



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 2025 are as follows:

TABLE 1-1: AREA MEDIAN INCOME

Household Size	1	2	3	4	5	6
80% Area Median Income	\$60,300	\$68,900	\$77,500	\$86,100	\$93,000	\$99,900

- 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
- 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 1,800 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 1,500 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.

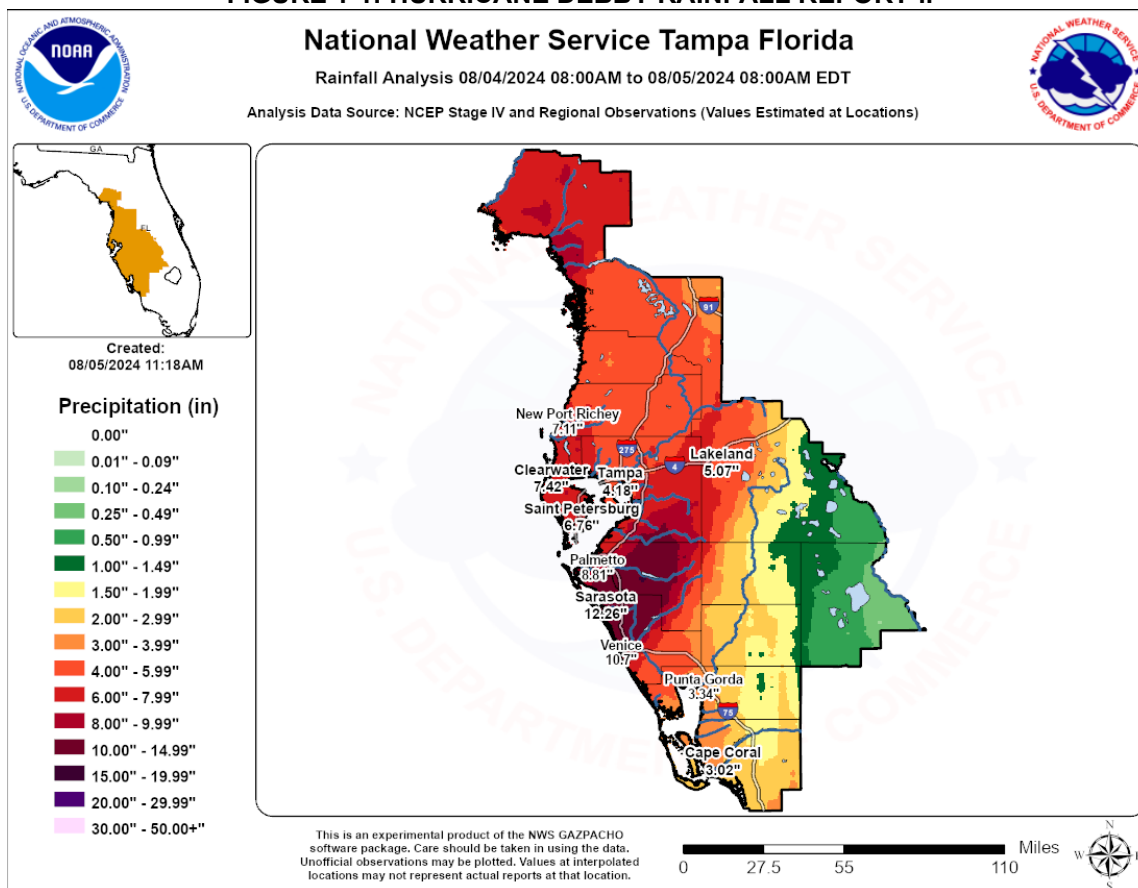
When a major disaster strikes, those struggling to recover tend to be disproportionately minority, elderly, aging in place, persons with disabilities, and families with children. To better identify the disaster impacts of the whole community, the County analyzed the above-mentioned data sets to determine 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 infrastructure and public facilities that benefit LMI areas
- Damaged nonprofit facilities and service disruptions
- 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. 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 REPORT ii



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 dataⁱⁱⁱ, SBA disaster assistance applicant data^{iv}, 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.

Following a review by the Local Mitigation Strategy Working Group, the County has determined that flooding poses the greatest overall threat among identified hazards. This is due not only to its direct impacts, but also because flooding is closely linked to several other hazard types. During the analysis, County staff highlighted repeated concerns about the vulnerability of evacuation routes to flooding. This issue was especially evident during the 2024 storms, when floodwaters compromised the Fruitville Road evacuation corridor.

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
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 2024 storms 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.

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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 do not 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%	80.22%
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 Connection between proposed programs and projects and unmet needs and mitigation needs.

The primary focus of Sarasota County's CDBG-DR programs is to address the remaining disaster recovery needs stemming from Hurricanes Debby, Helene, and 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.^v

FIGURE 4-1: AVERAGE 2-BEDROOM RENT IN SARASOTA COUNTY



To effectively support the rehabilitation and reconstruction of damaged properties, the program must invest significant resources in infrastructure improvements, particularly in dredging and expanding the stormwater capacity of major waterways throughout Sarasota County. Phillippi Creek, for instance, has seen years of sediment buildup, a condition that worsened significantly after the 2024 storms. This sediment accumulation has reduced the creek's capacity to manage stormwater, increasing the risk of flooding, especially along critical evacuation routes.

Many of Sarasota County's major waterways, including Phillippi Creek, are classified as impaired by the Florida Department of Environmental Protection (FDEP). During Hurricane Debby, more than a foot of rainfall caused severe flooding, particularly in neighborhoods such as Pinecraft. This led to the evacuation of over 500 residents and extensive property damage. Numerous homeowners along Phillippi Creek and canals connecting to the creek reported flooding during each major storm event in 2024, underscoring the persistent and recurring nature of the threat.

Flooding along the Fruitville Road evacuation corridor, exacerbated by reduced stormwater capacity in Phillippi Creek and other key waterways, also posed serious life safety risks for first responders and residents trying to evacuate 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 minimizing displacement in its disaster recovery efforts. Prior to pursuing each activity, the County will consider the potential to trigger relocation or displacement and will minimize relocation or displacement of persons and entities when feasible. 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. Sarasota County has an adopted Residential Anti-displacement and Relocation Assistance Plan (RARAP), which outlines the County's policies and procedures for minimizing displacement and providing relocation assistance in accordance with applicable federal requirements. A copy of this RARAP can be found on our website at <https://www.resilientsrq.net/>. 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, including ensuring the accessibility needs of displaced persons with disabilities. 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.

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5.0 Program Design

TABLE 5-1: 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 Phillippi Creek	\$45,000,000	100%	\$45,000,000
Dredging of Major Waterways	\$21,000,000	70%	\$30,000,000
INFRASTRUCTURE & PUBLIC FACILITIES TOTAL			\$132,089,300
Total Program Budget	\$159,272,510		\$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

5.1 Administration

TABLE 5-2: 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%

5.2 Planning

TABLE 5-3: 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%

5.3 Housing

5.3.1 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 and in compliance with all applicable federal statutes. 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.

TABLE 5-4: 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%

5.3.2 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 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 all applicable local, state and national building codes and regulations.
- **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 applicable local, state and national building codes and regulations.
- Meet a minimum energy efficiency standard to promote sustainability and resilience.

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

Reducing Impediments for Assistance: 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, or disability. Training for staff and program partners will reinforce these principles.

5.3.3 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 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 Impediments for Assistance: 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. Training for staff and program partners will reinforce these principles.

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5.3.4 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 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 and resilient 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 applicable local, state and national building codes and regulations.

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

Reducing Impediments for Assistance: 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 or age. 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 impediments to access and prioritizing those with the greatest need, this program will support inclusive and equitable housing recovery efforts in storm-affected communities.

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5.4 Infrastructure

5.4.1 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 5-5: 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 Phillippi Creek	\$45,000,000	100%
Dredging of Major Waterways	\$30,000,000	70%
Infrastructure Program Total:	\$132,089,300	80.22%*
*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.		

5.4.2 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 (501(c)(3) or 501(c)(4))

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 Impediments for Assistance: Sarasota County will engage in proactive, outreach to communities with critical Infrastructure needs. 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 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.

5.4.3 Dredging of Phillippi Creek

Program Description: Phillippi Creek, a vital waterway in Sarasota County, plays a critical role in the County’s stormwater management system. Over time, the creek has experienced notable sediment accumulation, a natural process that has intensified in recent years due to extreme weather events. This build up has gradually diminished the channel’s capacity, elevating flood risks in surrounding neighborhoods.

The creek’s diminished capacity became especially evident during Hurricane Debby, which brought over a foot of rainfall to the area. This resulted in the flooding of communities such as Pinecraft, prompting the evacuation of more than 500 residents and causing widespread property damage. Additionally, several homeowners along Phillippi Creek and canals connecting to the creek reported flooding during each of the 2024 storms, emphasizing the persistent and recurring nature of the flood risk.

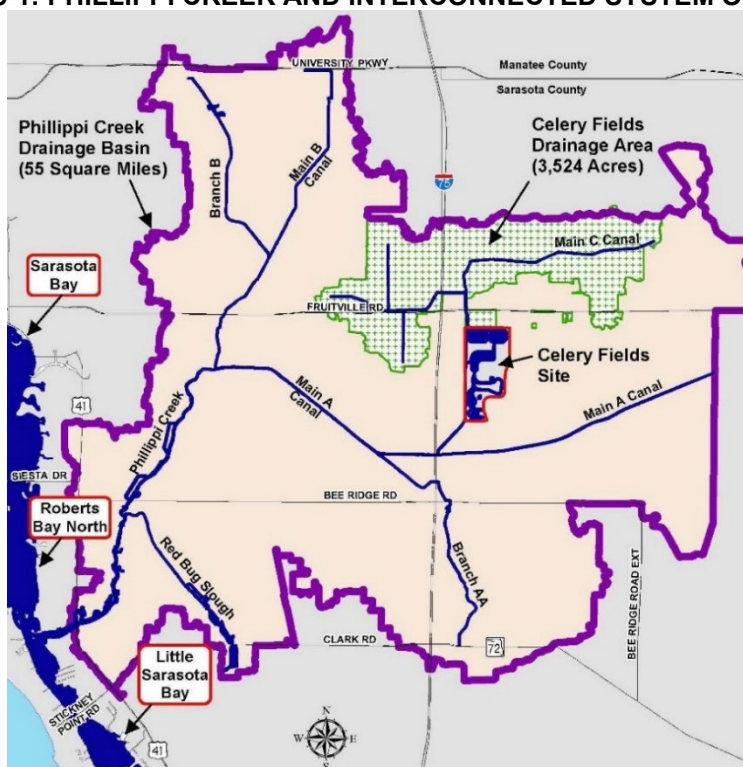
During the reverse storm surge, strong offshore winds push water away from the coastline, causing water levels to drop significantly in bays, rivers, creeks and major waterways. This process exposes large areas of the seabed and riverbeds that are normally underwater. As a result, these waterways often fill up with silt when the water eventually returns. One of the primary reasons for this sediment buildup is resuspension and deposition. When water is pushed away, the exposed riverbeds and estuaries become vulnerable to

wind erosion and the movement of loose sediments. Once the storm surge reverses and water rushes back in, it picks up large amounts of this silt and deposits it in waterways.

Another factor is the increased turbidity caused by the sudden influx of returning water. As the water moves back into previously dry areas, it stirs up fine sediments that had settled over time. This leads to murky water filled with suspended particles, which eventually settle and contribute to sediment accumulation. Reverse storm surges also disrupt natural flow patterns in waterways. These altered currents not only transport displaced sediments but also bring in additional material from offshore areas. Once the normal tidal flows resume, they redistribute these sediments, leading to deposits in rivers and estuaries. Debris and organic material accumulation contribute to the problem. Along with silt, decaying plants and other debris can be swept into the waterways, further impacting navigation, water quality, and marine ecosystems.

Phillippi Creek is part of an interconnected system of canals and branches that are also impacted when sediment accumulates in the main channel. This buildup restricts proper drainage, causing rainwater to back up and flood the surrounding waterways. Among these, Main A Canal and Branch AA benefit significantly from the Celery Fields, a 3,524-acre regional stormwater facility designed to manage excess runoff by holding the stormwater onsite. In contrast, Main B Canal and Branch B, which lack similar upstream support, are more susceptible to flooding during heavy rainfall events, especially where the canal meets the creek.

FIGURE 5-1: PHILLIPPI CREEK AND INTERCONNECTED SYSTEM OF CANALS



The Celery Fields play a critical role in regional flood mitigation. The area primarily consists of open marshlands, deep ponds, and a series of canals, bordered by oak, willow, and pine trees along its eastern and southern edges. The system is divided into three main segments. The North Cells receive stormwater from the Fruitville Road entry canal and contain deep ponds. Water from the North Cells flows into the

Central Cells before continuing under Palmer Boulevard into the South Cells. From there, water moves southward into Phillippi Creek.

Main B Canal, which passes beneath Fruitville Road, a major evacuation corridor, is particularly vulnerable to the impacts of sedimentation and limited drainage capacity. Although Main B Canal and Branch B are not included in the current dredging project, improvements to stormwater flow in the main system are expected to alleviate flooding risks along the northern portion of the evacuation route.

To address these issues, CDBG-DR funds will be used to dredge approximately 7 miles of Phillippi Creek, from its mouth through the Pinecraft neighborhood. This project aims to restore the creek's capacity to manage stormwater by removing accumulated sediments, thereby mitigating future flooding risks, improving drainage efficiency, and enhancing water quality. The project will improve flood resilience, ensure public safety, and directly benefit LMI persons within the service area. The unmet needs assessment identified critical gaps in stormwater management, drainage systems, and other infrastructure vulnerabilities, which this project seeks to address.

Amount of CDBG-DR Funds Allocated to this Program: \$45,000,000

Eligible Applicants: Sarasota County

Eligible Activity: 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;

National Objective: Benefit to Low- and Moderate-Income Area (LMA). To benefit LMI persons, the service area of the project must benefit at least 51% of LMI.

Assistance provided under this project will meet the national objective of benefiting LMI areas by reducing flood risk and providing a more secure evacuation route for the population in the service area shown below:

FIGURE 5-2: PHILLIPPI CREEK BENEFIT AREA

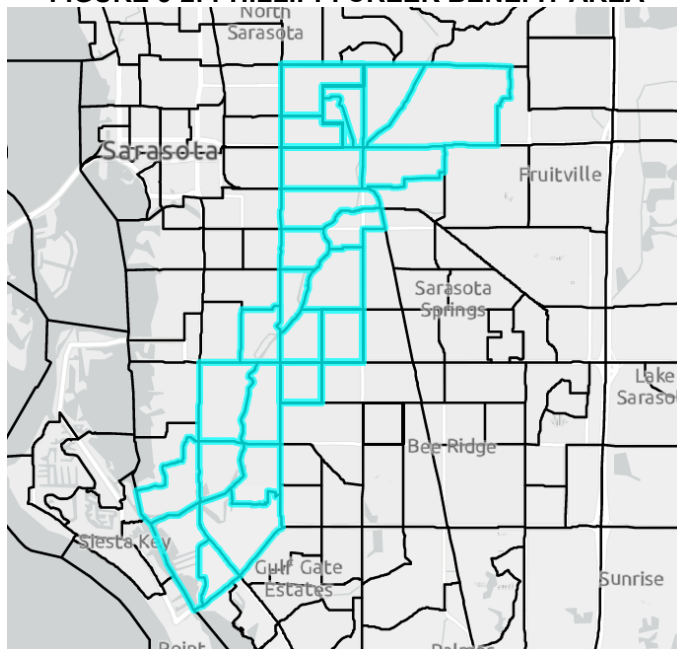


TABLE 5-6: DREDGING OF PHILLIPPI CREEK BENEFIT AREA ANALYSIS

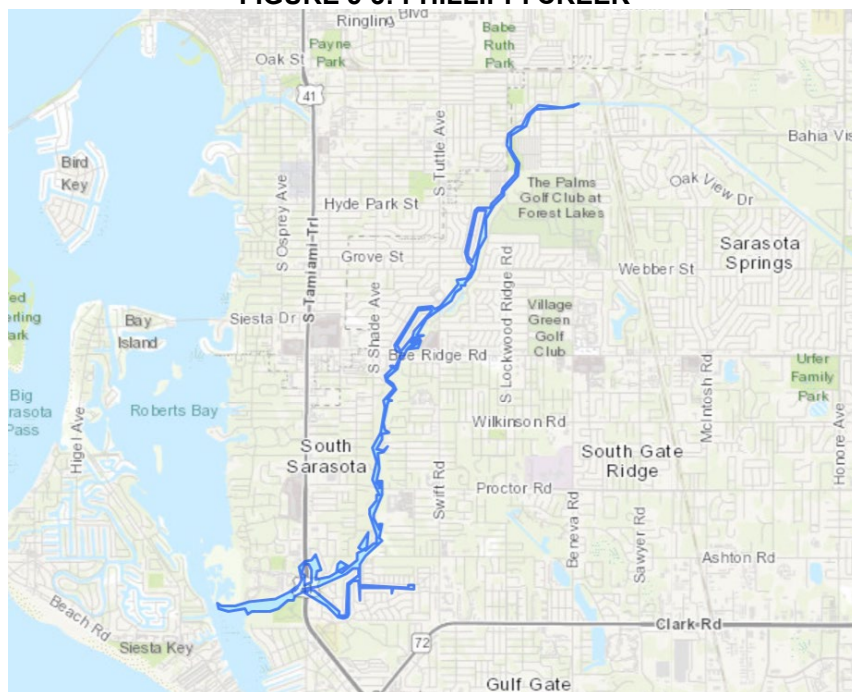
CDBG Recipient	Census Tract		LMI Pop	Total Pop	Percent LMI
Sarasota County	1801	1	355	450	78.90%
Sarasota County	1801	2	160	790	20.30%
Sarasota County	1801	5	280	855	32.70%
Sarasota County	1804	1	355	920	38.60%
Sarasota County	1805	1	945	2,140	44.20%
Sarasota County	1803	2	730	1,390	52.50%
Sarasota County	1803	1	700	1,380	50.70%
Sarasota County	1804	2	985	1,825	54.00%
Sarasota County	1704	1	620	1,050	59.00%
Sarasota County	1602	3	515	1,080	47.70%
Sarasota County	1602	2	1,260	1,675	75.20%
Sarasota County	1601	2	335	985	34.00%
Sarasota County	503	3	390	595	65.50%
Sarasota County	602	3	280	1,005	27.90%
Sarasota County	1601	3	410	1,080	38.00%
Sarasota County	503	2	515	845	60.90%
Sarasota County	503	1	1,360	2,320	58.60%
Sarasota County	406	1	985	1,615	61.00%
Sarasota County	405	1	1,690	2,670	63.30%
Sarasota County	404	1	490	1,230	39.80%
Sarasota County	1301	1	1,455	2,505	58.10%
Sarasota County	407	3	1,595	2,295	69.50%
Sarasota County	407	1	910	1,745	52.10%
Sarasota County	407	2	315	660	47.70%
Sarasota County	406	2	1,205	2,055	58.60%
			18,840	35,160	53.58%

Funding Distribution: Direct allocation by Sarasota County Board of County Commissioners.

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Eligible Geographic Areas: As shown in the image, Phillippi Creek spans approximately 7.2 miles, its mouth starts at Little Sarasota Bay and ends at Beneva Road.

FIGURE 5-3: PHILLIPPI CREEK



Other Eligibility Criteria: This project addresses unmet recovery and mitigation needs for infrastructure by restoring the stormwater management capacity of Phillippi Creek through dredging. This project will reduce recurring flood risks, improve drainage efficiency, and enhance water quality in communities that have been impacted by the 2024 storms.

Mitigation Measures: Enhancing the creek's capacity will lower the likelihood of future flooding events, protecting residential and commercial properties. Removing sediments will improve water quality, benefiting aquatic habitats and promoting biodiversity.

Reducing Impediments 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. 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 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.

5.4.4 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: \$30,000,000

Eligible Applicants: Sarasota County and Public Entities

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 Impediments for Assistance: Sarasota County will engage in proactive outreach to communities most affected by flooding throughout Sarasota County. 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 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.

5.5 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.”

5.6 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.

6.0 General Information

6.1 Citizen Participation

Sarasota County is committed to promoting participation by creating opportunities for all residents. This includes proactive measures such as targeted outreach through strong community partnerships, and accessible public input options both virtually and in-person. The County provides disability accommodations, and maintains continuous engagement through effective feedback mechanisms, ensuring that the public is fully informed and involved in the recovery process. Sarasota County will follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 and 24 CFR 570.486, where applicable.

6.1.1 Consultation of Developing the Action Plan

TABLE 6-1: PARTNERS CONSULTED

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.

Partners Consulted	Describe Consultation
Nongovernmental organizations	Consulted through direct correspondence and stakeholder meetings to identify storm related impacts.
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.

6.1.2 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.

TABLE 6-2: SOCIAL MEDIA OUTREACH

Platform	Reach/Impressions
Facebook	74,000
X	5,358
Resilient SRQ Newsletter	6,329
Total	85,687

To address potential impediments to participation, Sarasota County implements measures such as 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.

6.1.3 Public Hearings

6.1.3.1 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.

6.1.4 Consideration of Public Comments

The public comments received during the 30-calendar day public comment period for this Action Plan have been published on our website with Sarasota County's responses. The public comment period was open from March 3, 2025, to April 3, 2025. The dashboard, an interactive online tool displaying the complete set of public comments received on the draft Action Plan, is available at <https://2024storms.resilientsrq.net/action-plan>. A summary of these public comments and the County's responses is included in Appendix A of this Action Plan.

6.1.5 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.

6.2 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.

6.2.1 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)

requirements. Sarasota County will review and respond to all public comments received and submit to HUD for approval.

6.2.2 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.

6.3 Environmental Review

Sarasota County is the Responsible Entity (RE) for the purposes of environmental review under 24 CFR Part 58. As the RE, the County assumes the authority for decision-making and completion of environmental reviews for all activities proposed for funding under the Community Development Block Grant-Disaster Recovery (CDBG-DR) Program. Sarasota County will ensure that environmental reviews are conducted in compliance with all applicable federal laws and regulations.

6.4 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 the number of beneficiaries assisted for each activity each quarter in total and for the following categories: LMI persons and data required at 570.506(g)(2); 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.

6.5 Compliance with Immigration Verification Requirements

Sarasota County will administer its CDBG-DR allocation in compliance with applicable immigration restrictions. This includes adhering to the eligibility and verification requirements under Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (8 U.S.C. §§ 1601–1646), and utilizing the SAVE system or a federally approved equivalent to verify eligibility. CDBG-DR funds will not be used in any manner that facilitates the subsidization or promotion of illegal immigration or supports policies that shield individuals unlawfully present in the United States. These measures ensure that Federal public benefits are only provided to eligible recipients in accordance with federal law and HUD guidance.

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7.0 Appendix A: Summary of Public Comments for Draft Action Plan

Sarasota County public comment period on the draft action plan took place from March 3, 2025, to April 3, 2025. Over 560 comments were received during this time.

Comments could be submitted using the following formats:

- Using an online form at the webpage, <https://2024storms.resilientsrq.net/action-plan>
- Emailing ResilientSRQComments@scgov.net
- Attending the public hearing and providing comments either in writing or orally
- Mailing a letter to the Resilient SRQ team

TABLE 7-1: SUMMARY OF PUBLIC COMMENTS & COUNTY RESPONSES

Dredging of major waterways	Total 385	Summary of Comments Received: Comments received asked the County to dredge major waterways, including but not limited to Phillippi Creek and Hudson Bayou for stormwater management.
County response: Comments received helped further justify the substantial need for these projects and indicate public support for such projects. No further actions were taken. Several comments provided suggestions for additional projects for consideration. For dredging of major waterway projects to be considered by the County, a public entity can submit the request via an application process once the Dredging of Major Waterways program launches after HUD's formal approval of this Action Plan and development of programmatic Policies and Procedures. The County anticipates potentially launching the program sometime in 2025 at which time applications will need to be submitted by eligible public entities. The public will be made aware of the launch of this program through the County's website. All projects must meet a HUD National Objective: serve an urgent need, aid in the elimination of slum or blight, or benefit low to moderate income persons. All projects must also have a direct or indirect tie back to the 2024 storms, unless using the mitigation set aside.		
Housing Recovery	Total 55	Summary of Comments Received: Comments in support of housing recovery asked that the county dedicate funding to assisting residents repair or replace their homes so that they can safely return to their property
County response: Comments received helped further justify the substantial need for housing recovery and indicated public support for such projects. Requests for assistance can be submitted via application process once the housing programs launch after HUD's formal approval of this Action Plan and development of programmatic Policies and Procedures. The County anticipates potentially launching the program sometime in 2025 at which time applications will need to be submitted by eligible homeowners. The public will be made aware of the launch of this program through the County's website.		

General Flooding Concerns/Infrastructure	Total 44	Summary of Comments Received: Comments received asked the County to consider specific infrastructure projects and to increase the resiliency of our roads, bridges, stormwater and wastewater management, and the electrical power grid as well as address flooding concerns.
<p>County response: Comments received helped further justify the substantial need for these projects and indicated public support for such projects. No further actions were taken.</p> <p>Several comments provided suggestions for additional projects for consideration. Infrastructure and public facility projects to be considered by the County can be submitted via application process once the Infrastructure and Public Facilities program launches after HUD's formal approval of this Action Plan and development of programmatic Policies and Procedures. The County anticipates potentially launching the program sometime in 2025 at which time applications will need to be submitted by eligible public or non-profit entities. The public will be made aware of the launch of this program through the County's website.</p> <p>All projects must meet a HUD National Objective: serve an urgent need, aid in the elimination of slum or blight, or benefit low to moderate income persons. All projects must also have a direct or indirect tie back to the 2024 storms, unless using the mitigation set aside.</p>		
Gulf Gate Golf Course	Total 34	Summary of Comments Received: Comments received about the Gulf Gate golf course expressed their support for acquisition and conversion of the 49-acre golf course for a future Stormwater Management System and Water Quality Resilience Project. Comments received claimed the project would provide flood protection for an area of 1,900 acres representing 7,600 living units and would promote a more resilient community and filter stormwater before it flows into Little Sarasota Bay.
<p>County response: Comments received helped further justify the substantial need for Infrastructure and Public Facilities projects and indicated public support for such projects. No further actions were taken.</p> <p>Several comments provided suggestions for the acquisition of the Gulf Gate golf course which would need to be applied for under the infrastructure and public facility projects to be considered by the County. The request to purchase the 49-acre parcel can be submitted via an application process once the Infrastructure and Public Facilities program launches after HUD's formal approval of this Action Plan and development of programmatic Policies and Procedures. The County anticipates potentially launching the program sometime in 2025 at which time applications will need to be submitted by eligible public entities. The public will be made aware of the launch of this program through the County's website.</p> <p>All projects must meet a HUD National Objective: serve an urgent need, aid in the elimination of slum or blight, or benefit low to moderate income persons. All projects must also have a direct or indirect tie back to the 2024 storms, unless using the mitigation set aside.</p>		

Mitigation	Total 14	Summary of Comments Received: Comments received requested the County to reconsider the removal of the Resilient Sarasota Single-Family Mitigation Program.
County response: <p>Although the Resilient Sarasota Single-Family Mitigation Program was removed as a potential program, all projects funded will CDBG-DR will have mitigation measures built into the project to meet the 15% mitigation set-aside. The program may be reconsidered at a later time by the Board of County Commissioners, and the Action Plan can be amended as community needs evolve.</p> <p>County staff will include resources to the State's mitigation program, My Safe Florida Home & Elevate Florida, on the County website and continue to direct residents inquiring about mitigation only assistance to those programs for assistance.</p>		
Support for the draft Action Plan/Compliments	Total 13	Summary of Comments Received: Comments included accolades for the draft action plan and were complimentary of Staff for their outreach efforts.
County response: <p>Thank you for your positive feedback on the draft action plan and our outreach efforts. We appreciate your support and remain committed to engaging with the community to develop effective and inclusive solutions.</p>		
Multifamily Affordable Housing	Total 12	Summary of Comments Received: Comments were in support of new affordable housing asking the county to utilize as much funding as possible to create additional affordable and workforce housing.
County response: <p>Comments received helped further justify the substantial need for affordable housing and indicated public support for such projects. Creation of new affordable housing is an eligible activity under CDBG-DR and meets the HUD National Objective of benefit low to moderate income persons.</p> <p>Affordable housing projects to be considered by the County can be submitted via application process once the housing programs launch after HUD's formal approval of this Action Plan and development of programmatic Policies and Procedures. The County anticipates potentially launching the program sometime in 2025 at which time applications will need to be submitted by eligible entities. The public will be made aware of the launch of this program through the County's website.</p>		
Environmental Concerns	Total 9	Summary of Comments Received: Comments received asking the County to consider taking additional steps to combat climate change and protect the environment.
County response: <p>Environmental concerns may be taken into consideration when projects and programs are being developed and may need to be accounted for in potential projects or programs considered in the future.</p> <p>Per Sec. 124-122 - Landscaping and Buffering of the Sarasota County Unified Development Code, properly landscaped and maintained areas can reduce the potential incompatibility of adjacent land uses, conserve natural resources and maintain open space, protect established residential neighborhoods, and promote and enhance community image and roadway beautification. Additional Environmental and Natural Resource preservation can be found in Chapter 54 of the Code of Ordinances, including air quality, water quality, environmentally sensitive land, etc.</p>		

Economic Revitalization	Total 6	Summary of Comments Received: Comments received for economic revitalization requested that a portion of these funds go to restoring losses, including loss of business operations, which occurred because of the 2024 storms.
County response: The County has reviewed and considered the comments related to assisting businesses. Any business assistance program would need to have tie-back to the event as indicated in the HUD CDBG-DR Policy Guide, <i>“All economic revitalization activities must address economic impact(s) caused by the disaster”</i> . This could possibly include assistance with repairs to damaged businesses, buy-out of damaged properties, business development assistance in the wake of business/job loss, or similar recovery activities. If a tie-back to the 2024 storms could be established, these programs would still have to meet a HUD National Objective. Economic development and economic revitalization activities typically can only meet the Benefit to Low to Moderate Income (LMI) Persons or Urgent Need National Objective (with Urgent Need only being permitted in special situations). To qualify as an Urgent Need, businesses would need to demonstrate there is a serious and immediate threat to the health or welfare of the community. The program may be reconsidered at a later time by the Board of County Commissioners, and the Action Plan can be amended as community needs evolve.		
Urban Planning Concerns	Total 6	Summary of Comments Received: Comments received regarding new development expressed concern regarding building practices and indicated a desire for funds to be focused on infrastructure and land preservation rather than housing.
County response: The County received and reviewed comments recommending that funds be used on infrastructure rather than housing. Based upon data analysis, there is a strong need for both housing and infrastructure/public facilities programs, especially in areas that were most impacted from the 2024 storms. The County will consider infrastructure and housing projects that best meet the unmet needs of Sarasota County.		

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8.0 Appendix B: References & Data Sources

- ⁱ U.S. Department of Commerce. "Hurricane Debby - August 2024." National Weather Service. Accessed February 11, 2025.
- ⁱⁱ National Hurricane Center. "Hurricane Debby - August 2024 ." National Oceanic and Atmospheric Administration. Accessed February 11, 2025. <https://www.weather.gov/tbw/HurricaneDebby2024> .
- ⁱⁱⁱ OpenFEMA. "Data Sets: Individual Assistance Applicant Data." Last modified 2024. FEMA.gov. Accessed January 27, 2025. <https://www.fema.gov/about/openfema/data-sets/>.
- ^{iv} U.S. Small Business Administration. "SBA Disaster Assistance Applicant Data." Last modified 2024. SBA Open Data. Accessed February 10, 2025. <https://data.sba.gov/>.
- ^v United Way. "Eviction Mitigation Program – State of the Housing Crisis Dashboard." Accessed February 28, 2025. <https://unitedwaysuncoast.org/eviction-mitigation/>.