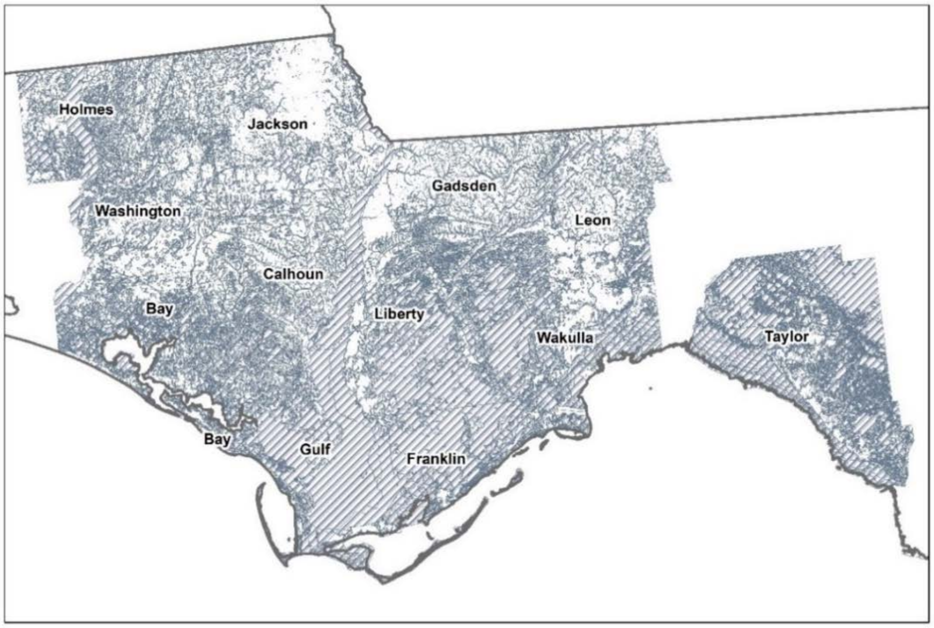

Figure 11: 100-Year flood zones for Michael presidentially declared counties[9]

Figure 12: Hurricane Michael storm surge inundation[10]

[9] https://msc.fema.gov/portal/advanceSearch
[10] https://data.femadata.com/FIMA/NHRAP/Michael/

1.2 Impact on Florida Communities

Recent disaster events have highlighted discrepancies between FEMA IA verified property losses and SBA verified losses. These discrepancies occur mainly because procedural differences in the way the FEMA and SBA record damage. FEMA's process of damage assessment accounts only for damages to essential living spaces and not the entire residence.[11] As a result, FEMA underestimates overall damage when compared to SBA real property damage estimates. Table 7 shows that SBA average loss estimates are 10.75 times higher than FEMA's estimates for the same properties when comparing FEMA IA Applicant data[12] with SBA home loan data[13]. An additional comparison of FEMA High/Severe damages (30 residences)[14] to those from Leon County's preliminary damage assessment (N = 269 residences)[15] indicate that FEMA underestimated Major/Destroyed homes at a rate of nearly 9:1. Accounting for FEMA's general underestimates of total damages requires this assessment to utilize the SBA damage estimates in calculating impacts and unmet needs. Using SBA damage estimates in conjunction with FEMA's enables an accounting for probable under-estimates in FEMA impact values. This assessment multiplied FEMA's estimates by the average difference between FEMA and SBA damage estimates to overcome FEMA's underestimates in true property and contents losses across Florida's presidentially declared counties.[16] SBA's average real property loss is 10.75 times higher overall than FEMA's real-property full verified loss (RP_FVL) and SBA's contents losses are 9.2 times higher than FEMA's personal property full verified loss (PP_FVL).

Table 7: Summary differences between FEMA and SBA real property losses

Program	Applicants	Total Property Loss	Average Loss	Median Loss
FEMA Housing Program	102,989	32,594 applicants had losses of $165,122,271	$5,066	$1,831
Small Business Admin Housing Program	26,446	11,036 applicants had losses of $600,787,688	$54,439	$40,979

1.2.1 County Specific Impacts

The following subsections describe Hurricane Michael's impacts at the county level across the presidentially declared FEMA IA Counties. An applicant occupancy status (*Table 8*) summary shows the number of FEMA IA applicants by tenure (owner/renter/not specified) status for each county.

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11 https://emilms.fema.gov/IS1160/groups/387.html
12 FEMA FIDA 33919, January 12, 2019.
13 SBA Home Applicant Report, March 12, 2019.
14 FEMA FIDA 33919, January 12, 2019.
15 http://tlcgis.maps.arcgis.com/home/item.html?id=ee0e13542b1d4d748e238ca17a33786d
16 https://www.fema.gov/disaster/4399

Table 9 shows vulnerable FEMA IA applicant groups identified by FEMA applicant level data utilized in this assessment.[17] Each of these summaries aid in a building a general understanding of the overall impacts within each county and across the entire disaster area. Significant impacts within each presidentially declared IA County as well as impacts to vulnerable populations within these counties are detailed below.

Table 8: FEMA IA applicant by occupancy status (owner, renter, not specified)

County	Owner-Occupied Housing Applicants	% Owner-Occupied Housing Applicants	Renter-Occupied Housing Applicants	% Renter-Occupied Housing Applicants	Not Specified	% non-Specified Tenure	Applicant Total
Bay	34,043	58.37%	23,915	41.00%	368	0.63%	58,326
Calhoun	3,236	79.06%	832	20.33%	25	0.61%	4,093
Franklin	1,259	72.69%	456	26.33%	17	0.98%	1,732
Gadsden	5,018	71.97%	1,927	27.64%	27	0.39%	6,972
Gulf	4,084	76.00%	1,236	23.00%	54	1.00%	5,374
Holmes	965	76.04%	298	23.48%	6	0.47%	1,269
Jackson	8,505	74.41%	2,840	24.85%	85	0.74%	11,430
Leon	2,879	40.81%	4,160	58.97%	15	0.21%	7,054
Liberty	1,149	82.13%	239	17.08%	11	0.79%	1,399
Taylor	121	64.71%	62	33.16%	4	2.14%	187
Wakulla	998	73.93%	336	24.89%	16	1.19%	1,350
Washington	2,481	77.48%	705	22.02%	16	0.50%	3,202
Total	64,738	63.23%	37,006	36.14%	644	0.63%	102,388

[17] FEMA FIDA 33919, January 12, 2019.

Table 9: Applicant vulnerability characteristics

County	Applicants with Access and Functional Needs	% Applicants with Access and Functional Needs	Applicants over Age 65	% Applicants Over Age 65	Applicants Residing in 100-Year Flood Zone
Bay	1,888	60.73%	11,838	53.49%	8,165
Calhoun	132	4.25%	1,092	4.93%	448
Franklin	32	1.03%	506	2.29%	915
Gadsden	212	6.82%	1,648	7.45%	154
Gulf	145	4.66%	1,679	7.59%	1940
Holmes	30	0.96%	276	1.25%	172
Jackson	383	12.32%	3,018	13.64%	465
Leon	138	4.44%	636	2.87%	359
Liberty	46	1.48%	333	1.50%	81
Taylor	4	0.13%	39	0.18%	92
Wakulla	21	0.68%	330	1.49%	624
Washington	78	2.51%	738	3.33%	332
Total	3,109	100.00%	22,133	100.00%	13,747

Table 10: County Demographic Summary

County	Number of Households	Median Household Income	% Households Over 65 Living Alone	% Black Households	% Asian & Pacific Islander Households	% Native American Households	% White (Non-Hispanic) Households	% Hispanic Households	% Owner-Occupied Households	% Renter-Occupied Households
Bay	102,811	$50,283	11%	12%	3%	1%	77%	7%	62%	38%
Calhoun	6,021	$36,237	15%	13%	1%	1%	77%	6%	84%	17%
Franklin	8,698	$41,267	13%	13%	1%	1%	79%	5%	74%	27%
Gadsden	19,704	$39,830	11%	56%	1%	1%	33%	10%	70%	30%
Gulf	9,577	$44,647	13%	17%	1%	1%	76%	5%	75%	25%
Holmes	8,693	$37,474	15%	7%	1%	1%	87%	3%	78%	22%
Jackson	21,082	$36,944	13%	27%	1%	1%	65%	5%	70%	30%
Leon	129,665	$49,941	9%	32%	4%	0%	57%	6%	53%	47%
Liberty	3,412	$36,741	11%	19%	0%	1%	72%	7%	75%	25%
Taylor	3,913	$39,911	13%	20%	1%	1%	73%	4%	79%	21%
Wakulla	13,453	$57,866	11%	13%	1%	1%	80%	4%	80%	20%
Washington	10,886	$36,989	13%	15%	1%	2%	78%	4%	79%	21%

Table 11: FEMA and Estimated Impact Summary for Michael Declared Counties

County	Number of Housing Units	Number of Housing Units with FEMA verified damage	% of Total Housing Units with any FEMA Verified Damage	Count of Housing Units with High* FEMA Verified Damage	% of Total Housing Units with High* FEMA Verified Damage	Estimate of Housing Units with High* Damage	% of Total Housing Units with Estimated High Damage
Bay	102,811	17,295	16.82%	5,484	5.33%	25,045	24.36%
Calhoun	6,021	2,100	34.88%	260	4.32%	2,154	35.77%
Franklin	8,698	585	6.73%	71	0.82%	501	5.76%
Gadsden	19,704	2,307	11.71%	76	0.39%	1,666	8.46%
Gulf	9,577	2,149	22.44%	657	6.86%	2,184	22.80%
Holmes	8,693	410	4.72%	13	0.15%	274	3.15%
Jackson	21,082	4,800	22.77%	407	1.93%	4,582	21.73%
Leon	129,665	679	0.52%	30	0.02%	452	0.35%
Liberty	3,412	612	17.94%	26	0.76%	450	13.19%
Taylor	3,913	71	1.81%	5	0.13%	58	1.48%
Wakulla	13,453	415	3.08%	94	0.70%	414	3.08%
Washington	10,886	1,222	11.23%	54	0.50%	925	8.50%

** Owner - Major/Severe, Renter - High Damage*

1.2.1.1 Bay County

Over 58,000 FEMA applicants in Bay County self-identified as disaster victims (Table 8). More than 17,000 of these had some level of damage according to FEMA. According to losses from FEMA IA inspections[18], nearly 5,500 of the nearly 103,000 homes in Bay County (5.33%) received high/severe levels of damage. Although damage from Hurricane Michael was widespread across the county, some of the hardest hit areas include Fountain, Lynn Haven, Mexico Beach, Panama City Beach and Youngstown. FEMA inspected damage data only provides a partial view of impacts in Bay County. Here, more than 10 percent of the population is over 65 years old and living alone and nearly 40 percent of the households are rental units. Both of these social vulnerability characteristics may lead to a slower recovery from a disaster. Among FEMA applicants in Bay County nearly 2,000 reported that they had access and functional needs and 53 percent were over age 65 (*Table 9*). Additionally, more than 8,000 FEMA IA applicants reside within the 100-year flood zone (*Table 9*).

Bay County FEMA IA Applicant Facts

Households: **102,811**

Median Household Income: **$50,283**

FEMA Applicants: **58,326**

High/Severe Damage (%): **25,042 (24.36%)**

Owner (Renter) ((*Unspecified)*) Applicants:

34,043 (23,915) ((368*))*

Access and Functional Needs: 1,**888**

Age over 65: **11,838**

Residing in Flood Zone: **8,165**

[18] Estimated losses utilize a 10.75 times multiplier on FEAM real property and a 9.2 times multiplier on FEMA personal property losses

1.2.1.2 Calhoun County

Calhoun County FEMA IA Applicant Facts

Households: **6,021**

Median Household Income: **$36,237**

FEMA Applicants: **4,093**

High/Severe Damage (%): **2,152 (35.746%)**

Owner (Renter) ((*Unspecified)*) Applicants:

3,236 (832) ((25))

Access and Functional Needs: **132**

Age over 65: **1,092**

Residing in Flood Zone: **448**

The less populated Calhoun County (~6,000 households) had nearly as large of a percentage (4.32%) of homes with inspected damage in the major/severe category as Bay County. A working-class county, Calhoun County is nearly 85 percent owner-occupied and has a median household income of just over $36,000. More than 15 percent of households are maintained by homeowners over the age of 65 living alone, although in some of the impacted census tracts this percentage increases to nearly 20 percent. Although this tract had only one household with major/severe damage, it may in fact have more impacts than are represented by FEMA (who does not inspect rental property for real property damages).[19,20] Nearly 65 percent (2,095) of Calhoun County's 3,236 FEMA IA owner-occupied applicants (Table 8) had some level of inspected damage from Hurricane Michael and an additional 365 of the 832 renter applicants had some level of damage. Nearly 450 of these applicants reside within the 100-year Flood Zone. Calhoun County is home to nearly 5 percent of both FEMA Applicants over age 65 and those with access and functional needs.

1.2.1.3 Franklin County

Franklin County FEMA IA Applicant Facts

Households: **8,698**

Median Household Income: **$41,267**

FEMA Applicants: **1,732**

High/Severe Damage (%): **501 (5.76%)**

Owner (Renter) ((*Unspecified)*) Applicants:

1,259 (456) ((17))

Access and Functional Needs: **32**

Age over 65: **506**

Residing in Flood Zone: **915**

Franklin, a low-lying coastal county, has a majority of its land within the 100-year flood zone. As a result, more than 900 of its 1,732 applicants reside within a flood zone (*Table 9*). Because of Franklin County's position, which was further to the east of the landfall location, Hurricane Michael severely damaged only 5.75 percent of the homes. Nearly 75 percent of Franklin County's households are owner-occupied, although the percentage is higher in places with high/severe damaged homes. Here, 1,259 owner occupied households and 456 renter occupied households applied for FEMA assistance (Table 8). Although fewer than 600 homes across the county were found to have high/severe FEMA damage the balance of homes (more than 1,500), damaged to a lesser extent, may require significant recovery resources to aid in recover.

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[19] https://www.fema.gov/news-release/2019/03/13/fact-sheet-home-inspections-homeowners-and-renters
[20] https://www.govinfo.gov/content/pkg/FR-2018-08-14/pdf/2018-17365.pdf

1.2.1.4 Gadsden County

Gadsden County FEMA IA Applicant Facts

Households: **19,704**

Median Household Income: **$39,830**

FEMA Applicants: **6,972**

High/Severe Damage (%): **1,666 (8.46%)**

Owner (Renter) ((*Unspecified)*) Applicants:

5,018 (1,927) ((27))

Access and Functional Needs: **212**

Age over 65: **1,648**

Residing in Flood Zone: **154**

Gadsden County, like many other panhandle counties has a higher percentage of land area in the 100-year flood zone. Additionally, Gadsden County's lower median household income ($39,000), modest percentage of Householders over 75 living alone (11.3%), higher percentage of Black Households (55.9%) and higher percentage of renter households (29.8%) highlight the vulnerability of this county to environmental threats such as Hurricane Michael. Across the county there are a total of 2,307 homes (over 10% of all homes) with some level of damage from Hurricane Michael (*Table 11*). FEMA's initial assessment identified only 76 households with high/severe damages. This assessment finds an estimated 1,666 homes with high damage when accounting for SBA loss estimates. Among the communities with the most high/severe damage are Chattahoochee and Quincy. More than 200 FEMA applicants residing in Gadsden County reported access and functional needs and nearly 1,700 are over 65 years of age (*Table 9*). Additionally, more than 150 applicants reside within the 100-year flood zone. Furthermore, many census tracts with high/severe damaged homes have higher than (county) average percentage Black households and elders living along, indicating possible higher impacts in vulnerable communities.

1.2.1.5 Gulf County

Gulf County FEMA IA Applicant Facts

Households: **9,577**

Median Household Income: **$44,647**

FEMA Applicants: **5,374**

High/Severe Damage (%): **2,184 (22.8%)**

Owner (Renter) ((*Unspecified)*) Applicants:

4,084 (1,236) ((54))

Access and Functional Needs: **145**

Age over 65: **1,679**

Residing in Flood Zone: **1,940**

Hurricane Michael's impacts were extensive in Gulf County. FEMA assessment indicates that more than 20 percent of homes across the county sustained some level of damage from the hurricane. Initially FEMA assessments identified more than 650 housing units with high/severe levels of damage and further analysis estimates more than 2,000 homes with high/severe damage according to FEMA inspections (*Table 11*).[21] Nearly 50 percent of all FEMA applicant households in Gulf County had some level of FEMA verified damages (> 2,600). Gulf County's high number of FEMA applicants in the flood zone (1,940) (*Table 9*) means that recovery in this area will be challenging as rebuilding must address building code updates and National Flood Insurance Program (NFIP) guidelines.

[21] Estimated losses utilize a 10.75 times multiplier on FEAM real property and a 9.2 times multiplier on FEMA personal property losses

1.2.1.6 Holmes County

Holmes County, like other counties in the region has a higher than average (87%) Caucasian working-class population that are mainly homeowners (78%). A higher than average number of older homeowners living alone and lower incomes are among the key indicators of a slightly lower ability to prepare for and respond to disasters (Table 9). Holmes County was fortunate to miss the brunt of Hurricane Michael's impacts. Although, the town of Bonifay was perhaps the most heavily impacted with nearly 200 homes classified as heavily damaged. While more than 30 percent (410) of those applying for FEMA aid (1,269) had some level of inspected damage, fewer than 300 households across the county were categorized with high/severe damage. Among these applicants are 172 household located in the 100-Year Flood Zone as well as 30 applicants with access and functional needs and more than 275 that are over age 65 (Table 9).

Holmes County FEMA IA Applicant Facts

Households: **8,693**

Median Household Income: **$37,474**

FEMA Applicants: **1,269**

High/Severe Damage (%): **274 (3.15%)**

Owner (Renter) ((*Unspecified))* Applicants:

965 (298) ((6))

Access and Functional Needs: **30**

Age over 65: **276**

Residing in Flood Zone: **172**

1.2.1.7 Jackson County

Jackson County, located along the northern border of Florida was inland enough to escape much of the direct impacts from Hurricane Michael's storm surge. However, the high winds associated with this powerful hurricane caused significant damage to more than 4,500 homes across the county. Jackson County's demographic profile is slightly different than some of its neighbors with a higher percentage of Black households (27%), nearly 30 percent renter-occupied housing, and a higher percentage of older householders living alone (13), and modest median household income ($37,000). Of the 11,000+ applicants to FEMA's IA program, 4,800 had some level of damage. Across the county, more than 450 FEMA applicants live in flood zones, more than 350 have access and functional needs, and more than 3,000 are over age 65 (Table 9).

Jackson County FEMA IA Applicant Facts

Households: **21,082**

Median Household Income: **$36,944**

FEMA Applicants: **11,430**

High/Severe Damage (%): **4,582 (21.73%)**

Owner (Renter) ((*Unspecified))* Applicants:

8,505 (2,840) ((85))

Access and Functional Needs: **383**

Age over 65: **3,018**

Residing in Flood Zone: **465**

1.2.1.8 Leon County

Leon County, home of the state's capital in Tallahassee, located more than 22 miles inland from the coast, was not impacted by Michael's storm surge. Furthermore, its location relative to the path of the storm meant that most of Michael's devastating winds stayed to the west of Tallahassee. Estimating damages from FEMA's inspections reveals more than 450 (3.5%) high/severe damaged homes out of Leon's nearly 130,000 homes. More than 7,000 households applied for FEMA IA support following Hurricane Michael, yet fewer than 1,000 were inspected with damage (Table 13). Among the FEMA IA applicants are more than 600 over the age of 65, nearly 150 have access and functional needs, and another 350+ reside in the 100-Year flood zone (Table 9). Leon County's high renter population poses a unique challenge for emergency managers/planners and disaster recovery program development. Nearly 60 percent of the applicants to FEMA's IA program are renters. This typically under-represented group of disaster victims might have more needs than initially estimated by FEMA inspections.

Leon County FEMA IA Applicant Facts

Households: **129,665**

Median Household Income: **$49,941**

FEMA Applicants: **7,054**

High/Severe Damage (%): **452 (0.35%)**

Owner (Renter) ((*Unspecified)*) Applicants:

2,879 (4,160) ((15))

Access and Functional Needs: **138**

Age over 65: **636**

Residing in Flood Zone: **359**

1.2.1.9 Liberty County

Liberty County, located inland of Franklin County, experienced Hurricane Michael storm surges along its southeastern boundary. The path of Hurricane Michael also swept across the county with damaging winds. Fortunately, Liberty County's modest population and lower number of households (3,412) was largely spared by Hurricane Michael with an estimated 450 of households with high/severe damage (Table 11). Like many of the other counties in this disaster zone, much of the county is located within the 100-year flood zone. Fortunately, of the nearly 1,400 applicants to FEMA's IA program only 81 are located in the flood zone and another 330+ applicants are over 65 years of age (Table 9). Although Liberty County has 75 percent owner-occupied households and 25 percent rental households (Table 10), those who applied for FEMA were largely homeowners (82%) while renters only accounted for 17 percent of applicants. An additional 11 applicants (<1%) did not specify their housing tenure. This difference may indicate low enrollment in FEMA's IA program for renter populations across the disaster zone.

Liberty County FEMA IA Applicant Facts

Households: **3,412**

Median Household Income: **$36,741**

FEMA Applicants: **1,399**

High/Severe Damage (%): **450 (13.19%)**

Owner (Renter) ((*Unspecified)*) Applicants:

1,149 (239) ((11))

Access and Functional Needs: **46**

Age over 65: **333**

Residing in Flood Zone: **81**

1.2.1.10 Taylor County

Taylor County, located nearly 100 miles to the east of Hurricane Michael's landfall in Bay County, saw very low levels of damage. Only 71 applicants out of FEMA's IA program (out of 187) applicants had inspected damage. Although this percentage is large, the number of applicants indicates that limited damages occurred across the county. Of nearly 4,000 households across the county, fewer than 60 homes were estimated to have high/severe damage. One of the more diverse counties in the impact area, Taylor County has 19 percent Black households, 72 percent White, and 7 percent Hispanic (Table 10). Among FEMA IA applicants only 39 are over the age of 65, four have access and functional needs, and 92 are located within the 100-Year flood zone (Table 9).

Taylor County FEMA IA Applicant Facts

Households: **3,913**

Median Household Income: **$39,911**

FEMA Applicants: **187**

High/Severe Damage (%): **58 (1.48%)**

Owner (Renter) ((*Unspecified)*) Applicants:

121 (62) ((4))

Access and Functional Needs: **4**

Age over 65: **39**

Residing in Flood Zone: **92**

1.2.1.11 Wakulla County

Wakulla County, which has the highest median household income ($57,855) of any impacted county, is 80 percent owner occupied, 80 percent White, 13 percent Black, and has 11 percent households over the age of 65 living alone. Wakulla County was impacted by Hurricane Michael's storm surge and winds. Only three percent of Wakulla County's homes (415) had FEMA inspected damages (Table 13). Of these, only 94 were inspected with high/severe damages. When accounting for SBA losses, the estimated number of damaged homes across the county increased to more than 400. Among those who applied for FEMA's IA program (1,350), more than 300 homeowners over the age of 65 and more than 600 homes are located within the 100-Year flood zone (Table 9).

Wakulla County FEMA IA Applicant Facts

Households: **13,453**

Median Household Income: **$57,866**

FEMA Applicants: **1,350**

High/Severe Damage (%): **414 (3.08%)**

Owner (Renter) ((*Unspecified)*) Applicants:

998 (336) ((16))

Access and Functional Needs: **21**

Age over 65: **330**

Residing in Flood Zone: **624**

1.2.1.12 Washington County

Similar to most other counties in the area, Washington County has a high amount of land area in the 100-Year flood zone. Fortunately, Washington County's location inland from the coast protected it from storm surges. However, Hurricane Michael's winds caused damage to more than 1,200 households with an estimated 900+ high/severe damaged households across the county. Like Taylor and Wakulla, Washington County is mostly homogenous with only a slight diversity in the population. Washington has 80 percent White households, 13 percent Black households, and four percent Hispanic households. Washington is nearly 80 percent owner-occupied and has just over 13 percent older residents living alone. Although there are nearly 11,000 households across the county only 3,202 applied for FEMA aid. Of these applicants, a large majority are homeowners, more than 700 are over the age of 65, more than 300 are located in the 100-Year flood zone, and more than 75 have access and functional needs.

Washington County FEMA IA Applicant Facts

Households: **10,886**

Median Household Income: **$36,989**

FEMA Applicants: **3,202**

High/Severe Damage (%): **925 (8.5%)**

Owner (Renter) ((*Unspecified))* Applicants:

2,481 (705) ((16))

Access and Functional Needs: **78**

Age over 65: **738**

Residing in Flood Zone: **332**

1.3 Housing Specific Impacts

1.3.1 Methods for Understanding Housing Specific Impacts

As discussed previously, FEMA's process of conducting damage assessments, which accounts only for damages to essential living spaces and not the entire residence,[22] underestimates overall damage when compared to SBA real property damage estimates. This report utilized SBA data in connection with FEMA Individual Assistance (IA) program data to describe impacts at the county level because FEMA data alone does not fully capture impacts from disasters. For Hurricane Michael, the difference between FEMA's inspected damage estimate Real Property Full Value Loss (RP_FVL) and SBA's inspected verified loss estimate was significant when compared at a summarized level (Table 12). Here, SBA's real property losses were 10.75 times higher than FEMA's on average across the disaster area. Furthermore, when comparing FEMA and SBA disaster victim data on a case-by-case basis where each dataset contained matching FEMA registrant ID (N=17,351 owners with matching records) 28.6 percent of FEMA applicants (4,971) had $0 FEMA inspected real property losses and greater than $0 SBA inspected real estate losses. A similar picture of loss differences appears when assessing the differences between FEMA and SBA loss estimates based on personal property and contents respectively across the disaster-impacted counties. Here, SBA loss estimates are 9.2 times higher than FEMA's (Table 12). Furthermore, 13.6 percent all renter applicants (943 of 6,0944) matching 1:1 between FEMA and SBA have $0 FEMA Personal Property Loss and > $0 SBA content loss (Table 12) These differences between FEMA verified losses and SBA verified losses is important when attempting to account for all impacts from Hurricane Michael. For this assessment, FEMA real property losses were first multiplied by 10.75 and content losses were multiplied by 9.2 to account for discrepancies between FEMA and SBA loss accounting. Individual county differences in losses (Table 12) were also utilized in this assessment to understand the impacts at the individual county level.

Table 12: Verified loss differentials between FEMA IA program and SBA home loan program for Hurricane Michael

County	Owners with FEMA/SBA Registrant ID Match			Renters with FEMA/SBA Registrant ID Match		
	Total Owners	With $0 FEMA Real Property Loss and > $0 SBA Verified Real Estate Loss	% with SBA Losses but not FEMA Losses	Total Renters	With $0 FEMA Personal Property Loss and > $0 SBA Verified Contents Loss	% with SBA Losses but not FEMA Losses
Bay	10,414	3,368	32.3%	5,551	725	13.1%
Calhoun	1,002	209	20.9%	170	25	14.7%
Franklin	287	59	20.6%	66	9	13.6%
Gadsden	846	178	21.0%	121	13	10.7%
Gulf	1,304	296	22.7%	319	49	15.4%
Holmes	141	30	21.3%	17	0	0.0%
Jackson	1,959	474	24.2%	400	74	18.5%
Leon	334	114	34.1%	137	25	18.2%
Liberty	330	84	25.5%	34	5	14.7%
Taylor	14	0	0.0%	3	0	0.0%
Wakulla	167	31	18.6%	37	4	10.8%
Washington	553	128	23.1%	89	14	15.7%
Total	17,351	4,971	28.6%	6,944	943	13.6%

[22] https://emilms.fema.gov/IS1160/groups/387.html

Classifying FEMA's IA Inspected damage[23] into categories based on HUD outlined damage levels provides a consistent view of damages across the disaster area. Table 13 shows the categories utilized by HUD in determining impacts and unmet needs. These categories allow for comparison between FEMA/HUD findings and this assessment's findings. They provide a consistent and likely view of Hurricane Michael impacts across the region.

Table 13: HUD Damage categories by FEMA full verified loss (FVL) designations[24]

HUD Damage Category	Owner		Renter	
	Reported Real Property Full Verified Loss (FVL)	Flood Depth	Reported Personal Property Full Verified Loss (FVL)	Flood Depth
Minor-Low	< $3,000		< $1,000	
Minor-High	$3,000 - $7,999		$1,000 - $1,999	
Major-Low	$8,000 - $14,999	1' - 4'	$2,000 - $3,499	1' - 4'
Major-High	$15,000 - $28,800	4' - 6'	$3,500 - $7,499	4' - 6'
Severe	> $28,800	> 6'	> $7,500	> 6'

Applying these categories to FEMA's IA applicant data helps quantify the inspected damages into HUD's "minor", "major" and "severe" categories (Table 14). Further, this table shows the number of owners vs renters in each of the categories.

Table 14: Estimated housing damage by severity for FEMA IA assistance applicants[25]

Tenure Status	Minor	Major	Severe	Total
Owned	7,339	11,634	14,001	32,974
Rented	709	4,284	8,769	13,762
Total	8,048	15,918	22,770	46,736

1.3.2 Impact on Homeowners

Homeowners across the Hurricane Michael impacted area saw significant impacts from high winds, flooding and storm surges. Based on the data reflected in Table 15, homeowners' primary residences sustained various amounts of damage. Across the impacted area, more than 25,000 homes sustained major or severe damage using FEMA's inspection results and SBA inspected damage differentials. Among those impacted by Hurricane Michael are more than 20,000 households under 80 percent AMI or making less than 80 percent of the AMI (Table 16). Additionally, those residing in FEMA defined flood zones (more than 2,500) and the nearly 4,000 additional Hurricane Michael victims with minor damage are below the 80 percent area median income, will likely require significant resources in order to recovery to pre-event levels of protection.

[23] Estimated losses utilize a 10.75 times multiplier on FEAM real property and a 9.2 times multiplier on FEMA personal property losses

[24] https://www.govinfo.gov/content/pkg/FR-2018-08-14/pdf/2018-17365.pdf

[25] Source: FEMA FIDA 33919_FSA_4399, January 9, 2019

Table 15: Estimated damaged to owner occupied housing units by county

County	Minor-Low	Minor-High	Major-Low	Major-High	Severe	Grand Total
Bay	1,068	1,694	2,051	3,707	8,900	17,420
Calhoun	120	192	242	573	990	2,117
Franklin	101	85	81	118	216	601
Gadsden	536	461	433	529	375	2,334
Gulf	200	243	262	380	1,098	2,183
Holmes	111	82	78	93	57	421
Jackson	506	684	727	1,277	1,670	4,864
Leon	303	141	94	95	58	691
Liberty	110	131	99	150	130	620
Taylor	14	10	11	13	23	71
Wakulla	46	50	63	70	199	428
Washington	229	226	202	296	292	1,245
Grand Total	3,344	3,999	4,343	7,301	14,008	32,995

Table 16: Estimated owner applicants by damage category, LMI and NFIP flood zone

Flood Zone / Income Level	Amount of Damage				
LMI30	Minor	Major	Severe	None	Total
NFIP Zone A	97	122	207	140	566
NFIP Zone V	4	4	13	17	38
NFIP Zone X	872	1,296	1,576	1,366	5,110
LMI50					
NFIP Zone A	136	190	293	234	853
NFIP Zone V	5	8	26	13	52
NFIP Zone X	1,046	1,615	1,878	1,957	6,496
LMI80					
NFIP Zone A	156	288	408	443	1,295
NFIP Zone V	7	12	45	42	106
NFIP Zone X	1,324	2,145	2,416	3,839	9,724
Above80LMI					
NFIP Zone A	385	726	1,168	2,449	4,728
NFIP Zone V	37	62	173	314	586
NFIP Zone X	2,356	4,193	4,683	15,756	26,988
No Income Data					
NFIP Zone A	70	113	222	476	881
NFIP Zone V	5	5	37	102	149
NFIP Zone X	396	667	790	2,416	4,269
Grand Total	6,896	11,446	13,935	29,564	61,841

1.3.3 Impact on Rental Stocks

Nearly one-third of all applicants to FEMA's Individual Assistance program for Hurricane Michael are renters. Of these, more than 12,500 were left with major or severe damage (total of Major and Severe in

Table 17) in Hurricane Michael's wake. Table 17 reflects damage to Florida's rental housing stock by severity level, income level, and flood zone.

Table 17: Estimated renter occupied applicants by damage category, LMI and NFIP flood zone

Flood Zone / Income Level	Amount of Damage				
LMI30	**Minor**	**Major**	**Severe**	**None**	**Total**
NFIP Zone A	8	63	157	288	516
NFIP Zone V	-	2	10	13	25
NFIP Zone X	142	857	1,709	3,208	5,916
LMI50					
NFIP Zone A	14	58	187	368	627
NFIP Zone V	-	2	9	8	19
NFIP Zone X	105	838	1,800	3,336	6,079
LMI80					
NFIP Zone A	14	102	281	564	961
NFIP Zone V	-	-	10	16	26
NFIP Zone X	144	920	1,893	3,980	6,937
Above80LMI					
NFIP Zone A	30	142	303	806	1,281
NFIP Zone V	2	6	15	36	59
NFIP Zone X	168	832	1,643	4,352	6,995
No Income Data					
NFIP Zone A	6	52	90	329	477
NFIP Zone V	-	2	16	19	37
NFIP Zone X	46	292	557	1,981	2,876
Grand Total	679	4,168	8,680	19,304	32,831

According to the US Census, two impacted counties in specific, Bay County (37.55%) and Leon County (47.37%), have more than the State average percentage of rental units (36.4%)[26]. Damage to these vital housing stocks leaves the state with a shortage of rental properties across the impact area. According to FEMA data, more than 20,000 Hurricane Michael victims received rental assistance following the storm, with 70% of those receiving assistance residing in Bay County (Table 18). These high numbers of rental assistance recipients indicate a growing rental crisis across the impact area.

[26] https://www.census.gov/quickfacts/fact/table/fl,US/HSD410217

Table 18: Estimated number of FEMA IA applicants receiving rental assistance

County	Number Receiving Rental Assistance	Total Applicants	% of Applicants Receiving Rental Assistance
Bay	14,408	58,326	24.70%
Calhoun	984	4,093	24.04%
Franklin	209	1,732	12.07%
Gadsden	600	6,972	8.61%
Gulf	1,156	5,374	21.51%
Holmes	75	1,269	5.91%
Jackson	2,255	11,430	19.73%
Leon	163	7,054	2.31%
Liberty	159	1,399	11.37%
Taylor	22	187	11.76%
Wakulla	172	1,350	12.74%
Washington	310	3,202	9.68%
Grand Total	**20,513**	**102,388**	**20.03%**

Hurricane Michael impacted subsidized housing across the impact area. Nearly 2,000 housing units supported by Florida's State Housing Initiatives Program (SHIP) had moderate damage and more than 1,650 had major or severe damage (Table 19). Bay County was one of the most heavily impacted areas with more than 1,400 SHIP program residences damaged by Hurricane Michael.

With increased demand for rental units from households displaced by Hurricane Michael coupled with a diminished supply as a result of storm damage, rental prices will likely increase throughout the Panhandle and particularly in the most impacted communities. These factors may make rental units unaffordable for many LMI families.

According to the University of Central Florida's Vulnerability Mapping and Analysis Platform, more than 22 percent of all households in impacted counties are "mortgaged burdened," meaning these households expend more than 40 percent of their family income for housing related expenses. The rate increases to 44 percent across the impacted counties when looking only at "rent burdened" households.[27]

[27] https://www.vulnerabilitymap.org/

Table 19: Damages to housing stock supported by State Housing Initiative Program (SHIP) [28]

Local Government	Destroyed ($75,000)	Major ($50,000)	Moderate ($20,000)	Damage Total	% of total	% of Tier
Tier I						
Panama City	328	193	890	$48,190,000	34.99%	38.00%
Bay	178	98	395	$26,150,000	18.99%	21.00%
Gulf	75	273	202	$23,315,000	16.93%	18.00%
Jackson	99	108	167	$16,165,000	11.74%	13.00%
Calhoun	80	91	139	$13,330,000	9.68%	10.00%
Tier 2						
Gadsden	19	18	17	$2,665,000	1.93%	27.00%
Washington	15	13	12	$2,015,000	1.46%	21.00%
Wakulla	1	21	39	$1,905,000	1.38%	20.00%
Franklin	2	22	32	$1,890,000	1.37%	19.00%
Liberty	8	9	11	$1,270,000	0.92%	13.00%
Total	**809**	**852**	**1,916**	**$137,735,000**	**100.00%**	

1.3.4 Transitional Sheltering

Victims in presidentially declared disaster areas are eligible for the Transitional Sheltering Assistance (TSA) Program,[29] if they meet specific criteria. TSA eligibility criteria for Hurricane Michael[30] provides guidance on how victims can access transitional sheltering support. Available data for Hurricane Michael indicates that (as of Feb 21, 2019) 507 survivors were checked into hotels under TSA across Bay, Gulf and Jackson Counties – the only counties authorized for TSA.[31] FEMA FIDA data (from January) provides a slightly differing view of TSA showing a larger number of survivors had utilized the program (Table 20).[32] Here, a majority of TSA utilization occurred in Bay County with fewer than 6% of TSA recipients from Gulf and Jackson Counties.

Table 20: Transitional Sheltering Assistance (TSA) program utilization by county

County	Transitional Sheltering Assistance Recipients	% of All Transitional Sheltering Assistance Recipients
Bay	1,836	94.06%
Gulf	52	2.66%
Jackson	64	3.28%
Grand Total	**1,952**	

[28] Florida Housing Finance Corporation
[29] https://www.fema.gov/transitional-shelter-assistance
[30] https://www.fema.gov/media-library-data/1539636980122-4d9866b7bf9c1e805aa59c7a62c42c69/Michael_Fact_Sheet.pdf
[31] https://www.fema.gov/media-library-data/1550772229299-a4dba35773aa27e73daf1df1b739c499/02.21.2019HurricaneMichaelRecoveryWeekly_Number4.pdf
[32] Source: FEMA FIDA 33919_FSA_4399, January 9, 2019

1.3.5 Impact on Low-to-Moderate Income Populations

Hurricane Michael's impact on LMI households in Florida's Panhandle was particularly pronounced. Of the FEMA IA applicants who have reported major or severe damage to their homes, more than 50 percent are low and moderate income across most presidentially declared counties (Table 21). In Gulf and Leon Counties, this disproportionate impact on LMI populations is greater than 70 percent and in Bay County, nearly 14,000 LMI households had major/severe damage. Across the twelve-county area, 9,325 renter applicants with reported damage to their homes were classified either low- and moderate-income households (Table 17 – total with damage and LMI).

While LMI households throughout the state were affected by the storm, the most impacted LMI households were found within the twelve most impacted counties. Table 21 reflects the total housing units in the most impacted counties and the percentage of impacted households with severe or major damage that are low income. Included here are more than 9,000 renter applicants across the study area with major-high or severe damages (Table 17).

Table 21: Percentage of housing stock with HUD defined major to severe damage by LMI category

County	Total Housing Units	Housing Units with Major/Severe Damage	Housing Units with Major/Severe Damage as a Percentage of all Housing Units	Households with Major/Severe Damage that are Low and Moderate Income	Households with Major/Severe Damage that are Low and Moderate Income as a Percentage of all Major/Severe Damage
Bay	102,811	25,045	24.4%	13,957	55.7%
Calhoun	6,021	2,154	35.8%	1,198	55.6%
Franklin	8,698	501	5.8%	229	45.7%
Gulf	9,577	1,666	17.4%	1,316	79.0%
Gadsden	19,704	2,184	11.1%	890	40.8%
Holmes	8,693	274	3.2%	179	65.3%
Jackson	21,082	4,582	21.7%	2,609	56.9%
Leon	129,665	452	0.3%	319	70.6%
Liberty	3,412	450	13.2%	287	63.8%
Taylor	11,101	58	0.5%	33	56.9%
Wakulla	13,453	414	3.1%	221	53.4%
Washington	10,886	925	8.5%	532	57.5%
Total	345,103	38,705	11.2%	21,770	56.2%

1.3.6 Impact on Special Needs Populations

1.3.6.1 Homeless Populations

Homelessness across Hurricane Michael-impacted counties is among the lowest in the state (Table 22). Data from the state's homeless survey, collected at Continuum of Care (CoC) areas consisting of multiple counties, shows that homelessness in the affected areas represents a small fraction of the total homeless across Florida. Although the number of homeless individuals across the impacted counties is low in comparison to other areas in the state, these vulnerable populations remain a potential unmet needs population.[33] Representing only four percent of the total homeless population, these vulnerable individuals will require recovery support in order to halt the downward spiral. Although homelessness

[33] https://www.myflfamilies.com/service-programs/homelessness/docs/Homelessness%20Report%202017.pdf

across the region has declined in recent years, those remaining in a homeless status are particularly susceptible to future disaster impacts and may require additional assistance to recover from Hurricane Michael's impacts.

Table 22: Homeless populations across Michael impacted counties

Continuum of Care Area (CoC)	Total Homeless - 2017	% of Statewide Homeless (32,109)
Franklin, Wakulla, Leon, Gadsden, Liberty, Taylor, Jefferson, Madison Counties CoC	1,072	3.3%
Bay, Calhoun, Gulf, Holmes, Washington, Jackson Counties CoC	3,36	1%

1.3.6.2 Older Adults

FEMA applicants over the age of 65 represent nearly a relatively small portion of the number of Hurricane Michael Applicants to FEMA (Table 23). However, these older populations are highly concentrated in areas at risk of flooding that are also frequently LMI areas. Recovery and rebuilding solutions for these vulnerable populations are sometimes limited. Although elevation would appear to be the best path forward, especially for those living in flood zones, such measures may be complicated by accessibility and mobility challenges. Unique solutions will be required to account for these challenges in recovery program development.

Table 23: FEMA IA applicants over 65 by income level and flood zone

County and Flood Zone	Total Over 65 Years	LMI30	LMI50	LMI80	Total LMI	% LMI
Bay	**1,855**	**126**	**240**	**399**	**765**	41.2%
NFIP Zone A	1,773	122	235	386	743	41.9%
NFIP Zone V	82	4	5	13	22	26.8%
Calhoun	**149**	**23**	**36**	**26**	**85**	57.0%
NFIP Zone A	149	23	36	26	85	57.0%
Franklin	**319**	**12**	**32**	**58**	**102**	32.0%
NFIP Zone A	181	11	24	37	72	39.8%
NFIP Zone V	138	1	8	21	30	21.7%
Gadsden	**37**	**5**	**11**	**6**	**22**	59.5%
NFIP Zone A	37	5	11	6	22	59.5%
Gulf	**641**	**32**	**69**	**116**	**217**	33.9%
NFIP Zone A	551	30	67	111	208	37.7%
NFIP Zone V	90	2	2	5	9	10.0%
Holmes	**39**	**5**	**6**	**9**	**20**	51.3%
NFIP Zone A	39	5	6	9	20	51.3%
Jackson	**126**	**13**	**31**	**23**	**67**	53.2%
NFIP Zone A	126	13	31	23	67	53.2%
Leon	**36**	**10**	**5**	**9**	**24**	66.7%
NFIP Zone A	36	10	5	9	24	66.7%
Liberty	**26**	**4**	**2**	**6**	**12**	46.2%
NFIP Zone A	26	4	2	6	12	46.2%
Taylor	**28**	**2**	**8**	**6**	**16**	57.1%
NFIP Zone A	21	2	8	5	15	71.4%
NFIP Zone V	7			1	1	14.3%

Wakulla	**224**	**25**	**31**	**41**	**97**	43.3%
NFIP Zone A	75	10	15	13	38	50.7%
NFIP Zone V	149	15	16	28	59	39.6%
Washington	**72**	**7**	**18**	**22**	**47**	65.3%
NFIP Zone A	72	7	18	22	47	65.3%
Grand Total	**3,552**	**264**	**489**	**721**	**1,474**	41.5%

1.3.6.3 Individuals with Access and Functional Needs

Disaster victims with Access and Functional Needs (AFN) (3,109) represent more than three percent of total applicants. A majority of those with AFN reside in Bay County (Table 24). Recovery programs should carefully consider additional costs associated with retrofitting, elevating and other building codes required to serve the needs of those with access and functional needs.

Table 24: FEMA IA applicants with access and functional needs (AFN) by county and LMI category

County	Total with Access and Functional Needs	LMI30	LMI50	LMI80	Total with AFN and LMI
Bay	1,888	418	388	384	1,190
Calhoun	132	25	37	31	93
Franklin	32	5	5	3	13
Gadsden	212	80	48	44	172
Gulf	145	22	28	35	85
Holmes	30	7	4	9	20
Jackson	383	65	85	99	249
Leon	138	55	27	16	98
Liberty	46	11	17	10	38
Taylor	4		2	1	3
Wakulla	21	5	2	4	11
Washington	78	13	21	20	54
Grand Total	**3,109**	**706**	**664**	**656**	**2,026**

1.3.7 Analysis of Unmet Housing Need

1.3.7.1 Housing Impact Methodology

Denial rates for Hurricane Michael FEMA Housing Assistance (HA) (75%) and the percent of those applying for but not receiving SBA assistance (66%) are nearly as high as Puerto Rico's Hurricane Irma and Maria (81% and 75% respectively) and provide a unique challenge for disaster recovery in Florida. Insufficient damage, insurance and the inability to verify ownership are the three most common reasons that FEMA denies HA (*Table 25*). It is important to note that an applicant can have more than one ineligibility reason. Therefore, it is not appropriate to sum. Those homeowners who have been unable to secure FEMA, SBA or other assistance funding have been left with an overwhelming unmet recovery need (Table 26).

Table 25: Number of FEMA housing assistance applicants by ineligibility reasons and county

County	Ineligibility Reason				
	Insufficient Damage	Insured	Ownership Not Verified	Not Primary Residence	Identity Not Verified
Bay	9,069	4,602	734	462	445
Calhoun	648	385	136	52	38
Franklin	415	127	74	27	20
Gadsden	1,928	615	265	65	73
Gulf	991	426	103	89	47
Holmes	351	67	65	16	10
Jackson	2,477	1,106	406	139	92
Leon	1,119	199	94	23	37
Liberty	416	137	59	13	11
Taylor	50	4	12	6	2
Wakulla	222	77	35	24	11
Washington	828	275	90	30	31
Total	**18,514**	**8,020**	**2,073**	**946**	**817**

Table 26: Hurricane Michael FEMA IA and SBA Home Loan funding receipt comparison

County	Total FEMA Applicants	FEMA Applicants Not Receiving IA Funding	% FEMA Applicants Not Receiving IA Funding	Total SBA Applicants	Total Not Receiving SBA Loans	% Not Receiving SBA Loans
Bay	58,326	41,507	71.2%	17,281	11,477	66.4%
Calhoun	4,093	2,602	63.6%	1,280	829	64.8%
Franklin	1,732	1,404	81.1%	387	273	70.5%
Gadsden	6,972	5,988	85.9%	1,058	769	72.7%
Gulf	5,374	3,809	70.9%	1,702	1,098	64.5%
Holmes	1,269	1,111	87.5%	166	113	68.1%
Jackson	11,430	8,213	71.9%	2,565	1,630	63.5%
Leon	7,054	6,779	96.1%	559	399	71.4%
Liberty	1,399	1,101	78.7%	398	250	62.8%
Taylor	187	158	84.5%	22	21	95.5%
Wakulla	1,350	1,072	79.4%	211	137	64.9%
Washington	3,202	2,576	80.4%	737	481	65.3%
Total	102,388	76,320	74.5%	26,366	17,477	66.3%

Utilizing the best available data, the current unmet need for housing in Florida's Hurricane Michael impacted areas is calculated using a methodology accounting for the gap between FEMA Full Verified Loss (FVL) and SBA award. FEMA's Individuals and Households Program provides assistance for repairs and replacements that will make a home "habitable," whereas SBA awards loan funding for the full cost to restore a home. This means that FEMA does not account for all damages to a home whereas SBA does a more robust "construction based" loss assessment.

HUD[19] 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 on impacts after a major disaster events are difficult to obtain or do not exists comprehensively across a disaster area, HUD has stated that empirically justified calculations may be used to determine the average cost to fully repair a home. Generally, this is accomplished by "using the average real property damage repair costs determined by the SBA 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."[34]

Previously approved impact assessment methodologies have utilized a combination of SBA estimates of damage and repair needs, FEMA IA Housing Assistance data, and National Flood Insurance (NFIP) claim and payment information to triangulate total impacts and unmet needs as opposed to relying only on FEMA verified losses alone. Utilizing SBA damage estimates provides a more comprehensive look at recovery than simply looking at FEMA inspected damage. SBA sends "construction specialists" trained to evaluate a more complete cost of repairing or replacing a damaged structure to each applicant, returning a more comprehensive estimate of recovery than original estimates from FEMA. In addition, further accounting for under-representation of impacted populations stemming from FEMA ineligible applicants provides a more accurate picture of overall housing impact across a study area.

In Florida, FEMA loss estimates are lower than SBA estimates for both real property and personal property. The average FEMA real property loss for Hurricane Michael was $5,066 based on 32,594 applicants with FEMA verified losses. SBA average verified losses per household were valued at $54,439 based on 955 applicants represent a 10.75 times higher verified loss amount than FEMA. SBA median loss value of $40,979 is 22.4 times higher than FEMA's value of $1,831 for the same group of applicants. SBA's average verified personal property losses at a value of $15,016 per household are 9.2 times higher than FEMA's $1,631 per household. Furthermore, matching FEMA's applicant data with SBA's loan data on FEMA registrant number for more than 17,000 applicants highlighted two other important facts utilized in identifying housing unmet needs (*Table 27*). First, FEMA underestimates the number (count) of housing units with real property losses in Hurricane Michael impacted areas. Specifically, 28.8 percent of matching records (disaster victims) had zero FEMA real property losses but greater than zero SBA verified property losses across all counties. Second, FEMA underestimates the number (count) of housing units with personal property losses for the same impacted areas. Although the percentage differs by county, on average 33.78 percent of matching records had zero FEMA personal property loss but greater than $0 SBA verified contents losses.

[34] Federal Register Vol. 78, No. 43 /Tuesday, March 5, 2013 - https://www.govinfo.gov/content/pkg/FR-2018-02-09/pdf/2018-02693.pdf

Table 27: Verified loss differentials between FEMA IA program and SBA home loan program for Hurricane Michael

County	Owners with FEMA/SBA Registrant ID Match			Renters with FEMA/SBA Registrant ID Match		
	Total Owners	With $0 FEMA Real Property Loss and > $0 SBA Verified Real Estate Loss	% with SBA Losses but not FEMA Losses	Total Renters	With $0 FEMA Personal Property Loss and > $0 SBA Verified Contents Loss	% with SBA Losses but not FEMA Losses
Bay	10,414	3,368	32.3%	5,551	725	13.1%
Calhoun	1,002	209	20.9%	170	25	14.7%
Franklin	287	59	20.6%	66	9	13.6%
Gadsden	846	178	21.0%	121	13	10.7%
Gulf	1,304	296	22.7%	319	49	15.4%
Holmes	141	30	21.3%	17	-	0.0%
Jackson	1,959	474	24.2%	400	74	18.5%
Leon	334	114	34.1%	137	25	18.2%
Liberty	330	84	25.5%	34	5	14.7%
Taylor	14	-	0.0%	3	-	0.0%
Wakulla	167	31	18.6%	37	4	10.8%
Washington	553	128	23.1%	89	14	15.7%
Total	17,351	4,971	28.6%	6,944	943	13.6%

Applying the average verified loss amount (by county) of all SBA applicants with real property losses to those who were disqualified or turned down for SBA loan assistance and those for whom a FEMA loss was established, pushes the full extent of Hurricane Michael's housing impact to more than $10 billion (before accounting for an increase in rebuilding for resilience or deductions for funds already provided). Additional considerations are factored into the process (or calculation) to arrive at a more comprehensive and realistic picture for this estimated unmet need. Utilizing the median SBA real property damage amount of (by county) accounts for outliers in the SBA data (a few very high and very low damage amounts) driving the average SBA loss up (Table 28).

Table 28: Average and median SBA home loan program verified real estate losses

County	Average SBA Verified Real Property Losses	Median SBA Verified Real Property Losses
Bay	$55,481	$42,183
Calhoun	$43,355	$31,414
Franklin	$32,708	$21,038
Gadsden	$23,955	$16,318
Gulf	$57,184	$36,921
Holmes	$22,584	$17,534
Jackson	$40,628	$29,734
Leon	$22,285	$17,789
Liberty	$26,066	$17,712

Taylor	$46,860	$36,361
Wakulla	$42,400	$25,195
Washington	$29,456	$21,219

Applying the median SBA property loss amount to the total number of SBA applicants who were not approved, in conjunction with HUD, estimates of unmet housing needs for those without a determined real property loss, provides a more conservative and realistic view of losses to residential property across Michael impacted areas. Utilizing the unmet needs values from HUD and FEMA data about the number of applicants, (more than 100,000) results in an unadjusted housing impact of $3.5 billion. Methods for creating housing impacts and unmet needs are discussed below.

Housing impacts for this needs assessment were calculated using SBA data in conjunction with FEMA applicant information. We begin (Table 29) by utilizing the known real property (repair, reconstruction and manufactured homes) losses from SBA for the 13,281 applicants for which this value is determined (A). Included here are also an estimate (B) of losses for those SBA applicants who were not approved for a disaster loan for real estate losses. Combined these SBA derived losses are more than $1.1 billion (C).

Table 29: SBA home loan program verified and estimated losses

ID	LINE ITEM	COUNT	VALUE
A	SBA applicants with a real estate verified loss	13,281	$660,787,888
B	SBA applicants without a real estate verified Loss (estimate)	13,084	$485,125,723
C	Total verified loss of FEMA applicants referred to SBA (estimate)	26,365	$1,145,913,611

Accounting for those FEMA non-renter (owner or "not specified") applicants who did not apply to SBA requires a more nuanced approach. Here, "not specified" non-renter populations are those who have indicated neither "owner" nor "renter" when applying for FEMA IA support. First, one can account for SBA's higher average loss value by multiplying any FEMA verified loss amount by 10.75 to create a more realistic loss estimate. Secondly, utilizing the loss value cutoffs and rebuild cost estimates provided in the federal register creates a clear and replicable picture of losses across the panhandle[35].

Table 30 shows the breakdown of estimated losses to those homeowners not accounted for in SBA's loan dataset. FEMA owner applicants with inspected losses (32,576) represent more than $1.7 billion in losses when multiplied by SBA's 10.75 times higher real property loss values (A). Rows (B – F) represent a breakdown of owner losses by HUD classified Minor-Low to Destroyed damage level categories for those owner applicants with FEMA personal property verified losses but without FEMA real property verified losses. Here, FEMA personal property verified losses were first multiplied by 9.2 to account for underestimates in FEMA derived losses and then classified into HUD designated unmet needs categories. Impact value estimates were derived by multiplying counts of applicants (by damage category) by HUD provided estimates (*Table 31*). Here a straight-line linear model is implemented, producing estimates for Minor-Low and Minor-High categories not provided by HUD (*Table 31*). An estimate of potential additional

[35] https://www.gpo.gov/fdsys/pkg/FR-2018-02-09/pdf/2018-02693.pdf

unmet needs population (J) was generated by first multiplying the sum total of owner applicants without either a real property or personal property loss (G) and (J) the number of SBA Applicants without a FEMA registrant number) less those who have applied to SBA (H) by a county specific multiplier accounting for FEMA's missing real property losses compared to SBA's (*Table 27*). This potential unmet need applicant count is then multiplied by the median SBA property loss value for each county (Table 28) and summed with values (A-F) to create an estimated loss for all homeowner applicants (K). Estimated total losses of $1.84 billion (L) to homeowners is derived by summing this value (K) with losses from SBA data alone (Table 29, Line C).

Table 30: Estimated damage to owner occupied dwellings

ID	LINE ITEM	COUNT	VALUE
A	FEMA owner or "not specified" applicants with FEMA inspected real property damage (SBA Multiplier)	32,576	$1,773,660,078
B	Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	4	$27,644
C	Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	74	$1,540,680
D	Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	31	$1,185,719
E	Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	180	$7,487,100
F	Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	130	$8,588,580
G	Total owner or "not specified" applicants without a FEMA Verified Loss (Property or Contents)	32,387	
H	Total SBA applicants	26,365	
I	Number of SBA Applicants without a FEMA Registration #	1,657	
J	Potential additional unmet needs population	1,985	$ 47,179,710
K	Losses of FEMA applicants not referred to SBA (Estimate)		$1,839,669,511
L	Total verified loss of all homeowner applicants across FEMA and SBA (Estimate)		$2,985,583,121

Table 31: Owner and renter applicants with FEMA verified personal property losses and HUD estimated rebuild costs by damage level

Category of Real Property Damage	Count of Owner or "Other" Applicants with FEMA verified Personal Property Losses	Count of Renter Applicants with FEMA verified Personal Property Losses	HUD Provided Estimate of rebuilding costs
Minor Low	24,864	4,793	$30,556 (Estimate)
Minor High	5,029	14,206	$34,728(Estimate)
Major Low	5,636	16,503	$38,249
Major High	5,096	27,274	$41,595
Severe	3,166	35,564	$66,066

A similar method as above was utilized to capture impacts to affected renter applicants (Table 32). Here, 13,729 renter applicants had verified real property damage (A). Lines B-F represent a break- down of renter losses by HUD classified Minor-Low to Severe damage levels for those applicants with FEMA personal property verified losses but without FEMA real property verified losses. Here, FEMA personal property verified losses were first multiplied by 9.2 to account for underestimates in losses then classified into HUD designated categories based on federal registry classifications. Damage estimates were derived by multiplying counts of applicants (by damage category) by HUD provided estimates (*Table 31*). An estimate of additional potential unmet needs population (I) was generated by multiplying the total renter applicants without either a real property or personal property loss (G) by county specific values accounting for FEMA's zero personal property losses compared to SBA's > zero contents losses (Table 26). This potential unmet need applicant count is then multiplied by the median SBA property loss value for each county (Table 28) and summed with values (A-F and H) to create an estimated loss for all home renter applicants (J).

Table 32: Estimated damage to renter applicant dwellings

ID	LINE ITEM	COUNT	VALUE
A	FEMA renter applicants with FEMA inspected real property damage (SBA Multiplier)	13,729	$247,369,589
B	Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	226	$1,561,886
C	Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	479	$9,972,780
D	Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	1,320	$50,488,680
E	Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	2,952	$122,788,440
F	Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	8,752	$578,209,632
G	Total renter applicants without a FEMA Verified Loss (Property or Contents)	23,277	
H	Total SBA business applicants with verified repair, reconstruction, or relocation losses (rental NAICS code)	813	$80,501,683
I	Potential additional unmet needs population	3,308	108,215,825
J	Total verified loss of rental property owners (Estimated)		$1,199,108,515

Next, damages cataloged by other sources outside of SBA and FEMA are accounted for (Table 33). Included here are preliminary damage estimates (A) provided by FHFC. Damage assessments received from FHFC included PHA and SHIP partner program data, but did not delineate damage specifically to PHAs. DEO contacted the PHAs in the impacted region to determine damage caused by Hurricane Michael. With the exception of one PHA that did not respond, the other PHAs impacted by Hurricane Michael indicated that their unmet needs were either addressed or being addressed by other funding sources.

Table 33: Other housing damages

ID	LINE ITEM	COUNT	VALUE
A	Real estate damage to housing stock supported by SHIP	3,577	$137,735,000

Totaling across all areas reveals housing losses of at least $3.18 billion. Accounting for an additional 30 percent in costs associated with necessary resilience measures such as more stringent building codes, cost of compliance measures, elevations or freeboard requirements increases the total estimate of damages to more than $4.1 billion (Table 34). HUD has historically accepted an additional 30 percent in costs to account for resiliency measures. Due to the high number of older structures in this part of Florida, it is estimated that the cost of including resilience measures to bring structures back up to code is 30 percent.

Table 34: Total estimated housing losses

TOTAL HOUSING VERIFIED LOSS	$3,176,513,026
Accounting for 30% resilience costs	**$4,129,466,933**

Accounting for FEMA funds, loans and other recovery resources (Table 35) depicts the total benefit provided to Hurricane Michael impacted areas to date. Here, more than $424 million across five categories spanning federal, state and local resources have been provided. Unfortunately, recovery funds provided to date still leave a large unmet housing need of greater than $3.7 billion (Table 36).

Table 35: Sources and amounts of recovery funds (to date)

ID	SERVICE	VALUE
A	FEMA housing assistance payments	$106,233,775
B	SBA Home - Real Property Loans	$294,206,754
G	SBA Business Loan Payments to Landlords	$19,009,400
H	NFIP building payments	
L	Public housing funds	$5,000,000
J	Total benefit (to date)	**$424,449,929**

Table 36: Total unmet need for Hurricane Michael (to date)

	VALUE
Total unmet housing need	$4,129,466,933
Accounting for 30% resilience addition	**$3,705,017,005**

1.4 Economic Impact

Hurricane Michael inflicted major damage to many businesses in the Florida panhandle, causing substantial damage to commercial structures, destroying their contents and causing losses in operating revenues. In the aftermath of the storm, many roads were blocked or washed away by storm surge, flooding, downed trees, power lines and other debris, and power outages were widespread. In this environment, operation of businesses is impossible, and recovery is difficult.

Records obtained from Dun & Bradstreet indicate that there are 72,727 businesses registered in the 12 counties included in the Hurricane Michael presidential disaster declaration. A summary of the total number of businesses registered by Dun & Bradstreet in each county is provided in Table 37. While most of the impacted counties have less than 4,000 registered businesses, Bay and Leon Counties together have more than 53,000 registered businesses. Notably, Bay County, which experienced the strongest winds and storm surge from Hurricane Michael, is one of two counties with the highest number of businesses in the twelve county area.

Table 37: Registered businesses in the counties included in the presidential disaster declaration for Hurricane Michael

County	Businesses with DUNS
Bay	21,253
Calhoun	989
Franklin	1,487
Gadsden	3,529
Gulf	1,691
Holmes	1,625
Jackson	3,739
Leon	31,771
Liberty	464
Taylor	1,361
Wakulla	3,056
Washington	1,762
TOTAL	*72,727*

A geospatial analysis of business locations in relation to wind speeds during Hurricane Michael reveals that a vast majority of the businesses in the impacted counties were located in areas that experienced tropical storm force winds or higher. This analysis is summarized in Table 38 for four discrete wind speed zones: less than 39 mph, 40 mph – 56 mph, 57 mph – 72 mph and 73 mph and above, with numbers in the table representing the number of businesses for different economic sectors in each of the four discrete wind speed zones. Specifically, of the 72,727 registered businesses in the impacted counties, 40,788 were located in areas that experienced sustained winds between 57 and 72 mph (tropical storm force), while 30,400 were located in areas that experienced sustained winds higher than 73 mph (hurricane force).

Table 38: Registered businesses by sector in four wind categories

NAICS Title	Less than 39 mph	40 mph - 56 mph	57 mph - 72 mph	73 mph and above
Agriculture, Forestry, Fishing and Hunting	-	63	487	533
Mining, Quarrying, and Oil and Gas Extraction	-	3	9	19
Utilities	-	4	80	48
Construction	6	105	3,726	3,668
Manufacturing	1	49	702	682
Wholesale Trade	1	55	941	831
Retail Trade	2	183	3,311	2,910
Transportation and Warehousing	2	54	738	804
Information	1	18	655	341
Finance and Insurance	3	39	1,500	864
Real Estate and Rental and Leasing	-	54	1,761	1,378
Professional, Scientific and Technical Services	7	95	4,470	2,278
Management of Companies and Enterprises	-	4	78	134
Administrative and Waste Management Services	8	149	5,557	3,694
Educational Services	-	9	507	174
Health Care and Social Assistance	3	81	2,580	1,696
Arts, Entertainment and Recreation	-	24	607	544
Accommodation and Food Services	-	69	1,594	1,464
Other Services and NGOs	4	204	4,325	3,097
Not Categorized	13	226	7,160	5,241
TOTAL	51	1,488	40,788	30,400

1.4.1 Reported Damage

While there is no comprehensive central repository of business damage and loss claims for Hurricane Michael, application data from the SBA's low-interest disaster loans[36] provide a reliable sample of the type and extent of damage and losses experienced by businesses because of Hurricane Michael. Current SBA claim data, summarized in Table 39, shows the number of applications for SBA loans that were approved, in process, declined and withdrawn, as well as the number of unique applicants, in each of the counties in the presidential disaster declaration for Hurricane Michael in the state of Florida. Of the 4,150 unique applicants who have sought low interest disaster assistance loans, only 18 percent have been approved, and 82 percent of applicants have either been declined (21%), withdrawn (18%), or are still in process (42%). Similarly, a majority of applicants (2,791 or 67%) are located in Bay County, which

[36] https://www.sba.gov/funding-programs/disaster-assistance

experienced a direct landfall during Hurricane Michael, and is also home to a large number of registered businesses.

Table 39: SBA application outcomes and status by county

County	Approved	In Process	Declined	Withdrawn	Unique Applicants
Bay	553	1,113	569	556	2,791
Calhoun	18	69	40	24	151
Franklin	26	51	34	18	129
Gadsden	13	60	33	20	126
Gulf	67	181	70	66	384
Holmes	6	10	10	5	31
Jackson	41	128	68	37	274
Leon	6	49	25	11	91
Liberty	6	20	9	6	41
Taylor	0	2	1	1	4
Wakulla	7	16	11	5	39
Washington	14	48	22	5	89
Total	757	1,747	892	754	4,150
Total (%)	18%	42%	21%	18%	100%

Successful applications for SBA disaster loan assistance require a follow-up inspection where damages are verified. Table 40 provides an analysis of the SBA inspection data by type of application or claim (i.e., reconstruction, repairs, furniture and fixtures, machinery and equipment, inventory and Economic Injury Disaster Loans (EIDL). The analysis indicates that 82.2 percent of inspected commercial structures sustained major damage, with 14.51 percent of structures qualifying for reconstruction loans and 67.7 percent of structures qualifying for repair loans. Similarly, large proportions of inspected businesses also sustained verified damage or losses in the contents of the structures, with 45.45 percent of inspected businesses qualifying for loans to replace furniture and fixtures, 65.79 percent of inspected businesses qualifying for loans to replace machinery and equipment, and 29.89 percent of inspected businesses qualifying for loans to replace inventory. Lastly, a sizable majority (78%) of inspected businesses also qualify for loans because of losses in operating revenues or the inability to meet obligations and pay ordinary and necessary operating expenses.

Table 40: SBA damage inspections conducted with verified damage and/or losses by type

Type of Damage	Inspections Conducted	Inspections with Verified Damage	Inspections with Verified Damage (%)
Reconstruction	1,158	168	14.51%
Repairs	1,158	784	67.70%
Furniture and Fixtures	1,529	695	45.45%
Machinery and Equipment	1,529	1,006	65.79%
Inventory	1,529	457	29.89%
EIDL	757	591	78.07%

Table 41 provides a breakdown of the total value of damages verified through SBA inspections in each county included in the presidential disaster declaration for Hurricane Michael in Florida. In addition, Table 41 reports county-level verified damage and losses for six types of claim or application: reconstruction, repairs, furniture and fixtures, machinery and equipment, inventory and operational losses, which are captured by applications for EIDL. This analysis reveals that the SBA has verified $251.8 million in business damage and losses statewide. A majority of these verified losses have been documented in Bay County ($205.3 million) and Gulf County ($19.3 million). However, it is important to note that these numbers represent just a small sample of damages, and the true extent of damages and losses to businesses because of Hurricane Michael is likely to be much larger. Namely, while there are 72,727 registered businesses in the impacted region, only 1,529 businesses have been inspected by SBA. Thus, the SBA data only provides information on 2.1 percent of businesses in the declared disaster counties.

Table 41: SBA verified damage and losses by county and type

county	Reconstruction	Repairs	Furniture and Fixtures	Machinery and Equipment	Inventory	EIDL	TOTAL
Bay	$49,341,861	$91,927,323	$9,484,429	$22,500,909	$9,282,562	$22,824,000	$205,361,084
Calhoun	$846,850	$1,686,298	$49,306	$439,868	$296,373	$186,500	$3,505,195
Franklin	$0	$2,424,516	$211,590	$753,610	$146,389	$844,600	$4,380,705
Gadsden	$34,145	$4,763,769	$383,361	$295,258	$43,680	$140,500	$5,660,713
Gulf	$2,665,059	$7,739,351	$1,156,242	$3,718,857	$566,141	$3,456,600	$19,302,250
Holmes	$0	$325,498	$7,908	$9,196	$5,300	$268,400	$616,302
Jackson	$1,734,945	$4,828,242	$216,812	$885,649	$208,397	$1,185,000	$9,059,045
Leon	$38,707	$346,014	$13,230	$126,325	$7,500	$398,100	$929,876
Liberty	$1,824	$289,729	$46,139	$103,064	$1,300	$93,300	$535,356
Taylor	$0	$49,594	$0	$0	$0	$0	$49,594
Wakulla	$0	$391,041	$13,098	$544,751	$71,521	$111,400	$1,131,811
Washington	$0	$530,947	$14,037	$352,597	$28,527	$402,600	$1,328,708
Total	$54,663,391	$115,302,322	$11,596,152	$29,730,084	$10,657,690	$29,911,000	$251,860,639

An analysis of business size impacted reveals that it was mostly small businesses that sought SBA loans. As Figure 13 shows, the vast majority of businesses with verified losses reported having less than 10 employees, or did not report a number of employees. Note that a large number of businesses did not report their number of employees.

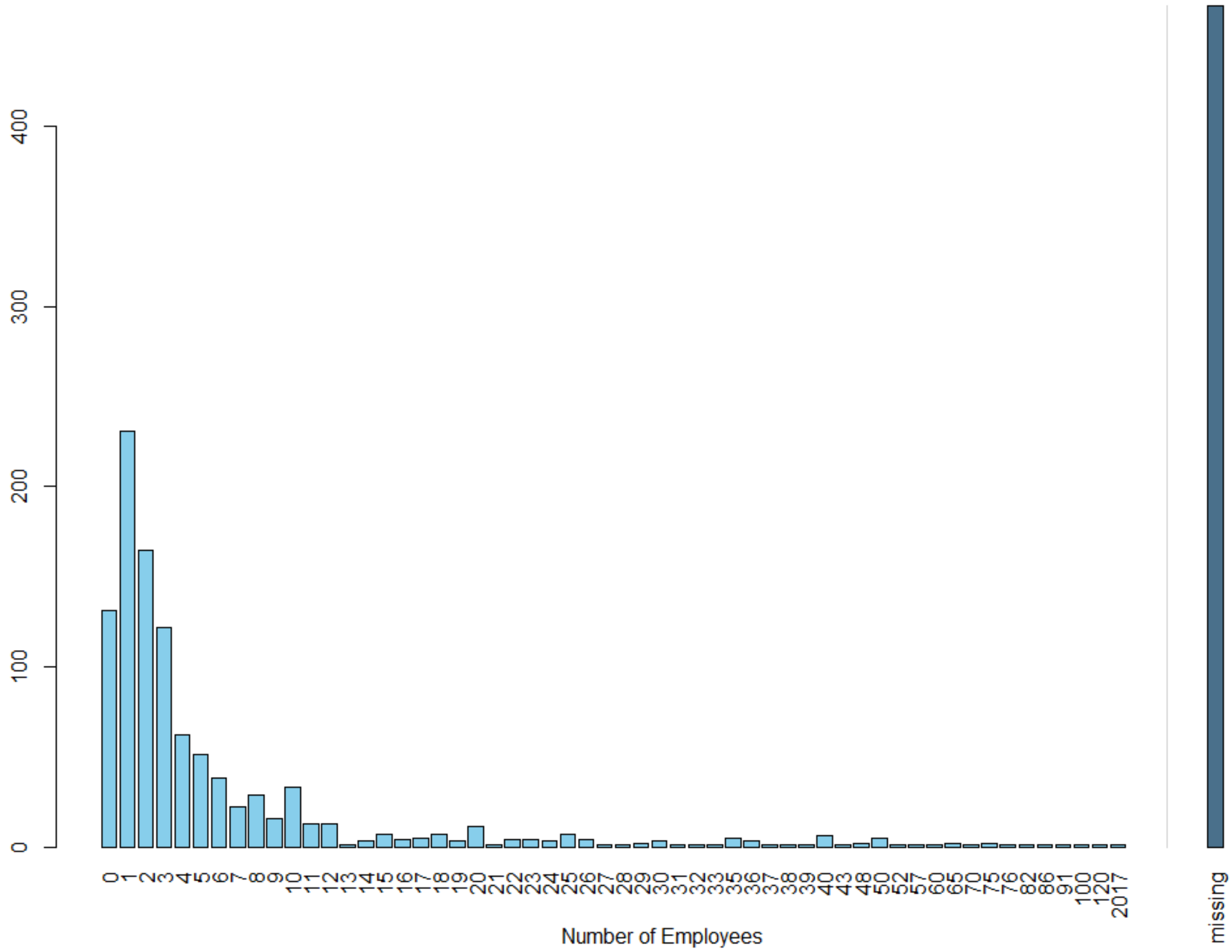
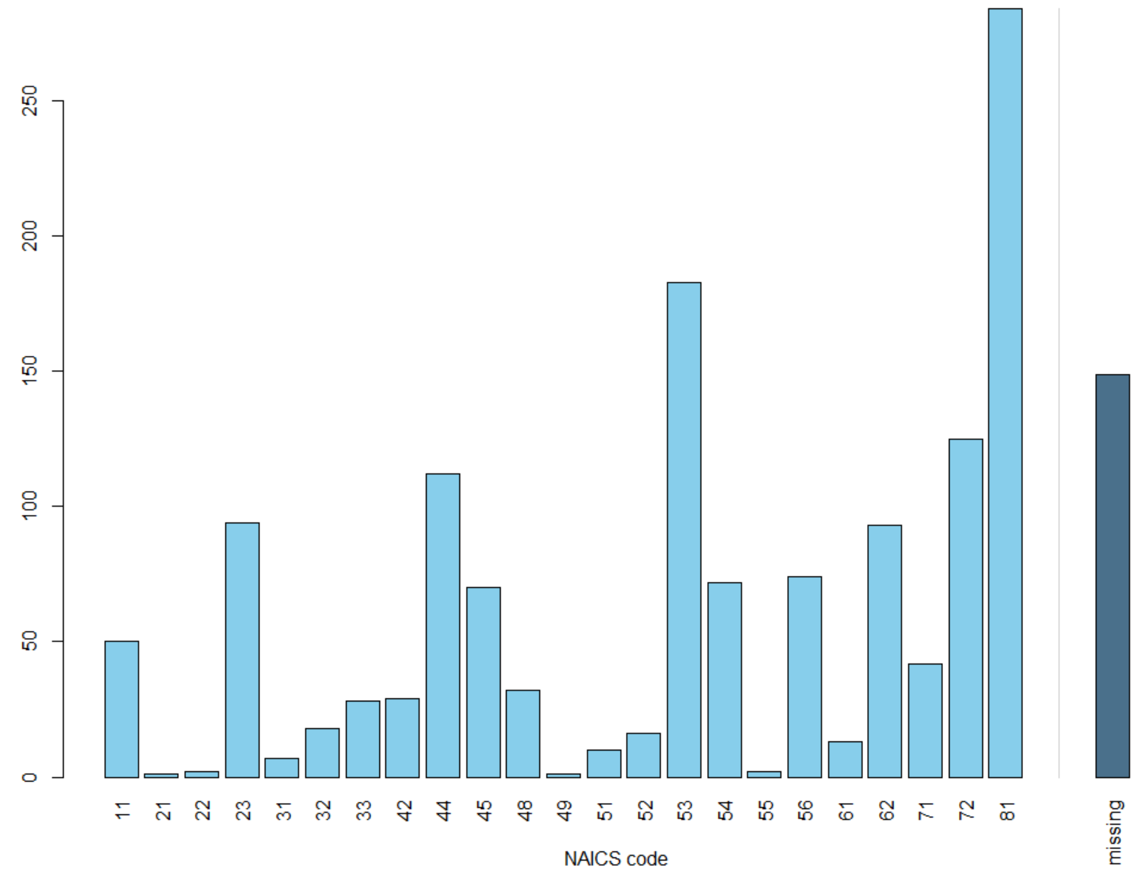


Figure 13: Number of Employees reported by businesses with SBA verified losses

In terms of business sectors impacted, Figure 14 reveals that the sectors with the highest numbers of verified claims include: Other services and NGOs; Real Estate Rental and Leasing; Accommodation and Food Services; and Retail Trade. A complete view with all sectors is available in Figure 14. Again, note the large number of businesses that do not report on these descriptive variables.



NAICS2	NAICS Title
11	Agriculture, Forestry, Fishing and Hunting
21	Mining, Quarrying, and Oil and Gas Extraction
22	Utilities
23	Construction
31	Manufacturing
32	Manufacturing
33	Manufacturing
42	Wholesale Trade
44	Retail Trade
45	Retail Trade
48	Transportation and Warehousing
49	Transportation and Warehousing
51	Information
52	Finance and Insurance
53	Real Estate Rental and Leasing
54	Professional, Scientific, and Technical Services
55	Management of Companies and Enterprises
56	Administrative and Support and Waste Management and Remediation Services
61	Educational Services
62	Health Care and Social Assistance
71	Arts, Entertainment, and Recreation
72	Accommodation and Food Services
81	Other Services and NGOs

Figure 14: Number of Businesses by Sector with SBA verified losses by Hurricane Michael

1.4.2 Total Business Damage and Loss Estimates

A comprehensive estimate of total business damages as losses resulting from Hurricane Michael can be produced by extrapolating from the SBA sample of 1,529 inspections to the universe of 72,727 registered businesses. Specifically, the SBA sample is used to obtain the proportion of businesses in each sector and wind category with verified damage and losses, as well as the average damage and loss experienced by businesses in each sector and wind category. To extrapolate these damage and loss numbers, the methodology relies on the list of registered businesses by sector and wind category obtained from Dun & Bradstreet (Table 37). For clarity and ease of interpretation, this methodology is summarized visually in Figure 15.

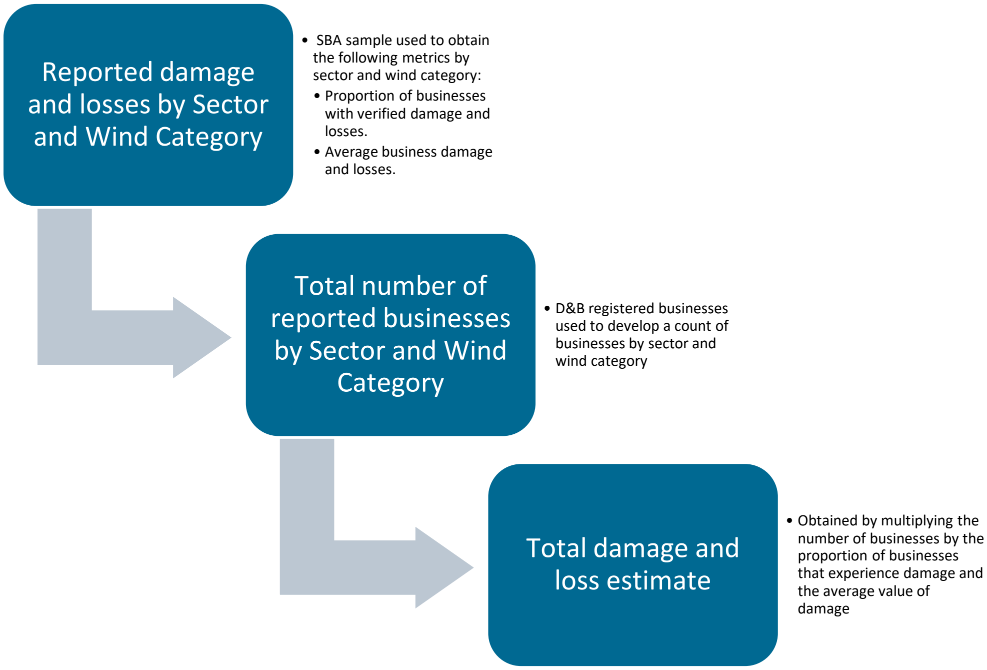


Figure 15: Process used to develop total business damage and loss estimates for Hurricane Michael

The results of this methodology are shown in Table 42, where the top panel provides estimates for businesses located in areas that experienced winds between 50 and 63 knots (Strong Gale force winds), and the lower panel provides estimates for businesses located in areas that experienced winds above 64 knots (Hurricane winds). In other words, Table 42 presents the estimated business or economic losses in the state of Florida because of Hurricane Michael. For clarity and ease of interpretation, results are broken down by industry sector, and estimates of structure, contents, and operations damage and losses for each industry sector are provided. In addition, Table 42 provides the total damage estimate and the estimated number of businesses impacted for each industry sector, as well as statewide totals. Some of the industry sectors that experienced the heaviest impacts include construction, professional and scientific services, administrative and waste management services, health care and social assistance and businesses that were not categorized. Total business damage and losses from Hurricane Michael are estimated at $9.69 billion, and 71,188 businesses are estimated to have been impacted.

Table 42: Total business damage and loss estimates by sector and wind category

50 Knots - 63 Knots						
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**	**Impacted Businesses**
Agriculture, Forestry, Fishing and Hunting	11	$18,258,994	$7,690,488	$8,782,071	$34,731,552	487
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0	9
Utilities	22	$0	$0	$0	$0	80

Construction	23	$94,664,619	$164,181,719	$228,899,358	$487,745,696	3,726
Manufacturing	31	$0	$0	$0	$0	112
Manufacturing	32	$0	$212,729	$17,836,150	$18,048,879	233
Manufacturing	33	$17,065,671	$4,005,183	$2,463,300	$23,534,154	357
Wholesale Trade	42	$9,503,159	$11,244,950	$214,736,200	$235,484,309	941
Retail Trade	44	$71,382,548	$59,920,669	$79,454,250	$210,757,467	2,235
Retail Trade	45	$83,077,422	$2,047,628	$14,776,708	$99,901,758	1,076
Transportation and Warehousing	48	$23,254,417	$10,866,700	$10,781,181	$44,902,298	643
Transportation and Warehousing	49	$0	$0	$0	$0	95
Information	51	$51,334,970	$0	$0	$51,334,970	655
Finance and Insurance	52	$0	$0	$0	$0	1,500
Real Estate and Rental and Leasing	53	$84,424,453	$17,352,014	$51,439,514	$153,215,981	1,761
Professional, Scientific, and Technical Services	54	$483,307,575	$450,814,028	$74,112,600	$1,008,234,203	4,470
Management of Companies and Enterprises	55	$0	$0	$0	$0	78
Administrative and Support and Waste Management and Remediation Services	56	$12,149,454	$55,118,772	$58,348,500	$125,616,726	5,557
Educational Services	61	$0	$0	$24,437,400	$24,437,400	507
Health Care and Social Assistance	62	$25,493,840	$2,877,560	$37,410,000	$65,781,400	2,580
Arts, Entertainment and Recreation	71	$0	$0	$0	$0	607
Accommodation and Food Services	72	$26,100,156	$16,117,820	$0	$42,217,976	1,594
Other Services and NGOs	81	$245,660,000	$25,634,708	$150,077,500	$421,372,208	4,325
Not Categorized	NA	$554,721,000	$17,020,434	$0	$571,741,434	7,160

64 Knots and above

NAICS Title	NAICS Code	Structure	Contents	Operations	TOTAL	Impacted Businesses
Agriculture, Forestry, Fishing and Hunting	11	$28,559,815	$7,133,577	$11,394,208	$47,087,600	533
Mining, Quarrying, and Oil and Gas Extraction	21	$929,803	$913,900	$0	$1,843,703	19
Utilities	22	$2,801,664	$0	$0	$2,801,664	48
Construction	23	$285,390,642	$127,507,349	$160,041,980	$572,939,971	3,668
Manufacturing	31	$1,091,938	$1,617,378	$1,735,344	$4,444,660	104
Manufacturing	32	$17,175,033	$6,038,542	$14,453,100	$37,666,675	212
Manufacturing	33	$17,132,634	$17,754,240	$19,019,168	$53,906,043	366
Wholesale Trade	42	$63,325,143	$21,306,365	$69,980,484	$154,611,992	831
Retail Trade	44	$173,557,416	$128,283,514	$79,807,033	$381,647,963	1,997
Retail Trade	45	$37,215,333	$30,056,015	$33,412,652	$100,684,000	913
Transportation and Warehousing	48	$24,753,648	$9,631,593	$22,539,101	$56,924,343	675
Transportation and Warehousing	49	$0	$477,687	$2,064,000	$2,541,687	129
Information	51	$10,103,404	$9,742,067	$5,808,253	$25,653,724	341
Finance and Insurance	52	$30,788,640	$11,534,508	$32,434,560	$74,757,708	864

Real Estate and Rental and Leasing	53	$212,765,117	$15,593,472	$35,497,561	$263,856,151	1,378
Professional, Scientific and Technical Services	54	$124,889,736	$72,363,350	$125,304,378	$322,557,464	2,278
Management of Companies and Enterprises	55	$18,735,210	$2,108,557	$6,284,600	$27,128,367	134
Administrative and Support and Waste Management and Remediation Services	56	$181,084,735	$111,128,396	$158,879,577	$451,092,708	3,694
Educational Services	61	$322,836,050	$21,234,322	$4,078,560	$348,148,932	174
Health Care and Social Assistance	62	$242,036,343	$128,234,045	$127,256,744	$497,527,132	1,696
Arts, Entertainment and Recreation	71	$68,815,850	$18,395,474	$19,645,567	$106,856,890	544
Accommodation and Food Services	72	$190,599,517	$74,051,379	$74,433,465	$339,084,361	1,464
Other Services and NGOs	81	$600,698,134	$102,543,155	$60,076,117	$763,317,407	3,097
Not Categorized	NA	$1,317,388,288	$123,563,912	$0	$1,440,952,200	5,241
TOTAL		$5,773,072,370	$1,886,318,199	$2,037,701,183	**$9,697,091,752**	**71,188**

A further breakdown of total damage and loss estimates by county is provided in Appendix 2.

1.4.3 Unmet Business Needs

Unmet needs for businesses recovering from the impacts of Hurricane Michael can be estimated by subtracting the estimated insurance payouts and the current SBA payouts from the total estimated damage. This section provides statewide and county-level summaries of known damages and losses (as reported in SBA application data on verified losses), estimated damage (as calculated in the previous section), estimated insurance payouts for business losses[37] and business interruptions[38], estimated insurance coverage[39] and current SBA loans.

1.4.3.1 Statewide Unmet Needs

SBA application data reveals that $251,860,639 in business damage and losses from 1,060 impacted businesses has been verified in the twelve counties that were included in the presidential disaster declaration for Hurricane Michael. However, 71,188 businesses are located in areas within these counties that experienced sustained winds of 57 mph or higher during Hurricane Michael, and these businesses are estimated to have sustained total damage and losses of $9.6 billion.

Estimated insurance payouts for damage and losses to commercial structures and contents are $2.6 billion. Similarly, estimated business interruption insurance payments are $725.3 million. In addition, a total of $68.4 million in low interest loans has been disbursed by the SBA. Therefore, the total unmet needs for the state of Florida are estimated to be $6,276,734,301. This information is summarized in Table

[37] Florida Office of Insurance Regulation reports that 57.15% of commercial property insurance claims related to Hurricane Michael were paid. Available at: https://www.floir.com/Office/HurricaneSeason/HurricaneMichaelClaimsData.aspx

[38] Florida Office of Insurance Regulation reports that 59.33% of business interruption insurance claims related to Hurricane Michael were paid. Available at: https://www.floir.com/Office/HurricaneSeason/HurricaneMichaelClaimsData.aspx

[39] The Insureon Small Business Outlook reports that 75% of US businesses are underinsured, and 40% of small businesses have no insurance at all. Thus, the estimated insured rate in this study is assumed to be 60%. Available at: https://www.insureon.com/resources/research/insurable-incidents

43, which includes four panels in a top-to-bottom direction. The first panel provides a summary of the known structure, contents and operations damage and losses, and reports both the count or number of businesses reporting damage or losses to SBA, as well as the amount of damage and losses reported. The second panel provides a summary of total estimated structure, contents and operations damage and losses, also providing the business count and the total amounts. The third panel provides estimates for insurance payouts for damage and losses to commercial structures, as well as business interruptions. The fourth and bottom panel summarizes payouts for accepted SBA loan applications for structure, contents, and operations losses and damages, reporting both the number of businesses that received loans and the amount of those loans. The bottom line in the table provides the estimate of unmet needs, which are estimated as the total estimated damage ($9,697,091,752) minus the estimated insurance payouts ($2,626,597,194 for structure insurance, and $725,337,157 for business interruption insurance), minus total payouts from SBA loans ($68,423,100).

Table 43: Total Economic Losses and Unmet Needs

Known Damage (SBA Verified Loss)		
	Count	**Amount**
Structure	952	$169,965,713
Contents	1,006	$51,983,926
Operations	591	$29,911,000
TOTAL	1,060	$251,860,639
Estimated Damage (D&B Registered Businesses)		
	Count	**Amount**
Structure	71,188	$5,773,072,370
Contents	71,188	$1,886,318,199
Operations	71,188	$2,037,701,183
TOTAL	71,188	$9,697,091,752
Insurance Payouts		
	Count	**Amount**
Commercial Structures	24,412	$2,626,597,194
Business Interruptions	42,233	$725,337,157
SBA Payouts		
	Count	**Amount**
Structure	314	$24,757,100
Contents	361	$14,497,800
Operations	592	$29,168,200
TOTAL SBA Payouts	596	$68,423,100
Total Benefits (SBA and Insurance)		***$3,420,357,451***
TOTAL Estimated Unmet Needs	***28,359***	***$6,276,734,301***

1.4.3.2 County Specific Unmet Need

This section provides a county-level summary of unmet needs for the twelve counties included in the presidential disaster declaration for Hurricane Michael in the state of Florida. Table 44 – Table 55 are structured in identical fashion as Table 43. The tables contain four panels in a top-to-bottom direction, with the first or top panel summarizing known business damage and losses in the county, the second panel summarizing estimated total business damage and losses in the county, the third panel summarizing estimated business insurance payouts in the county, the fourth panel summarizing SBA loan payouts in the county, and the final row providing the estimated unmet needs for businesses in the county.

Bay County Unmet Needs

Table 44 provides a summary of business losses and unmet needs for Bay County. Bay County experienced a direct hit from Hurricane Michael and was the most heavily impacted county in Florida's panhandle. SBA application data reveals that $205,361,084 in business damage and losses from 733 impacted businesses has been verified. However, 21,229 businesses are located in areas within Bay County that experienced sustained winds of 57 mph or higher during Hurricane Michael, and these businesses are estimated to have sustained total damage and losses of $4.19 billion.

Estimated insurance payouts for damage and losses to commercial structures and contents in Bay County are $1.18 billion. Estimated business interruption insurance payments are $262.6 million. In addition, a total of $54.3 million in low interest loans has been disbursed by the SBA. Therefore, the total unmet needs for Bay County are estimated to be $2,691,465,362.

Table 44: Bay County economic losses and unmet needs

Known Damage (SBA Verified Loss)		
	Count	**Amount**
Structure	662	$141,269,184
Contents	733	$41,267,900
Operations	435	$22,824,000
TOTAL	**733**	$205,361,084
Estimated Damage (D&B Registered Businesses)		
	Count	**Amount**
Structure	21,229	$2,736,045,153
Contents	21,229	$719,399,598
Operations	21,229	$737,972,238
TOTAL	21,229	$4,193,416,988
Insurance Payouts		
	Count	**Amount**
Commercial Structures	7,280	$1,184,958,699
Business Interruptions	12,594	$262,687,527
SBA Payouts		
	Count	**Amount**
Structure	236	$20,104,500
Contents	271	$11,731,500
Operations	436	$22,469,400
TOTAL SBA Payouts	436	$54,305,400
TOTAL Estimated Unmet Needs	***8,199***	***$2,691,465,362***

Calhoun County Unmet Needs

Table 45 provides a summary of business losses and unmet needs for Calhoun County. SBA application data reveals that $2,533,148 in business damage and losses from 39 impacted businesses in Calhoun County has been verified. However, a total of 987 businesses are located in areas within Calhoun County that experienced sustained winds of 57 mph or higher during Hurricane Michael, and these businesses are estimated to have sustained total damage and losses of $185.3 million.

Estimated insurance payouts for damage and losses to commercial structures and contents in Calhoun County are $52 million. Estimated business interruption insurance payments are $11.9 million. In addition, a total of $623,100 in low interest loans has been disbursed by the SBA. Therefore, the total unmet needs for Calhoun County are estimated to be $120,714,227.

Table 45: Calhoun County economic losses and unmet needs

Known Damage (SBA Verified Loss)		
	Count	**Amount**
Structure	39	$2,533,148
Contents	26	$785,547
Operations	7	$186,500
TOTAL	39	$3,505,195
Estimated Damage (D&B Registered Businesses)		
	Count	**Amount**
Structure	987	$119,311,495
Contents	987	$32,333,675
Operations	987	$33,685,860
TOTAL	987	$185,331,030
Insurance Payouts		
	Count	**Amount**
Commercial Structures	338	$52,002,934
Business Interruptions	586	$11,990,770
SBA Payouts		
	Count	**Amount**
Structure	10	$289,200
Contents	9	$147,400
Operations	7	$186,500
TOTAL SBA Payouts	10	$623,100
TOTAL Estimated Unmet Needs	***391***	***$120,714,227***

Franklin County Unmet Needs

Table 46 provides a summary of business losses and unmet needs for Franklin County. SBA application data reveals that $4,380,705 in business damages and losses from 34 impacted businesses in Franklin County has been verified. However, a total of 1,484 businesses are located in areas within Franklin County that experienced sustained winds of 57 mph or higher during Hurricane Michael, and these businesses are estimated to have sustained total damages and losses of $198.36 million.

Estimated insurance payouts for damage and losses to commercial structures and contents in Franklin County are $52.1 million. Estimated business interruption insurance payments are $16.5 million. In addition, a total of $1.49 million in low interest loans has been disbursed by the SBA. Therefore, the total unmet needs for Franklin County are estimated to be $128,238,569.

Table 46: Franklin County economic losses and unmet needs

Known Damage (SBA Verified Loss)		
	Count	**Amount**
Structure	22	$2,424,516
Contents	34	$1,111,589
Operations	23	$844,600
TOTAL	34	$4,380,705
Estimated Damage (D&B Registered Businesses)		
	Count	**Amount**
Structure	1,484	$114,606,140
Contents	1,484	$37,324,796
Operations	1,484	$46,436,394
TOTAL	1,484	$198,367,330
Insurance Payouts		
	Count	**Amount**
Commercial Structures	509	$52,100,930
Business Interruptions	880	$16,529,431
SBA Payouts		
	Count	**Amount**
Structure	8	$404,400
Contents	12	$250,600
Operations	23	$843,400
TOTAL SBA Payouts	23	$1,498,400
TOTAL Estimated Unmet Needs	***581***	***$128,238,569***

Gadsden County Unmet Needs

Table 47 provides a summary of business losses and unmet needs for Gadsden County. SBA application data reveals that $5,660,713 in business damage and losses from 31 impacted businesses in Gadsden County has been verified. However, a total of 3,527 businesses are located in areas within Gadsden County that experienced sustained winds of 57 mph or higher during Hurricane Michael, and these businesses are estimated to have sustained total damage and losses of $571.65 million.

Estimated insurance payouts for damage and losses to commercial structures and contents in Gadsden County are $155.9 million. Estimated business interruption insurance payments are $41.5 million. In addition, a total of $936,300 in low interest loans has been disbursed by the SBA. Therefore, the total unmet needs for Gadsden County are estimated to be $373,165,019.

Table 47: Gadsden County economic losses and unmet needs

Known Damage (SBA Verified Loss)		
	Count	**Amount**
Structure	31	$4,797,914
Contents	14	$722,299
Operations	11	$140,500
TOTAL	31	$5,660,713
Estimated Damage (D&B Registered Businesses)		
	Count	**Amount**
Structure	3,527	$351,271,726
Contents	3,527	$103,623,236
Operations	3,527	$116,764,615
TOTAL	3,527	$571,659,577
Insurance Payouts		
	Count	**Amount**
Commercial Structures	1,209	$155,994,895
Business Interruptions	2,092	$41,563,363
SBA Payouts		
	Count	**Amount**
Structure	5	$737,600
Contents	5	$58,200
Operations	11	$140,500
TOTAL SBA Payouts	11	$936,300
TOTAL Estimated Unmet Needs	**1,424**	**$373,165,019**

Gulf County Unmet Needs

Table 48 provides a summary of business losses and unmet needs for Gulf County. SBA application data reveals that $19,302,250 in business damage and losses from 102 impacted businesses in Gulf County has been verified. However, a total of 1,689 businesses are located in areas within Gulf County that experienced sustained winds of 57 mph or higher during Hurricane Michael, and these businesses are estimated to have sustained total damage and losses of $331.6 million.

Estimated insurance payouts for damage and losses to commercial structures and contents in Gulf County are $93.9 million. Estimated business interruption insurance payments are $20.51 million. In addition, a total of $5.94 million in low interest loans has been disbursed by the SBA. Therefore, the total unmet needs for Gulf County are estimated to be $211,221,966.

Table 48: Gulf County economic losses and unmet needs

Known Damage (SBA Verified Loss)		
	Count	**Amount**
Structure	85	$10,404,410
Contents	102	$5,441,240
Operations	53	$3,456,600
TOTAL	102	$19,302,250
Estimated Damage (D&B Registered Businesses)		
	Count	**Amount**
Structure	1,689	$217,114,835
Contents	1,689	$56,887,544
Operations	1,689	$57,644,857
TOTAL	1,689	$331,647,236
Insurance Payouts		
	Count	**Amount**
Commercial Structures	579	$93,962,290
Business Interruptions	1,002	$20,519,180
SBA Payouts		
	Count	**Amount**
Structure	22	$1,243,500
Contents	37	$1,412,800
Operations	53	$3,287,500
TOTAL SBA Payouts	53	$5,943,800
TOTAL Estimated Unmet Needs	***634***	***$211,221,966***

Holmes County Unmet Needs

Table 49 provides a summary of business losses and unmet needs for Holmes County. SBA application data reveals that $616,302 in business damage and losses from six impacted businesses in Holmes County has been verified. However, a total of 1,506 businesses are located in areas within Holmes County that experienced sustained winds of 57 mph or higher during Hurricane Michael, and these businesses are estimated to have sustained total damage and losses of $130.12 million.

Estimated insurance payouts for damage and losses to commercial structures and contents in Holmes County are $30.3 million. Estimated business interruption insurance payments are $14.79 million. In addition, a total of $268,400 in low interest loans has been disbursed by the SBA. Therefore, the total unmet needs for Holmes County are estimated to be $84,690,720.

Table 49: Holmes County economic losses and unmet needs

Known Damage (SBA Verified Loss)		
	Count	**Amount**
Structure	4	$325,498
Contents	4	$22,404
Operations	6	$268,400
TOTAL	6	$616,302
Estimated Damage (D&B Registered Businesses)		
	Count	**Amount**
Structure	1,506	$60,357,632
Contents	1,506	$28,196,073
Operations	1,506	$41,569,844
TOTAL	1,506	$130,123,548
Insurance Payouts		
	Count	**Amount**
Commercial Structures	516	$30,367,287
Business Interruptions	893	$14,797,141
SBA Payouts		
	Count	**Amount**
Structure	0	$0
Contents	0	$0
Operations	6	$268,400
TOTAL SBA Payouts	6	$268,400
TOTAL Estimated Unmet Needs	***607***	***$84,690,720***

Jackson County Unmet Needs

Table 50 provides a summary of business losses and unmet needs for Jackson County. SBA application data reveals that $9,059,045 in business damage and losses from 72 impacted businesses in Jackson County has been verified. However, a total of 3,738 businesses are located in areas within Jackson County that experienced sustained winds of 57 mph or higher during Hurricane Michael, and these businesses are estimated to have sustained total damage and losses of $679.1 million.

Estimated insurance payouts for damage and losses to commercial structures and contents in Jackson County are $190.8 million. Estimated business interruption insurance payments are $43.6 million. In addition, a total of $3.23 million in low interest loans has been disbursed by the SBA. Therefore, the total unmet needs for Jackson County are estimated to be $441,424,756.

Table 50: Jackson County economic losses and unmet needs

Known Damage (SBA Verified Loss)		
	Count	**Amount**
Structure	72	$6,563,187
Contents	57	$1,310,858
Operations	29	$1,185,000
TOTAL	72	$9,059,045
Estimated Damage (D&B Registered Businesses)		
	Count	**Amount**
Structure	3,738	$438,417,227
Contents	3,738	$117,993,694
Operations	3,738	$122,742,255
TOTAL	3,738	$679,153,176
Insurance Payouts		
	Count	**Amount**
Commercial Structures	1,282	$190,807,265
Business Interruptions	2,218	$43,691,155
SBA Payouts		
	Count	**Amount**
Structure	23	$1,736,200
Contents	17	$509,400
Operations	29	$984,400
TOTAL SBA Payouts	29	$3,230,000
TOTAL Estimated Unmet Needs	***1,491***	***$441,424,756***

Leon County Unmet Needs

Table 51 provides a summary of business losses and unmet needs for Leon County. SBA application data reveals that $929,876 in business damage and losses from 10 impacted businesses in Leon County has been verified. However, a total of 31,746 businesses are located in areas within Leon County that experienced sustained winds of 57 mph or higher during Hurricane Michael, and these businesses are estimated to have sustained total damage and losses of $2.85 billion.

Estimated insurance payouts for damage and losses to commercial structures and contents in Leon County are $725.8 million. Estimated business interruption insurance payments are $261.3 million. In addition, a total of $487,600 in low interest loans has been disbursed by the SBA. Therefore, the total unmet needs for Leon County are estimated to be $1,863,182,201.

Table 51: Leon County economic losses and unmet needs

Known Damage (SBA Verified Loss)		
	Count	**Amount**
Structure	9	$384,721
Contents	10	$147,055
Operations	5	$398,100
TOTAL	10	$929,876
Estimated Damage (D&B Registered Businesses)		
	Count	**Amount**
Structure	31,746	$1,443,553,755
Contents	31,746	$673,055,821
Operations	31,746	$734,267,573
TOTAL	31,746	$2,850,877,149
Insurance Payouts		
	Count	**Amount**
Commercial Structures	10,886	$725,838,528
Business Interruptions	18,834	$261,368,820
SBA Payouts		
	Count	**Amount**
Structure	2	$83,600
Contents	2	$5,900
Operations	5	$398,100
TOTAL SBA Payouts	5	$487,600
TOTAL Estimated Unmet Needs	***12,907***	***$1,863,182,201***

Liberty County Unmet Needs

Table 52 provides a summary of business losses and unmet needs for Liberty County. SBA application data reveals that $535,356 in business damage and losses from 11 impacted businesses in Liberty has been verified. However, a total of 464 businesses are located in areas within Liberty County that experienced sustained winds of 57 mph or higher during Hurricane Michael, and these businesses are estimated to have sustained total damage and losses of $93.54 million.

Estimated insurance payouts for damage and losses to commercial structures and contents in Liberty County are $26.85 million. Estimated business interruption insurance payments are $5.42 million. In addition, a total of $156,100 in low interest loans has been disbursed by the SBA. Therefore, the total unmet needs for Liberty County are estimated to be $61,113,827.

Table 52: Liberty County economic losses and unmet needs

Known Damage (SBA Verified Loss)		
	Count	**Amount**
Structure	11	$291,553
Contents	9	$150,503
Operations	4	$93,300
TOTAL	11	$535,356
Estimated Damage (D&B Registered Businesses)		
	Count	**Amount**
Structure	464	$62,597,555
Contents	464	$15,701,196
Operations	464	$15,250,234
TOTAL	464	$93,548,984
Insurance Payouts		
	Count	**Amount**
Commercial Structures	159	$26,850,606
Business Interruptions	275	$5,428,451
SBA Payouts		
	Count	**Amount**
Structure	5	$68,400
Contents	3	$11,700
Operations	4	$76,000
TOTAL SBA Payouts	5	$156,100
TOTAL Estimated Unmet Needs	***184***	***$61,113,827***

Taylor County Unmet Needs

Table 53 provides a summary of business losses and unmet needs for Taylor County. SBA application data reveals that $49,594 in business damage and losses from one impacted business in Taylor County has been verified. There is only one business located in areas within Taylor County that experienced sustained winds of 57 mph or higher during Hurricane Michael, and this business is estimated to have sustained total damage and losses of $25,497.

Estimated insurance payouts for damage and losses to commercial structures and contents in Taylor County are $3,771. Estimated business interruption insurance payments are $5,161. There has not been any disbursement of SBA low interest loans in Taylor County. Therefore, the total unmet needs for Taylor County are estimated to be $16,564.

Table 53: Taylor County economic losses and unmet needs

Known Damage (SBA Verified Loss)		
	Count	**Amount**
Structure	1	$49,594
Contents	0	$0
Operations	0	$0
TOTAL	1	$49,594
Estimated Damage (D&B Registered Businesses)		
	Count	**Amount**
Structure	1	$9,881
Contents	1	$1,115
Operations	1	$14,500
TOTAL	1	$25,497
Insurance Payouts		
	Count	**Amount**
Commercial Structures	0	$3,771
Business Interruptions	1	$5,161
SBA Payouts		
	Count	**Amount**
Structure	0	$0
Contents	0	$0
Operations	0	$0
TOTAL SBA Payouts	0	$0
TOTAL Estimated Unmet Needs	***0***	***$16,564***

Wakulla County Unmet Needs

Table 54 provides a summary of business losses and unmet needs for Wakulla County. SBA application data reveals that $1,131,811 in business damage and losses from nine impacted businesses in Wakulla County has been verified. However, a total of 3,056 businesses are located in areas within Wakulla County that experienced sustained winds of 57 mph or higher during Hurricane Michael, and these businesses are estimated to have sustained total damage and losses of $274.8 million.

Estimated insurance payouts for damage and losses to commercial structures and contents in Wakulla County are $65.4 million. Estimated business interruption insurance payments are $29.9 million. In addition, a total of $185,700 in low interest loans has been disbursed by the SBA. Therefore, the total unmet needs for Wakulla County are estimated to be $179,334,941.

Table 54: Wakulla County economic losses and unmet needs

Known Damage (SBA Verified Loss)		
	Count	**Amount**
Structure	4	$391,041
Contents	9	$629,370
Operations	7	$111,400
TOTAL	9	$1,131,811
Estimated Damage (D&B Registered Businesses)		
	Count	**Amount**
Structure	3,056	$126,485,348
Contents	3,056	$64,260,931
Operations	3,056	$84,134,408
TOTAL	3,056	$274,880,688
Insurance Payouts		
	Count	**Amount**
Commercial Structures	1,048	$65,411,685
Business Interruptions	1,813	$29,948,362
SBA Payouts		
	Count	**Amount**
Structure	0	$0
Contents	2	$74,300
Operations	7	$111,400
TOTAL SBA Payouts	7	$185,700
TOTAL Estimated Unmet Needs	***1,236***	***$179,334,941***

Washington County Unmet Needs

Table 55 provides a summary of business losses and unmet needs for Washington County. SBA application data reveals that $1,328,708 in business damage and losses from 12 impacted businesses in Washington County has been verified. However, a total of 1,761 businesses are located in areas within Washington County that experienced sustained winds of 57 mph or higher during Hurricane Michael, and these businesses are estimated to have sustained total damage and losses of $188 million.

Estimated insurance payouts for damage and losses to commercial structures and contents in Washington County are $48.2 million. Estimated business interruption insurance payments are $16.8 million. In addition, a total of $788,300 in low interest loans has been disbursed by the SBA. Therefore, the total unmet needs for Washington County are estimated to be $122,166,149.

Table 55: Washington County economic losses and unmet needs

Known Damage (SBA Verified Loss)		
	Count	**Amount**
Structure	12	$530,947
Contents	8	$395,161
Operations	11	$402,600
TOTAL	12	$1,328,708
Estimated Damage (D&B Registered Businesses)		
	Count	**Amount**
Structure	1,761	$103,301,623
Contents	1,761	$37,540,520
Operations	1,761	$47,218,406
TOTAL	1,761	$188,060,549
Insurance Payouts		
	Count	**Amount**
Commercial Structures	604	$48,298,305
Business Interruptions	1,045	$16,807,795
SBA Payouts		
	Count	**Amount**
Structure	3	$89,700
Contents	3	$296,000
Operations	11	$402,600
TOTAL SBA Payouts	11	$788,300
TOTAL Estimated Unmet Needs	***705***	***$122,166,149***

1.5 Infrastructure Impacts

1.5.1 Estimating Infrastructure Unmet Needs Using Public Assistance Data

Public Assistance data is slow to materialize as counties and the state work on creating project worksheets. Through its Public Assistance (PA) Program (CDFA Number 97.036), FEMA provides supplemental federal disaster grant assistance for debris removal, emergency protective measures and the repair, replacement or restoration of disaster-damaged, publicly owned facilities and the facilities of certain Private Non-Profit (PNP) organizations. The PA Program also encourages protection of these damaged facilities from future events by providing assistance for hazard mitigation measures during the recovery process. This dataset lists all public assistance recipients, designated as applicants in the data. The dataset also features a list of every funded, individual project, called project worksheets.[40]

FDEM oversees the Public Assistance Program and assists counties and local municipalities with applications for Public Assistance. FEDM's Public Assistance Project Worksheets provide the most comprehensive assessment of Hurricane Michael impacts to public buildings, infrastructure and other tax-funded assets. A review of FDEM's current public assistance program projects reveals more than $13.9 billion in infrastructure impacts across the twelve CDBG-DR county areas of interest (Table 56).

Table 56: Impact to infrastructure in CDBG-DR counties

County	Public Assistance Categories and Impacts								
	A – Debris Removal	B – Emergency Protective Measures	C – Roads and Bridges	D – Water Control Facilities	E – Buildings and Equipment	F - Utilities	G – Parks, Recreation, and Other	Z – Project Management	**Grand Total**
Bay	$878,318,895	$250,049,709	$168,881,198	$64,975,539	$564,937,186	$109,797,290	$179,705,826	$12,101,450	$2,228,767,093
Calhoun	$3,072,819	$2,223,700	$374,200		$35,411,331	$3,654,250	$5,018,738	$3,200	$49,758,238
Franklin	$639,679	$2,357,760	$13,742,140	$64,500	$10,503,753	$682,183	$4,084,565	$3,000	$32,077,580
Gadsden	$10,163,700	$26,735,235	$950,460		$78,342,640	$35,328,000	$2,490,511	$25,950	$154,036,495
Gulf	$9,507,534	$58,176,687	$1,965,552	$191,800	$13,811,478	$27,335,725	$10,212,237	$3,039,400	$124,240,413
Holmes	$470,000	$371,796	$13,247		$503,500	$310,306	$75,700	$35,100	$1,779,649
Jackson	$11,242,200	$92,240,192	$156,226,575	$100,000	$52,942,099	$22,276,471	$5,640,590	$12,900	$340,681,027
Leon	$395,336,766	$333,845,254	$4,098,014	$105,000	$108,448,867	$55,610,147	$25,949,019	$1,480,645	$924,873,712
Liberty	$3,556,701	$5,546,129	$196,575	$11,000	$8,703,288	$1,211,195	$2,488,253	$15,001	$21,728,142
Taylor	$60,000	$61,000			$5,332		$54,000	$250	$180,582
Wakulla	$56,400	$669,854	$184,276		$593,597	$126,984	$746,500	$12,100	$2,389,711
Washington	$268,501	$294,703	$292,223	$250,000	$947,153	$265,000	$619,500	$24,700	$2,961,780
Grand Total	**$1.3 B**	**$773 M**	**$346.9M**	**$65 M**	**$875 M**	**$256 M**	**$237 M**	**$16.7 M**	**$3.88 B**

[40] https://www.fema.gov/media-library/assets/documents/28331

Fortunately, cost share for Categories A, B, and most of Category Z costs is 0 percent for the state and will be covered 100 percent by FEMA through the Stafford Act.[41] All other PA categories remain at a 75 percent Federal / 25 percent State cost share. Estimating remaining unmet needs across these counties is possible by presuming that all state or local cost shares are “unmet needs”. Table 57 shows estimated unmet needs from infrastructure projects utilizing established cost share rates. Utilizing these methods results in an estimated unmet infrastructure need of $445.4 million across CDBG-DR counties of interest.

Table 57: Remaining infrastructure unmet needs in CDBG-DR counties

County	Public Assistance Categories and Impacts								
	A – Debris Removal	**B** – Emergency Protective Measures	**C** – Roads and Bridges	**D** – Water Control Facilities	**E** – Buildings and Equipment	**F** - Utilities	**G** – Parks, Recreation, and Other	**Z** – Project Management	**Grand Total**
Bay	$0	$0	$42,220,300	$16,243,885	$141,234,296	$27,449,322	$44,926,457	$0	$272,074,260
Calhoun	$0	$0	$93,550	$0	$8,852,833	$913,563	$1,254,685	$0	$11,114,630
Franklin	$0	$0	$3,435,535	$16,125	$2,625,938	$170,546	$1,021,141	$0	$7,269,285
Gadsden	$0	$0	$237,615	$0	$19,585,660	$8,832,000	$622,628	$0	$29,277,903
Gulf	$0	$0	$491,388	$47,950	$3,452,869	$6,833,931	$2,553,059	$0	$13,379,198
Holmes	$0	$0	$3,312	$0	$125,875	$77,576	$18,925	$0	$225,688
Jackson	$0	$0	$39,056,644	$25,000	$13,235,525	$5,569,118	$1,410,147	$0	$59,296,434
Leon	$0	$0	$1,024,503	$26,250	$27,112,217	$13,902,537	$6,487,255	$0	$48,552,762
Liberty	$0	$0	$49,144	$2,750	$2,175,822	$302,799	$622,063	$0	$3,152,578
Taylor	$0	$0	$0	$0	$1,333	$0	$13,500	$0	$14,833
Wakulla	$0	$0	$46,069	$0	$148,399	$31,746	$186,625	$0	$412,839
Washington	$0	$0	$73,056	$62,500	$236,788	$66,250	$154,875	$0	$593,469
Grand Total	$0	$0	$86,731,115	$16,424,460	$218,787,555	$64,149,388	$59,271,360	$0	$445,363,878

1.5.2 Impact to Availability of Rural Health Care

Access to healthcare services is critical to good health, yet rural residents face a variety of access barriers. For rural residents, the issue of access to health care services is particularly acute. Rural communities have lower population densities, resulting in rural residents having to travel greater distances to access health care and health care providers being less proximate to the people they serve.[42] A 1993 National Academies report, *Access to Healthcare in America*[43], defined access as the timely use of personal health services to achieve the best possible health outcomes. A 2014 Rural Policy Research Institute (RUPRI) Health Panel report[44] on rural healthcare access notes that access to health care influences overall physical, social and mental health status; prevention of disease and disability; detection and treatment of

[41] https://www.floridadisaster.org/news-media/news/20190310-governor-desantis-announces-formal-notification-from-fema-for-45-days-of-100-percent-federal-cost-share-reimbursement-for-hurricane-michael/

[42] Rural Health Information Hub (https://www.ruralhealthinfo.org/topics/healthcare-access#facility-closures)

[43] *Access to Health Care in America*, Institute of Medicine

[44] Access to Rural Health Care – A Literature Review and New Synthesis, Rural Policy Research Institute Health Panel (August 2014), quoting Health People 2020.gov 2012).

health conditions; quality of life; preventable death; and life expectancy. Ideally, residents should be able to conveniently and confidently access services such as primary care, dental care, behavioral health, emergency care and public health services.

The closure of rural healthcare facilities or the discontinuation of services can have a negative impact on the access to healthcare in a rural community. Local rural healthcare systems are fragile; when one facility closes or a provider leaves, it can impact care and access across the community. For example, if a surgeon leaves, critical surgical access declines and overall patient care is jeopardized. If a hospital closes, it may be harder to recruit physicians.

There are multiple factors that can affect the severity and impact of a hospital or healthcare facility closure, including distance to the next closest provider, availability of alternative services, transportation services and community members' socioeconomic and health status. Traveling to receive healthcare services places the burden on patients. For low income individuals, burdens such as a lack of paid time off from work, physical limitations, acute conditions or no personal transportation, can significantly affect their ability to access healthcare services.

A significant concern for rural communities losing their hospital is the loss of emergency services. In emergency situations, any delay in care can have serious adverse consequences on patient outcomes. A 2015 findings brief from the North Carolina Rural Health Research Program, A Comparison of Closed Rural Hospitals and Perceived Impact,[45] identifies the following potential impacts on healthcare access due to hospital closure:

- Unstable health services, particularly diagnostic and lab tests, obstetrics, rehabilitation and emergency medical care;
- Rising EMS costs;
- Residents not receiving needed care or services due to lack of transportation; and
- Greater impact on access for the elderly, racial/ethnic minorities, the poor and people with disabilities.

Hurricane Michael had a significant impact on the rural hospitals servicing Florida panhandle communities. Four hospitals and eleven nursing facilities were evacuated and closed.

Bay County

Approximately two weeks after Hurricane Michael made landfall in the Florida Panhandle, FEMA deployed a pre-Mitigation Assessment Team (pre-MAT) (October 22 to 25, 2018) consisting of subject matter experts (SMEs) to perform a preliminary field assessment of building damage in limited areas including Bay county.[46] The pre-MAT's assessments included observations of damage to medical facilities in Bay county; a summary of the pre-MAT's observations is below.

[45] *A Comparison of Closed Rural Hospitals and Perceived Impact*, NC Rural Health Research Program (April 2015).
[46] Mitigation Assessment Team Report Hurricane Michael in Florida, FEMA P-2077 (February 2020); https://www.fema.gov/media-library-data/1582559571919-8b4ba5ce4c75d0b4f73c7f69215451f1/901907_FEMA_MAT_Michael_508_02-21-2020_FINAL.pdf

Bay county has five hospitals. Bay Medical Sacred Heart Health System (Bay Medical), with 323 beds, and Gulf Coast Regional Medical Center, with 227 beds, are the largest hospitals in the county.

The Gulf Coast Regional Medical Center, located in Panama City, opened in 1977. It is licensed for 227 beds and has the region's only Level III Neonatal Intensive Care Unit. At the time of the hurricane, there were nearly 600 people in the hospital, including 150 patients, family members and people seeking shelter. The roof system on an adjacent three-story medical office building blew off, which resulted in extensive water damage throughout that building. Wind-borne roof debris from the office building shattered several hospital windows. Some of the hospital windows were protected by polycarbonate shutters, but most of the windows were not protected. A few of the hospital's bituminous cap sheet membrane roofs were damaged. Municipal water and sewer services were interrupted. An on-site well was damaged and not operational for several days. Except for the emergency room, evacuation of the hospital commenced the day after hurricane landfall. During the evacuation, there was loss of communication with the police department, the EOC and incoming helicopters. A phased reopening started on November 8, 2018 (29 days after hurricane landfall). On January 7, 2019 (91 days after hurricane landfall) the hospital had 100 percent of pre-storm capability.

Bay Medical has not been as quick to rebound from Hurricane Michael. Bay Medical, also located in Panama City, opened in 1949. The campus includes several buildings built over the past five decades. The latest addition opened in 2010. Bay Medical was a Level 2 trauma center with 323 beds, and the only trauma center between Pensacola and Tallahassee. The 2010 addition had protected glazing. Bay Medical suffered significant wind-related damage to numerous

Approximately 1,500 people occupied the hospital campus during the hurricane, including family members and pets. It was reported that the emergency room was "inundated" by people seeking shelter. No occupants were injured during the storm. When the outer panes of the 2010 Patient Care Tower started to break, there was concern about the safety of approximately 40 patients (post-heart surgery patients, critically ill septic patients and respiratory patients on ventilators). Those patients were moved to rooms without exterior windows on lower floors.

The day after Hurricane Michael made landfall, evacuation (including approximately 200 patients) of the entire facility commenced, except for the emergency room. Municipal electrical power was interrupted for nine days after the storm's landfall. During this time, power was provided by several generators. Municipal water service was interrupted for nearly five days. In the interim, water was provided by an on-site well and tanker trucks. Lack of water initially prevented the flushing of toilets.

The first phase of reopening began on January 2, 2019, with 75 patient beds, eight operating rooms and five cardiac catherization labs. More than 600 employees were laid off in February 2019 and in March 2019, it was announced that obstetrical services were being eliminated because of limited space options in the first phase of reconstruction. The rebuilding project is estimated to cost $47 million.

Calhoun and Liberty Counties

Calhoun-Liberty Hospital, a designated Critical Access Facility, serves as the sole provider of emergency and hospital care for the citizens of Calhoun, Liberty and the surrounding counties. The hospital also serves as the healthcare provider for the assisted living and rehabilitative centers in both counties.[47] The hospital serves a predominantly LMI population.

Hurricane Michael caused significant damage to the Calhoun-Liberty Hospital. Storm winds tore off eighty percent (80%) of the hospital's roof, resulting in a loss of sixty percent (60%) of its beds.

The Calhoun-Liberty Hospital is the trauma center for all medical emergencies that occur within Calhoun and Liberty Counties. Currently, with no operational hospital facilities, county Emergency Medical Services are forced to transport those in need of hospital-based care approximately 50 – 65 miles to Tallahassee. Doing so, takes the only ambulance within Liberty County out of service for a minimum of two and a half hours. During this time county citizens are denied access to emergency medical care unless a neighboring county has the capacity and availability to assist.

In addition to emergency services, Calhoun-Liberty Hospital provides basic essential medical services for the residents of Calhoun and Liberty Counties as well as the surrounding areas, including: mental health evaluations, outpatient clinic services, inpatient care, cardiac services, skilled nursing care, rehabilitation, basic surgical services, school physicals, youth program services, workers' compensation, outpatient laboratory services, radiology services, women's health services, employment screenings, educational services for diabetes and drug abuse counseling and treatment.[48]

The extent of the damage caused by Hurricane Michael resulted in a mandate by local building officials that the building must be brought back to code. The cost to repair exceeds the value of the current building. The estimated cost of rebuilding the facility is approximately $15 million.

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[47] *Local funding Initiative Request LFIR# 2537, Fiscal Year 2019-2020*, The Florida Senate (https://www.flsenate.gov/PublishedContent/Session/FiscalYear/FY2019-20/LocalFundingInitiativeRequests/FY2019-20_S2537.PDF)

[48] *Appropriations Project request APR# 1288– Fiscal year 2019-20*, The Florida House of Representatives (https://www.myfloridahouse.gov/Sections/Documents/loaddoc.aspx?FileName=1288_v1.pdf&DocumentType=MemberBudgetRequests&Session=2019&BillNumber=4797)

Appendix 2. County Breakdown of Impacts and Unmet Housing Needs

Bay County

Small Business Administration Verified Loss of All SBA Applicants		
	Count	Value
SBA applicants with a real estate verified loss	8,472	$ 470,034,654
SBA applicants without a real estate verified Loss (estimate)	8,809	$ 371,590,047
Total verified loss of FEMA applicants referred to SBA (estimate)	17,281	$ 841,624,701
Estimated Damage to Owner Applicant Dwellings		
	Count	Value
FEMA owner or "not specified" applicants with FEMA inspected real property damage (SBA Multiplier)	17,256	$ 1,129,688,864
Additional FEMA owner or "not specified"applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	3	$ 20,733
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	33	$ 687,060
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	14	$ 535,486
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	55	$ 2,287,725
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	59	$ 3,897,894
Total owner or "not specified" applicants without a FEMA Verified Loss (Property or Contents)	16,991	
Total SBA applicants	17,281	
Number of SBA Applicants without FEMA REGID	1,051	
Potential additional owner unmet need population	246	10,377,018
Losses of FEMA applicants not referred to SBA (estimate)		$ 1,147,494,780
Total verified loss of all homeowner applicants across FEMA and SBA (estimate)		$ 1,989,119,481
Estimated Damage to Rental Applicant Dwellings		
	Count	Value
FEMA renter applicants with FEMA inspected real property damage (SBA Multiplier)	10,841	$ 203,906,377
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	150	$ 1,036,650
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	316	$ 6,579,120
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	974	$ 37,254,526
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	2,123	$ 88,306,185
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	7,278	$ 480,828,348
Total renter applicants without a FEMA Verified Loss (Property or Contents)	13,074	
Total SBA business applicants (Landlords) with verified repair, reconstruction, or relocation losses (rental NAICS code 531110)	574	$ 62,563,406
Potential additiaonl renter unmet need population	1,708	72,048,564
Total verified loss of rental property (estimated)		$ 952,523,176
Other Housing Damage Estimates		
Real estate damage to public housing	2082	$ 74,340,000
Total verified loss to other housing (estimate)		$ 74,340,000
Total housing verified loss (estimate)		$ 2,174,357,956
Accounting for 30% resilience addition		$ 2,826,665,343
Duplication of Benefits		
FEMA housing assistance payments		$ 68,895,718
SBA Home - Real Property Loans		$ 203,436,774
SBA Business Loan Payments to landlords		$ 15,433,300
NFIP building payments		
State Housing Initiatives Partnership Program		$ 2,507,375
Total benefit		$ 290,273,167
Total unmet housing need		$ 1,884,084,788
Accounting for 30% resilience addition		$ 2,536,392,175

Calhoun County

Small Business Administration Verified Loss of All SBA Applicants		
	Count	Value
SBA applicants with a real estate verified loss	683	$ 29,611,278
SBA applicants without a real estate verified Loss (estimate)	597	$ 18,754,158
Total verified loss of FEMA applicants referred to SBA (estimate)	1,280	$ 48,365,436

Estimated Damage to Owner Applicant Dwellings		
	Count	Value
FEMA owner or "not specified" applicants with FEMA inspected real property damage (SBA Multiplier)	2,096	$ 106,319,590
Additional FEMA owner or "not specified"applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	0	$ -
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	1	$ 20,820
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	1	$ 38,249
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	7	$ 291,165
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	12	$ 792,792
Total owner or "not specified" applicants without a FEMA Verified Loss (Property or Contents)	1,144	
Total SBA applicants	1,280	
Number of SBA Applicants without FEMA REGID	85	
Potential additional owner unmet need population	-11	(345,554)
Losses of FEMA applicants not referred to SBA (estimate)		$ 107,117,062
Total verified loss of all homeowner applicants across FEMA and SBA (estimate)		$ 155,482,498

Estimated Damage to Rental Applicant Dwellings		
	Count	Value
FEMA renter applicants with FEMA inspected real property damage (SBA Multiplier)	365	$ 5,786,565
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	2	$ 13,822
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	15	$ 312,300
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	28	$ 1,070,972
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	112	$ 4,658,640
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	208	$ 13,741,728
Total renter applicants without a FEMA Verified Loss (Property or Contents)	467	
Total SBA business applicants (Landlords) with verified repair, reconstruction, or relocation losses (rental NAICS code 531110)	28	$ 1,203,750
Potential additiaonl renter unmet need population	69	2,167,566
Total verified loss of rental property (estimated)		$ 28,955,343

Other Housing Damage Estimates		
Real estate damage to public housing	310	$ 13,330,000
Total verified loss to other housing (estimate)		$ 13,330,000
Total housing verified loss (estimate)		$ 149,402,404
Accounting for 30% resilience addition		$ 194,223,126

Duplication of Benefits		
FEMA housing assistance payments		$ 7,393,032
SBA Home - Real Property Loans		$ 14,414,600
SBA Business Loan Payments to landlords		$ 412,600
NFIP building payments		
State Housing Initiatives Partnership Program		$ 425,125
Total benefit		$ 22,645,357
Total unmet housing need		$ 126,757,047
Accounting for 30% resilience addition		$ 171,577,769

Franklin County

Small Business Administration Verified Loss of All SBA Applicants		
	Count	Value
SBA applicants with a real estate verified loss	205	$ 6,705,194
SBA applicants without a real estate verified Loss (estimate)	182	$ 3,828,916
Total verified loss of FEMA applicants referred to SBA (estimate)	387	$ 10,534,110
Estimated Damage to Owner Applicant Dwellings		
	Count	Value
FEMA owner or "not specified" applicants with FEMA inspected real property damage (SBA Multiplier)	584	$ 23,283,979
Additional FEMA owner or "not specified"applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	0	$ -
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	0	$ -
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	2	$ 76,498
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	7	$ 291,165
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	8	$ 528,528
Total owner or "not specified" applicants without a FEMA Verified Loss (Property or Contents)	675	
Total SBA applicants	387	
Number of SBA Applicants without FEMA REGID	30	
Potential additional owner unmet need population	65	1,367,470
Losses of FEMA applicants not referred to SBA (estimate)		$ 25,547,640
Total verified loss of all homeowner applicants across FEMA and SBA (estimate)		$ 36,081,750
Estimated Damage to Rental Applicant Dwellings		
	Count	Value
FEMA renter applicants with FEMA inspected real property damage (SBA Multiplier)	95	$ 1,820,124
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	6	$ 41,466
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	4	$ 83,280
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	9	$ 344,241
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	25	$ 1,039,875
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	51	$ 3,369,366
Total renter applicants without a FEMA Verified Loss (Property or Contents)	361	
Total SBA business applicants (Landlords) with verified repair, reconstruction, or relocation losses (rental NAICS code 531110)	15	$ 866,585
Potential additiaonl renter unmet need population	49	1,030,862
Total verified loss of rental property (estimated)		$ 8,595,799
Other Housing Damage Estimates		
Real estate damage to public housing	56	$ 1,890,000
Total verified loss to other housing (estimate)		$ 1,890,000
Total housing verified loss (estimate)		$ 36,033,438
Accounting for 30% resilience addition		$ 46,843,470
Duplication of Benefits		
FEMA housing assistance payments		$ 1,488,036
SBA Home - Real Property Loans		$ 3,117,000
SBA Business Loan Payments to landlords		$ 284,100
NFIP building payments		
State Housing Initiatives Partnership Program		$ 142,075
Total benefit		$ 5,031,211
Total unmet housing need		$ 31,002,228
Accounting for 30% resilience addition		$ 41,812,260

Gadsden County

Small Business Administration Verified Loss of All SBA Applicants		
	Count	Value
SBA applicants with a real estate verified loss	481	$ 11,522,210
SBA applicants without a real estate verified Loss (estimate)	577	$ 9,415,486
Total verified loss of FEMA applicants referred to SBA (estimate)	1,058	$ 20,937,696

Estimated Damage to Owner Applicant Dwellings		
	Count	Value
FEMA owner or "not specified" applicants with FEMA inspected real property damage (SBA Multiplier)	2,299	$ 47,490,440
Additional FEMA owner or "not specified"applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	0	$ -
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	9	$ 187,380
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	2	$ 76,498
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	22	$ 915,090
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	2	$ 132,132
Total owner or "not specified" applicants without a FEMA Verified Loss (Property or Contents)	2,711	
Total SBA applicants	1,058	
Number of SBA Applicants without FEMA REGID	75	
Potential additional owner unmet need population	364	5,939,752
Losses of FEMA applicants not referred to SBA (estimate)		$ 54,741,292
Total verified loss of all homeowner applicants across FEMA and SBA (estimate)		$ 75,678,988

Estimated Damage to Rental Applicant Dwellings		
	Count	Value
FEMA renter applicants with FEMA inspected real property damage (SBA Multiplier)	371	$ 3,383,046
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	12	$ 82,932
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	33	$ 687,060
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	57	$ 2,180,193
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	141	$ 5,864,895
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	128	$ 8,456,448
Total renter applicants without a FEMA Verified Loss (Property or Contents)	1,556	
Total SBA business applicants (Landlords) with verified repair, reconstruction, or relocation losses (rental NAICS code 531110)	20	$ 741,648
Potential additiaonl renter unmet need population	167	2,725,106
Total verified loss of rental property (estimated)		$ 24,121,328

Other Housing Damage Estimates		
Real estate damage to public housing	54	$ 2,665,000
Total verified loss to other housing (estimate)		$ 2,665,000
Total housing verified loss (estimate)		$ 81,527,619
Accounting for 30% resilience addition		$ 105,985,905

Duplication of Benefits		
FEMA housing assistance payments		$ 3,054,785
SBA Home - Real Property Loans		$ 5,628,900
SBA Business Loan Payments to landlords		$ 332,700
NFIP building payments		
State Housing Initiatives Partnership Program		$ 201,500
Total benefit		$ 9,217,885

Total unmet housing need		$ 72,309,734
Accounting for 30% resilience addition		$ 96,768,020

Gulf County

Small Business Administration Verified Loss of All SBA Applicants		
	Count	Value
SBA applicants with a real estate verified loss	961	$ 54,954,023
SBA applicants without a real estate verified Loss (estimate)	741	$ 27,358,461
Total verified loss of FEMA applicants referred to SBA (estimate)	1,702	$ 82,312,484

Estimated Damage to Owner Applicant Dwellings		
	Count	Value
FEMA owner or "not specified" applicants with FEMA inspected real property damage (SBA Multiplier)	2,145	$ 209,927,670
Additional FEMA owner or "not specified"applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	0	$ -
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	4	$ 83,280
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	3	$ 114,747
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	15	$ 623,925
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	16	$ 1,057,056
Total owner or "not specified" applicants without a FEMA Verified Loss (Property or Contents)	1,955	
Total SBA applicants	1,702	
Number of SBA Applicants without FEMA REGID	75	
Potential additional owner unmet need population	74	2,732,154
Losses of FEMA applicants not referred to SBA (estimate)		$ 214,538,832
Total verified loss of all homeowner applicants across FEMA and SBA (estimate)		$ 296,851,316

Estimated Damage to Rental Applicant Dwellings		
	Count	Value
FEMA renter applicants with FEMA inspected real property damage (SBA Multiplier)	466	$ 12,259,223
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	9	$ 62,199
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	16	$ 333,120
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	45	$ 1,721,205
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	68	$ 2,828,460
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	328	$ 21,669,648
Total renter applicants without a FEMA Verified Loss (Property or Contents)	770	
Total SBA business applicants (Landlords) with verified repair, reconstruction, or relocation losses (rental NAICS code 531110)	87	$ 8,441,875
Potential additiaonl renter unmet need population	118	4,356,678
Total verified loss of rental property (estimated)		$ 51,672,408

Other Housing Damage Estimates		
Real estate damage to public housing	550	$ 23,315,000
Total verified loss to other housing (estimate)		$ 23,315,000
Total housing verified loss (estimate)		$ 289,526,240
Accounting for 30% resilience addition		$ 376,384,111

Duplication of Benefits		
FEMA housing assistance payments		$ 9,039,851
SBA Home - Real Property Loans		$ 24,269,630
SBA Business Loan Payments to landlords		$ 1,612,800
NFIP building payments		
State Housing Initiatives Partnership Program		$ 764,875
Total benefit		$ 35,687,156
Total unmet housing need		$ 253,839,083
Accounting for 30% resilience addition		$ 340,696,955

Holmes County

Small Business Administration Verified Loss of All SBA Applicants		
	Count	Value
SBA applicants with a real estate verified loss	84	$ 1,897,051
SBA applicants without a real estate verified Loss (estimate)	81	$ 1,420,254
Total verified loss of FEMA applicants referred to SBA (estimate)	165	$ 3,317,305
Estimated Damage to Owner Applicant Dwellings		
	Count	Value
FEMA owner or "not specified" applicants with FEMA inspected real property damage (SBA Multiplier)	409	$ 5,321,923
Additional FEMA owner or "not specified"applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	0	$ -
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	2	$ 41,640
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	1	$ 38,249
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	9	$ 374,355
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	0	$ -
Total owner or "not specified" applicants without a FEMA Verified Loss (Property or Contents)	550	
Total SBA applicants	165	
Number of SBA Applicants without FEMA REGID	11	
Potential additional owner unmet need population	84	1,472,856
Losses of FEMA applicants not referred to SBA (estimate)		$ 7,249,023
Total verified loss of all homeowner applicants across FEMA and SBA (estimate)		$ 10,566,328
Estimated Damage to Rental Applicant Dwellings		
	Count	Value
FEMA renter applicants with FEMA inspected real property damage (SBA Multiplier)	49	$ 481,267
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	3	$ 20,733
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	1	$ 20,820
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	8	$ 305,992
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	17	$ 707,115
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	20	$ 1,321,320
Total renter applicants without a FEMA Verified Loss (Property or Contents)	249	
Total SBA business applicants (Landlords) with verified repair, reconstruction, or relocation losses (rental NAICS code 531110)	2	$ 344,404
Potential additiaonl renter unmet need population	0	0
Total verified loss of rental property (estimated)		$ 3,201,651
Other Housing Damage Estimates		
Real estate damage to public housing	6	$ 205,000
Total verified loss to other housing (estimate)		$ 205,000
Total housing verified loss (estimate)		$ 10,655,674
Accounting for 30% resilience addition		$ 13,852,376
Duplication of Benefits		
FEMA housing assistance payments		$ 371,605
SBA Home - Real Property Loans		$ 1,000,600
SBA Business Loan Payments to landlords		$ -
NFIP building payments		
State Housing Initiatives Partnership Program		$ -
Total benefit		$ 1,372,205
Total unmet housing need		$ 9,283,469
Accounting for 30% resilience addition		$ 12,480,171

Jackson County

Small Business Administration Verified Loss of All SBA Applicants		
	Count	Value
SBA applicants with a real estate verified loss	1,465	$ 59,519,731
SBA applicants without a real estate verified Loss (estimate)	1,100	$ 32,707,400
Total verified loss of FEMA applicants referred to SBA (estimate)	2,565	$ 92,227,131

Estimated Damage to Owner Applicant Dwellings		
	Count	Value
FEMA owner or "not specified" applicants with FEMA inspected real property damage (SBA Multiplier)	4,792	$ 177,558,165
Additional FEMA owner or "not specified"applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	0	$ -
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	15	$ 312,300
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	5	$ 191,245
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	34	$ 1,414,230
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	18	$ 1,189,188
Total owner or "not specified" applicants without a FEMA Verified Loss (Property or Contents)	3,726	
Total SBA applicants	2,565	
Number of SBA Applicants without FEMA REGID	162	
Potential additional owner unmet need population	320	9,514,880
Losses of FEMA applicants not referred to SBA (estimate)		$ 190,180,008
Total verified loss of all homeowner applicants across FEMA and SBA (estimate)		$ 282,407,139

Estimated Damage to Rental Applicant Dwellings		
	Count	Value
FEMA renter applicants with FEMA inspected real property damage (SBA Multiplier)	985	$ 12,614,491
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	27	$ 186,597
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	55	$ 1,145,100
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	118	$ 4,513,382
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	303	$ 12,603,285
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	482	$ 31,843,812
Total renter applicants without a FEMA Verified Loss (Property or Contents)	1,855	
Total SBA business applicants (Landlords) with verified repair, reconstruction, or relocation losses (rental NAICS code 531110)	54	$ 4,605,547
Potential additiaonl renter unmet need population	343	10,198,762
Total verified loss of rental property (estimated)		$ 77,710,976

Other Housing Damage Estimates		
Real estate damage to public housing	374	$ 16,165,000
Total verified loss to other housing (estimate)		$ 16,165,000
Total housing verified loss (estimate)		$ 284,055,984
Accounting for 30% resilience addition		$ 369,272,779

Duplication of Benefits		
FEMA housing assistance payments		$ 11,337,772
SBA Home - Real Property Loans		$ 27,706,350
SBA Business Loan Payments to landlords		$ 508,900
NFIP building payments		
State Housing Initiatives Partnership Program		$ 552,625
Total benefit		$ 40,105,647

Total unmet housing need		$ 243,950,337
Accounting for 30% resilience addition		$ 329,167,132

Leon County

Small Business Administration Verified Loss of All SBA Applicants	Count	Value
SBA applicants with a real estate verified loss	216	$ 4,813,493
SBA applicants without a real estate verified Loss (estimate)	343	$ 6,101,627
Total verified loss of FEMA applicants referred to SBA (estimate)	559	$ 10,915,120

Estimated Damage to Owner Applicant Dwellings	Count	Value
FEMA owner or "not specified" applicants with FEMA inspected real property damage (SBA Multiplier)	679	$ 7,367,914
Additional FEMA owner or "not specified"applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	1	$ 6,911
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	1	$ 20,820
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	0	$ -
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	8	$ 332,760
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	2	$ 132,132
Total owner or "not specified" applicants without a FEMA Verified Loss (Property or Contents)	2,203	
Total SBA applicants	559	
Number of SBA Applicants without FEMA REGID	69	
Potential additional owner unmet need population	585	10,406,565
Losses of FEMA applicants not referred to SBA (estimate)		$ 18,267,102
Total verified loss of all homeowner applicants across FEMA and SBA (estimate)		$ 29,182,222

Estimated Damage to Rental Applicant Dwellings	Count	Value
FEMA renter applicants with FEMA inspected real property damage (SBA Multiplier)	234	$ 2,119,329
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	9	$ 62,199
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	20	$ 416,400
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	44	$ 1,682,956
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	72	$ 2,994,840
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	89	$ 5,879,874
Total renter applicants without a FEMA Verified Loss (Property or Contents)	3,926	
Total SBA business applicants (Landlords) with verified repair, reconstruction, or relocation losses (rental NAICS code 531110)	11	$ 786,046
Potential additiaonl renter unmet need population	716	12,736,924
Total verified loss of rental property (estimated)		$ 26,678,568

Other Housing Damage Estimates	Count	Value
Real estate damage to public housing	11	$ 475,000
Total verified loss to other housing (estimate)		$ 475,000
Total housing verified loss (estimate)		$ 45,420,670
Accounting for 30% resilience addition		$ 59,046,872

Duplication of Benefits		
FEMA housing assistance payments		$ 631,258
SBA Home - Real Property Loans		$ 2,881,600
SBA Business Loan Payments to landlords		$ 256,800
NFIP building payments		
State Housing Initiatives Partnership Program		$ -
Total benefit		$ 3,769,658
Total unmet housing need		$ 41,651,012
Accounting for 30% resilience addition		$ 55,277,213

Liberty County

Small Business Administration Verified Loss of All SBA Applicants		
	Count	Value
SBA applicants with a real estate verified loss	223	$ 5,812,787
SBA applicants without a real estate verified Loss (estimate)	175	$ 3,099,600
Total verified loss of FEMA applicants referred to SBA (estimate)	398	$ 8,912,387

Estimated Damage to Owner Applicant Dwellings		
	Count	Value
FEMA owner or "not specified" applicants with FEMA inspected real property damage (SBA Multiplier)	609	$ 14,924,875
Additional FEMA owner or "not specified"applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	0	$ -
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	3	$ 62,460
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	0	$ -
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	8	$ 332,760
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	0	$ -
Total owner or "not specified" applicants without a FEMA Verified Loss (Property or Contents)	540	
Total SBA applicants	398	
Number of SBA Applicants without FEMA REGID	29	
Potential additional owner unmet need population	44	779,328
Losses of FEMA applicants not referred to SBA (estimate)		$ 16,099,423
Total verified loss of all homeowner applicants across FEMA and SBA (estimate)		$ 25,011,810

Estimated Damage to Rental Applicant Dwellings		
	Count	Value
FEMA renter applicants with FEMA inspected real property damage (SBA Multiplier)	78	$ 841,458
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	5	$ 34,555
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	4	$ 83,280
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	13	$ 497,237
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	26	$ 1,081,470
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	30	$ 1,981,980
Total renter applicants without a FEMA Verified Loss (Property or Contents)	161	
Total SBA business applicants (Landlords) with verified repair, reconstruction, or relocation losses (rental NAICS code 531110)	5	$ 186,513
Potential additiaonl renter unmet need population	24	425,088
Total verified loss of rental property (estimated)		$ 5,131,581

Other Housing Damage Estimates		
Real estate damage to public housing	28	$ 1,270,000
Total verified loss to other housing (estimate)		$ 1,270,000
Total housing verified loss (estimate)		$ 22,501,004
Accounting for 30% resilience addition		$ 29,251,305

Duplication of Benefits		
FEMA housing assistance payments		$ 927,956
SBA Home - Real Property Loans		$ 3,397,200
SBA Business Loan Payments to landlords		$ 9,200
NFIP building payments		
State Housing Initiatives Partnership Program		$ 100,000
Total benefit		$ 4,434,356
Total unmet housing need		$ 18,066,647
Accounting for 30% resilience addition		$ 24,816,949

Taylor County

Small Business Administration Verified Loss of All SBA Applicants	Count	Value
SBA applicants with a real estate verified loss	4	$ 187,438
SBA applicants without a real estate verified Loss (estimate)	18	$ 654,489
Total verified loss of FEMA applicants referred to SBA (estimate)	22	$ 841,927

Estimated Damage to Owner Applicant Dwellings	Count	Value
FEMA owner or "not specified" applicants with FEMA inspected real property damage (SBA Multiplier)	71	$ 2,000,315
Additional FEMA owner or "not specified"applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	0	$ -
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	0	$ -
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	0	$ -
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	0	$ -
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	0	$ -
Total owner or "not specified" applicants without a FEMA Verified Loss (Property or Contents)	54	
Total SBA applicants	22	
Number of SBA Applicants without FEMA REGID	3	
Potential additional owner unmet need population	0	0
Losses of FEMA applicants not referred to SBA (estimate)		$ 2,000,315
Total verified loss of all homeowner applicants across FEMA and SBA (estimate)		$ 2,842,242

Estimated Damage to Rental Applicant Dwellings	Count	Value
FEMA renter applicants with FEMA inspected real property damage (SBA Multiplier)	11	$ 91,463
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	0	$ -
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	0	$ -
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	2	$ 76,498
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	5	$ 207,975
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	4	$ 264,264
Total renter applicants without a FEMA Verified Loss (Property or Contents)	51	
Total SBA business applicants (Landlords) with verified repair, reconstruction, or relocation losses (rental NAICS code 531110)	1	$ 41,410
Potential additiaonl renter unmet need population	0	0
Total verified loss of rental property (estimated)		$ 681,610

Other Housing Damage Estimates		
Real estate damage to public housing	5	$ 160,000
Total verified loss to other housing (estimate)		$ 160,000
Total housing verified loss (estimate)		$ 2,841,925
Accounting for 30% resilience addition		$ 3,694,502

Duplication of Benefits		
FEMA housing assistance payments		$ 78,092
SBA Home - Real Property Loans		$ 7,500
SBA Business Loan Payments to landlords		$ -
NFIP building payments		
State Housing Initiatives Partnership Program		$ -
Total benefit		$ 85,592

Total unmet housing need		$ 2,756,333
Accounting for 30% resilience addition		$ 3,608,910

Wakulla County

Small Business Administration Verified Loss of All SBA Applicants		
	Count	Value
SBA applicants with a real estate verified loss	107	$ 4,536,785
SBA applicants without a real estate verified Loss (estimate)	104	$ 2,620,280
Total verified loss of FEMA applicants referred to SBA (estimate)	211	$ 7,157,065

Estimated Damage to Owner Applicant Dwellings		
	Count	Value
FEMA owner or "not specified" applicants with FEMA inspected real property damage (SBA Multiplier)	415	$ 22,138,305
Additional FEMA owner or "not specified"applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	0	$ -
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	1	$ 20,820
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	1	$ 38,249
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	3	$ 124,785
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	8	$ 528,528
Total owner or "not specified" applicants without a FEMA Verified Loss (Property or Contents)	586	
Total SBA applicants	211	
Number of SBA Applicants without FEMA REGID	10	
Potential additional owner unmet need population	71	1,788,845
Losses of FEMA applicants not referred to SBA (estimate)		$ 24,639,532
Total verified loss of all homeowner applicants across FEMA and SBA (estimate)		$ 31,796,597

Estimated Damage to Rental Applicant Dwellings		
	Count	Value
FEMA renter applicants with FEMA inspected real property damage (SBA Multiplier)	85	$ 2,055,948
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	1	$ 6,911
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	2	$ 41,640
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	4	$ 152,996
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	13	$ 540,735
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	65	$ 4,294,290
Total renter applicants without a FEMA Verified Loss (Property or Contents)	251	
Total SBA business applicants (Landlords) with verified repair, reconstruction, or relocation losses (rental NAICS code 531110)	3	$ 26,185
Potential additiaonl renter unmet need population	27	680,265
Total verified loss of rental property (estimated)		$ 7,798,970

Other Housing Damage Estimates		
Real estate damage to public housing	61	$ 1,905,000
Total verified loss to other housing (estimate)		$ 1,905,000
Total housing verified loss (estimate)		$ 34,343,502
Accounting for 30% resilience addition		$ 44,646,553

Duplication of Benefits		
FEMA housing assistance payments		$ 1,135,515
SBA Home - Real Property Loans		$ 2,467,200
SBA Business Loan Payments to landlords		$ 21,700
NFIP building payments		
State Housing Initiatives Partnership Program		$ 149,500
Total benefit		$ 3,773,915

Total unmet housing need		$ 30,569,588
Accounting for 30% resilience addition		$ 40,872,638

Washington County

Small Business Administration Verified Loss of All SBA Applicants		
	Count	Value
SBA applicants with a real estate verified loss	380	$ 11,193,244
SBA applicants without a real estate verified Loss (estimate)	357	$ 7,575,005
Total verified loss of FEMA applicants referred to SBA (estimate)	737	$ 18,768,249
Estimated Damage to Owner Applicant Dwellings		
	Count	Value
FEMA owner or "not specified" applicants with FEMA inspected real property damage (SBA Multiplier)	1,221	$ 27,638,040
Additional FEMA owner or "not specified"applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	0	$ -
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	5	$ 104,100
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	2	$ 76,498
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	12	$ 499,140
Additional FEMA owner or "not specified" applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	5	$ 330,330
Total owner or "not specified" applicants without a FEMA Verified Loss (Property or Contents)	1,252	
Total SBA applicants	737	
Number of SBA Applicants without FEMA REGID	57	
Potential additional owner unmet need population	132	2,800,842
Losses of FEMA applicants not referred to SBA (estimate)		$ 31,448,950
Total verified loss of all homeowner applicants across FEMA and SBA (estimate)		$ 50,217,199
Estimated Damage to Rental Applicant Dwellings		
	Count	Value
FEMA renter applicants with FEMA inspected real property damage (SBA Multiplier)	149	$ 2,010,299
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-Low	2	$ 13,822
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Minor-High	13	$ 270,660
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-Low	18	$ 688,482
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Major-High	47	$ 1,954,965
Additional FEMA renter applicants with only FEMA inspected personal property damage (SBA Multiplier) Severe	69	$ 4,558,554
Total renter applicants without a FEMA Verified Loss (Property or Contents)	556	
Total SBA business applicants (Landlords) with verified repair, reconstruction, or relocation losses (rental NAICS code 531110)	13	$ 694,314
Potential additiaonl renter unmet need population	87	1,846,010
Total verified loss of rental property (estimated)		$ 12,037,105
Other Housing Damage Estimates		
Real estate damage to public housing	40	$ 2,015,000
Total verified loss to other housing (estimate)		$ 2,015,000
Total housing verified loss (estimate)		$ 45,501,056
Accounting for 30% resilience addition		$ 59,151,372
Duplication of Benefits		
FEMA housing assistance payments		$ 1,880,154
SBA Home - Real Property Loans		$ 5,879,400
SBA Business Loan Payments to landlords		$ 137,300
NFIP building payments		
State Housing Initiatives Partnership Program		$ 156,925
Total benefit		$ 8,053,779
Total unmet housing need		$ 37,447,276
Accounting for 30% resilience addition		$ 51,097,593

Appendix 3. County breakdown of total damage and loss estimates.

Bay County

57 - 72 mph					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$262,450	$110,541	$126,231	$499,221
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0
Utilities	22	$0	$0	$0	$0
Construction	23	$1,829,268	$3,172,594	$4,423,176	$9,425,038
Manufacturing	31	$0	$0	$0	$0
Manufacturing	32	$0	$913	$76,550	$77,463
Manufacturing	33	$334,621	$78,533	$48,300	$461,454
Wholesale Trade	42	$141,386	$167,300	$3,194,800	$3,503,486
Retail Trade	44	$1,117,848	$938,355	$1,244,250	$3,300,453
Retail Trade	45	$1,235,352	$30,448	$219,728	$1,485,528
Transportation and Warehousing	48	$216,993	$101,400	$100,602	$418,995
Transportation and Warehousing	49	$0	$0	$0	$0
Information	51	$626,992	$0	$0	$626,992
Finance and Insurance	52	$0	$0	$0	$0
Real Estate and Rental and Leasing	53	$3,883,237	$798,134	$2,366,042	$7,047,413
Professional, Scientific, and Technical Services	54	$8,325,433	$7,765,700	$1,276,660	$17,367,793
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$159,602	$724,072	$766,500	$1,650,175
Educational Services	61	$0	$0	$96,400	$96,400
Health Care and Social Assistance	62	$276,677	$31,229	$406,000	$713,907
Arts, Entertainment and Recreation	71	$0	$0	$0	$0
Accommodation and Food Services	72	$982,440	$606,693	$0	$1,589,133
Other Services and NGOs	81	$3,862,400	$403,043	$2,359,600	$6,625,043
NA	NA	$17,509,350	$537,237	$0	$18,046,587
73 mph and above					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$6,376,394	$1,592,675	$2,543,923	$10,512,991

Mining, Quarrying, and Oil and Gas Extraction	21	$342,559	$336,700	$0	$679,259
Utilities	22	$1,400,832	$0	$0	$1,400,832
Construction	23	$192,646,464	$86,070,937	$108,032,699	$386,750,100
Manufacturing	31	$692,960	$1,026,413	$1,101,276	$2,820,650
Manufacturing	32	$11,017,946	$3,873,782	$9,271,800	$24,163,527
Manufacturing	33	$12,685,639	$13,145,899	$14,082,499	$39,914,037
Wholesale Trade	42	$43,588,426	$14,665,753	$48,169,479	$106,423,657
Retail Trade	44	$113,416,338	$83,830,739	$52,152,317	$249,399,395
Retail Trade	45	$23,845,531	$19,258,235	$21,408,983	$64,512,749
Transportation and Warehousing	48	$12,981,913	$5,051,236	$11,820,506	$29,853,655
Transportation and Warehousing	49	$0	$307,349	$1,328,000	$1,635,349
Information	51	$6,459,068	$6,228,066	$3,713,194	$16,400,328
Finance and Insurance	52	$20,418,855	$7,649,622	$21,510,420	$49,578,897
Real Estate and Rental and Leasing	53	$159,187,834	$11,666,814	$26,558,770	$197,413,419
Professional, Scientific and Technical Services	54	$90,460,081	$52,414,191	$90,760,414	$233,634,686
Management of Companies and Enterprises	55	$15,100,020	$1,699,434	$5,065,200	$21,864,654
Administrative and Support and Waste Management and Remediation Services	56	$120,690,476	$74,065,542	$105,891,044	$300,647,062
Educational Services	61	$217,079,413	$14,278,251	$2,742,480	$234,100,144
Health Care and Social Assistance	62	$169,111,478	$89,597,491	$88,914,647	$347,623,615
Arts, Entertainment and Recreation	71	$50,220,390	$13,424,638	$14,336,930	$77,981,959
Accommodation and Food Services	72	$141,647,729	$55,032,719	$55,316,673	$251,997,121
Other Services and NGOs	81	$365,423,082	$62,380,143	$36,546,143	$464,349,369
NA	NA	$920,487,676	$86,336,777	$0	$1,006,824,453
TOTAL		$2,736,045,153	$719,399,598	$737,972,238	$4,193,416,988

Calhoun County

57 - 72 mph					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$0	$0	$0	$0
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0
Utilities	22	$0	$0	$0	$0
Construction	23	$0	$0	$0	$0
Manufacturing	31	$0	$0	$0	$0
Manufacturing	32	$0	$0	$0	$0
Manufacturing	33	$0	$0	$0	$0
Wholesale Trade	42	$0	$0	$0	$0
Retail Trade	44	$0	$0	$0	$0
Retail Trade	45	$0	$0	$0	$0
Transportation and Warehousing	48	$0	$0	$0	$0
Transportation and Warehousing	49	$0	$0	$0	$0
Information	51	$0	$0	$0	$0
Finance and Insurance	52	$0	$0	$0	$0
Real Estate and Rental and Leasing	53	$0	$0	$0	$0
Professional, Scientific and Technical Services	54	$0	$0	$0	$0
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$0	$0	$0	$0
Educational Services	61	$0	$0	$0	$0
Health Care and Social Assistance	62	$0	$0	$0	$0
Arts, Entertainment and Recreation	71	$0	$0	$0	$0
Accommodation and Food Services	72	$0	$0	$0	$0
Other Services and NGOs	81	$0	$0	$0	$0
NA	NA	$0	$0	$0	$0
73 mph and above					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$3,322,155	$829,797	$1,325,405	$5,477,357
Mining, Quarrying, and Oil and Gas Extraction	21	$97,874	$96,200	$0	$194,074

Utilities	22	$58,368	$0	$0	$58,368
Construction	23	$9,414,468	$4,206,213	$5,279,466	$18,900,146
Manufacturing	31	$31,498	$46,655	$50,058	$128,211
Manufacturing	32	$1,296,229	$455,739	$1,090,800	$2,842,768
Manufacturing	33	$561,726	$582,106	$623,579	$1,767,411
Wholesale Trade	42	$1,981,292	$666,625	$2,189,522	$4,837,439
Retail Trade	44	$5,822,908	$4,303,954	$2,677,552	$12,804,413
Retail Trade	45	$1,589,702	$1,283,882	$1,427,266	$4,300,850
Transportation and Warehousing	48	$1,760,259	$684,913	$1,602,781	$4,047,953
Transportation and Warehousing	49	$0	$11,109	$48,000	$59,109
Information	51	$503,689	$485,675	$289,561	$1,278,925
Finance and Insurance	52	$1,211,590	$453,904	$1,276,360	$2,941,854
Real Estate and Rental and Leasing	53	$4,323,239	$316,848	$721,286	$5,361,373
Professional, Scientific, and Technical Services	54	$2,576,742	$1,493,010	$2,585,297	$6,655,049
Management of Companies and Enterprises	55	$279,630	$31,471	$93,800	$404,901
Administrative and Support and Waste Management and Remediation Services	56	$5,539,409	$3,399,434	$4,860,149	$13,798,992
Educational Services	61	$9,276,898	$610,182	$117,200	$10,004,280
Health Care and Social Assistance	62	$6,850,085	$3,629,265	$3,601,606	$14,080,957
Arts, Entertainment and Recreation	71	$1,517,997	$405,783	$433,358	$2,357,137
Accommodation and Food Services	72	$3,124,582	$1,213,957	$1,220,221	$5,558,760
Other Services and NGOs	81	$21,723,665	$3,708,374	$2,172,594	$27,604,633
NA	NA	$36,447,491	$3,418,578	$0	$39,866,069
TOTAL		$119,311,495	$32,333,675	$33,685,860	$185,331,030

Franklin County

57 - 72 mph					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$224,957	$94,749	$108,198	$427,904
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0
Utilities	22	$0	$0	$0	$0
Construction	23	$2,972,561	$5,155,465	$7,187,661	$15,315,686
Manufacturing	31	$0	$0	$0	$0
Manufacturing	32	$0	$6,391	$535,850	$542,241
Manufacturing	33	$191,212	$44,876	$27,600	$263,688
Wholesale Trade	42	$343,366	$406,300	$7,758,800	$8,508,466
Retail Trade	44	$1,692,741	$1,420,938	$1,884,150	$4,997,828
Retail Trade	45	$2,470,704	$60,896	$439,456	$2,971,056
Transportation and Warehousing	48	$361,655	$169,000	$167,670	$698,325
Transportation and Warehousing	49	$0	$0	$0	$0
Information	51	$862,114	$0	$0	$862,114
Finance and Insurance	52	$0	$0	$0	$0
Real Estate and Rental and Leasing	53	$2,588,825	$532,089	$1,577,362	$4,698,275
Professional, Scientific and Technical Services	54	$6,487,350	$6,051,195	$994,800	$13,533,345
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$214,261	$972,042	$1,029,000	$2,215,303
Educational Services	61	$0	$0	$144,600	$144,600
Health Care and Social Assistance	62	$316,203	$35,691	$464,000	$815,893
Arts, Entertainment and Recreation	71	$0	$0	$0	$0
Accommodation and Food Services	72	$867,822	$535,912	$0	$1,403,734
Other Services and NGOs	81	$4,657,600	$486,022	$2,845,400	$7,989,022
NA	NA	$12,783,375	$392,231	$0	$13,175,606
73 mph and above					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$321,499	$80,303	$128,265	$530,067
Mining, Quarrying, and Oil and Gas Extraction	21	$48,937	$48,100	$0	$97,037

Utilities	22	$0	$0	$0	$0
Construction	23	$5,446,386	$2,433,346	$3,054,236	$10,933,969
Manufacturing	31	$73,496	$108,862	$116,802	$299,160
Manufacturing	32	$162,029	$56,967	$136,350	$355,346
Manufacturing	33	$93,621	$97,018	$103,930	$294,569
Wholesale Trade	42	$1,752,681	$589,707	$1,936,885	$4,279,273
Retail Trade	44	$3,823,999	$2,826,477	$1,758,392	$8,408,868
Retail Trade	45	$1,019,040	$823,002	$914,914	$2,756,955
Transportation and Warehousing	48	$366,721	$142,690	$333,913	$843,324
Transportation and Warehousing	49	$0	$14,812	$64,000	$78,812
Information	51	$148,144	$142,846	$85,165	$376,154
Finance and Insurance	52	$391,985	$146,851	$412,940	$951,776
Real Estate and Rental and Leasing	53	$4,168,838	$305,532	$695,526	$5,169,896
Professional, Scientific and Technical Services	54	$2,028,499	$1,175,349	$2,035,234	$5,239,081
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$2,990,300	$1,835,093	$2,623,621	$7,449,013
Educational Services	61	$5,566,139	$366,109	$70,320	$6,002,568
Health Care and Social Assistance	62	$3,995,883	$2,117,072	$2,100,937	$8,213,891
Arts, Entertainment and Recreation	71	$3,668,492	$980,641	$1,047,282	$5,696,415
Accommodation and Food Services	72	$5,728,401	$2,225,588	$2,237,071	$10,191,060
Other Services and NGOs	81	$14,159,175	$2,417,065	$1,416,066	$17,992,306
NA	NA	$21,617,133	$2,027,570	$0	$23,644,703
TOTAL		$114,606,140	$37,324,796	$46,436,394	$198,367,330

Gadsden County

57 - 72 mph					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$1,012,306	$426,372	$486,891	$1,925,569
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0
Utilities	22	$0	$0	$0	$0
Construction	23	$4,090,447	$7,094,272	$9,890,713	$21,075,431
Manufacturing	31	$0	$0	$0	$0
Manufacturing	32	$0	$8,217	$688,950	$697,167
Manufacturing	33	$430,227	$100,971	$62,100	$593,298
Wholesale Trade	42	$393,861	$466,050	$8,899,800	$9,759,711
Retail Trade	44	$2,267,634	$1,903,520	$2,524,050	$6,695,204
Retail Trade	45	$3,320,009	$81,829	$590,519	$3,992,357
Transportation and Warehousing	48	$1,699,779	$794,300	$788,049	$3,282,128
Transportation and Warehousing	49	$0	$0	$0	$0
Information	51	$705,366	$0	$0	$705,366
Finance and Insurance	52	$0	$0	$0	$0
Real Estate and Rental and Leasing	53	$1,294,412	$266,045	$788,681	$2,349,138
Professional, Scientific and Technical Services	54	$8,001,065	$7,463,141	$1,226,920	$16,691,126
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$376,049	$1,706,034	$1,806,000	$3,888,083
Educational Services	61	$0	$0	$433,800	$433,800
Health Care and Social Assistance	62	$247,033	$27,883	$362,500	$637,417
Arts, Entertainment and Recreation	71	$0	$0	$0	$0
Accommodation and Food Services	72	$589,464	$364,016	$0	$953,480
Other Services and NGOs	81	$6,702,400	$699,398	$4,094,600	$11,496,398
NA	NA	$13,790,550	$423,134	$0	$14,213,684
73 mph and above					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$4,876,066	$1,217,928	$1,945,353	$8,039,346
Mining, Quarrying, and Oil and Gas Extraction	21	$97,874	$96,200	$0	$194,074

Utilities	22	$350,208	$0	$0	$350,208
Construction	23	$21,552,129	$9,629,099	$12,086,049	$43,267,277
Manufacturing	31	$83,995	$124,414	$133,488	$341,897
Manufacturing	32	$1,863,329	$655,125	$1,568,025	$4,086,479
Manufacturing	33	$889,399	$921,668	$987,334	$2,798,401
Wholesale Trade	42	$4,114,991	$1,384,529	$4,547,468	$10,046,989
Retail Trade	44	$13,123,270	$9,699,955	$6,034,483	$28,857,708
Retail Trade	45	$2,853,311	$2,304,404	$2,561,759	$7,719,474
Transportation and Warehousing	48	$3,703,879	$1,441,172	$3,372,517	$8,517,568
Transportation and Warehousing	49	$0	$25,921	$112,000	$137,921
Information	51	$740,719	$714,228	$425,825	$1,880,772
Finance and Insurance	52	$1,995,560	$747,607	$2,102,240	$4,845,407
Real Estate and Rental and Leasing	53	$9,109,682	$667,645	$1,519,852	$11,297,179
Professional, Scientific, and Technical Services	54	$9,813,548	$5,686,146	$9,846,130	$25,345,824
Management of Companies and Enterprises	55	$838,890	$94,413	$281,400	$1,214,703
Administrative and Support and Waste Management and Remediation Services	56	$17,010,396	$10,438,970	$14,924,530	$42,373,895
Educational Services	61	$29,686,074	$1,952,581	$375,040	$32,013,695
Health Care and Social Assistance	62	$18,980,444	$10,056,090	$9,979,450	$39,015,984
Arts, Entertainment and Recreation	71	$3,288,993	$879,195	$938,943	$5,107,131
Accommodation and Food Services	72	$10,285,083	$3,995,942	$4,016,560	$18,297,585
Other Services and NGOs	81	$63,619,305	$10,860,237	$6,362,598	$80,842,141
NA	NA	$87,473,979	$8,204,587	$0	$95,678,566
TOTAL		$351,271,726	$103,623,236	$116,764,615	$571,659,577

Gulf County

57 - 72 mph					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$0	$0	$0	$0
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0
Utilities	22	$0	$0	$0	$0
Construction	23	$25,407	$44,064	$61,433	$130,903
Manufacturing	31	$0	$0	$0	$0
Manufacturing	32	$0	$0	$0	$0
Manufacturing	33	$0	$0	$0	$0
Wholesale Trade	42	$0	$0	$0	$0
Retail Trade	44	$0	$0	$0	$0
Retail Trade	45	$0	$0	$0	$0
Transportation and Warehousing	48	$0	$0	$0	$0
Transportation and Warehousing	49	$0	$0	$0	$0
Information	51	$0	$0	$0	$0
Finance and Insurance	52	$0	$0	$0	$0
Real Estate and Rental and Leasing	53	$0	$0	$0	$0
Professional, Scientific and Technical Services	54	$0	$0	$0	$0
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$0	$0	$0	$0
Educational Services	61	$0	$0	$0	$0
Health Care and Social Assistance	62	$0	$0	$0	$0
Arts, Entertainment and Recreation	71	$0	$0	$0	$0
Accommodation and Food Services	72	$0	$0	$0	$0
Other Services and NGOs	81	$0	$0	$0	$0
NA	NA	$0	$0	$0	$0
73 mph and above					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$1,018,080	$254,293	$406,173	$1,678,545
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0

Utilities	22	$525,312	$0	$0	$525,312
Construction	23	$18,439,908	$8,238,616	$10,340,771	$37,019,295
Manufacturing	31	$31,498	$46,655	$50,058	$128,211
Manufacturing	32	$567,100	$199,386	$477,225	$1,243,711
Manufacturing	33	$608,536	$630,615	$675,544	$1,914,695
Wholesale Trade	42	$3,276,752	$1,102,495	$3,621,132	$8,000,380
Retail Trade	44	$11,298,179	$8,350,955	$5,195,250	$24,844,384
Retail Trade	45	$1,997,318	$1,613,083	$1,793,231	$5,403,632
Transportation and Warehousing	48	$1,026,818	$399,533	$934,955	$2,361,306
Transportation and Warehousing	49	$0	$33,327	$144,000	$177,327
Information	51	$562,946	$542,813	$323,627	$1,429,386
Finance and Insurance	52	$1,746,115	$654,156	$1,839,460	$4,239,731
Real Estate and Rental and Leasing	53	$16,057,745	$1,176,866	$2,679,061	$19,913,672
Professional, Scientific and Technical Services	54	$5,482,429	$3,176,618	$5,500,631	$14,159,678
Management of Companies and Enterprises	55	$699,075	$78,678	$234,500	$1,012,253
Administrative and Support and Waste Management and Remediation Services	56	$10,049,369	$6,167,115	$8,817,085	$25,033,569
Educational Services	61	$12,987,657	$854,254	$164,080	$14,005,992
Health Care and Social Assistance	62	$9,418,867	$4,990,240	$4,952,208	$19,361,315
Arts, Entertainment and Recreation	71	$5,059,989	$1,352,608	$1,444,527	$7,857,124
Accommodation and Food Services	72	$11,717,183	$4,552,339	$4,575,828	$20,845,350
Other Services and NGOs	81	$34,137,188	$5,827,444	$3,414,077	$43,378,710
NA	NA	$70,381,362	$6,601,392	$0	$76,982,754
TOTAL		$217,114,835	$56,887,544	$57,644,857	$331,647,236

Holmes County

57 - 72 mph					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$3,599,309	$1,515,989	$1,731,168	$6,846,466
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0
Utilities	22	$0	$0	$0	$0
Construction	23	$6,097,560	$10,575,312	$14,743,920	$31,416,792
Manufacturing	31	$0	$0	$0	$0
Manufacturing	32	$0	$9,130	$765,500	$774,630
Manufacturing	33	$860,454	$201,942	$124,200	$1,186,596
Wholesale Trade	42	$363,564	$430,200	$8,215,200	$9,008,964
Retail Trade	44	$2,938,342	$2,466,533	$3,270,600	$8,675,475
Retail Trade	45	$4,092,104	$100,859	$727,849	$4,920,812
Transportation and Warehousing	48	$2,350,758	$1,098,500	$1,089,855	$4,539,113
Transportation and Warehousing	49	$0	$0	$0	$0
Information	51	$862,114	$0	$0	$862,114
Finance and Insurance	52	$0	$0	$0	$0
Real Estate and Rental and Leasing	53	$1,438,236	$295,605	$876,312	$2,610,153
Professional, Scientific and Technical Services	54	$7,892,943	$7,362,287	$1,210,340	$16,465,570
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$461,316	$2,092,867	$2,215,500	$4,769,683
Educational Services	61	$0	$0	$385,600	$385,600
Health Care and Social Assistance	62	$592,880	$66,920	$870,000	$1,529,800
Arts, Entertainment and Recreation	71	$0	$0	$0	$0
Accommodation and Food Services	72	$769,578	$475,243	$0	$1,244,821
Other Services and NGOs	81	$8,747,200	$912,773	$5,343,800	$15,003,773
NA	NA	$19,291,275	$591,912	$0	$19,883,187
73 mph and above					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$0	$0	$0	$0
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0

Utilities	22	$0	$0	$0	$0
Construction	23	$0	$0	$0	$0
Manufacturing	31	$0	$0	$0	$0
Manufacturing	32	$0	$0	$0	$0
Manufacturing	33	$0	$0	$0	$0
Wholesale Trade	42	$0	$0	$0	$0
Retail Trade	44	$0	$0	$0	$0
Retail Trade	45	$0	$0	$0	$0
Transportation and Warehousing	48	$0	$0	$0	$0
Transportation and Warehousing	49	$0	$0	$0	$0
Information	51	$0	$0	$0	$0
Finance and Insurance	52	$0	$0	$0	$0
Real Estate and Rental and Leasing	53	$0	$0	$0	$0
Professional, Scientific and Technical Services	54	$0	$0	$0	$0
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$0	$0	$0	$0
Educational Services	61	$0	$0	$0	$0
Health Care and Social Assistance	62	$0	$0	$0	$0
Arts, Entertainment and Recreation	71	$0	$0	$0	$0
Accommodation and Food Services	72	$0	$0	$0	$0
Other Services and NGOs	81	$0	$0	$0	$0
NA	NA	$0	$0	$0	$0
TOTAL		$60,357,632	$28,196,073	$41,569,844	$130,123,548

Jackson County

57 - 72 mph					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$1,949,626	$821,161	$937,716	$3,708,502
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0
Utilities	22	$0	$0	$0	$0
Construction	23	$1,346,545	$2,335,381	$3,255,949	$6,937,875
Manufacturing	31	$0	$0	$0	$0
Manufacturing	32	$0	$5,478	$459,300	$464,778
Manufacturing	33	$239,015	$56,095	$34,500	$329,610
Wholesale Trade	42	$161,584	$191,200	$3,651,200	$4,003,984
Retail Trade	44	$1,277,540	$1,072,406	$1,422,000	$3,771,946
Retail Trade	45	$1,389,771	$34,254	$247,194	$1,671,219
Transportation and Warehousing	48	$687,145	$321,100	$318,573	$1,326,818
Transportation and Warehousing	49	$0	$0	$0	$0
Information	51	$470,244	$0	$0	$470,244
Finance and Insurance	52	$0	$0	$0	$0
Real Estate and Rental and Leasing	53	$527,353	$108,389	$321,314	$957,056
Professional, Scientific and Technical Services	54	$2,703,063	$2,521,331	$414,500	$5,638,894
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$144,298	$654,641	$693,000	$1,491,939
Educational Services	61	$0	$0	$144,600	$144,600
Health Care and Social Assistance	62	$207,508	$23,422	$304,500	$535,430
Arts, Entertainment and Recreation	71	$0	$0	$0	$0
Accommodation and Food Services	72	$245,610	$151,673	$0	$397,283
Other Services and NGOs	81	$2,669,600	$278,574	$1,630,900	$4,579,074
NA	NA	$6,043,050	$185,418	$0	$6,228,468
73 mph and above					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$9,269,884	$2,315,401	$3,698,308	$15,283,592
Mining, Quarrying, and Oil and Gas Extraction	21	$342,559	$336,700	$0	$679,259

Utilities	22	$291,840	$0	$0	$291,840
Construction	23	$21,941,156	$9,802,910	$12,304,209	$44,048,275
Manufacturing	31	$157,491	$233,276	$250,290	$641,057
Manufacturing	32	$1,458,258	$512,706	$1,227,150	$3,198,114
Manufacturing	33	$1,544,746	$1,600,792	$1,714,843	$4,860,381
Wholesale Trade	42	$6,248,690	$2,102,433	$6,905,415	$15,256,538
Retail Trade	44	$20,423,632	$15,095,957	$9,391,413	$44,911,002
Retail Trade	45	$4,891,391	$3,950,407	$4,391,586	$13,233,384
Transportation and Warehousing	48	$3,777,223	$1,469,710	$3,439,300	$8,686,233
Transportation and Warehousing	49	$0	$66,654	$288,000	$354,654
Information	51	$1,333,294	$1,285,610	$766,485	$3,385,389
Finance and Insurance	52	$4,418,740	$1,655,416	$4,654,960	$10,729,116
Real Estate and Rental and Leasing	53	$16,366,547	$1,199,498	$2,730,582	$20,296,627
Professional, Scientific and Technical Services	54	$11,293,804	$6,543,832	$11,331,300	$29,168,937
Management of Companies and Enterprises	55	$1,677,780	$188,826	$562,800	$2,429,406
Administrative and Support and Waste Management and Remediation Services	56	$16,667,247	$10,228,385	$14,623,459	$41,519,091
Educational Services	61	$35,252,212	$2,318,690	$445,360	$38,016,263
Health Care and Social Assistance	62	$28,113,891	$14,895,110	$14,781,591	$57,790,593
Arts, Entertainment and Recreation	71	$3,668,492	$980,641	$1,047,282	$5,696,415
Accommodation and Food Services	72	$15,492,720	$6,019,204	$6,050,261	$27,562,185
Other Services and NGOs	81	$83,015,435	$14,171,285	$8,302,415	$105,489,135
NA	NA	$130,708,245	$12,259,728	$0	$142,967,973
TOTAL		$438,417,227	$117,993,694	$122,742,255	$679,153,176

Leon County

57 - 72 mph					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$7,910,981	$3,332,018	$3,804,963	$15,047,962
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0
Utilities	22	$0	$0	$0	$0
Construction	23	$61,737,795	$107,075,034	$149,282,190	$318,095,019
Manufacturing	31	$0	$0	$0	$0
Manufacturing	32	$0	$156,123	$13,090,050	$13,246,173
Manufacturing	33	$12,667,795	$2,973,035	$1,828,500	$17,469,330
Wholesale Trade	42	$7,079,399	$8,376,950	$159,968,200	$175,424,549
Retail Trade	44	$53,848,311	$45,201,901	$59,937,300	$158,987,512
Retail Trade	45	$60,918,296	$1,501,467	$10,835,337	$73,255,100
Transportation and Warehousing	48	$13,887,552	$6,489,600	$6,438,528	$26,815,680
Transportation and Warehousing	49	$0	$0	$0	$0
Information	51	$44,829,928	$0	$0	$44,829,928
Finance and Insurance	52	$0	$0	$0	$0
Real Estate and Rental and Leasing	53	$66,925,915	$13,755,486	$40,777,718	$121,459,120
Professional, Scientific and Technical Services	54	$414,757,910	$386,873,067	$63,600,880	$865,231,857
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$9,315,966	$42,264,007	$44,740,500	$96,320,473
Educational Services	61	$0	$0	$22,172,000	$22,172,000
Health Care and Social Assistance	62	$22,193,475	$2,505,039	$32,567,000	$57,265,513
Arts, Entertainment and Recreation	71	$0	$0	$0	$0
Accommodation and Food Services	72	$20,058,150	$12,386,656	$0	$32,444,806
Other Services and NGOs	81	$192,438,400	$20,081,015	$117,563,600	$330,083,015
NA	NA	$429,134,025	$13,167,065	$0	$442,301,090
73 mph and above					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$267,916	$66,919	$106,888	$441,722
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0

Utilities	22	$58,368	$0	$0	$58,368
Construction	23	$3,812,470	$1,703,342	$2,137,965	$7,653,778
Manufacturing	31	$0	$0	$0	$0
Manufacturing	32	$81,014	$28,484	$68,175	$177,673
Manufacturing	33	$187,242	$194,035	$207,860	$589,137
Wholesale Trade	42	$762,035	$256,394	$842,124	$1,860,553
Retail Trade	44	$1,129,818	$835,095	$519,525	$2,484,438
Retail Trade	45	$40,762	$32,920	$36,597	$110,278
Transportation and Warehousing	48	$110,016	$42,807	$100,174	$252,997
Transportation and Warehousing	49	$0	$0	$0	$0
Information	51	$88,886	$85,707	$51,099	$225,693
Finance and Insurance	52	$249,445	$93,451	$262,780	$605,676
Real Estate and Rental and Leasing	53	$617,606	$45,264	$103,041	$765,910
Professional, Scientific and Technical Services	54	$603,067	$349,428	$605,069	$1,557,565
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$2,402,044	$1,474,091	$2,107,498	$5,983,634
Educational Services	61	$3,710,759	$244,073	$46,880	$4,001,712
Health Care and Social Assistance	62	$285,420	$151,219	$150,067	$586,707
Arts, Entertainment and Recreation	71	$0	$0	$0	$0
Accommodation and Food Services	72	$260,382	$101,163	$101,685	$463,230
Other Services and NGOs	81	$2,133,574	$364,215	$213,380	$2,711,169
NA	NA	$9,049,032	$848,750	$0	$9,897,783
TOTAL		$1,443,553,755	$673,055,821	$734,267,573	$2,850,877,149

Liberty County

57 - 72 mph					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$0	$0	$0	$0
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0
Utilities	22	$0	$0	$0	$0
Construction	23	$0	$0	$0	$0
Manufacturing	31	$0	$0	$0	$0
Manufacturing	32	$0	$0	$0	$0
Manufacturing	33	$0	$0	$0	$0
Wholesale Trade	42	$0	$0	$0	$0
Retail Trade	44	$0	$0	$0	$0
Retail Trade	45	$0	$0	$0	$0
Transportation and Warehousing	48	$0	$0	$0	$0
Transportation and Warehousing	49	$0	$0	$0	$0
Information	51	$0	$0	$0	$0
Finance and Insurance	52	$0	$0	$0	$0
Real Estate and Rental and Leasing	53	$0	$0	$0	$0
Professional, Scientific and Technical Services	54	$0	$0	$0	$0
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$0	$0	$0	$0
Educational Services	61	$0	$0	$0	$0
Health Care and Social Assistance	62	$0	$0	$0	$0
Arts, Entertainment and Recreation	71	$0	$0	$0	$0
Accommodation and Food Services	72	$0	$0	$0	$0
Other Services and NGOs	81	$0	$0	$0	$0
NA	NA	$77,475	$2,377	$0	$79,852
73 mph and above					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$2,089,743	$521,969	$833,723	$3,445,434
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0

Utilities	22	$58,368	$0	$0	$58,368
Construction	23	$4,668,331	$2,085,725	$2,617,917	$9,371,973
Manufacturing	31	$0	$0	$0	$0
Manufacturing	32	$567,100	$199,386	$477,225	$1,243,711
Manufacturing	33	$374,484	$388,071	$415,720	$1,178,274
Wholesale Trade	42	$838,239	$282,034	$926,336	$2,046,609
Retail Trade	44	$2,694,181	$1,991,382	$1,238,867	$5,924,430
Retail Trade	45	$652,185	$526,721	$585,545	$1,764,451
Transportation and Warehousing	48	$733,441	$285,381	$667,825	$1,686,647
Transportation and Warehousing	49	$0	$11,109	$48,000	$59,109
Information	51	$148,144	$142,846	$85,165	$376,154
Finance and Insurance	52	$213,810	$80,101	$225,240	$519,151
Real Estate and Rental and Leasing	53	$926,408	$67,896	$154,561	$1,148,866
Professional, Scientific, and Technical Services	54	$986,837	$571,791	$990,114	$2,548,742
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$2,107,917	$1,293,590	$1,849,437	$5,250,944
Educational Services	61	$7,421,518	$488,145	$93,760	$8,003,424
Health Care and Social Assistance	62	$3,995,883	$2,117,072	$2,100,937	$8,213,891
Arts, Entertainment and Recreation	71	$632,499	$169,076	$180,566	$982,141
Accommodation and Food Services	72	$1,822,673	$708,142	$711,795	$3,242,610
Other Services and NGOs	81	$10,473,910	$1,787,966	$1,047,501	$13,309,377
NA	NA	$21,114,409	$1,980,418	$0	$23,094,826
TOTAL		$62,597,555	$15,701,196	$15,250,234	$93,548,984

Taylor County

57 - 72 mph					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$0	$0	$0	$0
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0
Utilities	22	$0	$0	$0	$0
Construction	23	$0	$0	$0	$0
Manufacturing	31	$0	$0	$0	$0
Manufacturing	32	$0	$0	$0	$0
Manufacturing	33	$0	$0	$0	$0
Wholesale Trade	42	$0	$0	$0	$0
Retail Trade	44	$0	$0	$0	$0
Retail Trade	45	$0	$0	$0	$0
Transportation and Warehousing	48	$0	$0	$0	$0
Transportation and Warehousing	49	$0	$0	$0	$0
Information	51	$0	$0	$0	$0
Finance and Insurance	52	$0	$0	$0	$0
Real Estate and Rental and Leasing	53	$0	$0	$0	$0
Professional, Scientific and Technical Services	54	$0	$0	$0	$0
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$0	$0	$0	$0
Educational Services	61	$0	$0	$0	$0
Health Care and Social Assistance	62	$9,881	$1,115	$14,500	$25,497
Arts, Entertainment and Recreation	71	$0	$0	$0	$0
Accommodation and Food Services	72	$0	$0	$0	$0
Other Services and NGOs	81	$0	$0	$0	$0
NA	NA	$0	$0	$0	$0
73 mph and above					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$0	$0	$0	$0
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0

Utilities	22	$0	$0	$0	$0
Construction	23	$0	$0	$0	$0
Manufacturing	31	$0	$0	$0	$0
Manufacturing	32	$0	$0	$0	$0
Manufacturing	33	$0	$0	$0	$0
Wholesale Trade	42	$0	$0	$0	$0
Retail Trade	44	$0	$0	$0	$0
Retail Trade	45	$0	$0	$0	$0
Transportation and Warehousing	48	$0	$0	$0	$0
Transportation and Warehousing	49	$0	$0	$0	$0
Information	51	$0	$0	$0	$0
Finance and Insurance	52	$0	$0	$0	$0
Real Estate and Rental and Leasing	53	$0	$0	$0	$0
Professional, Scientific and Technical Services	54	$0	$0	$0	$0
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$0	$0	$0	$0
Educational Services	61	$0	$0	$0	$0
Health Care and Social Assistance	62	$0	$0	$0	$0
Arts, Entertainment and Recreation	71	$0	$0	$0	$0
Accommodation and Food Services	72	$0	$0	$0	$0
Other Services and NGOs	81	$0	$0	$0	$0
NA	NA	$0	$0	$0	$0
TOTAL		$9,881	$1,115	$14,500	$25,497

Wakulla County

57 - 72 mph					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$1,537,205	$647,454	$739,353	$2,924,012
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0
Utilities	22	$0	$0	$0	$0
Construction	23	$12,804,876	$22,208,155	$30,962,232	$65,975,263
Manufacturing	31	$0	$0	$0	$0
Manufacturing	32	$0	$19,173	$1,607,550	$1,626,723
Manufacturing	33	$1,529,696	$359,008	$220,800	$2,109,504
Wholesale Trade	42	$717,029	$848,450	$16,202,200	$17,767,679
Retail Trade	44	$5,078,222	$4,262,813	$5,652,450	$14,993,484
Retail Trade	45	$7,026,065	$173,173	$1,249,703	$8,448,941
Transportation and Warehousing	48	$2,495,420	$1,166,100	$1,156,923	$4,818,443
Transportation and Warehousing	49	$0	$0	$0	$0
Information	51	$2,194,472	$0	$0	$2,194,472
Finance and Insurance	52	$0	$0	$0	$0
Real Estate and Rental and Leasing	53	$6,088,532	$1,251,395	$3,709,721	$11,049,648
Professional, Scientific and Technical Services	54	$25,192,543	$23,498,807	$3,863,140	$52,554,490
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$1,086,608	$4,929,644	$5,218,500	$11,234,751
Educational Services	61	$0	$0	$771,200	$771,200
Health Care and Social Assistance	62	$830,032	$93,688	$1,218,000	$2,141,720
Arts, Entertainment and Recreation	71	$0	$0	$0	$0
Accommodation and Food Services	72	$1,670,148	$1,031,379	$0	$2,701,527
Other Services and NGOs	81	$17,608,000	$1,837,401	$10,757,000	$30,202,401
NA	NA	$38,582,550	$1,183,823	$0	$39,766,373
73 mph and above					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$107,166	$26,768	$42,755	$176,689
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0

Utilities	22	$0	$0	$0	$0
Construction	23	$622,444	$278,097	$349,056	$1,249,596
Manufacturing	31	$10,499	$15,552	$16,686	$42,737
Manufacturing	32	$0	$0	$0	$0
Manufacturing	33	$0	$0	$0	$0
Wholesale Trade	42	$0	$0	$0	$0
Retail Trade	44	$173,818	$128,476	$79,927	$382,221
Retail Trade	45	$40,762	$32,920	$36,597	$110,278
Transportation and Warehousing	48	$0	$0	$0	$0
Transportation and Warehousing	49	$0	$0	$0	$0
Information	51	$0	$0	$0	$0
Finance and Insurance	52	$0	$0	$0	$0
Real Estate and Rental and Leasing	53	$154,401	$11,316	$25,760	$191,478
Professional, Scientific and Technical Services	54	$54,824	$31,766	$55,006	$141,597
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$98,043	$60,167	$86,020	$244,230
Educational Services	61	$0	$0	$0	$0
Health Care and Social Assistance	62	$142,710	$75,610	$75,033	$293,353
Arts, Entertainment and Recreation	71	$0	$0	$0	$0
Accommodation and Food Services	72	$0	$0	$0	$0
Other Services and NGOs	81	$387,923	$66,221	$38,796	$492,940
NA	NA	$251,362	$23,576	$0	$274,938
TOTAL		$126,485,348	$64,260,931	$84,134,408	$274,880,688

Washington County

57 - 72 mph					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$1,762,162	$742,203	$847,551	$3,351,916
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0
Utilities	22	$0	$0	$0	$0
Construction	23	$3,760,162	$6,521,442	$9,092,084	$19,373,688
Manufacturing	31	$0	$0	$0	$0
Manufacturing	32	$0	$7,304	$612,400	$619,704
Manufacturing	33	$812,651	$190,723	$117,300	$1,120,674
Wholesale Trade	42	$302,970	$358,500	$6,846,000	$7,507,470
Retail Trade	44	$3,161,912	$2,654,204	$3,519,450	$9,335,566
Retail Trade	45	$2,625,123	$64,702	$466,922	$3,156,747
Transportation and Warehousing	48	$1,555,117	$726,700	$720,981	$3,002,798
Transportation and Warehousing	49	$0	$0	$0	$0
Information	51	$783,740	$0	$0	$783,740
Finance and Insurance	52	$0	$0	$0	$0
Real Estate and Rental and Leasing	53	$1,677,942	$344,873	$1,022,364	$3,045,179
Professional, Scientific and Technical Services	54	$9,947,270	$9,278,499	$1,525,360	$20,751,129
Management of Companies and Enterprises	55	$0	$0	$0	$0
Administrative and Support and Waste Management and Remediation Services	56	$391,354	$1,775,465	$1,879,500	$4,046,319
Educational Services	61	$0	$0	$289,200	$289,200
Health Care and Social Assistance	62	$820,151	$92,573	$1,203,500	$2,116,223
Arts, Entertainment and Recreation	71	$0	$0	$0	$0
Accommodation and Food Services	72	$916,944	$566,247	$0	$1,483,191
Other Services and NGOs	81	$8,974,400	$936,482	$5,482,600	$15,393,482
NA	NA	$17,509,350	$537,237	$0	$18,046,587
73 mph and above					
NAICS Title	**NAICS Code**	**Structure**	**Contents**	**Operations**	**TOTAL**
Agriculture, Forestry, Fishing and Hunting	11	$910,913	$227,525	$363,418	$1,501,856
Mining, Quarrying, and Oil and Gas Extraction	21	$0	$0	$0	$0

Utilities	22	$58,368	$0	$0	$58,368
Construction	23	$6,846,886	$3,059,064	$3,839,611	$13,745,561
Manufacturing	31	$10,499	$15,552	$16,686	$42,737
Manufacturing	32	$162,029	$56,967	$136,350	$355,346
Manufacturing	33	$187,242	$194,035	$207,860	$589,137
Wholesale Trade	42	$762,035	$256,394	$842,124	$1,860,553
Retail Trade	44	$1,651,272	$1,220,524	$759,306	$3,631,102
Retail Trade	45	$285,331	$230,440	$256,176	$771,947
Transportation and Warehousing	48	$293,377	$114,152	$267,130	$674,659
Transportation and Warehousing	49	$0	$7,406	$32,000	$39,406
Information	51	$118,515	$114,276	$68,132	$300,923
Finance and Insurance	52	$142,540	$53,401	$150,160	$346,101
Real Estate and Rental and Leasing	53	$1,852,817	$135,792	$309,122	$2,297,731
Professional, Scientific and Technical Services	54	$1,589,904	$921,219	$1,595,183	$4,106,307
Management of Companies and Enterprises	55	$139,815	$15,736	$46,900	$202,451
Administrative and Support and Waste Management and Remediation Services	56	$3,529,535	$2,166,011	$3,096,732	$8,792,278
Educational Services	61	$1,855,380	$122,036	$23,440	$2,000,856
Health Care and Social Assistance	62	$1,141,681	$604,878	$600,268	$2,346,826
Arts, Entertainment and Recreation	71	$758,998	$202,891	$216,679	$1,178,569
Accommodation and Food Services	72	$520,764	$202,326	$203,370	$926,460
Other Services and NGOs	81	$5,624,878	$960,204	$562,547	$7,147,628
NA	NA	$19,857,599	$1,862,536	$0	$21,720,134
TOTAL		$103,301,623	$37,540,520	$47,218,406	$188,060,549

Appendix 4. Summary of Public Comments

Responses to Public Comments

This document describes the comments received from the public following the release of the initial CDBG-DR draft Action Plan. Each section addresses comments and questions that correspond to specific topics mentioned in the draft Action Plan.

- Release Date: March 11, 2020
- Comment Period: March 11, 2020 – April 10, 2020
- Approved by HUD: TBA
- Number of Comments Received: 144[49]

Comments were received via e-mail and hard copy mail. The duration of the public comment period as well as instructions for how public comment submissions were posted to the webpage and expressed in a webinar overview of the draft Action Plan. Recordings of all webinars can be found on the CDBG-DR official webpage at www.floridajobs.org/CDBG-DR.

Public Comments Related to Program Oversight and Management

1. How often does DEO anticipate running the program prioritization? For instance, if a program is prioritized high in November, does it retain its priority as other applications are evaluated?

   DEO response:
   DEO's Office of Disaster Recovery mission is to assist disaster impacted communities to recovery from past disasters and to increase communities' resiliency to future disasters. Within each program, priority will be placed on serving the low- and moderate-income populations in the communities served by the program's various activities (i.e. Housing, Infrastructure and Economic Revitalization/Development) while addressing the remaining unmet needs.

2. DEO 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 of this notice. How is "timely manner" defined?

   DEO response:
   HUD requires that 100% CDBG-DR funding be expended within six (6) years of the signing of the grant agreement giving the grantee access to the federal funds. CDBG-DR programs must be carried out in a manner such that all grant close out and audit/verification activities are completed within the six-year period. HUD conducts routine – minimum of two in-person – monitorings of the CDBG-DR grant per year to ensure that the grantee's program is making appropriate progress. Additionally, HUD conducts desk audits of grantees and may conduct audits of subrecipient programs to ensure appropriate progress. In addition to HUD monitoring, DEO conducts monitoring of the program and DEO has contracted with a vendor to provide third party compliance monitoring.

[49] DEO received a total of 144 comments/questions via 34 e-mails and letters

3. Commenters requested clarification of administrative and planning costs.

   DEO response:

   Grant Administration Costs (GACs) are costs incurred for the general management, oversight and coordination of the CDBG-DR grant and activities funded with grant funds.

   - Must be used for activities related to CDBG-DR program.
     - Cannot be used to cover administration related to managing other disaster recovery programs funded through HUD's CDBG-DR appropriation.
     - Some examples of eligible activities are preparing budgets and schedules, preparing HUD-required documents; monitoring program activities, staff costs (including overhead), etc.
     - Funding Cap: Maximum 5% of total grant amount and 5% of program income
     - Only grantees and subrecipients can incur administration costs.

   Planning Costs

   - The "end product" of a Planning Activity is a Plan.
     - Planning for a specific project is a project cost (or Activity Delivery Costs (ADC), allowable costs incurred for implementing and carrying out a specific CDBG-DR activity, if undertaken by the grantee/subrecipient).
     - A Planning Activity may convert to an ADC, if specific planning progresses far enough to be a CDBG-DR eligible activity and meet a CDBG-DR National Objective.
   - Only grantees and subrecipients can incur planning costs.
     - Use and amount of planning funds should be defined in grant agreements with subrecipients.

4. Many commenters requested that pre-award costs be allowed as an administrative expense under this CDBG-DR grant.

   DEO response:

   Federal regulations (2 CFR 200.458) defines pre-award or pre-agreement costs as "those incurred prior to the effective date of the Federal award directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for the efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with the written approval of the Federal awarding agency."

   24 CFR 570.200 (h)(1) confirms that DEO may incur costs or may authorize a subrecipient to incur costs, and then after the effective date of the grant agreement pay for those costs using CDBG-DR funds, provided that the activity for which the costs are being incurred is included in the Action Plan and other criteria listed in the (h)(1) section. The effective date of the grant agreement is the program year start date or the date that the consolidated plan (Action Plan) is received by HUD, whichever is later.

5. Commenters requested clarification on CDBG-DR funding allocation, specifically for the Most Impacted and Distressed (MID) Communities.

   DEO response:
   At least 80 percent of the program allocation will be spent within HUD-identified Most-Impacted and Distressed (MID) communities, which include: Bay, Calhoun, Gulf and Jackson counties; 32321 (Liberty), 32327 (Wakulla), 32328 (Franklin), 32346 (Wakulla and Franklin), 32351 (Gadsden), 32428 (Washington) ZIP codes and the jurisdictions within the counties. Per FR-6182-N-01, where HUD identified specific zip codes as MID communities, DEO intends to expand program operations and eligibility to the whole county. The remaining 20 percent can be spent in state-identified MID communities, which are listed in the Action Plan.

   The state-identified MID areas are counties (and municipalities within those counties) that received FEMA Individual Assistance (IA) declarations in addition to their Public Assistance (PA) declaration. Receiving an IA declaration in addition to a PA declaration indicates that the county had a significant amount of damage to housing in addition to public infrastructure.

6. A commenter asked DEO to define "specialized service providers" mentioned in the Action Plan.

   DEO response:
   DEO will ensure ongoing coordination with service providers that work with vulnerable populations to ensure that any remaining or ongoing storm-related impact is brought to DEO's attention for a coordinated approach. In addition, any vulnerable populations brought to DEO's attention who are not served under current DEO programs may be referred to specialized service providers for assistance such as volunteer organizations that remain active throughout the long-term recovery efforts – National Voluntary Organizations Active in Disaster (VOADs) and Long-Term Recovery Groups (LTRGs).

7. Commenters requested that DEO provide technical assistance funding to all communities.

   DEO response:
   DEO is prioritizing the availability of technical assistance to applicants located in an area that is identified as a 1) HUD or State MID area and 2) classified as a Fiscally Constrained County.

Public Comments Related to Applications

8. Commenters asked for specific information regarding how to apply for the programs identified in the draft Action Plan. Commenters also requested clarification regarding the preparation of quality applications and the proper methods used to document a connection between damages and Hurricane Michael.

   DEO response:
   The draft Action Plan outlines programs the state plans to offer, using the initial allocation of CDBG-DR funds provided by HUD to Florida, to assist the state's long-term recovery from

Hurricane Michael. HUD must approve the draft Action Plan before the state can access CDBG-DR funds and implement its proposed programs. The state continues to work on developing mechanisms to administer its proposed programs efficiently and effectively, which includes developing program applications, policies and procedures.

DEO recommends communities begin to gather existing data provided by local emergency management services, for example FEMA, SBA and NFIP. Private insurance claims are also good examples of storm-related damage documentation. DEO will also consider other related reporting methods that demonstrate a connection to Hurricane Michael.

Once HUD approves the state's draft Action Plan and the mechanisms for administering proposed programs are in place, the state will use a variety of outreach methods to inform the public of the availability of funds and provide instructions on how to apply for the program. Please visit DEO's Disaster Recovery webpage, www.floridajobs.org/CDBG-DR, to be added to DEO's email distribution list.

9. Commenters requested that non-profit organizations be listed as eligible applicants for funding to expedite dispersal of funds to communities they serve. The commenters referenced the work non-profit organizations currently do to repair, reconstruct and/or replace the homes of individuals impacted by Hurricane Michael.

   DEO also received comments recommending that third-party inspectors be deemed allowed to approve or disapprove work completed. Several comments suggested that DEO assign work to contractors using reasonable unit costs based on geographic region and work performance.

   DEO response:
   DEO appreciates the work that non-profits contribute to helping communities across the state recover. In addition, DEO plans to continue its coordination with volunteer organizations that remain active throughout the long-term, recovery efforts. DEO will work with a vendor to manage the state-administered housing program. Non-profit organizations will be able to apply through a solicitation process for the rebuilding and reconstruction of homes. DEO will finalize applications and scoring criteria at a later date.

   DEO has competitively procured a contractor pool to conduct the housing repair, replacement and reconstruction activities in Hurricane Michael impacted areas. The selection criteria for this pool is designed to ensure that the contractors have the required expertise, experience and capacity to carry out the recovery efforts. Qualified non-profit organizations responding to the competitive procurement would be eligible to participate in the Hurricane Michael disaster recovery program. Qualified non-profit organizations that did not respond to the competitive procurement, but who are interested in providing construction services, are eligible to serve as subcontractors to those contractors that are members of the contractor pool established by the competitive procurement.

Public Comments Related to Community Outreach

10. Commenters requested an explanation of the Housing Repair and Replacement Program's (HRRP)outreach strategy.

    DEO response:
    DEO has contracted with an experienced media relations firm located in the Hurricane Michael impacted area to provide comprehensive outreach services pertaining to the HRRP. The outreach strategy will have several components designed ~~to~~ specifically to address the rural demographics of the Hurricane Michael impacted area.

11. Commenters requested for the public comment period to be extended.

    DEO response:
    To ensure DEO submits the Action Plan to HUD in a timely manner, DEO will not be extending the public comment period. DEO will continue to work with communities and provide outreach regarding the state's Action Plan and next steps and continue to receive input to best address unmet needs.

    If anyone wishes to be added to DEO's distribution list to learn more about upcoming events and announcements, please visit DEO's Office of Disaster Recovery webpage at www.floridajobs.org/CDBG-DR.

Public Comment Related to Unmet Needs Assessment

12. Commenters voiced concern regarding the unmet needs assessment. Commenters also asked for clarification as to the source for this information and felt there were some discrepancies within the statistics.

    DEO response:
    DEO used the best available data in creating the unmet needs assessment for Florida. DEO recognizes the need for preparedness and mitigation as a priority in rebuilding areas that have been affected by Hurricane Michael.

13. Commenters suggested that DEO submit waiver requests to HUD including a request to allow CDBG-DR funds for buildings for the General Conduct of Government, to permit tourism marketing and lowering the LMI rate from 70% to 50%.

    DEO response:
    DEO appreciates these comments and will carefully take them into consideration.

Public Comments Related to Program Details

14. A commenter requested an explanation of the Green Building Standard.

    DEO response:
    CDBG-DR grantees are required to adopt a Green Building Standard for:

    - All new construction of residential buildings; and
    - All replacement of substantially damaged residential buildings (including reconstruction, changes to structural elements).

    Green Building Standards include:

    - ENERGY STAR;
    - LEED;
    - Enterprise Green Communities
    - ICC-700 National Green Building Standard; and
    - Other equivalent comprehensive green building program (approved by HUD).

    More information about the Green Building Standards can be found at https://www.hud.gov/program_offices/economic_development/eegb/about.

15. Commenters, citing 83 FR 40314, requested that DEO allow for the adoption of prior Federal environmental reviews.

    DEO response:
    DEO will, to the extent allowed under Federal rules and regulation, provide for the adoption of prior federal environmental reviews, provided the review is fully compliant with HUD standards and encompasses the specific site of proposed CDBG-DR activities funded by HUD through DEO.

16. Several commenters requested DEO use pre-approved contractors and vendors to assist in the execution of the proposed draft Action Plan.

    DEO response:
    DEO will centrally manage the Housing Repair and Replacement Program and will work with contractors and vendors directly to ensure the full execution of the program.

17. Commenters stated that the Action Plan should specifically allow “related rental costs” under the Uniform Relocation Assistance (URA) Act.

    DEO response:
    To avoid displacement and homelessness, DEO has developed the Temporary Housing Assistance Benefit (THAB) to provide additional assistance for homeowners who are experiencing a financial hardship that are participating in the Housing Repair and Replacement Program (HRRP), where the homeowner has been approved for rehabilitation or reconstruction assistance and the

Homeowner Grant Agreement has been signed by the homeowner, until repairs to their damaged homes are completed. The THAB provides assistance under Rebuild Florida's HRRP for unmet needs related to eligible short-term lodging or rental expenses, for up to 6 months, provided the household is at or below 80% AMI and is a beneficiary also receiving assistance for the rehabilitation, reconstruction or replacement of their Hurricane Michael damaged property.

18. Commenters requested clarification of Affirmatively Furthering Fair Housing.

    DEO response:
    All jurisdictions that receive HUD funding are required to Affirmatively Further Fair Housing (AFFH). According to the Final Rule on AFFH issued by HUD in 2015, AFFH is defined as "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." (80 FR 42353). Protected characteristics include race, color, religion, sex, national origin, familial status, having a disability and having a specific type of disability.

    HUD's AFFH Rule requires that localities that receive HUD funding prepare an Assessment of Fair Housing (AFH) that examines the fair housing challenges in their community, the factors contributing to these challenges, and goals for overcoming these challenges and a strategy for achieving these goals. HUD has created a database, mapping tools, and guidance for communities to conduct these assessments.

19. Commenters requested clarity on duplication of benefits and how the state will ensure no duplication has occurred.

    DEO response:
    Eligible applicants may have previously received assistance from other sources. Under the requirements of Stafford Act (42 U.S.C. 5121, et seq.), as interpreted and applied by HUD, the Program **must** take into account certain aid received by applicants in determining the amount of assistance which can be granted.

    In accordance with the Stafford Act, all projects, both directly and subrecipient administered, must perform due diligence to identify potentially duplicative sources of funding, analyze whether the source is duplicative, and include duplicative sources in an assessment that is deducted from the project's need based award determination.

    Funds received from any source, including flood insurance, FEMA and hazard insurance that were used to cover repair to the homeowner's home will reduce the amount of disaster assistance if the evidence of expenditures at least equals the amount of assistance provided from the source(s). Documentation must be provided demonstrating the cost and type of repair conducted. Any additional funds paid to homeowner awardees for the same purpose as the housing assistance award after the state has completed the repair, rehabilitation or replacement of the homeowner's housing units must be returned to DEO as detailed in the subrogation agreement.

DEO will detail precisely how we will conduct proper verification of benefits to ensure non-duplication in our forthcoming policies and procedures.

20. Will local governments receiving assistance be required to publicly announce and open their detailed citizen participation plan for public comment?

    DEO response:
    A Citizen Participation Plan is required by Section 104(a)(2) of the Housing and Community Development Act and by regulations at 24 CFR 570.486(a)(6). Local governments must provide citizens with reasonable advance notice of and opportunity to comment on proposed activities in an application to the state.

Public Comments Related to Housing Programs

21. Many commenters asked for clarification on DEO's proposed Housing Repair and Replacement Program. There was confusion regarding which activities would be eligible within the program.

    Staff response:
    The proposed eligible activities under the Housing Repair and Replacement Program include:

    - Repairs to, reconstruction or replacement of housing units damaged by Hurricane Michael, which may include bringing the home into code compliance and mitigation against future storm impacts, including elevation;
    - The completion of work to homes that have been partially repaired;
    - Repairs to, or replacement of, manufactured, modular and mobile homes impacted by Hurricane Michael;
    - Temporary Housing Assistance based on individual homeowners needs and their participation in the Housing Repair Program;
    - Temporary Housing Assistance based on individual tenant needs and their participation in the Housing Repair Program;
    - Title Assistance based on individual homeowners needs and their participation in the Housing Repair and Replacement Program; and
    - Acquisition of substantially-damaged housing units for housing redevelopment or buyouts of substantially-damaged properties may also be considered.

22. Many comments requested that DEO consider the inclusion of a Homeowner Reimbursement Program to assist homeowners in recovering out-of-pocket expenses for home repairs due to Hurricane Michael.

DEO response:
DEO is committed to assisting Floridians to recover from the impacts of natural disasters. DEO's HRRP is designed to provide direct housing repair and replacement services to low- and moderate-income homeowners who are financially unable to repair or replace their damaged homes. At this time, DEO is not considering reimbursement to homeowners who have expended funds to repair their homes.

23. A few commenters expressed concern with the state's standards for elevating structures two feet above base flood elevation, compared to three feet above base flood elevation. A commenter asked if structural elevation included lifting mobile homes.

DEO response:
Elevations will be included for applicants that meet requirements determined by the program, including substantially damaged properties as per locally approved floodplain requirements. Elevations will not be conducted on properties outside of the floodplain, with the possible exception where elevation is required by local ordinance. DEO will follow HUD guidance to ensure all structures, defined at 44 CFR 59.1, designed principally for residential use and located in the one percent annual (or 100-year) floodplain, that receive assistance for new construction, repair of substantial damage, or substantial improvement, as defined at 24 CFR 55.2(b)(10), will be elevated with the lowest floor at least two feet above the one percent annual floodplain elevation.

DEO will comply with local building codes where higher elevation standards are required. DEO may elevate up to three feet above the base flood elevation for the subject property so that it qualifies for NFIP flood insurance premium discounts when it is cost reasonable for the state to do so and when it does not create other conflicts.

Mobile home units that will require elevation above the standard installation height will be replaced with a modular housing unit elevated to program standards.

24. A commenter asked for clarification on income limits.

DEO response:
DEO will utilize the most current income rates set by HUD each year. At a minimum, 70 percent of program funds meet a low- and moderate-income national objective. Households with income higher than 120 percent of Area Median Income (AMI) will not be eligible for this program.

25. Are second homes considered eligible for rehabilitation if a tenant was residing there during the time of the storm?

DEO response:

Generally, properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation assistance or housing incentives.

A second home is defined under this notice as a home that is not the primary residence of the owner, a tenant or any occupant at the time of the storm or at the time of application for assistance. If the property was serving as a rental property at the time of the disaster the property might qualify for rehabilitation if it meets certain criteria and complies with affordability requirements.

DEO will adopt policies and procedures that specify the criteria under which a second home would qualify for rehabilitaton (for example: to meet specific disaster recovery needs such as adding affordable housing for low- and moderate-income persons).

26. Commenters suggested that DEO include funding for Housing Counseling. Are the counties responsible for identifying Housing Counseling Service Agencies or will DEO recommend them? Will this be done by separate contract from DEO? Make homeownership counseling widely available to anyone who seeks it and provide adequate funding and resources for local communities to provide homeownership counseling at the local level.

    DEO response:
    The proposed State Action Plan states that housing counseling services will be available and provided through a HUD-certified counseling agency. DEO is required to coordinate with HUD-certified housing counseling organizations to ensure that information and services are made available to both renters and homeowners. HUD sponsors housing counseling agencies throughout the country that provide advice on buying a home, renting, defaults, foreclosures and credit issues.

    The counties will not be responsible for identifying Housing Counseling Service Agencies. The program policies will provide further clarification on the provision of housing couseling services.

27. DEO received a comment requesting funds for impact windows and other safety, accessibility and resilience improvements.

    DEO response:
    Applicants with special needs or special accommodation requirements (disabled) are considered a prioritized vulnerability factor within the Program. During eligibility review, applicants must provide documentation substantiating the disability. Once a disability is confirmed, the applicant may then request reasonable accommodation modifications.

    DEO has adopted resiliency and mitigation measures, in the form of Resilient Home Construction Standards, to further both HUD and Florida goals of increasing resistance to future disaster. CDBG-DR funding allows this type of activity in conjunction with the repair of remaining storm damage.

28. DEO received comments requesting the increase of the amount of available housing funds for new construction and/or to rehabilitate units *not* damaged by the disaster.

DEO response:
Although HUD guidance permits DEO to fund new construction or rehabilitate units *not* damaged by the disaster if the activity clearly addresses a disaster-related impact and is located in a disaster-affected area, DEO is choosing to use CDBG-DR funds to replace and rehabilitate homes and rental units damaged by Hurricane Michael.

29. A commenter requested that DEO replace pre-1994 mobile homes with new manufactured or modular housing for both owner lots and mobile home park spaces. DEO received a comment requesting an expansion of activities to include mobile home enhanced features such as window film and carport security. One commenter requested DEO consider allowing the replacement of mobile/manufactured homes with site-built units "even if zoning allows for a mobile home, in situations where the owner provides funds for the cost difference."

    DEO response:
    As stated in the Action Plan, repair of a Mobile/Manufactured Housing Unit (MHU) greater than 5 years old and/or with more than $15,000 (hard and soft construction costs) worth of repairs from Hurricane Michael damage is not feasible and replacement is warranted.

    Replacement is the demolition, removal and replacement of a damaged mobile home unit (MHU) with a new MHU in substantially the same footprint or at a new location, if the original damaged unit was on leased land and the MHU owner must relocate to a new property. Local zoning and code requirements will be observed by the program. If local zoning disallows replacement of a mobile home, then DEO will allow code compliant site built or modular units.

    DEO has adopted resiliency and mitigation measures, in the form of Resilient Home Construction Standards, to further both HUD and Florida goals of increasing resistance to future disaster. CDBG-DR funding allows this type of activity in conjunction with the repair of remaining storm damage. The exterior window materials will be ENERGY STAR® rated, consistent with the HUD CPD Green Building Retrofit Checklist, along with impact resistant laminated glazing, all in accordance with Florida building code. All new vinyl windows will be installed within the existing window frame, to eliminate destruction to exterior and interior finishes.

    Unattached structures, such as carports, are not eligible for repair or replacement. Improvements must be physically attached to the structure and be permanent in nature to be eligible.

30. DEO received comments requesting confirmation of the entity responsible for administering the Voluntary Home Buyout Program.

    DEO response:
    DEO will manage subrecipient agreements directly with eligible local governments and coordinate with our partners at FDEM on project application evaluation, required environmental and cultural resource reviews and program implementation, where applicable. Counties that are interested in

participating in the Voluntary Home Buyout Program will have two potential funding options for pursuing home buyout. The first option is to leverage CDBG-DR funding as match for projects that are also eligible for the Hazard Mitigation Assistance (HMA) grant programs. The second option is to work directly with DEO on projects located in low- and moderate-income areas to buyout residential areas in support of permanent open space supporting green infrastructure or other floodplain management systems.

Cities and counties that are interested in this program will work with DEO to determine feasibility of the project. Once a project is determined feasible, it will be eligible for funding in this program. Local governments are encouraged to leverage matching funds under this program and will also be eligible to include homeowner incentives to encourage relocation.

Additional criteria for both homeowner buyout program options, including a process map for coordination with the Florida Division of Emergency Management will be detailed in Home Buyout Program guidance to be released after the approval of this action plan.

31. What activities are eligible for funding in the Voluntary Home Buyout Program?

DEO response:
Allowable costs for property buyout projects depend upon the scope of the project. The following costs associated with the buyout of hazard-prone real property and the demolition of structures are allowable:

- Market value of the real property (i.e., land and structure) either at the time of sale or immediately prior to Hurricane Michael depending upon the ownership status at the time of Hurricane Michael. Therefore, if the appraisal of the property is prior to the disaster then all Duplication of Benefits (DOB) must be subtracted from this amount unless the owner can provide proof that funds were used for another eligible purpose and should be excluded as an offset to the amount of the DOB.
- Fees for necessary appraisal costs, title search, title insurance, property inspection, and survey if applicable.
- Demolition and removal of property.
- Fees paid for environmental review services. Relocation costs associated with displaced tenants under the Uniform Relocation Act

32. What professional services may be procured to achieve success for the Voluntary Home Buyout Program?

DEO response:
Local governments are responsible to hire contract teams that are licensed in the State of Florida to provide the following:

- Appraisals;
- Title and legal services;
- Environmental reviews;
- Demolition of the property; and

- Other related buyout processes.

33. DEO received a comment requesting clarification on the selection of Low-to-moderate income benefit as the National Objective seeking to be met by the Voluntary Home Buyout Program.

    DEO response:
    Section 101(c) of the Housing and Community Development Act (HCDA) requires each funded activity to meet a national objective of the CDBG program, including the national objective of benefitting low-and-moderate-income persons. Grantees may meet this national objective on an area basis, through an activity which is available to benefit all the residents of an area where at least 51 percent of the residents are low- and moderate income. DEO will prioritize home buyout projects that focus on the acquisition of concentrations of residential areas that meet low- and moderate-income area requirements.

    The CDBG-DR driven buyout program will be required to meet a low-moderate area (LMA) benefit for funding so that DEO meets or exceeds its overall low- and moderate-income support requirements. Proposed buyout areas will undergo a review of eligibility to ensure that the end use of the properties results in a project service area where at least 51 percent of the residents are LMI.

    DEO will create guidance and best practices for communities to consider on how property that is acquired through this program can be utilized for public benefit, that meet HUD requirements for permanent green space. Communities that participate in this program will be encouraged to have a plan for how this property will be used in the future to further reduce flood risk and/or serve as a recreational space for the public.

34. Several commenters suggested that DEO expand the Voluntary Homeowner Buyout Program to include an acquisition program that allows local governments to acquire real property for mixed and general use purposes. DEO also received comments requesting to place the construction and replacement of Housing units demolished through the Voluntary Home Buyout Program that are eligible for new construction/replacement through HRRP, under the control of the county or municipality.

    DEO response:
    Housing units are demolished through the Voluntary Home Buyout Program in order to protect the property owner from future losses after demonstrating a history of repetitive losses. The Voluntary Home Buyout Program will prevent future storm damage by establishing greenspace restrictions on program sites. Housing units demolished through the Voluntary Home Buyout Program will not be eligible for new construction/replacement through the Housing Repair and Replacement Program.

Public Comment Related to Hometown Revitalization Program

35. A commenter asked why the Commercial Revitalization category is tied to employment.

DEO response:
The attraction, retention and return of businesses and jobs to a disaster-impacted area is critical to long term recovery. Accordingly, for CDBG–DR purposes, economic revitalization may include any CDBG–DR eligible activity that demonstrably restores and improves some aspect of the local economy through the attraction, retention and return of businesses and jobs. The activity may address job losses, or negative impacts to tax revenues or businesses.

36. Many commenters stated that DEO should consider including a program like the Small Business Revitalization Program approved by HUD in North Carolina's Hurricane Matthew Action Plan.

    DEO response:
    DEO administers the Florida Small Business Emergency Bridge Loan Program in partnership with the Florida Small Business Development Center (SBDC) Network to provide cash flow to businesses damaged by a disaster. The short-term, interest-free loans help bridge the gap between the time damage is incurred and when a business secures other financial resources, including payment of insurance claims or longer-term Small Business Administration loans. Up to $10 million has been allocated for the program.

37. Will the subrecipients be required to propose their methods for allowing non-profit and other organizations to work through them?

    DEO response:
    Subrecipients will be required to provide sufficient information to allow the department to evaluate the subrecipient's ability to adequately administer the programs funded, including any information relating to the use of non-profits and other organizations assisting in the subrecipient's activity delivery.

38. A commenter requested DEO to consider including Florida's Regional Planning Councils (RPCs) as an eligible sub-recipient of funding under the CDBG-DR Commercial Revitalization strategy for Hurricane Michael.

    DEO response:
    Regional Planning Councils are eligible if they work through an Unit of General Local Government (UGLG).

Public Comment Related to Infrastructure

39. Several commenters requested more funding to address infrastructure needs.

    DEO response:
    DEO recognizes the importance of meeting the remaining unmet infrastructure needs throughout the MID areas of Florida following Hurricane Michael. Based on our unmet needs assessment and community feedback, DEO recognizes there is also a need for housing and economic revitalization activities.

Pursuant to HUD guidance, each grantee receiving an allocation for a 2018 or 2019 disaster is required to primarily consider and address its unmet housing recovery needs. Grantees may also propose the use of funds for unmet economic revitalization and infrastructure needs unrelated to the grantee's unmet housing needs if the grantee demonstrates in its needs assessment that there is no remaining unmet housing need or that the remaining unmet housing need will be addressed by other sources of funds.

The General Infrastructure Program, total budget of $342,032,145, will address infrastructure needs that support low-and moderate-moderate (LMI) housing needs, primarily serve LMI populations, or demonstrate an urgent need in the community.

40. A commenter asked for clarification of broadband infrastructure and requested confirmation of the entity responsible for funding broadband infrastructure.

    DEO response:
    Broadband is the common term used to refer to a very fast connection to the Internet. Such connections are also referred to as high-speed broadband or high-speed Internet.

    CDBG-DR funds can be used to finance the provision of broadband services such as infrastructure development, internet access, wiring, hardware and software purchases, development and construction of computer rooms, digital literacy classes/economic development, etc.).

41. A clarification to the minimum and maximum amount of assistance per project was requested for the infrastructure section.

    DEO response:
    The minimum award amount for the General Infrastructure Program is $250,000. DEO will allow the applicant jurisdictions to determine what the maximum assistance per applicant will be as part of their proposal. DEO will review these proposals and may use this information in determining award amounts.

42. One commenter asked whether school districts are considered an eligible subrecipient of the General Infrastructure Repair funding.

    DEO response:
    Units of General Local Government are eligible subrecipients of the General Infrastructure Repair Program. UGLG are defined in 24 CFR 291.505 as a "county or parish, city, town, township, or other political subdivision of a state." 31 USC 6501(6) includes a school district within the definition of local government.

43. Are Units of General Local Government (UGLG) limited to a single project application, may this single application include multiple sub-projects, at multiple sites, within the jurisdiction of the UGLG?

DEO response:
No. You may submit multiple applications. However, DEO will only accept one project per application for the General Infrastructure Repair Program. The project application may consist of one infrastructure project that may have multiple service areas (e.g., if an entity would like to work on a sewer system which may have a few different work locations but would be the same project).

44. Can a UGLG submit multiple projects on separate applications?

    DEO response:
    Yes. DEO will accept multipleproject applications per eligible entity.

45. Several comments asked whether Hurricane Michael CDBG-DR funding can be used for the new construction of a fire or police station.

    DEO response:
    These activities may be allowable under the Public Facilities and Improvements category of basic eligibility within the Housing and Community Development Action (HCDA), if the new construction is related to damage the facility sustained during the storm. HUD requires that CDBG-DR funded projects have a damage tieback to the storm.

46. A commenter asked whether the use of CDBG-DR funds as a HMGP match will be a lump sum provided for the entire HMGP allocation provided to the state.

    DEO response:
    DEO will maximize the benefit achieved through the expenditure of CDBG-DR funds by allocating a total of $109,000,000 of the General Infrastructure Repair Program's budget to provide matching funds for resilience projects that have received funding from FEMA's Hazard Mitigation Grant Program (HMGP).

47. A commenter requested clarification of the process for applying for and receiving Public Assistance (PA) match funding from the General Infrastructure Reapir Program.

    DEO response:
    An applicant may submit an application for the General Infrastructure Program for a Public Assistance match project. The application prcosess will be the same as other infrastructure projects.

48. A commenter asked if all infrastructure projects are required to support LMI housing.

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

49. A commenter asked about the eligibility of constructing and hardening storm shelters and resiliency centers.

DEO response:
The regulations (Reference: §570.201(c)) specify that facilities that are designed for use in providing shelter for persons having special needs are considered to be public facilities (and not permanent housing), and thus are covered under the Public Facilities and Improvements category of basic eligibility. Such shelters would include nursing homes, convalescent homes, hospitals, shelters for victims of domestic violence, shelters and transitional facilities/housing for the homeless, halfway houses for run-away children, drug offenders or parolees, group homes for the developmentally disabled, and shelters for disaster victims.

50. Calhoun-Liberty Hospital requested funding for the construction of a replacement facility.

DEO response:
DEO acknowledges the damage and impacts of Hurricane Michael on the Calhoun-Liberty Hospital, a Critical Access Hospital. DEO updated the Action Plan to include an allocation of $10,000,000 from the General Infrastructure Repair Program's budget toward the reconstruction of the Calhoun-Liberty Hospital.

Public Comment Related to Language Accessibility

51. A commenter asked what other languages DEO anticipates for application and outreach materials.

DEO response:
DEO will provide a Spanish translation of the final Action Plan. DEO has also included interpretive and translation services on the CDBG-DR official webpage informing citizens in 15 different languages that translation services are available upon request.

Public Comment Related to Stylistic and Grammatical Recommendations

52. Several commenters addressed stylistic and grammatical issues within the proposed Action Plan. A few communities requested the state to use updated numbers and different illustrations to better show their direct impacts from Hurricane Michael.

DEO response:
DEO acknowledges each submitted recommendation. Several adjustments were made to make tables and charts easier to comprehend and interpret. The few typos and grammatical errors have been corrected. Additionally, all counties have been included in the correct tables.

DEO used the best available data set at the time to display the direct impacts from Hurricane Michael.

FLORIDA DEPARTMENT of ECONOMIC OPPORTUNITY

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