



Sarasota County
Resilient SRQ
2024 Storms Debby, Helene and Milton

Public Action Plan

Community Development Block Grant - Disaster Recovery



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1.0 Overview

The U.S. Department of Housing and Urban Development (HUD) has allocated \$210,094,000 in Community Development Block Grant - Disaster Recovery (CDBG-DR) funding to Sarasota County to support long-term recovery efforts following the impacts of Hurricane Debby (DR-4806-FL), Hurricane Helene (DR-4828-FL), and Hurricane Milton (DR-4834-FL) in 2024. This allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2025, as outlined in the Federal Register, 90 FR 4759 (January 21, 2025) <https://www.federalregister.gov/d/2025-00943/>. These funds are further governed by Common Application, Waivers, and Alternative Requirements for Community Development Block Grant Disaster Recovery Grantees: The Universal Notice, as outlined in the Federal Register, 90 FR 1754 (January 13, 2025) <https://www.federalregister.gov/documents/2025/01/08/2024-31621/common-application-waivers-and-alternative-requirements-for-community-development-block-grant>.

CDBG-DR funding is designed to address unmet needs that remain after all other forms of disaster assistance have been exhausted. This Action Plan outlines how Sarasota County will utilize these funds to address remaining unmet needs, focusing on housing, infrastructure, economic revitalization, and mitigation activities.

1.1 About the CDBG-DR Program

The CDBG-DR program, administered by HUD, provides flexible funding to help communities recover from presidentially declared disasters. CDBG-DR funds are intended to support long-term recovery by addressing needs related to housing, infrastructure, economic revitalization, and mitigation that are not fully covered by insurance, other Federal assistance, or any other funding source. These funds are provided as a last resort to help cities, counties, and states to recover from Presidentially declared disasters. Many CDBG-DR grantees brand their CDBG-DR program – for Sarasota County, these funds are branded as the “Resilient SRQ” program.

1.1.1 National Objectives

All CDBG-DR-funded activities must meet at least one of HUD’s national objectives:

- Benefit to Low- and Moderate-Income (LMI) Persons: Prioritizing assistance for LMI individuals and households. LMI is defined as households at or below 80% area median income. HUD’s income limits for Sarasota County in 2024 are as follows:

Table 1-1: Area Median Income

Household Size	1	2	3	4	5	6
80% Area Median Income	\$56,300	\$64,350	\$72,350	\$80,400	\$86,800	\$93,250

- Prevention or Elimination of Slums and Blight: Addressing deteriorated conditions in impacted areas.
- Urgent Need: Responding to conditions that pose serious and immediate threats to health and safety.

1.1.2 Eligible Activities

CDBG-DR funds offer broad flexibility to address disaster-related needs, including:

- Housing: Rehabilitation, reconstruction, buyouts, new construction, and rental assistance.

- Infrastructure: Restoration and improvement of public facilities, utilities, roads, and drainage systems.
- Economic Revitalization: Business support through grants, loans, and job creation initiatives.
- Public Services: Case management, health services, and other critical recovery-related services.
- Mitigation: Investments to reduce future disaster risks and enhance community resilience.

1.2 Disaster-Specific Overview

Between August and October 2024, Sarasota County endured the severe impacts of three significant weather events: Hurricanes Debby, Helene, and Milton. Together, these events caused widespread devastation to the community, resulting in extensive property damage, economic disruption, and significant challenges to recovery.

Hurricane Debby brought sustained winds of up to 64 mph and over 17 inches of rainfall in certain areas, leading to historic flooding throughout Sarasota County. This excessive rainfall caused substantial infrastructure damage, including flooded roadways and overwhelmed drainage systems. Residential areas, particularly low-lying neighborhoods, experienced severe flooding, displacing numerous households. Areas outside designated flood zones experienced significant flooding due to the extreme rainfall.

As a Category 4 hurricane, Hurricane Helene struck Florida's Big Bend region with maximum sustained winds of 140 mph. While Sarasota County did not experience a direct landfall, the region endured tropical storm-force winds and significant storm surge, leading to coastal flooding and property damage. Power outages affected thousands of residents, with utility crews working diligently to restore electricity in the aftermath.

Hurricane Milton, a Category 3 storm, made landfall shortly after Hurricane Helene near Siesta Key in Sarasota County, compounding recovery efforts. This hurricane brought maximum sustained winds at 120 mph with an additional 10 inches of rainfall, further exacerbating flooding in already waterlogged areas. High winds tore off roofs, uprooted trees, and damaged critical infrastructure, including power lines and communications networks. Flooded streets and neighborhoods remained inaccessible for days, posing serious life safety issues by preventing first responders from reaching those in need and hindering residents from safely evacuating their homes. These delays significantly impacted relief efforts, increasing the risk to both emergency personnel and affected communities.

1.2.1 Most Impacted and Distressed (MID) Areas

HUD has identified Sarasota County's entire jurisdiction as a MID area. This designation underscores the significant unmet disaster recovery needs within the county, which were used as the basis for determining the allocation of CDBG-DR funds. As required, 100 percent of the CDBG-DR allocation will directly benefit Sarasota County, ensuring resources are focused on addressing the recovery challenges. Sarasota County conducted a comprehensive disaster damage assessment across its entire jurisdiction, working closely with public entities and non-profit organizations to obtain a complete and accurate picture of the damage sustained from the 2024 storms.

1.2.2 Overview of the Impacts of the Qualifying Disaster

The County analyzed several sources for data related to the impacts of the qualifying 2024 storms. The analysis included a review of disaster damage, demographic, and socioeconomic data sets from the following sources:

- Disaster impact reports from Sarasota County Emergency Management, Florida Division of Emergency Management (FDEM), and the National Hurricane Center for each storm event

- Affordable housing impacts and analysis from United Way Suncoast
- Disaster impact data from nonprofits
- Federal Emergency Management Agency (FEMA) Individual Assistance (IA) data
- FEMA Public Assistance (PA) data
- Resilient Florida project data
- FEMA Hazard Mitigation Grant Program (HMGP) project analysis
- Small Business Assistance (SBA) disaster assistance data
- U.S. Census American Community Survey
- HUD block group data
- Resilient SRQ Individual, Business, and Non-profit Survey data
- Public Housing Authority (PHA) program data and disaster impact data
- Continuum of Care (CoC) point-in-time count data and disaster impact data
- Consultations with community groups that serve vulnerable and marginalized populations
- Market studies and gap analysis on affordable housing needs
- Unmet needs survey of disaster-impacted survivors (i.e. homeowners, businesses, and non-profits)

Sarasota County conducted outreach efforts through the launch of an unmet needs survey for homeowners, businesses, and non-profit organizations. The community was made aware of the survey through various methods including, a dedicated CDBG-DR and Resilient SRQ webpage, press releases, social media, media interviews, email newsletters to over 1,200 subscribers, and targeted community presentations. Additionally, four public input meetings were held throughout the impacted county areas at publicly accessible library locations during evenings and weekends to encourage participation. The County received over 1,400 completed surveys, providing insights into the most urgent recovery priorities. The survey results, along with stakeholder engagements and data from federal partners assisted in identifying where resources should be directed.

When a major disaster strikes, those struggling to recover tend to be disproportionately minority, elderly, aging in place, persons with disabilities, families with children, and households with limited English proficiency.¹ To better identify the disaster impacts of the whole community, the County analyzed the above-mentioned data sets to determine the following:

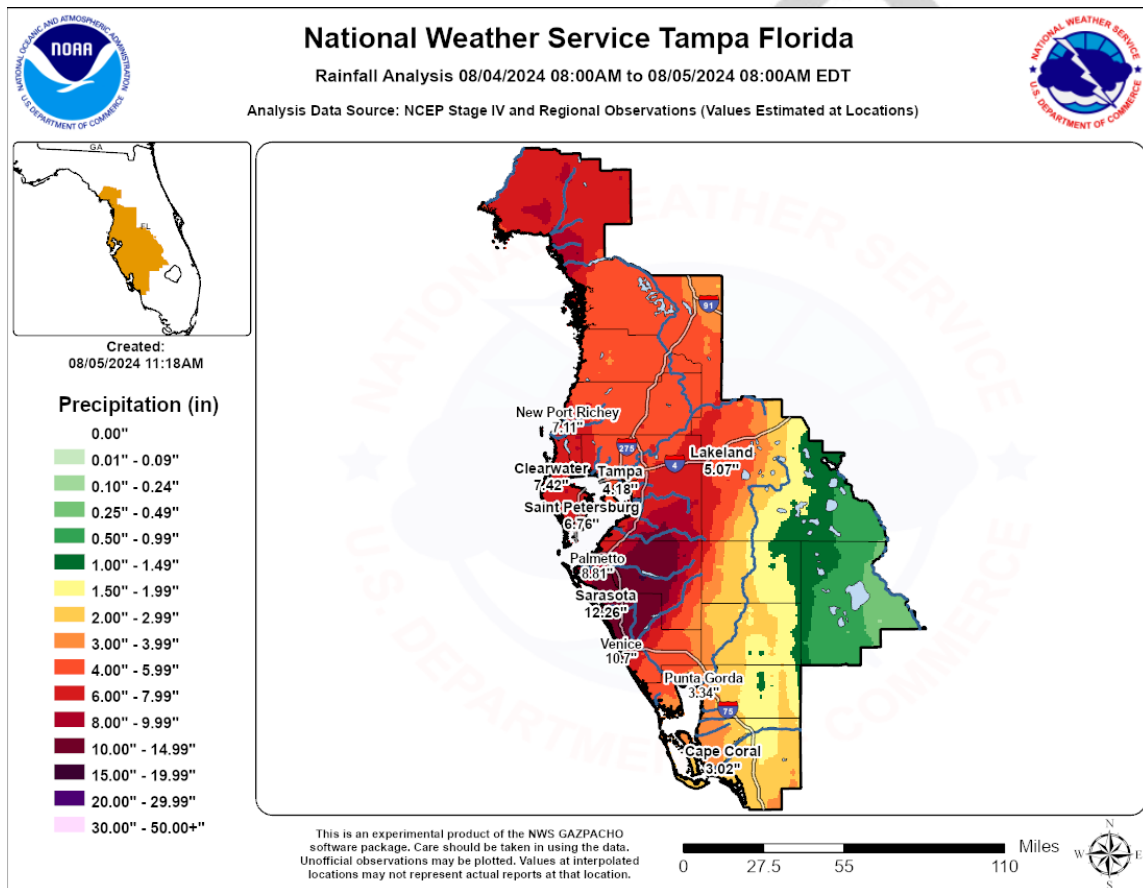
- The number FEMA IA applicants who are homeowners and renters
- The remaining unmet housing need after receiving FEMA, SBA, and other available assistance
- The location of the damaged properties
- Damaged properties located in LMI neighborhoods
- Damaged properties located in areas that are historically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

The analysis of data and information demonstrated that the disaster damage from 2024 storms Debby, Helene, and Milton was caused by a combination of high winds, excessive rain, and flooding. Among these factors, inland flooding stood out as especially destructive throughout the County.

Tropical Depression Four moved into the southeast Gulf of Mexico and strengthened into Hurricane Debby on August 3. Debby strengthened into a hurricane while centered roughly 100 miles west-northwest of Tampa. The hurricane gradually turned north-northeast while continuing to strengthen and made landfall

near Steinhatchee, Florida, on Monday, August 5, 2024. Debby produced storm surge and wind damage across west-central and southwest Florida as it passed by the area to the west. However, its most significant impact was river and flash flooding caused by torrential rainfall. Reports indicate that Sarasota County received between 12 and 26 inches of rain which exacerbated the storm's impacts.ⁱⁱ This led to numerous road closures and required water rescues from stranded vehicles, homes, and apartments in area neighborhoods. The figure below shows the reported rainfall along Hurricane Debby's path showing 12 to 26 inches of rain in the northern portion of Sarasota County.

Figure 1-1: Hurricane Debby Rainfall Reportⁱⁱⁱ



Hurricane Helene formed in the northwest Caribbean Sea on Monday, September 23, 2024, as Potential Tropical Cyclone Nine before tracking north into the eastern Gulf of Mexico and intensifying into a Category 4 hurricane. The storm made landfall along Florida's Big Bend on Thursday, September 26, after battering the Gulf Coast. Helene brought torrential rainfall, with over a foot recorded in parts of Florida, Georgia, and the Carolinas. Catastrophic hurricane-force winds impacted coastal areas within the storm's eyewall, extending inland into Sarasota County, where gusts reached up to 74 mph in the northern portion of the county. Rainfall totals ranged from 1 to 4 inches.

The hurricane also produced record-breaking storm surge, submerging Sarasota County's barrier islands under floodwaters and leaving behind massive sand deposits that continue to hinder recovery efforts. The excessive sand caused blockage of several major waterways, which exacerbated the flooding. Water levels peaked at 6.04 feet above mean higher high water (MHHW), shattering the previous record of 3.57 feet set during Hurricane Idalia in 2023. Coastal areas of Sarasota County experienced water levels between 3 and 7 feet above MHHW. Despite never making a direct hit on Sarasota County, Helene is one

of five named storms since 2017 that have collectively caused hundreds of millions of dollars in damage to the region.

Major Hurricane Milton made landfall near Siesta Key on Wednesday, October 9, 2024, as a Category 3 hurricane with maximum sustained winds of 120 mph. Initially a powerful Category 5 storm in the southwestern Gulf of Mexico, Milton tracked east-southeast before turning east and northeast, maintaining Category 4 and 5 strength. As it neared Sarasota County, increasing wind shear weakened its intensity, but its wind field expanded, amplifying impacts far from its center. The storm's outer circulation reached Sarasota County late on October 8, bringing tropical storm-force gusts that persisted into early October 10. Significant impacts were felt across the county, including a tornado outbreak with at least 19 confirmed tornadoes throughout the state. Hurricane-force wind gusts downed trees and power lines, causing widespread damage to homes and businesses. Meanwhile, torrential rainfall on Milton's northern side produced 10 to 15 inches of rain, resulting in localized flooding and rising river levels. Along the Gulf coast, a maximum storm surge of approximately 5 to 10 feet above MHHW was recorded.

Table 1-2: Disaster Overview

Disaster Summary	
Qualifying Disasters:	Hurricane Debby (DR-4806-FL), Hurricane Helene (DR-4828-FL), and Hurricane Milton (DR-4834-FL)
HUD-identified MID Areas:	Sarasota County
CDBG-DR Mitigation Set Aside:	\$27,404,000
Total Allocation:	\$210,094,000

2.0 Unmet Needs Assessment

2.1.1 Evaluate the Impacts of the Three Core Aspects of Recovery

The County implemented a comprehensive approach to compiling and analyzing the disaster impacts of the 2024 storms and the community's remaining unmet needs. The unmet needs assessment includes a detailed analysis of the disaster impacts on housing, infrastructure and public facilities, and the local economy.

2.1.1.1 Housing

The analysis evaluated the extent of housing damage and financial gaps following a disaster to determine funding priorities. It analyzes data on impacted households, insurance coverage, repair costs, and socioeconomic factors to identify the most vulnerable populations. This assessment ensures that recovery efforts align with the community's needs.

2.1.1.1.1 Emergency Shelters, Interim, and Permanent Housing

Sarasota County engaged in consultations with the Continuum of Care to ascertain post disaster impacts of these facilities. Three organizations reported damage to their facilities, resulting in \$975,710 in property damage. A total of \$250,000 of assistance was received, leaving an unmet need of \$725,710.

2.1.1.1.2 Rental and Owner-Occupied Single Family and Multifamily Housing

Sarasota County assessed the disaster impacts to housing caused by the 2024 storms by analyzing FEMA IA applicant data, and SBA applicant data. Relying on FEMA-verified loss data alone does not provide a comprehensive assessment of the true unmet housing need in the impact area. FEMA-verified loss estimates are much lower than the actual costs to rehabilitate and reconstruct damaged homes. The data set under-represents the population due to ineligible applicants such as those who have insurance even though their insurance may refuse to pay for any damages, or their deductible is too high. To determine the estimated amount of unmet housing need, the County conducted an analysis using the FEMA IA

application portal data^{iv}, SBA disaster assistance applicant data^v, and historical data from previous disasters.

The County analyzed the FEMA IA application data and found that 85,594 Sarasota County households applied for disaster assistance. The County analyzed the average amount of CDBG-DR assistance that has been awarded to homeowners and tenants in previous similar disasters. The County found that homeowners receive, on average, \$78,100 of assistance for home rehabilitation and reconstruction of their primary residence. Tenants receive approximately \$25,000 of assistance for personal property damage. The County then analyzed the SBA disaster home loan application data and found an additional 1,896 Sarasota County households applied for disaster assistance loans.

By applying the average award for homeowners and renters to the isolated applicants in the FEMA IA data set, the County found that the estimated damages/need for homeowners is approximately \$1,745,769,300, and the estimated damages/need for tenants is \$325,950,000, for a total of \$2,071,719,300. The SBA disaster home loan data showed an additional \$134,707,653.96 of verified losses for a combine estimated damages/need of \$2,206,426,953.96. The County reduced the total amount of damages/need by the assistance already provided by FEMA and SBA to these applicants which totaled \$101,874,348.39. This leaves an unmet housing need of \$2,104,552,605.57.

2.1.1.1.3 Public Housing (Including HUD-assisted) and Other Affordable Housing

Sarasota County has two public housing authorities (PHA), the Sarasota Housing Authority (SHA) and the Venice Housing Authority (VHA). The SHA manages and operates 12 public housing facilities containing a total of 958 residential units, for over 2,400 low-income families in Sarasota. The facilities include:

- Amaryllis Park - 84-units
- Bertha Mitchell - 100-units
- Cypress Square - 84-units
- Diamond Oaks Apartment - 12-units
- Flint River Apartments - 9-units
- Janie's Garden I, II, & III - 226-units
- King Stone Townhomes - 28-units
- Lofts on Lemon - 128-units
- Single-Family Homes - 12-homes
- The Annex - 75-units
- Bertha Mitchell - 100-units
- The Towers - 100-units

The VHA manages and maintains two public housing facilities (Venetian Walk I and II) containing a total of 113 housing units. The County consulted with both PHAs during the development of the Action Plan to obtain information on impacts and the current recovery status of public housing facilities, and housing choice vouchers properties. FEMA PA data indicates that SHA had damage from Hurricane Milton, which totaled \$364,861 in FEMA PA assistance. VHA indicated that none of the public housing units received any damage from the 2024 storms. However, the apartment building did require minor repairs to their roofs.

Notably, Sarasota County, as with many other areas of the country, are in need of additional affordable housing units, to include those for vulnerable populations. To assess the pre-disaster needs regarding a lack of affordable housing, the County analyzed a report ("Sarasota County Housing Action Plan") prepared by the Florida Housing Coalition. According to a report prepared for specifically Sarasota County, a housing

market and gap analysis concluded that there is an estimated 5,068-unit deficit of affordable rental housing for households at or below 80% AMI. It is only natural to conclude that the three storms which impacted Sarasota County further exacerbated these needs, which were significant pre-disaster.

2.1.1.2 Infrastructure

This section outlines the damage and losses to infrastructure in Sarasota County resulting from the 2024 storms. The calculation of unmet needs primarily relies on cost data from FEMA's PA, HMGP, and remaining, unfunded CDBG-DR unmet needs from Hurricane Ian in 2022, along with documented infrastructure damage within the County. Additional engineering assessments may further refine these unmet needs as damage is addressed.

The FEMA PA program, authorized by the Robert T. Stafford Disaster Relief and Emergency Act, provides financial aid to repair damaged facilities after a disaster. This includes debris removal and other emergency response efforts. Eligible applicants include local governments, states, and nonprofit organizations.

Typically, FEMA PA provides for a federal cost share of anywhere between 75% to 100% for eligible debris removal, emergency response activities, and permanent repair work. The State of Florida traditionally covers the remaining half of the non-federal share, with eligible entities responsible for the remaining non-federal cost share, or unmet need in this circumstance, for these disasters. For the 2024 storms, Debby, Helene, and Milton, FEMA has authorized an array of federal cost share for activities through a certain date.

To determine the remaining infrastructure and public facilities needs, current FEMA PA data and estimates were compiled for Sarasota County and its municipalities: Longboat Key, North Port, Sarasota, and Venice. Since FEMA fully funds emergency work at 100%, those costs were excluded from this analysis. Infrastructure and public facilities projects include restoration to roads, bridges, water control facilities, public buildings, parks, recreational facilities, and other public facilities. While the unmet need for housing remains significant, much of the housing damage was caused or worsened by flooding from storm-related silt deposits and debris in major waterways, as well as other infrastructure (i.e. roads, bridges, water, sewer, and stormwater) damaged or overwhelmed by these storms. Investing in critical infrastructure improvements will not only help mitigate future flood risks but would also benefit a broader population, including low-to-moderate income (LMI) residents.

In addition to an assessment of current FEMA PA data, the County has previously received CDBG-DR funds for its Hurricane Ian impacts in 2022. As part of the open application process for potential award of these funds, public entities were invited to identify their infrastructure unmet needs and desired CDBG-DR funding award. Those projects that were not funded as part of the Hurricane Ian allocation and this open application process were included in this assessment as a continuing unmet need from these 2024 storms due to the far-reaching impacts of these storms.

The data in the table below serves as an estimate based on best available data as the complete evaluation of these recent storms are still ongoing for the public entities. The data represented below is as of February 13, 2025.

Table 2-1: Public Entities Estimated Unmet Need for 2024 Storms

	Sarasota County	Venice	North Port	Longboat Key	Sarasota (City)	Total
Total Cost	\$160,822,447	\$8,054,625	\$559,089,000	\$2,863,886	\$46,450,990	\$777,280,947
Local Cost Share	\$20,102,806	\$1,006,828	\$69,886,125	\$357,986	\$5,806,374	\$97,160,118

	Sarasota County	Venice	North Port	Longboat Key	Sarasota (City)	Total
Total Unmet Need	\$140,719,641	\$7,047,797	\$489,202,875	\$2,505,890	\$40,644,616	\$680,120,828
Total FEMA PA Damage	\$83,716,807	\$2,792,156	\$1,787,645	\$30,608,752	\$8,573,639	\$127,479,000
Hurricane Ian Unfunded Infrastructure Projects						\$126,772,675
Total Unmet Infrastructure Needs						\$934,372,503

2.1.1.3 Economic Revitalization

Despite Sarasota County's economy maintaining its strength and exhibiting positive performance, the occurrence of disasters has had a profound impact on local businesses, employees, and key industries. Particularly, the manufacturing, service, and hospitality sectors within the County have experienced the consequences of these disasters, and their recovery efforts are still ongoing. Furthermore, various industries are grappling with ongoing damage from the destructive nature of the disaster, especially in heavily affected areas. The following section offers a high-level analysis of the economic impact caused by the disaster in Sarasota County. Other sections of this Action Plan address unfulfilled needs concerning housing and infrastructure recovery using data sources from FEMA and other resources and show significant needs. This section is focused on unmet needs regarding the requirements for economic recovery, which is an inherently difficult need to measure. The best data available to understand the effects of the hurricane come from the United States SBA, which provides assistance for business losses verified after disasters.

The economic impact of the 2024 storms, has affected small businesses with some experiencing temporary or permanent layoffs. Sarasota County conducted a Business Disaster Assessment for small businesses receiving over 265 responses, of those 86 reported losses caused by flood damage. Based on self-reported data, 74 small businesses reported laying off 480 employees temporarily, while 169 employees faced permanent job loss.

Table 2-2: Quantified Disaster Impacts and exacerbated Pre-Existing needs of Housing, Infrastructure, and Economic Revitalization, Other Financial Assistance, and Remaining Unmet Need

Category	Needs	Other Funding Provided/Obligated	Unmet Need (Needs – Other Funding)
Housing	\$2,207,402,663.96	\$102,489,209.39	\$2,104,913,454.57
Infrastructure	\$1,031,532,621.00	\$97,160,118.00	\$934,372,503.00
Economic Revitalization	\$60,069,448.60	\$3,969,769.09	\$56,099,679.51
Total	\$3,299,004,733.56	\$203,619,096.48	\$3,095,385,637.08

While the remaining unmet need for housing is significant, damages sustained to housing were created or exacerbated by flooding from major waterways and infrastructure impacted and overwhelmed by these events. Improving these critical components of infrastructure will not only allow the County to mitigate future flooding impacts to these same households but potentially serve a greater area, including LMI populations. Due to the storm conditions and tracks, a majority of households impacted are also predominantly in areas that don't meet LMI requirements. Overall, ignoring the significance of these infrastructure impacts and unmet needs would only result in repeated instances of damages and flooding to households, driving the need for increased housing assistance in future, similar events. Table 2-3 provided below identifies the proposed allocations by the major categories of housing, infrastructure, and economic revitalization, to include administrative and planning.

Table 2-3: Proposed Allocations

Category	Allocation Amount	% of Total Allocation	% of LMI Goal
Housing	\$63,300,000	30.10%	70%
Infrastructure	\$132,089,300	62.90%	73%
Economic Revitalization	\$0	0%	N/A
Administration	\$10,504,700	5%	N/A
Planning	\$4,200,000	2%	N/A
Total	\$210,094,000		

3.0 Mitigation Needs Assessment

A critical component of this Action Plan, as required by the Universal Notice, is a review of the local Hazard Mitigation Plan (HMP) which is entitled as Sarasota County's Unified Local Mitigation Strategy (LMS). A review of this local HMP, identifies four of the seven hazards with extensive or catastrophic extents of damage which occur annually - Coastal Storm, Flood, Hurricane, and Seasonal Severe Weather Storm – all of which result in flood related disasters. These are also the types of hazards which have resulted in significant impacts, damages, and financial loss for the County in recent years. This includes Hurricanes Debby, Helene, and Milton and flood impacts that the County is still recovering from. This being the case, the County prioritized mitigation activities to address flood related hazards and impacts for its CDBG-DR allocation as evidenced by the higher proportion of funds dedicated to infrastructure, to include major waterways that significantly influence flooding risks for homes.

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

The Universal Notice allows for Sarasota County to “cite the current FEMA-approved HMP or CWPP, or other resilience or long-term recovery plan to address the mitigation needs assessment if there is a clear connection of programs and projects to the mitigation needs.” Please visit <https://2024storms.resilientsrq.net/action-plan> to review the complete Sarasota County Unified Local Mitigation Strategy (LMS).

Further, the County consulted with emergency management officials during the development of this action plan as the LMS is currently being updated and those revisions will be released in 2026. It was determined during this consultation that the four of the seven hazards with extensive or catastrophic extents of damage which occur annually - Coastal Storm, Flood, Hurricane, and Seasonal Severe Weather Storm - have not changed.

4.0 Fair Housing and Civil Rights Data Collection

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

Following major disasters like Hurricanes Debby, Helene, and Milton, those who are struggling to recover tend to disproportionately include minority populations, persons who are elderly or aging in place, people with disabilities, families with children, and households with limited English proficiency. The County will utilize its vast network of community groups and implement a targeted outreach campaign to encourage participation from vulnerable populations. The County's communication and outreach strategy was successfully implemented during the development of the Action Plan for Hurricane Ian in 2022 and will be replicated and expanded as necessary to provide the whole community with information about the programs and how to participate.

The County has collected data in terms of number and percentage for each of the groups listed below and cited the appropriate data sources. Where number and percentage were not available, data sources and an explanation are provided.

- Populations with Limited English Proficient (LEP) by language spoken;
- Persons belonging to protected classes;
- Persons belonging to protected classes by housing tenure (i.e., homeowner vs renter);
- Persons belonging to vulnerable populations;
- Persons belonging to historically distressed and underserved communities;
- Indigenous populations and tribal communities; and
- Racially or ethnically concentrated areas of poverty (R/ECAPs).

4.1 Populations with Limited English Proficient (LEP) in Sarasota County

As required Under Title VI of the Civil Rights Act of 1964, recipients of Federal financial assistance are required to take reasonable steps to make their programs, services, and activities accessible by eligible persons with limited English proficiency. Additionally, the Department of Justice LEP guidance outlining the four-factor analysis must be applied to HUD funded programs and projects. To identify any potential population with limited English proficiency, as step one of the four-factor analysis, the County utilized 2023 ACS Five-Year data^{vi}. The County then took steps to identify any population that may trigger translation requirements which would include any population that makes up 5 percent or more of the eligible population or contains 1,000 or more people. Populations exceeding these limits would trigger the requirement to provide translated vital documents.

Table 4-1 provides important information about language proficiency for the population within Sarasota County, Florida. It presents data on the estimated number of individuals in the County who speak English less than "very well" and the corresponding percentage of the population. This data is valuable for understanding language challenges faced by a segment of the community during times of disaster. By identifying areas with a significant number of individuals who may have difficulty communicating in English, emergency management and relief efforts can prioritize language access services to ensure effective communication and equitable access to critical information and resources.

The total population of those evaluated was 434,023. Among the language categories there were four that did exceed the 1,000 person criteria triggering translation requirements. These language categories include:

- Spanish – 12,968 speak English less than “very well”
- Russian, Polish, or other Slavic languages – 3,146 speak English less than “very well”
- French, Haitian or Cajun- 1,284 speak English less than “very well”
- Other Indo-European languages – 1,375 speak English less than “very well”

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

Table 4-1: Sarasota County LEP Breakdown

Language	Total Population	Population Speak English “Very Well”	Population Speak English Less Than “Very Well”
Total	434,023		
Speak only English	372,343		
Spanish	31,301	18,333	12,968
French, Haitian, or Cajun	4,749	3,465	1,284
German or other West Germanic languages	4,628	3,866	762
Russian, Polish, or other Slavic languages	8,147	5,001	3,146
Other Indo-European languages	5,659	4,284	1,375
Korean	148	97	51
Chinese (incl. Mandarin, Cantonese)	1,472	568	904
Vietnamese	1,211	500	711
Tagalog (incl. Filipino)	1,018	721	297
Other Asian and Pacific Island languages	1,314	737	577
Arabic	702	560	142
Other and unspecified languages	1,331	1,010	321

4.2 Persons belonging to protected classes

The White-Caucasian population vastly comprises the majority of the racial population in Sarasota County at 84 percent. The next largest racial population is Black or African American, which makes up 4.1 percent of the population. No other racial group makes up more than 2 percent of the total population in the County. While other racial groups are minimally represented, there is a substantial Hispanic population in the County with approximately 10.2 percent of the population identifying themselves as being of Hispanic origin.^{vii}

The 2023 ACS Five-Year data indicates that approximately 12.44 percent of the Sarasota County population was born outside of the United States. The County has noted that this may contribute to some language barrier issues and therefore took steps to communicate with local service providers to help identify what those language needs may be (as detailed in LEP). The County is aware that there is a significant portion of the foreign-born community that overlaps with the Hispanic community in the County. This is reinforced by Census data which indicates that 35.5 percent of the foreign-born population is identified by the Census as being of Hispanic origin.

Despite the population of American Indian and Alaskan Natives representing less than 1 percent of the total population, and there being no formally recognized tribal land or reservations in the County, the County is aware of local tribal nations with historic and cultural interests in the area. The two tribal groups include Miccosukee and Muscogee. Both groups were notified during the development of the action plan.

Data on religious affiliation is limited for Sarasota County. The American Values Atlas Survey is only collected at the state level which shows the majority identifying as unaffiliated. However, as part of this Action Plan process, Resilient SRQ consulted a variety of faith-based organizations to understand and evaluate unmet needs and disproportionate impacts in the communities affected, including the Sarasota Ministerial Association, which represents over 90 churches, synagogues and faith-based organizations within the county. Sarasota County will continue to coordinate with those organizations to evaluate any

potential concerns related to protected classes in the community based on their religious affiliation and to ensure these recovery efforts do not have an unjustified discriminatory effect upon these groups.

There is limited data currently available on gender identity and sexual orientation in Sarasota County. The most recent data available from the 2023 5-year estimate indicates that 1,659 people reported as living in same sex marriages and 642 residents reported as living unmarried in same sex relationships within Sarasota County.^{viii} Likewise, data on gender identity in Sarasota County is currently not readily available. Sarasota County is dedicated to ensuring that recovery efforts do not have an unjustified discriminatory effect on protected class groups and vulnerable populations.

Table 4-2: Grantee Demographics and Disaster Impacted Populations^{ix}

Demographics	Areawide Estimate	Areawide Percentage
Total Population	449,011	
Under 5 Years	14,988	3.3%
65 Years and Over	167,531	37.3%
*Population with a Disability < age 65 ^x	23,562	5.32%
White or Caucasian	377,207	84.0%
Black or African American	18,450	4.1%
American Indian or Alaska Native	988	0.2%
Asian	8,399	1.9%
Native Hawaiian or Other Pacific Islander	187	0.0%
Hispanic or Latino (of any race)	45,922	10.2%
Foreign Born ^{xi}	55,851	12.44%

*Total Population ACS 2023 Table S1810 is 443,093, resulting in a slightly different area wide percentage than if using the total population pulled from ACS 2023 Table DP05

4.3 Income Demographics

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

The tables below serve as vital tools in understanding the economic vulnerability and resilience of the impacted population. It aids in identifying households that may require additional support or resources to recover and rebuild their lives.

Table 4-3: Household Income Summary Data

Income/Economic Demographics	Statewide	Sarasota County
Median Household Income ^{xii}	\$71,711	\$80,633
Per Capita Income ^{xiii}	\$41,055	\$55,430

Table 4-4: Income Demographics: Low Income

Income/Economic Demographics	Statewide Population Below Poverty Level	Sarasota County Population Below Poverty Level
Income in the past 12 months below poverty level ^{xiv}	2,707,698	36,101

Table 4-5: People Living in Poverty by Age

Age Group	Total Population	Total Number Below Poverty Level	Area Wide Percent Below Poverty Level
Total population for whom poverty status is determined ^{xv}	440,606	36,101	8.2%
Under 18 Years	61,758	7,117	11.5%
Under 5 Years	14,412	1,405	9.7%
5 to 17 Years	47,346	5,712	12.1%
Related children of householder under 18 years	61,582	6,991	11.4%
18 to 64 years	215,348	17,670	8.2%
18 to 34 Years	60,549	5,048	8.3%
35 to 64 Years	154,799	12,622	8.2%
60 years and Over	201,939	14,766	7.3%
65 Years and Over	163,500	11,314	6.9%

Table 4-6: People Living in Poverty by Race/Ethnicity

Race Ethnicity	Total Population	Total Number Below Poverty Level	Percent Below Poverty Level
Total population for whom poverty status is determined ^{xvi}	440,606		
White Alone	370,576	27,263	7.4%
Black or African American alone	17,612	3,508	19.9%
American Indian and Alaska Native alone	980	49	5.0%
Asian alone	8,207	741	9.0%
Native Hawaiian and Other Pacific Islander alone	173	0	0.0%
Some other race alone	9,992	1,259	12.6%
Two or more races	33,066	3,281	9.9%
Hispanic or Latino origin (of any race)	45,314	5,152	11.4%
White alone, not Hispanic or Latino	355,506	25,776	7.3%

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

The County is aware of areas of minority concentration and poverty, and historically underserved communities. Individuals in these areas may experience various barriers to accessing CDBG-DR funded programs, such as limited access to computers or internet service, lack of trust in government programs due to past experience, limited economic resources to continue insurance coverage after assistance, or limited access to transportation.

While CDBG-DR projects are not anticipated to have an unjustified discriminatory effect on, or fail to benefit these areas, Sarasota County will actively avoid those outcomes through the following efforts:

- Develop a robust marketing and outreach strategy to ensure that individuals within historically underserved areas are aware of and have access to CDBG-DR funded programs. Strategy will include providing mobile or pop-up application sites to allow households without access to transportation or technology to access services.

- Ensure marketing materials, case management and direct service staff are representative of the population being served, including the use of local-trusted community members and partners, whenever possible, to build trust with individuals who may be apprehensive to accessing services.
- Provide access to holistic case management and housing counseling services to ensure long-term housing stability.
- Ensure that County, subrecipient, and developer policies and practices which are likely to have a discriminatory effect are actually necessary to achieve a substantial legitimate interest.
- Prioritize benefit to LMI households and areas, many of which often intersect with protected class groups.

Overall, the County anticipates that program areas outlined in this Action Plan will have a positive impact on protected class groups.

4.4 Persons belonging to protected classes by Housing Tenure

Table 4-7: People Belonging to Protected Classes by Housing Tenure

Housing Tenure including Protected Classes	Total	Owner Occupied	Percentage of Owner Occupied	Renter Occupied	Percentage of Renter Occupied
Total	205,503	156,876	76.3%	48,627	23.7%
Female Led Household, No Spouse Present ^{xvii}		10,211	4.97%	7,381	3.59%
Black or African American Alone	6,374	2,706	1.3%	3,668	1.8%
American Indian and Alaska Native Alone	242	160	0.07%	82	0.4%
Asian Alone	3,125	2,530	1.23%	595	.29%
Native Hawaiian and Other Pacific Islander Alone	78	78	.04%	0	0%
Other Race Alone	3,096	1,921	.93%	1,175	.57%
Two or More Races	10,697	6,220	3.03%	4,477	2.2%
White Alone, not Hispanic or Latino	176,996	140,283	68.26%	36,713	17.86%
Hispanic or Latino	14,354	8,292	4.03%	6,062	2.95%

4.5 Persons belonging to vulnerable populations

Hurricanes Debby, Helene, and Milton wreaked havoc on Sarasota County and its municipalities, inflicting severe damage upon numerous infrastructure and public facilities. As a result, critical services were inaccessible to many vulnerable residents. This rendered residents trapped within their flooded homes while posing significant challenges for emergency services attempting to reach these areas.

Additionally, there are specific populations that often face increased or special needs within the County. These populations include such groups as the elderly, persons with disabilities (mental, physical, developmental, etc.), victims of domestic violence, persons with alcohol or other substance-use disorder, persons with HIV/AIDS and their families, homeless and those at risk of homelessness. These populations are often served by public service providers, local government services, and non-profit organizations.

Table 4-8: People Belonging to Vulnerable Populations

Vulnerable Populations	Areawide Estimate	Areawide Percentage
Persons with Disabilities	67,807	15.3% ^{xviii}
Persons Aged 65 and Over	167,531	37.3%

Florida's identity as a retirement destination results in the state having a slightly larger elderly population (65+) than many states, Sarasota County has an even more substantial percentage of older adults. The County contains over 150,000 people aged 65 and above with an areawide percentage at 37.3% percent. While this data may seem to indicate that housing for the elderly, or other supportive housing, may be of need, the County's identity as retirement destination makes for a more unique situation when it comes to this population. There is a significant proportion of this population who use their financial resources to obtain housing in the County and live comfortably in retirement. While these individuals may live on fixed or semi-fixed incomes, they often have pre-established financial resources which allow greater financial flexibility than other similar 65+ populations. This is further reinforced by the 2023 ACS census data that shows those aged 65 and over living in poverty are 6.9% of the population of Sarasota County, though they make up 37.3 percent of the demographic.^{xix}

2023 ACS census data shows that persons with disabilities make up over 15.3% of Sarasota County's population. Sarasota County will engage in ongoing coordination with public service providers that work with vulnerable populations, such as those with disabilities, to ensure that any remaining or ongoing storm related impacts are brought to the County's attention to enable a coordinated approach to recovery. In addition, any vulnerable populations or those with special supportive housing needs who are not served under current County recovery programs may be referred to specialized public service providers for assistance.

While ACS data was not available to ascertain numbers and percentages for victims of domestic violence, persons with HIV/AIDS and their families or persons experiencing alcohol and substance abuse disorders, we were able to determine the data through Florida Health Charts.

For victims of domestic violence in 2023, Sarasota County had 1,089 reports of domestic violence, which is a rate of 235.3 per 100,000.^{xx} Sarasota County is in the second quartile for this measure. This means that relative to other counties in Florida, there are more Domestic Violence Offenses in about half of the counties, and less in about one quarter of the counties.

Persons with HIV/AIDS and their families within Sarasota County for 2023 was 1,186. This is a rate of 256.3 per 100,000.^{xxi}

FL Health Charts has a substance use dashboard for Sarasota County. Data for 2023 and 2024 is still being compiled, however as of the end of year 2022, there were 1,826 adult substance abuse program enrollees, while the same time frame showed a rate of 30.5 per 100,000 fatal opioid drug overdoses.^{xxii}

According to the 2023 United States National Survey on Drug Use and Health (NSDUH): 48.5 million (16.7%) Americans (aged 12 and older) battled a substance use disorder in the past year. 10.2% of Americans 12 and older had an alcohol use disorder in the past year.^{xxiii}

4.5.1 Individuals and Families Experiencing Homelessness

Economic downturns and the cost of housing place families and individuals at risk of homelessness. People experiencing homelessness are especially vulnerable during a disaster. They are more likely to experience aggravation of existing mental illness and withdrawal from substances, and many are unable to evacuate. Places they found to be safe before the disaster might not be accessible.

Prior to the 2024 storms, Florida’s Council on Homelessness issued their Annual Report^{xxiv} on June 2024, prior to August landfall of Hurricane Debby. Their point-in-time count for Sarasota County prior to the storm was 478 individuals. However, counts are taken in January of every year, therefore it is important to retrieve new counts post-disaster to fully understand the impact on vulnerable populations. Sarasota County is continuing to consult with CoCs currently to extract the most up-to-date information.

The table below represents the 2024 counts for Sheltered and Unsheltered Homeless by CoC for 2024 taken prior to landfall of the first 2024 storm, Hurricane Debby.

Table 4-9: 2024 Sarasota County Point-in-Time Count

Area	Sheltered Homeless	Unsheltered Homeless	Total Known Homeless
Sarasota, Bradenton/Manatee, Sarasota Counties Continuum of Care	454	654	1108

In order to assist these populations and address specific needs, the County intends to provide funds for public entities and non-profits to undertake activities which would include these populations. While specific projects benefiting vulnerable populations have yet to be identified, the County felt it was in the best interest of these populations to allow the public entities and non-profit service providers to approach the County with projects since these entities will be most keenly aware of specific needs for these populations.

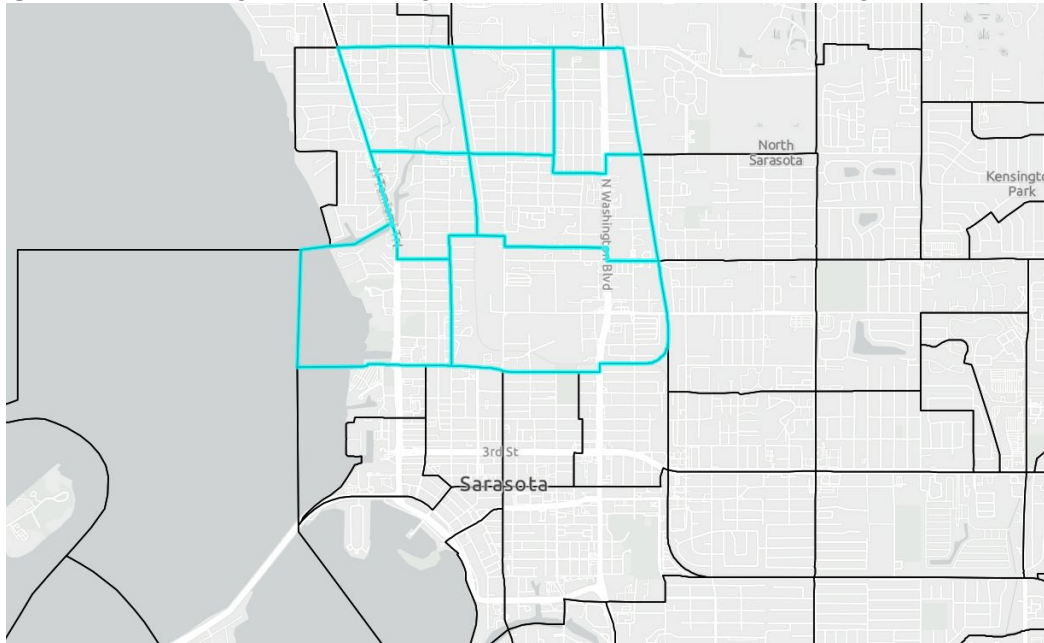
All infrastructure and public facility projects will be evaluated to ensure conformity with the overall long-term planning goals of the County and local municipalities. Projects should support thoughtful and sustainable recovery and development in the County, especially as it relates to minimizing future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

4.5.2 Persons belonging to historically distressed and underserved communities

Sarasota County is aware that there are multiple historically distressed and underserved communities across the county. Each represents a unique set of needs based on various factors. HUD provides access to Racially or Ethnically Concentrated Areas of Poverty (RECAP) maps and data through its online

platform. Sarasota County sought to identify any RECAP tracts in the jurisdiction and found there are two RECAP zones within Sarasota County as of September 2023. Tract 200 and 300 within the norther portion of the county meet the definition below.

Figure 5-1: Racially or Ethnically Concentrated Areas of Poverty (RECAP) map



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

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

CDBG-DR allocations cannot fully relieve disparities caused by historic inequalities based on race and income. However, CDBG-DR funds can be expended in communities based on the unique needs of the community, such as an emphasis on job training in lower-income areas with depressed jobs outlook because of storm impacts and local capacity support for public entities attempting to recover after storm impacts. To the greatest extent possible, CDBG-DR funds will work to address each community's recovery needs without disrupting community fabric or the vital way of life, and further the resilience and longevity of these recovering communities.

5.0 Connection between proposed programs and projects and unmet needs, mitigation needs, and fair housing and civil rights assessments.

The primary focus of Sarasota County's CDBG-DR programs is to address the remaining disaster recovery needs stemming from Hurricanes Debby, Helene, and Hurricane Milton, as identified in the unmet needs analysis. For a detailed assessment of unmet needs, refer to Section 2.0: Unmet Needs Assessment.

A review of the unmet needs shows that rental prices in Southwest Florida, especially in Sarasota County continue to be at an all-time high. More families are rent-burdened or facing eviction. According

to the United Way Suncoast State of the Housing Crisis, rent prices increased by 24 percent in 2021 in the region, resulting in 1 in 2 families being rent cost-burdened. Although rent prices have decreased slightly, Sarasota County's population continues to grow rapidly, outpacing the availability of new affordable housing stock. This is compounded by the fact that many rentals have been taken off the market due to property damage from the 2024 storms or are now being occupied by homeowners whose primary residents were severely damaged. The graph below shows the increase in prices for the average 2-bedroom rental in Sarasota County, with the current average rate at \$1,607 for a 2-bedroom rental unit. Over the last five years, rent prices in Sarasota County have remained the highest in the area, as shown in the graph below when compared to the surrounding counties: Pinellas, Manatee, Hillsborough, and DeSoto.^{xxv}

Figure 6-1: Average 2-Bedroom Rent in Sarasota County



To safely address the need for rehabilitation and reconstruction of damaged properties, the program must allocate significant resources to infrastructure, specifically the dredging and increased stormwater capacity of major waterways within Sarasota County. For example, Phillippi Creek, like many other vital waterways in Sarasota County, has experienced sediment accumulation over the years, greatly accelerated by the 2024 storms, leading to reduced channel capacity and increased flood risks. Substantial siltation has compromised the creek's ability to manage stormwater effectively, resulting in flooding of critical evacuation routes. Many major waterways are considered impaired according to the Florida Dept. of Environmental Protection's (FDEP). Hurricane Debby inundated the area with over a foot of rainfall, resulting in severe flooding, particularly in neighborhoods like Pinecraft. This flooding necessitated the evacuation of over 500 residents and caused extensive property damage. Several homeowners along Phillippi Creek reported flooding during each of the 2024 storms, emphasizing the persistent and recurring nature of the flood risk. Additionally, flooding along the Fruitville Road, a critical evacuation corridor, from the reduced stormwater capacity of Phillippi Creek and other major waterways due to sediment buildup, created life safety concerns for first responders and evacuating residents west of the creek.

Sarasota County's CDBG-DR programs are designed to address the most severe unmet needs while fully complying with HUD's Universal Notice guidelines. The Action Plan's primary objectives, based on the unmet needs analysis, are to address housing recovery, infrastructure rehabilitation and reconstruction, and prevent future impacts to housing through dredging of major waterways.

The County will ensure that CDBG-DR-funded programs align with HUD National Objectives, comply with regulatory guidance, and incorporate best practices from prior recovery efforts.

In January 2025, Sarasota County began the Action Plan development process, including seeking public input for potential funding allocations. Feedback received during public input meetings, surveys, and stakeholder engagement has been considered in these proposed allocations and will continue to be considered as adjustments are made to the program allocations, if necessary, ensuring responsiveness to the needs of affected residents of the County.

The Action Plan prioritizes funding allocations based on the greatest identified needs, ensuring resources are distributed proportionally across housing, infrastructure, and economic recovery:

- Housing Recovery – The County will allocate significant resources to housing rehabilitation, reconstruction, and additional safe and affordable housing options.
- Infrastructure and Public Facilities – The County will invest in critical infrastructure improvements, including roads, bridges, water control facilities, and public buildings, to facilitate housing recovery and future disaster resilience.
- Flood Mitigation and Resilience – Projects such as dredging major waterways will reduce the risk of future flooding and enhance community resilience.

CDBG-DR funds will prioritize projects that benefit low-to-moderate income (LMI) populations, ensuring at least 70% of all program funds serve LMI households. Housing rehabilitation programs will require applicants to meet income qualifications, while infrastructure projects will be assessed based on their service areas, prioritizing those benefiting LMI communities.

To reduce the impacts of future disasters, Sarasota County will integrate hazard mitigation measures into all CDBG-DR programs, aligning with its State and FEMA-approved Local Mitigation Strategy (LMS). These strategies include:

- Strengthening public infrastructure to withstand extreme weather events.
- Upgrading stormwater management systems to reduce flooding risks.
- Implementing sustainable land-use planning to improve long-term disaster resilience.
- Dredging major waterways to prevent recurring flood damage.

Each project will be designed based on post-disaster hazard risk evaluations, ensuring that CDBG-DR investments not only restore communities but also mitigate future disaster impacts.

Sarasota County is committed to ensuring that protected classes and historically underserved communities benefit proportionally from CDBG-DR funds. Section 4.0 of this Action Plan covers Fair Housing and civil rights data. All proposed programs and projects are informed through unmet needs as well as the impact of projects upon protected classes, vulnerable populations and historically distressed and underserved communities. The County will utilize its vast network of community groups and implement a targeted outreach campaign to encourage participation while also reducing barriers to assistance.

Sarasota County is committed to minimizing displacement in its disaster recovery efforts. The County's strategy prioritizes projects that do not inherently lead to displacement and actively seeks alternative solutions when potential displacement is identified. If displacement becomes unavoidable, the County will ensure full compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and Section 104(d) of the Housing and Community Development Act of 1974 to protect and assist affected individuals. Additionally, Sarasota County will provide relocation assistance and other necessary support to ensure that displaced residents and entities receive the resources needed to transition successfully. Through careful project selection, equitable planning, and adherence to regulatory

requirements, the County aims to mitigate disruption while fostering long-term community stability and resilience.

6.0 Program Design

Table 7-1: Program Budget

Program	Estimated LMI Funding Goal Amount	Estimated LMI Funding Goal by Program	Total Allocation by Program
Housing			
Homeowner Rehabilitation/Reconstruction	\$17,500,000	70%	\$25,000,000
Homeowner Reimbursement	\$5,810,000	70%	\$8,300,000
New Multifamily Affordable Housing	\$30,000,000	100%	\$30,000,000
HOUSING TOTAL			\$63,300,000
Infrastructure & Public Facilities			
Sarasota County, Public Entities, Non-Profits	\$39,962,510	70%	\$57,089,300
Dredging of Major Waterways	\$56,250,000	75%	\$75,000,000
INFRASTRUCTURE & PUBLIC FACILITIES TOTAL			\$132,089,300
Total Program Budget	\$149,522,510		\$195,389,300
Sarasota County Administration Activities	N/A	N/A	\$10,504,700
Planning Activities	N/A	N/A	\$4,200,000
TOTAL GRANT BUDGET			\$210,094,000

6.1 Administration

Table 7-2: Grantee Administration Activity Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration Total:	\$10,504,700	5%
Total	\$210,094,000	100%

6.2 Planning

Table 7-3: Grantee Planning Activity Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Planning Total:	\$4,200,000	2%
Total	210,094,000	100%

6.3 Housing

6.3.1 Housing Programs Overview

Significant impacts were experienced due to the 2024 disasters, resulting in damages to residential property as indicated in the Unmet Needs Analysis. The unmet needs analysis shows that housing is the area of most concern in Sarasota County; therefore, the County will implement separate programs to address the housing impacts.

These include a homeowner rehabilitation/reconstruction program, a homeowner reimbursement program, and new multifamily affordable housing program. The main goal of the housing efforts in Sarasota County is to provide decent, safe, and sanitary housing for residents affected by the disaster. The program also aims to address the housing needs of low-income, moderate-income, and vulnerable households as much as possible.

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

Table 7-4: Grantee Housing Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Homeowner Rehabilitation/Reconstruction Program	\$25,000,000	70%
Homeowner Reimbursement Program	\$8,300,000	70%
New Multifamily Affordable Housing	\$30,000,000	100%
Housing Program Total:	\$63,300,000	80%

6.3.2 Homeowner Rehabilitation/Reconstruction Program

Program Description: The Homeowner Rehabilitation and Reconstruction Program provides support to eligible homeowners whose primary residence sustained damage from at least one of the 2024 storms, specifically Hurricanes Debby, Helene, and/or Hurricane Milton. This program is directly tied to the recovery efforts following these qualifying disasters, addressing critical housing needs identified through the unmet needs assessment. This program was developed in response to the widespread damage caused by the 2024 storms. Many homes suffered structural damage, rendering them uninhabitable or unsafe. The program aims to restore these homes, ensuring that affected families can return to safe, secure, and resilient living environments. The unmet needs assessment identified significant gaps in housing recovery and this program targets those gaps by providing financial assistance for rehabilitation or reconstruction, focusing on restoring housing stability for vulnerable populations.

Program Components:

- Rehabilitation Assistance: Provides funding to restore damaged homes to livable standards, ensuring compliance with local building codes and HUD housing quality standards.
- Reconstruction Assistance: Available when:
 - The cost to rehabilitate the home exceeds 60% of the property's current total value or the cost of comparable reconstruction.
 - Rehabilitation is determined to be infeasible.

Amount of CDBG-DR Funds Allocated to this Program: \$25,000,000

Eligible Applicants: Homeowners located in Sarasota County.

Eligible Structures: Manufactured/Mobile Home Units, Single-Family Homes, Condominiums, and Townhouses

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

- Single-family owner-occupied rehabilitation, reconstruction, and/or new construction
- Repair or replacement of manufactured housing units
- Elevation
- Relocation assistance
- Demolition
- Mitigation features
- Lead-based paint testing and remediation
- ADA improvements

National Objective: Benefit to Low- and Moderate-Income (LMI) Person or Urgent Need may be used for non-LMI households.

Funding Distribution: Funds will be distributed through an application-based system, prioritizing LMI homeowners.

Eligible Geographic Areas: Sarasota County

Other Eligibility Criteria:

- Home must have been owner-occupied at the time of the storm;
- Home must have served as primary residence at the time of storm;
- Home must be current primary residence;
- Home must be located in Sarasota County;
- Home mortgage must be in good standing or owned free and clear;
- Home must have sustained damage from a qualifying 2024 storm; and
- Applicants that previously received federal disaster relief assistance which required the recipient to maintain flood insurance, but who did not maintain such insurance, are not eligible for assistance.

Maximum Amount of Assistance Per Beneficiary:

Rehabilitation Assistance: \$200,000

Reconstruction Assistance: \$310,000

Maximum Income of Beneficiary: LMI households must be at or below 80% area median income. A non-LMI households must be at or below the 120% area median income.

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

Mitigation Measures: All rehabilitation and reconstruction projects funded through this program must:

- Evaluate if the home is located in a Special Flood Hazard Area. For reconstruction, assess whether elevation above the Base Flood Elevation is required.
- Comply with an industry-recognized standard certified under the Green and Resilient Building Standards.
- Meet a minimum energy efficiency standard to promote sustainability and resilience.

Approved Green and Resilient Building Standards:

- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance, or Neighborhood Development)
- ICC-700 National Green Building Standard (NGBS) Green or NGBS Green+Resilience
- International Living Future Institute, Living Building Challenge
- Greenpoint Rated New Home, Greenpoint Rated Existing Home (Whole House or Whole Building Label)
- Earth Advantage New Homes
- IBHS FORTIFIED Home (Roof, Silver, Gold); IBHS FORTIFIED Commercial (Roof, Silver, Gold); IBHS FORTIFIED Multifamily (Roof, Silver, Gold)
- NFPA 1140, Standard for Wildland Fire Protection
- 2024 Wildland Urban Interface (WUI) Code
- NFPA Firewise USA
- Any other equivalent comprehensive green and/or resilient building standard acceptable to HUD

Approved Minimum Energy Efficiency Standards:

- EPA ENERGY STAR® V 3.2 or ENERGY STAR® NextGen certification or ENERGY STAR (Certified Homes or Multifamily High-Rise High Performance)
- DOE Zero Energy Ready Home
- EarthCraft House, EarthCraft Multifamily
- Passive House Institute Passive Building or EnerPHit certification (Passive House Institute US - PHIUS), International Passive House Association
- GreenPoint Rated New Home, GreenPoint Rated Existing Home (Whole House or Whole Building Label)
- Earth Advantage New Homes
- Any other equivalent energy efficiency standard acceptable to HUD

This program is designed to support the safe, sustainable, and energy-efficient recovery of homes impacted by the 2024 storms, ensuring long-term resilience for affected communities.

Reducing Barriers for Assistance: Proactive outreach efforts will be conducted to effectively reach diverse communities. This will include multilingual materials, and partnerships with trusted community organizations to build awareness and trust. Sarasota County will implement a simplified, user-friendly application process supported by various assistance methods. This will include in-person support at convenient locations throughout the County and dedicated helplines. Comprehensive guidance materials will also be provided to help applicants navigate the process with ease. The County will strictly adhere to non-discrimination policies to ensure that no individual is denied access to assistance based on race, color, national origin, religion, sex, familial status, disability, or other protected characteristics. Training for staff and program partners will reinforce these principles.

6.3.3 Homeowner Reimbursement Program

Program Description: The Homeowner Reimbursement Program provides financial relief to eligible homeowners whose primary residences sustained damage from at least one of the 2024 storms, specifically Hurricanes Debby, Helene, and/or Milton. This program supports recovery efforts by reimbursing homeowners for eligible repair and reconstruction expenses incurred out-of-pocket after the disaster. This program directly responds to the urgent financial strain faced by homeowners due to the 2024 storms. Many residents had to self-fund emergency repairs to ensure their homes were safe and habitable. This program aims to ease that financial burden and promote equitable recovery. The unmet

needs assessment highlighted that a significant number of affected homeowners faced financial hardship after covering immediate repair costs. This program addresses these needs by providing reimbursement for documented, eligible expenses related to storm damage repairs. Costs must be directly related to repairs or reconstruction needed due to storm damage.

Amount of CDBG-DR Funds Allocated to this Program: \$8,300,000

Eligible Applicants: Homeowners located in Sarasota County.

Eligible Structures: Manufactured/Mobile Home Units, Single-Family Homes, Condominiums, and Townhouses

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

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

National Objective: Benefit to Low- and Moderate-Income (LMI) Persons or Urgent Need may be used for non-LMI households.

Funding Distribution: Funds will be distributed through an application-based system, prioritizing LMI homeowners.

Eligible Geographic Areas: Sarasota County

Other Eligibility Criteria:

- Home must have been owner-occupied at the time of the storm;
- Home must have served as primary residence at the time of the storm;
- Home must be current primary residence;
- Home must be located in Sarasota County;
- Home mortgage must be in good standing or owned free and clear;
- Home must have sustained damage from a qualifying 2024 storm; and
- Applicants that previously received federal disaster relief assistance which required the recipient to maintain flood insurance, but who did not maintain such insurance, are not eligible for assistance.

Maximum Amount of Assistance Per Beneficiary: Reimbursement Assistance: \$50,000

Maximum Income of Beneficiary: LMI households must be at or below 80% area median income. A non-LMI households must be at or below the 120% area median income.

Recapture Provisions: Homeowner must maintain ownership of their home for 1-year after execution of grant agreement.

Mitigation Measures: A site inspection will be conducted to verify that the repairs made to the home are eligible, code-compliant, and ensure the home is decent, safe, and sanitary. For properties located in a Special Flood Hazard Area (SFHA), homeowners are required to obtain and maintain flood insurance in perpetuity, as stipulated in the grant agreement prior to reimbursement.

Reducing Barriers for Assistance: Proactive outreach efforts will be conducted to effectively reach diverse communities. This will include multilingual materials, and partnerships with trusted community organizations to build awareness and trust. Sarasota County will implement a simplified, user-friendly application process supported by various assistance methods. This will include in-person support at

convenient locations throughout the County and dedicated helplines. Comprehensive guidance materials will also be provided to help applicants navigate the process with ease. The County will strictly adhere to non-discrimination policies to ensure that no individual is denied access to assistance based on race, color, national origin, religion, sex, familial status, disability, or other protected characteristics. Training for staff and program partners will reinforce these principles.

6.3.4 New Multifamily Affordable Housing Program

Program Description: The New Multifamily Affordable Housing Program aims to address the critical shortage of affordable housing pre-disaster and further exacerbated by the 2024 storms, specifically Hurricanes Debby, Helene, and/ or Hurricane Milton. This program focuses on the development of new, resilient, and energy-efficient multifamily rental housing to serve low- to moderate-income (LMI) households.

The 2024 storms resulted in the destruction and severe damage of thousands of owner-occupied homes and rental units, leaving many families without stable housing. The unmet needs assessment identified a significant gap in affordable homeownership opportunities and rental housing options, particularly in storm-affected areas with high concentrations of damage. This program directly addresses these gaps by funding the construction of new multifamily rental housing to increase the availability of affordable, resilient, and energy-efficient rental units for households displaced by the storms.

Amount of CDBG-DR Funds Allocated to this Program: \$30,000,000

Eligible Applicants: Non-profits/Non-profit developers, For-profit developers, Public housing authorities, and Public entities.

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

- Rehabilitation, reconstruction, and new construction of affordable multi-family housing subject to affordability requirements and HUD standards.

National Objective:

LMI Housing (LMH), 51% of units must be occupied by LMI households.

Funding Distribution: Funds will be distributed through an application-based system, staff will evaluate and score applications, and projects will be selected by Sarasota County Board of County Commissioners.

Eligible Geographic Areas: Sarasota County

Other Eligibility Criteria:

- Proposed project must have a minimum of 51% of affordable units.
- Proposed project meets Section 504 requirements.
- Proposed project must be in Sarasota County.
- Proposed project must establish affordable rents at the annual high HOME rents or below.
- New construction of five or more units shall be deed-restricted for a minimum affordability period of 20 years.

Maximum Amount of Assistance Per Beneficiary: There are no program maximums.

Maximum Income of Beneficiary: Households must be at or below 80% area median income.

Recapture Provisions:

At least 51% of the units must remain affordable to low- and moderate-income households for a minimum of 20 years.

Mitigation Measures: All projects funded through this program must:

- Assess whether elevation above the Base Flood Elevation is required.
- Comply with an industry-recognized standard certified under the Green and Resilient Building Standards.
- Meet a minimum energy efficiency standard to promote sustainability and resilience.

Approved Green and Resilient Building Standards:

- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance, or Neighborhood Development)
- ICC-700 National Green Building Standard (NGBS) Green or NGBS Green+Resilience
- International Living Future Institute, Living Building Challenge
- Greenpoint Rated New Home, Greenpoint Rated Existing Home (Whole House or Whole Building Label)
- Earth Advantage New Homes
- IBHS FORTIFIED Home (Roof, Silver, Gold); IBHS FORTIFIED Commercial (Roof, Silver, Gold); IBHS FORTIFIED Multifamily (Roof, Silver, Gold)
- NFPA 1140, Standard for Wildland Fire Protection
- 2024 Wildland Urban Interface (WUI) Code
- NFPA Firewise USA
- Any other equivalent comprehensive green and/or resilient building standard acceptable to HUD

Approved Minimum Energy Efficiency Standards:

- EPA ENERGY STAR® V 3.2 or ENERGY STAR® NextGen certification or ENERGY STAR (Certified Homes or Multifamily High-Rise High Performance)
- DOE Zero Energy Ready Home
- EarthCraft House, EarthCraft Multifamily
- Passive House Institute Passive Building or EnerPHit certification (Passive House Institute US - PHIUS), International Passive House Association
- GreenPoint Rated New Home, GreenPoint Rated Existing Home (Whole House or Whole Building Label)
- Earth Advantage New Homes
- Any other equivalent energy efficiency standard acceptable to HUD

This program is designed to support the safe, sustainable, and energy-efficient development of affordable homes to increase the County's affordable housing stock.

Reducing Barriers for Assistance: Proactive outreach efforts will be conducted to effectively reach diverse communities. This will include multilingual materials, and partnerships with trusted community organizations to build awareness and trust. Sarasota County will implement a simplified, user-friendly application process supported by various assistance methods. Sarasota County along with its subrecipients responsible for developing and overseeing these projects, will strictly adhere to non-discrimination policies in compliance with all applicable federal, state, and local fair housing and civil rights laws. No individual will be denied access to assistance based on race, color, national origin, religion, sex, familial status, disability, age, or any other protected characteristic. Training for staff and program subrecipients will reinforce these principles, ensuring compliance with fair housing laws and promoting

equitable access to housing opportunities. Additionally, the program will prioritize outreach to vulnerable populations, including individuals with disabilities, seniors, and low-income families, to ensure that those most in need can access stable, safe, affordable rental housing in new multifamily developments. By reducing barriers to access and prioritizing those with the greatest need, this program will support inclusive and equitable housing recovery efforts in storm-affected communities.

6.4 Infrastructure

6.4.1 Infrastructure and Public Facilities Program Overview

The Infrastructure and Public Facilities programs are designed to support the repair, replacement, and enhancement of public infrastructure, inclusive of property acquisition, to mitigate future disaster risks and address urgent community needs. This program focuses on projects that strengthen community resilience, promote public safety, and reduce the potential for future flooding and storm-related damage. Eligible activities are aligned with HUD's guidelines, focusing on mitigation measures that address known hazards.

Table 6-5: Infrastructure and Public Facilities Allocation

Category	CDBG-DR Allocation Amount	Minimum % of CDBG-DR Allocation for LMI Benefit
Sarasota County, Public Entities and, Non-Profits	\$57,089,300	70%
Dredging of Major Waterways	\$75,000,000	75%
Infrastructure Program Total:	\$132,089,300	73%*
*In accordance with Section III.D.6.f. of the Universal Notice, Sarasota County will count funds expended for infrastructure activities towards benefiting LMI persons.		

6.4.2 Sarasota County, Public Entities and Non-Profits

Program Description: The program aims to address critical infrastructure needs identified through the unmet needs assessment, with a focus on projects that strengthen community resilience to future disasters. Eligible projects may include the repair or replacement of public facilities, water and sewer systems, roads, bridges, drainage systems, and other critical infrastructure components. The 2024 storms caused extensive damage to public infrastructure, disrupting essential services and threatening public health and safety. This program is tied directly to recovery efforts, addressing infrastructure vulnerabilities that were exposed or worsened by the disasters. The 2024 storms revealed and exacerbated vulnerabilities in public infrastructure, particularly in flood-prone areas. This program addresses urgent needs created by these disasters by implementing infrastructure improvements that mitigate future risks. Projects are designed to prevent recurring damage, ensure public safety, and enhance community resilience, consistent with the national objective of urgent need under HUD regulations. The unmet needs assessment identified critical gaps in stormwater management, drainage systems, and other infrastructure vulnerabilities that have repeatedly contributed to flooding and property damage.

Amount of CDBG-DR Funds Allocated to this Program: \$57,089,300

Eligible Applicants: Sarasota County, Public Entities, and Non-Profits

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

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

- Demolition, rehabilitation, or construction of programmatically eligible public or semi-public facilities (such as fire stations, shelters, food banks);
- Acquisition (easement, right-of-way [ROW]) following Uniform Relocation Act (URA).

National Objective: Benefit to Low- and Moderate-Income (LMI) Persons and Urgent Need. To benefit LMI persons, the service area of the project must benefit at least 51% of LMI or the project must service low to moderate income clientele (LMC) as defined by HUD. Urgent Need may be used depending on the nature of the project, the activities taken may alleviate or prevent the conditions which “pose a serious and immediate threat to the health or welfare of the community”.

Funding Distribution: Funds will be distributed through an application-based system, staff will evaluate and score applications, and projects will be selected by Sarasota County Board of County Commissioners.

Eligible Geographic Areas: Sarasota County

Other Eligibility Criteria:

Public Entity and Sarasota County: Projects that benefit LMA will receive highest priority. Projects must have a tieback to at least one of the qualifying 2024 storms unless the project is being considered as a mitigation project under mitigation-set aside.

Non-Profits: Projects benefit low to moderate clientele (LMC) in accordance with HUD and has a tieback to at least one the qualifying 2024 storms unless the project is being considered as a mitigation project under mitigation set-aside.

Maximum Amount of Assistance Per Beneficiary: There are no program maximums.

Mitigation Measures: All projects funded through this program will include construction standards to enhance community resilience against future disasters.

Reducing Barriers for Assistance: Sarasota County will engage in proactive, inclusive outreach to communities with critical Infrastructure needs. This will include multilingual communication materials, culturally appropriate outreach strategies, and partnerships with local community-based organizations that serve vulnerable populations, including seniors, persons with disabilities, non-English speakers, and minority groups. Utilizing demographic data, flood impact assessments, damage assessments and input from local stakeholders, the grantee will identify populations at heightened risk of disaster impacts and potential barriers to accessing project benefits. This includes evaluating the needs of residents with limited mobility, language barriers, or economic constraints. The project design inherently prioritizes LMI communities, as identified in the unmet needs assessment. By focusing on improving critical Infrastructure in these areas, the project directly reduces the disproportionate impacts from a disaster on vulnerable populations and aims to strengthen community resilience to future disasters.

6.4.3 Dredging of Major Waterways

Program Description: The Dredging of Major Waterways Program is designed to address critical infrastructure needs identified through the unmet needs assessment, with a focus on projects that enhance flood mitigation, water flow efficiency, and community resilience to future disasters. A major waterway is a body or conveyance of water, such as a river, bay, creek, or canal, that receives and carries stormwater drainage from a large area or has a continuous flow. For the purposes of this program, creeks and canals that connect to a major waterway (e.g., Intracoastal Waterway, Sarasota Bay, Myakka River, Philippi Creek) shall be considered major waterways. The primary purpose of this program is to mitigate existing or future flood impacts by the removal of sedimentation and debris within major waterways. The 2024 storms caused extensive sediment buildup, erosion, and blockages in key waterways, exacerbating

flooding and drainage issues. This program is directly tied to storm recovery efforts, addressing critical vulnerabilities that were exposed or worsened by these disasters. The dredging and restoration of impacted waterways will improve stormwater management, reduce flood risks, and protect public infrastructure and private property from future damage. By implementing these projects, the program seeks to prevent recurring flood-related damage, ensure public safety, and strengthen long-term community resilience. The unmet needs assessment has highlighted persistent stormwater management challenges and the necessity of proactive dredging to safeguard residents, businesses, and public infrastructure from future disasters.

Amount of CDBG-DR Funds Allocated to this Program: \$75,000,000

Eligible Applicants: Sarasota County

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

- Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management system

National Objective: Benefit to Low- and Moderate-Income Area (LMA) and Urgent Need. To benefit LMI persons, the service area of the project must benefit at least 51%. Urgent Need may be used depending on the nature of the project, the activities taken may alleviate or prevent the conditions which “pose a serious and immediate threat to the health or welfare of the community”.

Funding Distribution: Funds will be distributed through an application-based system, staff will evaluate and score applications, and projects will be selected by Sarasota County Board of County Commissioners.

Eligible Geographic Areas: Sarasota County

Other Eligibility Criteria: Projects that benefit LMA will receive highest priority. Project has a tieback to at least one of the qualifying 2024 storms unless the project is being considered as a mitigation project under mitigation set-aside.

Mitigation Measures: All projects funded through this program will incorporate dredging and waterway restoration measures to enhance flood mitigation, improve stormwater drainage, and reduce future disaster risks. These efforts will strengthen community resilience by ensuring major waterways remain clear and functional, minimizing the impact of extreme weather events.

Reducing Barriers for Assistance: Sarasota County will engage in proactive, inclusive outreach to communities most affected by flooding, particularly in neighborhoods like Pinecraft and other areas along Phillippi Creek and throughout Sarasota County. This will include multilingual communication materials, culturally appropriate outreach strategies, and partnerships with local community-based organizations that serve vulnerable populations, including seniors, persons with disabilities, non-English speakers, and minority groups. Utilizing demographic data, flood impact assessments, and input from local stakeholders, the grantee will identify populations at heightened risk of flooding impacts and potential barriers to accessing project benefits. This includes evaluating the needs of residents with limited mobility, language barriers, or economic constraints. The project design inherently prioritizes LMI communities, as identified in the unmet needs assessment. By focusing on improving flood resilience in these areas, the project directly reduces the disproportionate impacts of flooding on vulnerable populations.

6.5 CDBG-DR Mitigation Set-Aside

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

The County will assess infrastructure projects identified in the Infrastructure Unmet Needs Assessment Section of this Action Plan based on several predefined criteria. The infrastructure project selection process is further defined in the Infrastructure Program Overview section of this Action Plan. During that selection process, the County will consider projects that do not have a tie-back to the disaster but support the local mitigation strategy. These projects may become “mitigation only activities.”

6.6 General Exception Criteria

Sarasota County will make exceptions to the maximum award amounts when necessary to comply with federal accessibility standards or to provide reasonable accommodations for individuals with disabilities, ensuring equal access to programs. For programs or projects with a known maximum assistance amount, exceptions will be considered on a case-by-case basis to address specific accessibility or accommodation needs. In cases where there is no established maximum assistance amount, particularly for individual projects, funding will be determined based on the actual, reasonable costs required to meet program objectives and federal requirements.

7.0 General Information

7.1 Citizen Participation

Sarasota County is committed to promoting equitable participation by creating inclusive opportunities for all residents. This includes proactive measures such as affirmative marketing strategies with multilingual materials, targeted outreach through strong community partnerships, and accessible public input options both virtually and in-person. The County provides and offers multilingual materials, disability accommodations, and maintains continuous engagement through effective feedback mechanisms, ensuring that underserved populations are fully informed and involved in the recovery process.

7.1.1 Consultation of Developing the Action Plan

Partners Consulted	Describe Consultation
Federal Partners (FEMA, SBA)	Consulted through direct request for storm-related data and data on assistance provided.
Local/State Government	Consulted through direct correspondence and stakeholder meetings to identify storm related impacts.
Indian Tribes	Consulted through direct correspondence to identify storm related impacts and shared for awareness.
Nongovernmental organizations	Consulted through direct correspondence and stakeholder meetings to identify storm related impacts.

Partners Consulted	Describe Consultation
Private sector	Consulted through direct correspondence and stakeholder meetings to identify storm related impacts.
State and local emergency management agencies that have primary responsibility for the administration of FEMA funds	Consulted through direct correspondence and stakeholder meetings to identify storm related impacts.
Agencies that manage local Continuum of Care	Consulted through direct correspondence and stakeholder meetings to identify storm related impacts on homeless populations and unmet needs.
Public Housing Agencies	Consulted through direct correspondence to assess the impact from the storms on public housing developments.
State Housing Finance Agencies	Consulted through direct correspondence and shared for awareness.
Other Stakeholders	Outreach included public input meetings (dates provided), community surveys (with notification via correspondence), and opportunities for feedback through online platforms, email submissions, and public input session. Included community leaders and advocacy groups.

7.1.2 Public Comments

Following the creation of the Action Plan or any substantial amendment, Sarasota County publishes the proposed documents for public comment on its official disaster recovery website, www.ResilientSRQ.net, for a minimum of 30 days. This process ensures transparency and allows the public ample opportunity to review and provide feedback. To maximize accessibility, the County also makes hard copies available upon request and distributes summaries at public libraries, community centers, and other municipal buildings. The County also disseminates information through local media, social platforms, and local newspaper advertisements to help reach as many community members as possible and raise awareness about the opportunity to provide feedback.

To address potential barriers to participation, Sarasota County implements measures such as translating vital documents holding public input and public hearings in facilities that are accessible to all, and offering multiple submission methods including email, online forms, postal mail, and in-person options. By enhancing outreach efforts and ensuring accessibility, the County advances meaningful public engagement in the disaster recovery planning process.

7.1.3 Public Hearings

7.1.3.1 Accessibility of Public Hearings

Sarasota County conducted four public input meetings during the development of the Action Plan to gather feedback directly from the community, ensuring that the plan reflects the needs and priorities of potential and actual beneficiaries. Once the Action Plan was drafted, two public hearings were held to allow for formal public comments during the required 30-day comment period. These hearings provide an opportunity for residents to review and respond to the proposed plan before it is finalized.

Both public input meetings and public hearings were scheduled at times and locations convenient for community members, including evenings and weekends when feasible. Meetings are held in ADA-

compliant facilities to ensure physical accessibility, and virtual options are provided with accessibility features such as closed captioning.

7.1.3.2 Meaningful Access

Sarasota County, designated as a Most Impacted and Distressed (MID) area, is committed to providing meaningful access for individuals with Limited English Proficiency (LEP) during both in-person and virtual public hearings related to CDBG-DR activities. Based on ACS data indicating that 3.1% of the population is Spanish-speaking, the County ensures that notices, outreach materials, and vital documents are available in both English and Spanish. Language assistance services include oral interpretation, bilingual staff, telephone interpreter services, written translations, and referrals to community liaisons proficient in other languages as needed. Additionally, to ensure meaningful access during public hearings, a live interpreter was present at each event to assist LEP attendees in real time.

Public notices informed residents of the availability of free language assistance and provide instructions for requesting services. LEP individuals can request additional assistance by contacting ResilientSRQ@scgov.net or the County's ADA/Title VI Coordinator via adacoordinator@scgov.net or phone by calling 3-1-1. Sarasota County will provide timely responses to all public comments and questions, translating them as needed, and will ensure public access to all questions and responses to promote transparency and inclusive participation.

7.1.4 Consideration of Public Comments

The public comments received during the 30-calendar day public comment period for this Action Plan will be published on our website with Sarasota County's responses. The public comment period will run from March 3, 2025, to April 3, 2025. The dashboard with the draft Action Plan comments will be available shortly after the comment period ends at <https://2024storms.resilientsrq.net/action-plan>.

7.1.5 Citizen Complaints

Complaints can be submitted via email to ResilientSRQ@scgov.net, by phone at 941-861-5309 or 3-1-1, or by mail to Resilient SRQ, 301 N. Cattlemen Rd., Suite 200, Sarasota, FL 34232. All complaints will be reviewed by the CDBG-DR program staff, who will conduct investigations as necessary and work towards a timely resolution.

The County is committed to providing a written response to all complaints within 15 business days of receipt. If additional time is required to address the issue, the County will notify the complainant with an explanation for the delay. Complaints regarding fraud, waste, or abuse of government funds will be handled in accordance with Sarasota County's CDBG-DR policies and, if substantiated, will be forwarded to the HUD Office of Inspector General (OIG) Fraud Hotline.

7.2 Modifications to the Action Plan

Over time, recovery needs will change. Sarasota County will amend the CDBG-DR Action Plan as often as necessary to best address our long-term recovery needs and goals. This plan describes proposed programs and activities. Amendments to the Action Plan will be made to update the needs assessment, modify existing or create new activities, or reprogram funds, as necessary. Each amendment will be highlighted or otherwise identified within the plan.

7.2.1 Substantial Amendment

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

- a. Addition or deletion of a program benefit or eligibility criteria;
- b. Addition or deletion of an entire program or activity;

- c. Increase, decrease, or reallocation of funds amongst other approved activities, where alternation of funds constitutes at or above \$20 million of the total current award.

When Sarasota County pursues the substantial amendment process, the amendment will be posted at [Resilient SRQ - Sarasota County Government](https://www.resilientsrq.net/) (<https://www.resilientsrq.net/>) for a 30 calendar day public comment period. The amendment will be posted in adherence with Americans with Disabilities Act (ADA) and LEP requirements. Sarasota County will review and respond to all public comments received and submit to HUD for approval.

7.2.2 Non-substantial Amendment

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

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

7.3 Performance Reports

HUD waives the requirements for submission of a performance report pursuant to 42 U.S.C. 12708(a), 24 CFR 91.520, and annual status and evaluation reports that are due each fiscal year under 24 CFR 1003.506(a). Alternatively, HUD establishes an alternative requirement that grantees enter information in the DRGR system on a quarterly basis, which is referred to as a performance report within the DRGR system (commonly referred to as the quarterly performance report (QPR)).

Sarasota County will submit performance reports on a quarterly basis until all funds have been expended and the County has reported on accomplishments and submitted all required materials for closeout. Upon closure of the grant, the County will shift to annual reporting as described in section III.B.12.e.(3) of the Universal Notice.

Sarasota County will input information in the DRGR system that is sufficient in detail to permit HUD's review of the County's performance and to enable remote review of data to allow HUD to assess compliance and risk.

Sarasota County will use the DRGR system to:

- i. Enter projects into the DRGR Action Plan at a level of detail sufficient to allow HUD to determine the County's compliance: 1) appropriate activity type, 2) national objective, and 3) responsible entity;
- ii. Document the County's oversight of its disaster recovery projects through project level reporting (e.g., summary information on monitoring visits and reports, audits, technical assistance);
- iii. For direct benefit activities only, enter summary data on completed applications for assistance and the number of beneficiaries assisted for each activity each quarter in total and for the following subcategories: 1) persons with disabilities, 2) age, 3) familial status, 4) LEP persons, 5) LMI persons, 6) race, and 7) ethnicity; and iv. If applicable, track program income receipts, disbursements, revolving loan funds, and leveraged funds.

Sarasota County's first performance report will be submitted in accordance with the Universal notice, which is 30 calendar days after the first full calendar quarter after HUD signs the grant agreement. Following the initial performance report, Sarasota County will continue quarterly submission of performance reports

within DRGR no later than 30 calendar days following the end of each calendar quarter. The County will ensure that the DRGR Action Plan is in “Reviewed and Approved Status” in the DRGR system.

Therefore, the County will submit any amendments (substantial or non-substantial) to the DRGR Action Plan at least 45 calendar days prior to the performance report deadline (i.e., QPR deadline). For all activities, the address of each CDBG-DR assisted property will be recorded in the performance report. Once the County submits the performance report into DRGR, an email will be sent to our assigned HUD CPD staff member to confirm submission. HUD will review the submitted performance report with the HUD Performance Report Review Guide.

Once the assigned HUD CPD staff member approves the performance report, the County will publish a version of the performance report that omits PII on our Resilient SRQ webpage within three calendar days of HUD’s approval.

Any rejected performance reports will follow the guidelines outlined within the Universal Notice. The County will make revisions within 30 calendar days and resubmit the performance review in DRGR. If the assigned HUD CPD staff member finds the updated performance review to be satisfactory, the County will publish a version of the performance review that omits PII reported in the performance review, as approved by HUD, within three calendar days of HUD approval.

The remainder of this page is intentionally left blank.

8.0 Appendix A: References & Data Sources

- ⁱ U.S. Department of Housing and Urban Development. "Citizen Participation & Equitable Engagement Toolkit: Introduction." HUD Exchange. [Citizen Participation & Equitable Engagement Toolkit: Introduction - HUD Exchange](#).
- ⁱⁱ U.S. Department of Commerce. "Hurricane Debby - August 2024." National Weather Service. Accessed February 11, 2025.
- ⁱⁱⁱ National Hurricane Center. "Hurricane Debby - August 2024 ." National Oceanic and Atmospheric Administration. Accessed February 11, 2025. <https://www.weather.gov/tbw/HurricaneDebby2024> .
- ^{iv} OpenFEMA. "Data Sets: Individual Assistance Applicant Data." Last modified 2024. FEMA.gov. Accessed January 27, 2025. <https://www.fema.gov/about/openfema/data-sets/>.
- ^v U.S. Small Business Administration. "SBA Disaster Assistance Applicant Data." Last modified 2024. SBA Open Data. Accessed February 10, 2025. <https://data.sba.gov/>.
- ^{vi} U.S. Census Bureau, U.S. Department of Commerce. "Language Spoken at Home for the Population 5 Years and Over." *American Community Survey, ACS 5-Year Estimates Detailed Tables, Table C16001*, 2023, <https://data.census.gov/table/ACS5Y2023.C16001?q=C16001&g=050XX00US12115&y=2023&d=ACS 5-Year Estimates Detailed Tables>. Accessed on February 4, 2025.
- ^{vii} U.S. Census Bureau, U.S. Department of Commerce. "ACS Demographic and Housing Estimates." *American Community Survey, ACS 5-Year Estimates Data Profiles, Table DP05*, 2023, <https://data.census.gov/table/ACS5Y2023.DP05?q=deomographics in Sarasota County, Florida&y=2023>. Accessed on February 4, 2025.
- ^{viii} U.S. Census Bureau, U.S. Department of Commerce. "Household Type (Including Living Alone) by Relationship." *American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B09019*, 2023, <https://data.census.gov/table/ACS5Y2023.B09019?q=same sex&g=050XX00US12115>. Accessed on February 4, 2025.
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