

Manatee County, Florida | May 2025 | DRAFT

# Community Development Block Grant Disaster Recovery (CDBG-DR) Action Plan

Hurricanes Debby, Helene, and Milton



# Change Log

The following table summarizes HUD approval of the County of Manatee’s Community Development Block Grant Disaster Recovery (CDBG-DR) Action Plan and any subsequent amendments approved by HUD.

Version (Date)	Summary of Changes
Version 1 (May 21, 2025)	Draft Action Plan for Public Comment

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# Executive Summary

From August 2024 to October 2024, the County of Manatee ("County"), was severely impacted by Hurricanes Debby, Helene, and Milton ("2024 Hurricanes"), resulting in catastrophic damage to housing, infrastructure, and economic activity. Since that time, the County has worked to leverage resources from the state and Federal agencies to navigate the long-term recovery process towards a more resilient community.

In response to significant disasters, Congress may appropriate additional recovery funding through the United States (U.S.) Department of Housing and Urban Development's (HUD) Community Development Block Grant Disaster Recovery (CDBG-DR) Program. In December 2024, the Disaster Relief Supplemental Appropriations Act, 2025 (Division B of the American Relief Act, 2025, Public Law 118-158, December 21, 2024) appropriated more than \$12 billion. HUD formally allocated \$252,711,000 of this CDBG-DR appropriation to the County on January 16, 2025. As outlined in this Action Plan, CDBG-DR funds will be used primarily to restore impacted housing stock and public infrastructure and implement resilience measures to reduce the impacts of future disasters.

This Action Plan is required by HUD for the County to access CDBG-DR funding. The primary purpose of the Action Plan is to estimate the County's unmet needs, defined as needs that cannot be met by other sources, and describe how the County intends to use CDBG-DR funding to address those unmet needs. While the Action Plan is a key milestone in the recovery process, it is not intended to serve as a comprehensive long-term recovery plan. It is specific to the use of CDBG-DR funds and associated requirements.

The Plan includes the following sections:

1. **Disaster-Specific Overview:** Describes the broad impacts of the 2024 Hurricane Season, and the County's recovery efforts.
2. **Unmet Needs Assessment:** Estimates unmet recovery needs in three core aspects of recovery as defined by HUD: housing, infrastructure, and the economy. The Unmet Needs Assessment is used to guide the prioritization of recovery activities to address housing, infrastructure, and economic unmet needs.
3. **Mitigation Needs Assessment:** Identifies natural hazards faced by the County, provides a risk-based assessment of those hazards, and identifies mitigation priorities.

4. **Connection Between Proposed Programs and Projects and Unmet Needs and Mitigation Needs:** Describes the programs and activities proposed by the County, and the proposed allocation across those programs and activities.
5. **General Information:** Includes important information on the County's citizen participation process, including public hearings, stakeholder consultations, community outreach, and the public comment process. The section also contains administrative information, such as how the plan will be amended.

Table 1 provides a summary of the proposed allocations described in the Plan. Each program is described in the *Funding Criteria* section.

*Table 1 – CDBG-DR Program Allocations and Funding Thresholds*

Eligible Cost Category	CDBG-DR Allocation Amount	Percent of CDBG-DR Amount*	CDBG-Mitigation Set-Aside	Estimated Percent of CDBG-DR Mitigation Set-Aside	Total CDBG-DR and Mitigation Amounts by Eligible Cost Category	Estimated Percentage of All Funds to Combined MID Area	Estimated Percentage of All Funds to Overall LMI Benefit
Administration (5%)	\$12,635,000	5%	-	-	\$12,635,550	-	N/A
Housing	\$107,556,000	42.56%	\$0	0%	\$107,556,000	100%	TBD
Infrastructure	\$97,038,000	38.40%	\$32,962,000	100%	\$130,000,000	100%	TBD
Economic Revitalization	\$0	N/A	N/A	N/A	N/A	N/A	N/A
CDBG-DR Mitigation Set-Aside	\$32,962,000	13.04%	-	-	-	100%	TBD
Planning	\$2,520,000	1%	N/A	N/A	\$2,520,000	100%	N/A
<b>Total</b>	<b>\$252,711,000</b>	<b>100%</b>	<b>\$32,962,000</b>	<b>100%</b>	<b>\$252,711,000</b>	<b>100%</b>	<b>70%</b>
<b>Percent of Total</b>	<b>100%</b>	<b>100%</b>	<b>15%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>70%***</b>

\*Percentages derived from total allocation (Activities + Mitigation) due to Administration amount applied to entirety of the allocation.

\*\*CDBG-DR Mitigation Set Aside (\$32,962,000) is 15% of the CDBG-DR Allocation for Unmet Needs (\$219,749,000) but represents 13.04% of the CDBG-DR plus Mitigation total (\$252,711,000).

\*\*\*Individual program LMI benefit percentages may vary. Projected LMI benefit is estimated at 70% across all eligible cost categories and are subject to refinement as projects are further developed and beneficiaries are identified.

# Overview

On January 7, 2025, HUD announced that the County will receive \$252,711,000 in funding to support long-term recovery efforts following Hurricane Debby (FEMA DR-4806-FL), Hurricane Helene (FEMA DR-4828-FL), and Hurricane Milton (FEMA DR-4834-FL). CDBG-DR funding is designed to address needs that remain after all other assistance has been exhausted. This Action Plan details how funds will be allocated to address remaining unmet needs in Manatee County.

To meet disaster recovery needs, the appropriations act(s) making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and facilitate a quicker recovery. To ensure that projects are deployed in a timely manner and to streamline the recovery process, HUD provided multiple waivers and flexibilities in the January 8, 2025, [Federal Register Notice \(90 FR 1754\)](#) (Updated March 19, 2025) ("Revised Universal Notice") and Allocation Announcement Notice (AAN). The County will utilize these waivers and flexibilities when necessary to expedite the deployment of funds consistent with HUD's six-year window for use of the funds.

## Disaster-Specific Overview

Between August and October 2024, the County was impacted by three federally declared disaster events in close succession: Hurricane Debby, Hurricane Helene, and Hurricane Milton. Each storm brought distinct hazard conditions – including extreme rainfall, coastal storm surge, and high winds – that collectively affected the County. The consecutive nature of these events contributed to cumulative impacts on infrastructure, essential services, and housing across the community.

### Hurricane Debby

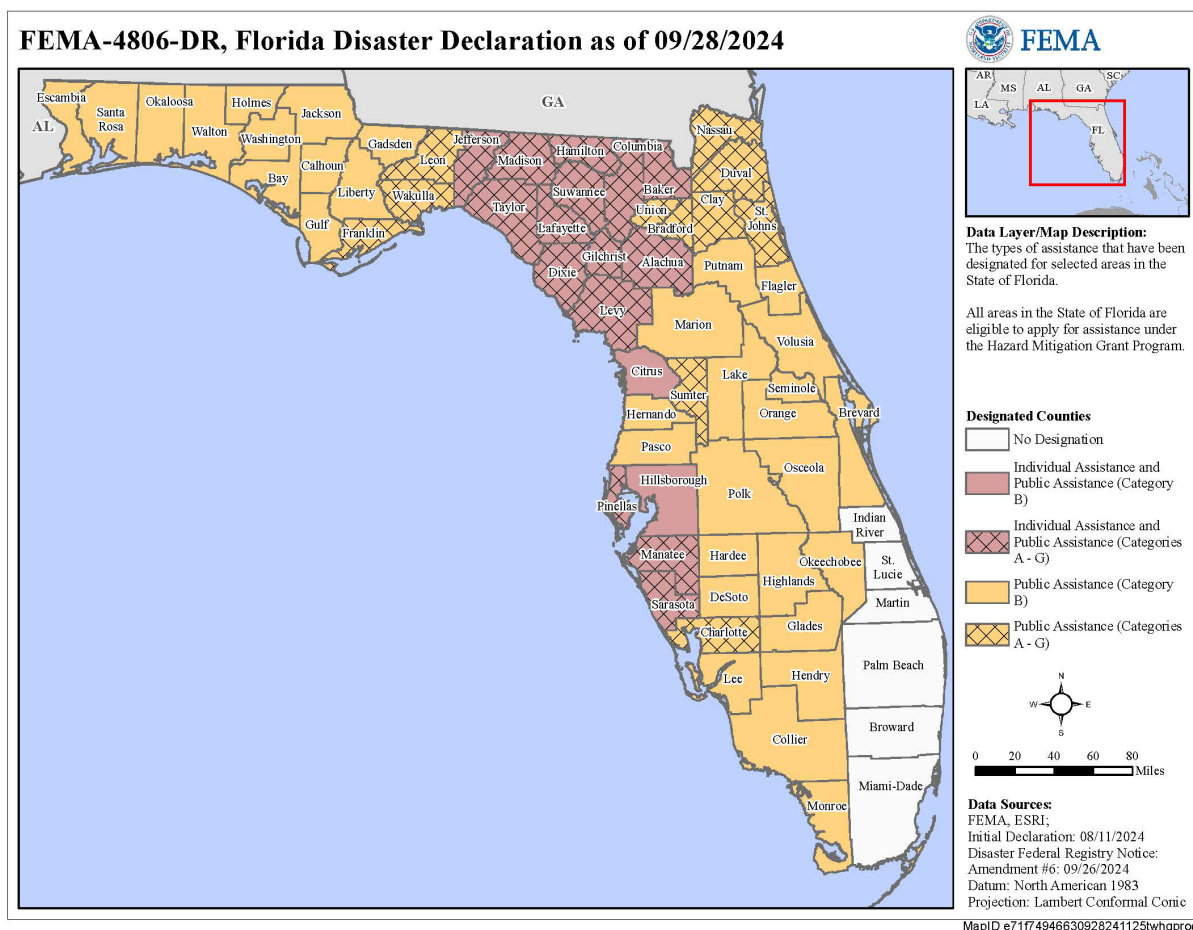
Hurricane Debby, a Category 1 hurricane, impacted the County with sustained tropical storm-force winds and prolonged, heavy rainfall from August 3-5, 2024. Rainfall totals exceeded 18 inches in some areas leading to significant inland flooding, stormwater system overload, and runoff.<sup>1</sup> Wastewater treatment systems were overwhelmed, resulting in the

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<sup>1</sup> Source: [Tropical Cyclone Report: Hurricane Debby \(AL042024\)](#), National Hurricane Center. 2025.

release of more than 17 million gallons of untreated or partially treated wastewater, far exceeding system capacity.<sup>2</sup> Debby also produced a storm surge of approximately 3 to 5 feet along portions of the County's coastline, contributing to low-lying coastal flooding and infrastructure strain.<sup>3</sup>

*Figure 1 – Hurricane Debby Disaster Declaration*



Source: FEMA Designated Areas: Disaster 4806.<sup>4</sup>

On August 9, 2024, Governor Ron DeSantis submitted a request for a major disaster declaration, seeking federal assistance for Individual Assistance, debris removal, and emergency protective measures for multiple counties, including Manatee County, as well as statewide Hazard Mitigation assistance.<sup>5</sup> Due to the storm's severity, the request was expedited before completion of Joint Preliminary Damage Assessments (PDAs), conducted

<sup>2</sup> Source: [Debby, Helene, and Milton: Post-Hurricane Impacts and Recovery Session Report](#). Tampa Bay Regional Planning Council. 2025.

<sup>3</sup> Source: [Tropical Cyclone Report: Hurricane Debby \(AL042024\)](#). National Hurricane Center. 2025.

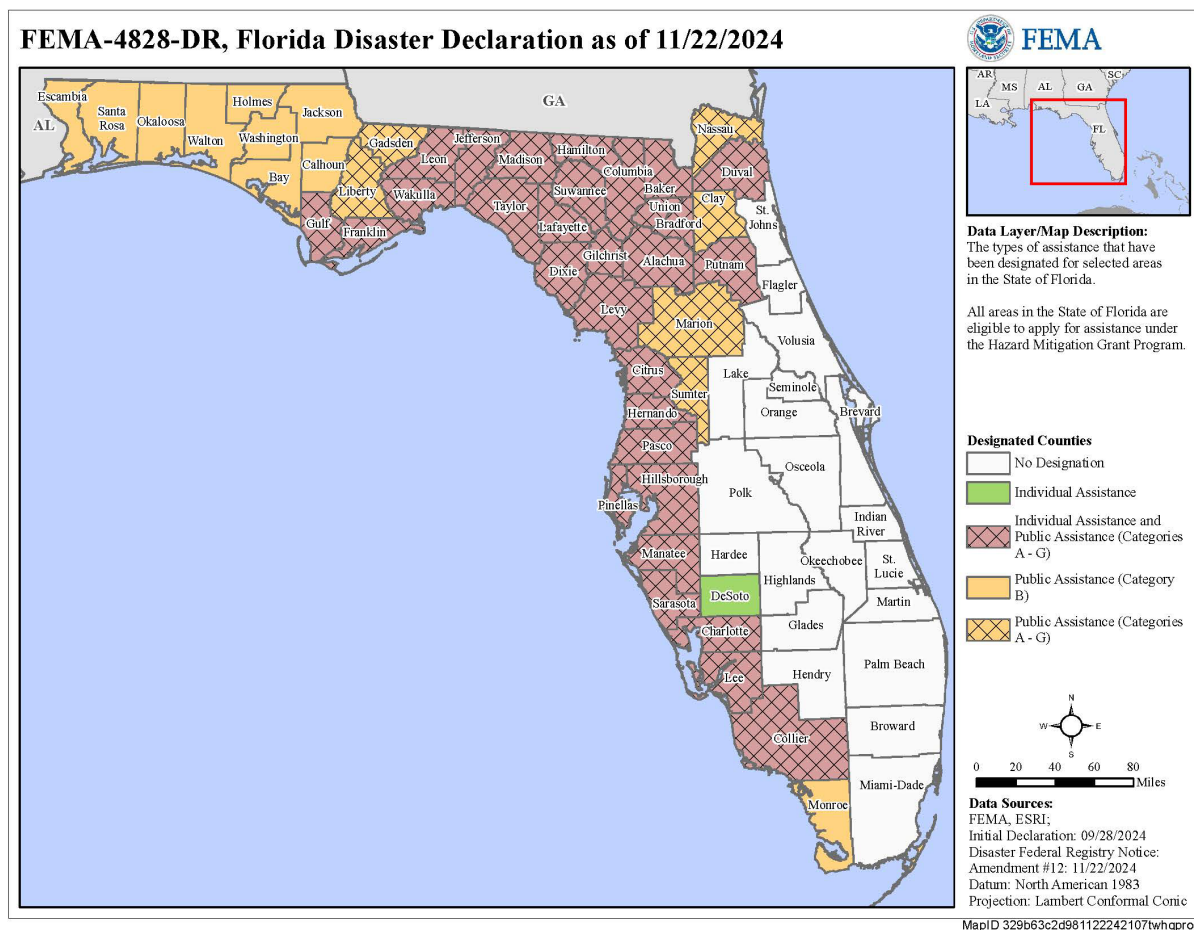
<sup>4</sup> Source: [Designated Areas: Disaster 4806](#). FEMA. 2024.

<sup>5</sup> Source: [Preliminary Damage Assessment Report: FEMA-4806-DR-FL](#). FEMA. 2024.

by FEMA, the Florida Division of Emergency Management, and local officials. On August 10, 2024, former President Biden approved the declaration, authorizing Individual Assistance for Manatee County and nine other counties, Public Assistance for emergency work in eleven counties, and Hazard Mitigation Grant Program statewide.<sup>6</sup>

## Hurricane Helene

Figure 2 – Hurricane Helene Disaster Declaration



Source: FEMA Designated Areas: Disaster 4828.<sup>7</sup>

Hurricane Helene, a Category 4 hurricane, made landfall north of the County on September 27, 2024, but brought significant impacts to Manatee. A storm tide of 6.68 feet above Mean Higher High Water (MHHW) was recorded along the County's coast,<sup>8</sup> with overall storm surge levels in the four to six foot range, leading to extensive coastal inundation and infrastructure

<sup>6</sup> Source: Preliminary Damage Assessment Report: FEMA-4806-DR-FL. FEMA. 2024.

<sup>7</sup> Source: Designated Areas: Disaster 4828. FEMA. 2024.

<sup>8</sup> Source: Tropical Cyclone Report: Hurricane Helene. National Hurricane Center. 2025

impacts.<sup>9</sup> The storm surge also pushed sand onto the island, depositing it in depths of three to five feet and eroding the shoreline by approximately 10 to 15 feet.<sup>10</sup> Additionally, powerful winds affected an estimated 4,363 residential structures, destroying at least 356 and causing major damage to an additional 971, according to post-storm damage assessments conducted by the County.

On September 28, 2024, a Major Disaster Declaration was approved by former President Biden following Governor DeSantis's request for Individual and Public Assistance for 25 counties, including Manatee, and Hazard Mitigation Grant Program assistance statewide.<sup>11</sup> Due to the storm's catastrophic impacts, the request was expedited and granted prior to the completion of Preliminary Damage Assessments.<sup>12</sup>

## Hurricane Milton

Hurricane Milton, a Category 3 hurricane at landfall, produced prolonged periods of rainfall and tropical storm conditions across the County in early October 2024. The storm delivered over 10 inches of rain in parts of the County, with official rain gauges recording up to 13 inches, causing widespread surface water flooding and placing intense pressure on drainage systems throughout the County.<sup>13</sup> These impacts were compounded by saturated soil conditions from prior storms, contributing to transportation and utility disruptions.<sup>14</sup>

On October 11, 2024, former President Biden issued a Major Disaster Declaration following the Governor's expedited request. The declaration authorized Individual and Public Assistance for 34 counties, including Manatee, and provided statewide Hazard Mitigation Grant Program support.<sup>15</sup>

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<sup>9</sup> Source: [Manatee County Local Mitigation Strategy Plan 2024 Draft Update](#). Manatee County. 2025.

<sup>10</sup> Source: [Manatee County Local Mitigation Strategy Plan 2024 Draft Update](#). Manatee County. 2025.

<sup>11</sup> Source: [Preliminary Damage Assessment Report: FEMA-4828-DR-FL](#). FEMA. 2024.

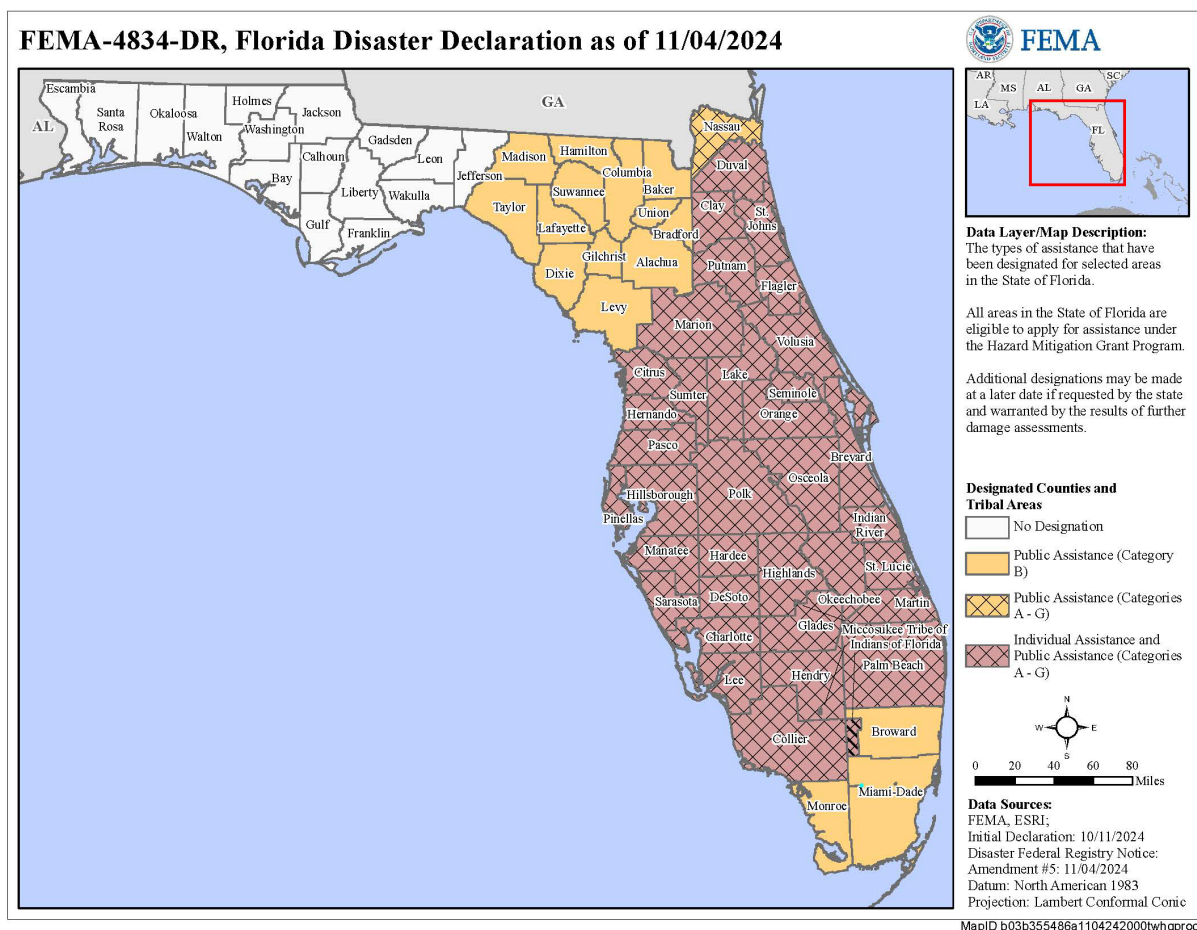
<sup>12</sup> Source: [Preliminary Damage Assessment Report: FEMA-4828-DR-FL](#). FEMA. 2024.

<sup>13</sup> Source: [Manatee County Local Mitigation Strategy Plan 2024 Draft Update](#). Manatee County. 2025.

<sup>14</sup> Source: [Manatee County Local Mitigation Strategy Plan 2024 Draft Update](#). Manatee County. 2025.

<sup>15</sup> Source: [Preliminary Damage Assessment Report: FEMA-4834-DR-FL](#). FEMA. 2024.

Figure 3 – Hurricane Milton Disaster Declaration



Source: FEMA Designated Areas: Disaster 4834.<sup>16</sup>

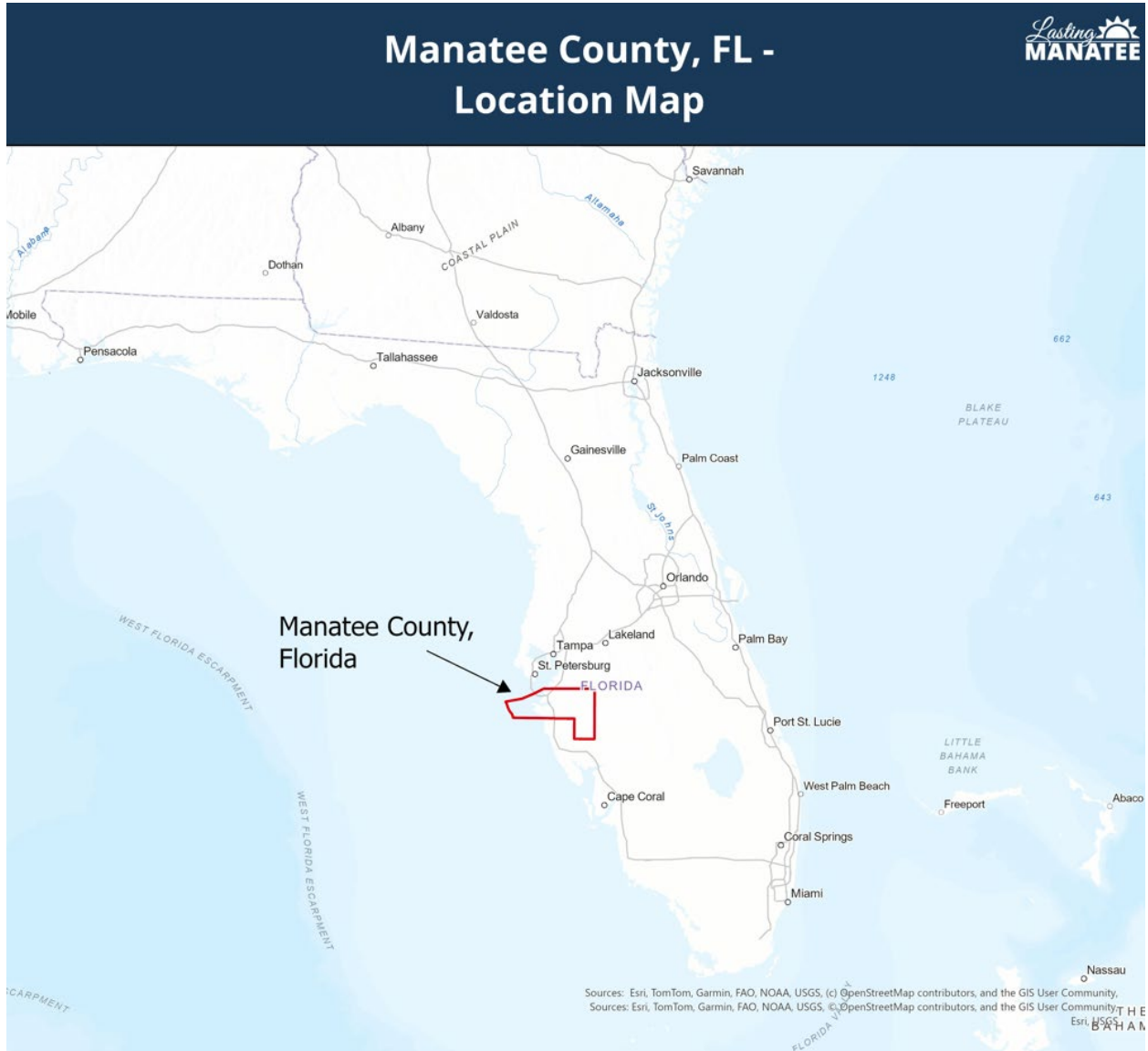
## Most Impacted and Distressed Areas

### HUD-Identified MID Areas

HUD has identified the entirety of Manatee County as the most impacted and distressed (MID) area for the purposes of this CDBG-DR allocation. This designation reflects the County's significant unmet disaster recovery needs resulting from the 2024 Hurricanes. In accordance with HUD requirements, the County will expend 100 percent of the total allocation within the HUD-identified MID.

<sup>16</sup> Source: [Designated Areas: Disaster 4834](#). FEMA. 2024.

Figure 4 – Location of Manatee County, Florida



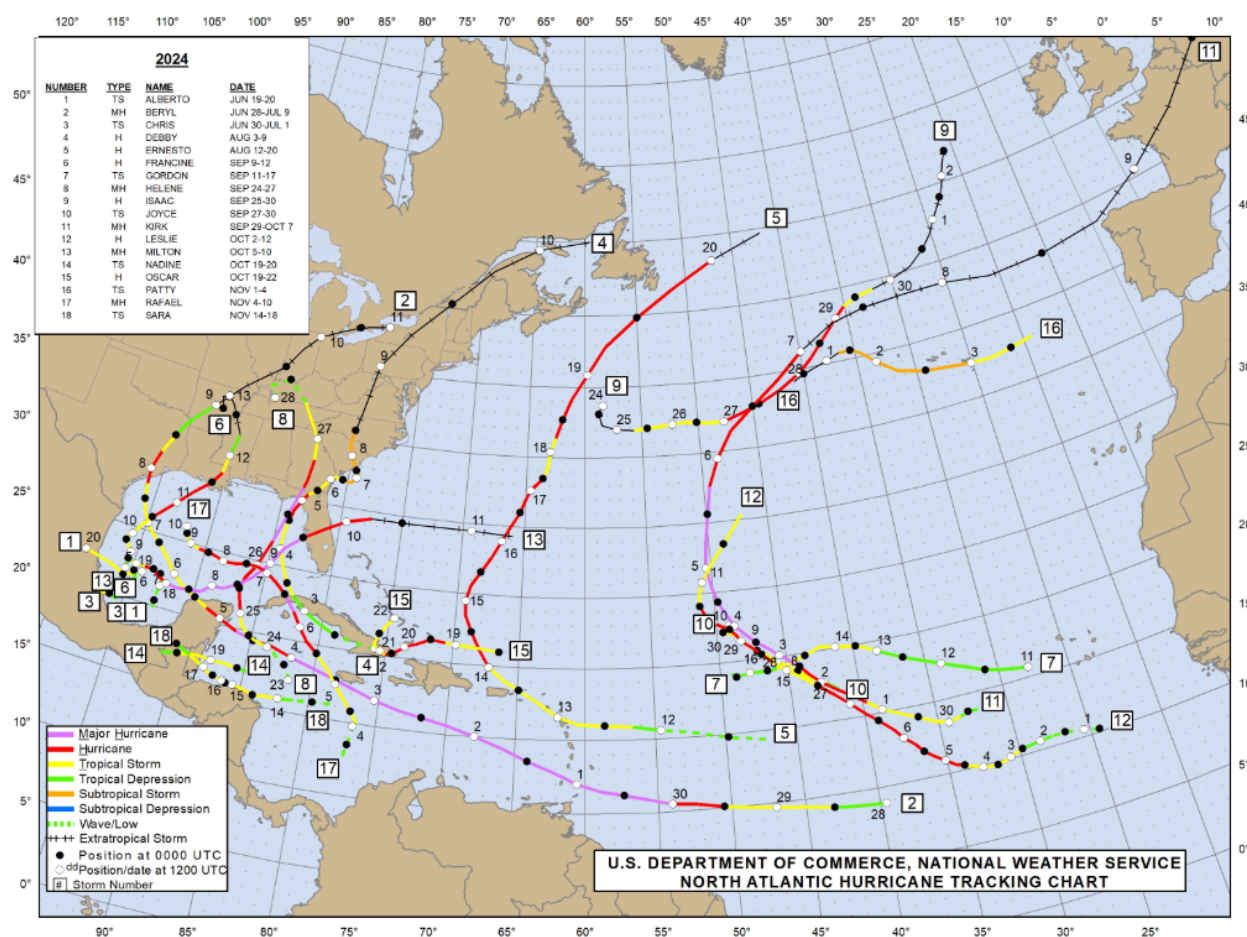
## Overview of the Impacts of the Qualifying Disaster

Table 2 – HUD Identified MID Areas

Disaster Summary	
Qualifying Disasters:	Hurricane Debby (DR-4806-FL), Hurricane Helene (DR-4828-FL), Hurricane Milton (DR-4834-FL)
HUD-Identified MID Areas:	Manatee County, FL

Between August and October 2024, the County sustained significant impacts from the 2024 Hurricanes – all making landfall along Florida’s Gulf Coast and causing an approximate \$1.65 billion in Direct and Indirect Needs, according to the results of the Unmet Needs Assessment. Over a 65-day period, the three storms brought record-breaking rainfall to the County, surpassing 100-year flood levels in several locations. Unlike isolated disasters, the cumulative effects of the 2024 Hurricanes led to compounding impacts on housing, infrastructure, and the economy, making it increasingly difficult for communities to recover. Heavy rainfall from each hurricane caused rivers and streams to swell due to persistent flooding, with water levels rising with each storm. The condensed timing of these storms strained emergency response and recovery efforts, making it challenging to provide timely assistance to county residents.

*Figure 5 – 2024 North Atlantic Hurricane Season Track Map*



Source: National Hurricane Center<sup>17</sup>

<sup>17</sup> Source: [2024 Atlantic Hurricane Season](#). National Hurricane Center. 2024.

## Hurricane Debby Impacts

On August 5, 2024, Hurricane Debby made landfall in the Big Bend area of Florida as a Category 1 hurricane with winds reaching 80 miles per hour (mph). Debby's broad wind field and outer rain bands impacted nearly the entire west coast of Florida with storm surge flooding, strong wind gusts, and torrential rainfall. Rainfall totals throughout the County varied by location with peak rainfall totaling 18.86 inches at the Parrish station, 18.34 inches at the Lakewood Ranch 3.5 E station, 14.81 inches at the Lake Manatee at Verna Bethany Road station, 14.48 inches at the Bradenton 10.8 SE station, and 14.20 inches at the Bradenton 5 ESE station.<sup>18</sup> Wind gusts on land ranged from 45 mph to 70 mph with peak wind gusts in the County seen in Anna Maria Island and the Sarasota-Bradenton International Airport at 64 mph and 63 mph respectively.<sup>19</sup>

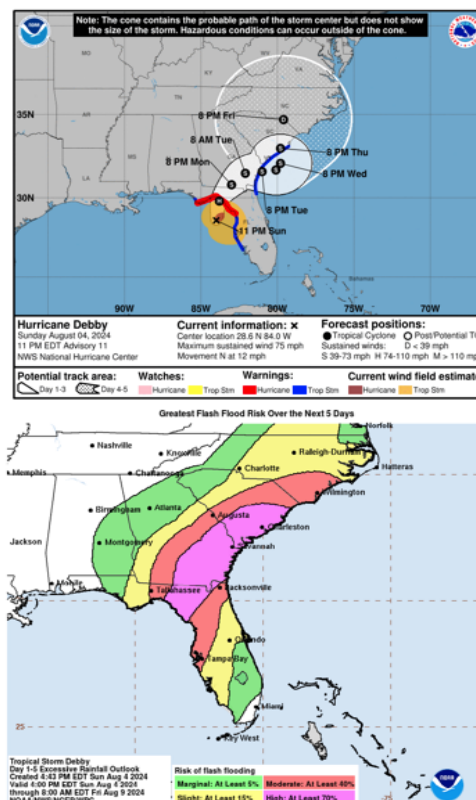
Figure 6 – National Hurricane Center Advisory for Hurricane Debby



### Key Messages for Hurricane Debby Advisory 11: 11:00 PM EDT Sun Aug 04, 2024



1. Potentially historic heavy rainfall across southeast Georgia and South Carolina through Friday morning will likely result in areas of catastrophic flooding. Heavy rainfall will likely result in considerable flooding impacts from portions of central and northern Florida through the Coastal Plain of the Carolinas through Friday.
2. There is a danger of life-threatening storm surge along portions of the Gulf Coast of Florida, with 6 to 10 feet of inundation above ground level expected somewhere between Ochlockonee River to Yankeetown late tonight and Monday morning. Residents in the Storm Surge Warning area should follow any advice given by local officials.
3. Hurricane conditions are expected Monday along portions of the Florida Big Bend region where a Hurricane Warning is in effect, with tropical storm conditions beginning this evening. Tropical storm conditions are expected through Monday farther south within the Tropical Storm Warning area along Florida's west coast, including the Tampa Bay area.
4. Dangerous storm surge and wind impacts are expected along portions of the southeast U.S. coast from northeastern Florida to North Carolina through the middle of the week, and storm surge warnings and tropical storm watches and warnings have been issued for portions of these areas.



Source: National Hurricane Center<sup>20</sup>

<sup>18</sup> Source: [Hurricane Debby Post-Storm Summary Report](#). Florida Climate Center. 2024.

<sup>19</sup> Source: [Hurricane Debby Post-Storm Summary Report](#). Florida Climate Center. 2024.

<sup>20</sup> Source: [Key Messages for Hurricane Debby](#). National Hurricane Center. 2024.

Rainfall and storm surge flooding impacted several areas throughout western Florida as several rivers and lakes rose to record levels leading to over 200 high-water rescues throughout the County within 24 hours of Helene's landfall.<sup>21</sup> Gamble Creek near Parrish rose to 21.44 feet, the Manatee River at Rye Bridge peaked at 20.12 feet, and the Myakka River at Myakka River State Park elevated to 10.22 feet.<sup>22</sup> Storm surge observed in Port Manatee peaked at 2.4 feet above MHHW.<sup>23</sup>

The impacts of Debby's historic levels of rainfall extended to wastewater treatment plants in the region which became overwhelmed, discharging approximately 17 million gallons of wastewater into Sarasota Bay.<sup>24</sup> Lake Manatee, a 6-billion-gallon reservoir created by the Manatee County Dam, received more than 18 billion gallons of water during the storm, overwhelming the dam's capacity and causing severe flooding that damaged nearby homes, roadways, and critical infrastructure.

## Hurricane Helene Impacts

On September 26, 2024, Hurricane Helene made landfall as a major Category 4 hurricane in the Big Bend area, slightly north of where Debby made landfall one month prior. With peak winds of 140 mph, large size, and expansive wind field, Helene devastated communities along Florida's Gulf Coast. In the County, peak wind gusts of 74 mph were recorded at the Sarasota/Bradenton station.<sup>25</sup> Unlike Debby, Helene did not produce significant heavy rainfall in central or south Florida; however, the storm's forward momentum and outer bands produced strong onshore winds and pushed large amounts of water onshore, generating record high storm surge levels.

Major coastal flooding occurred along Florida's west coast, leaving roadways and homes covered in sand. Record storm surge levels were recorded at coastal tide gauges at Longboat Key (6.68 feet) and Port Manatee (6.04 feet), surpassing the previous records set during Hurricane Idalia in 2023.<sup>26</sup> Aerial imagery collected by the NOAA Remote Sensing Division shows that many homes were removed from foundations leaving only the slab and stilts where the elevated home once was.<sup>27</sup>

*Figure 7 – National Hurricane Center Advisory for Hurricane Helene*

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<sup>21</sup> Source: [More Than 200 people Rescued in Manatee County Due to Rising Floodwaters from Hurricane Debby](#). Tampa Bay 10. 2024.

<sup>22</sup> Source: [Hurricane Debby Post-Storm Summary Report](#). Florida Climate Center. 2024.

<sup>23</sup> Source: [Hurricane Debby Post-Storm Summary Report](#). Florida Climate Center. 2024.

<sup>24</sup> Source: [How Many Hurricanes Have Made Landfall in Florida this Year?](#) WTSP. 2024.

<sup>25</sup> Source: [Hurricane Helene Post-Summary Report](#). Florida Climate Center. 2024.

<sup>26</sup> Source: [Hurricane Helene Tropical Cyclone Report](#). National Hurricane Center. 2025.

<sup>27</sup> Source: [Hurricane Helene Tropical Cyclone Report](#). National Hurricane Center. 2025.



## Key Messages for Hurricane Helene

### Advisory 12: 4:00 AM CDT Thu Sep 26, 2024

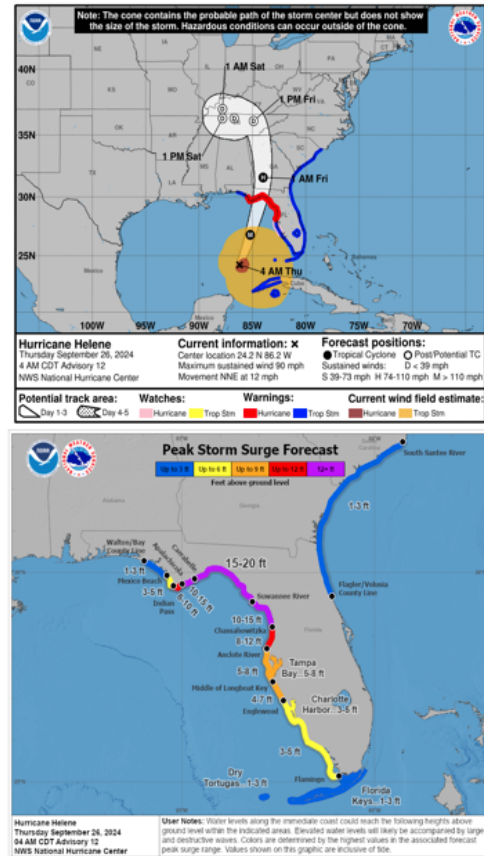


1. A catastrophic and deadly storm surge is likely along portions of the Florida Big Bend coast, where inundation could reach as high as 20 feet above ground level, along with destructive waves. There is also a danger of life-threatening storm surge along the remainder of the west coast of the Florida Peninsula. Residents in those areas should follow advice given by local officials and evacuate if told to do so.

2. Potentially catastrophic hurricane-force winds are expected within the eyewall of Helene when it makes landfall in the Florida Big Bend region later today. Preparations to protect life and property should be completed this morning before tropical storm conditions arrive. Damaging and life-threatening hurricane-force winds, especially in gusts, will penetrate well inland over portions of northern Florida and southern Georgia later today and tonight where Hurricane Warnings are in effect. Strong wind gusts are also likely farther north across portions of northern Georgia and the Carolinas, particularly over the higher terrain of the southern Appalachians.

3. Catastrophic and life-threatening flash and urban flooding, including numerous significant landslides, is expected across portions of the southern Appalachians through Friday. Considerable to locally catastrophic flash and urban flooding is likely for northwestern and northern Florida and the Southeast through Friday. Widespread significant river flooding and isolated major river flooding are likely.

4. Tropical storm conditions are expected over portions of western Cuba within the Tropical Storm Warning area. Hurricane Helene will bring heavy rain to portions of the western Caribbean with potentially significant flooding across western Cuba and the northeastern Yucatan Peninsula through this morning.



Source: National Hurricane Center<sup>28</sup>

Catastrophic damage was reported in the County. Of all Florida counties facing power outages, the County saw the highest number of outages, reporting more than 40,000 without power on September 26.<sup>29</sup> Initial damage estimates indicated that 90 to 95 percent of the structures on Bradenton Beach were destroyed by Helene's storm surge. In mainland Manatee County, approximately 594 structures were reported as destroyed and an additional 1,699 reported major damage.<sup>30</sup>

<sup>28</sup> Source: [Key Messages for Hurricane Helene](#). National Hurricane Center. 2024.

<sup>29</sup> Source: [Power Outages Near 123,000 from Manatee to Collier Due to Helene Now Just a Bit Under 12,000](#). WGPU. 2024.

<sup>30</sup> Source: [Hurricane Helene Tropical Cyclone Report](#). National Hurricane Center. 2025.

# Hurricane Milton Impacts

Figure 8 – National Hurricane Center Advisory for Hurricane Milton



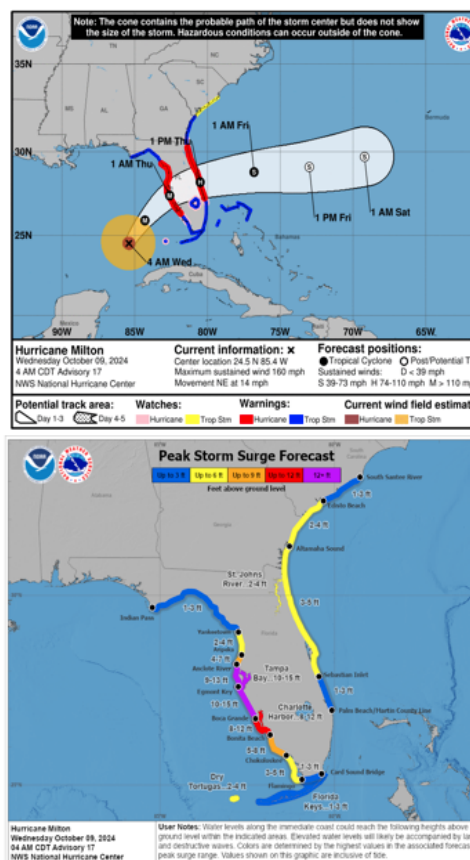
## Key Messages for Hurricane Milton Advisory 17: 4:00 AM CDT Wed Oct 09, 2024



1. A large area of destructive storm surge, with highest inundations of 10 ft or greater, is expected along a portion of the west-central coast of the Florida Peninsula. If you are in the Storm Surge Warning area, this is an extremely life-threatening situation, and you should evacuate as soon as possible if ordered by local officials.

2. Devastating hurricane-force winds are expected along portions of the west coast of Florida, where a Hurricane Warning is in effect. Milton is forecast to remain a hurricane while it crosses the Florida Peninsula and life-threatening hurricane-force winds, especially in gusts, are expected to spread inland across the peninsula. Preparations to protect life and property, including being ready for long-duration power outages, should be rushed to completion.

3. Heavy rainfall across the Florida Peninsula through Thursday brings the risk of catastrophic and life-threatening flash and urban flooding along with moderate to major river flooding, especially in areas where coastal and inland flooding combine to increase the overall flood threat.



Source: National Hurricane Center<sup>31</sup>

On October 9, 2024, approximately two weeks following Hurricane Helene, Hurricane Milton made landfall as a Category 3 hurricane in Siesta Key, just north of the County. While the heaviest rainfall and highest winds occurred near Tampa Bay, areas to the south experienced the greatest amounts of storm surge with strong onshore winds. Milton's impacts extended inland, spawning over 40 tornadoes across the Peninsula and causing widespread wind and flooding damage as it made landfall and tracked east across the state.

The National Weather Service (NWS) issued 126 tornado warnings in Florida on October 9, surpassing the state record of 69 issued on September 10, 2017, during Hurricane Irma, and falling short of the 134 issued in Alabama on April 27, 2011 – a national record.<sup>32</sup> There were

<sup>31</sup> Source: [Key Messages for Hurricane Milton](#). National Hurricane Center. 2024.

<sup>32</sup> Source: [Post-Storm Summary Report on Hurricane Milton](#). Florida Climate Center. 2024.

12 reported tornadoes in the West Central (Tampa Bay Weather) region on October 9, with four EF-0, six EF-1, and two EF-2 tornadoes impacting the area.<sup>33</sup>

Peak wind gusts of 103 mph were recorded in the County at the Tampa Skyway Fishing Pier, followed by 102 mph at the Sarasota-Bradenton International Airport.<sup>34</sup> Rainfall totals were greatest just north of the County in St. Petersburg; however, rainfall totals recorded at rain gauges throughout the County saw peak rainfall exceeding thirteen inches with 13.05 inches at Bradenton, 10.37 inches at Aztec Grove, 9.24 inches at McMullen Creek, 9.21 at Frog Creek, 8.54 inches at Wares Creek 9<sup>th</sup> Street, 8.52 inches at Curiosity Creek, 8.48 inches at Carr Drain, and 8.44 inches at Palma Sola Drain.<sup>35</sup>

Storm surge from Milton measured 5.04 feet over MHHW with significant waves on top,<sup>36</sup> greatly exacerbating erosion effects on many coastal communities and beaches in the County, including Passage Key, Longboat Key, and Anna Maria Island. Strong winds and high surge levels pushed an immense amount of sand inland, adding to the sand that was displaced from Hurricane Helene. Flooded roadways and neighborhoods remained inaccessible for days, preventing first responders from reaching those in need and impeding residents from safely evacuating their homes.

*Table 3 – CDBG-DR Allocation Overview*

CDBG-DR Allocation Overview	
CDBG-DR Allocation	\$219,749,000
CDBG-DR Mitigation Set-Aside	\$32,962,000
<b>Total Allocation</b>	<b>\$252,711,000</b>

## Administration of CDBG-DR Funds

The County's Grants Administration Division, located within the Government Relations Department, serves as the lead agency for administering the \$252,711,000 in CDBG-DR funds allocated by HUD for the 2024 Hurricanes. The County will retain full oversight and responsibility for all inherently governmental activities, including compliance with HUD regulations, project oversight, monitoring, performance tracking, and financial reporting

<sup>33</sup> Source. [Post-Storm Summary Report on Hurricane Milton](#). Florida Climate Center. 2024.

<sup>34</sup> Source. [Post-Storm Summary Report on Hurricane Milton](#). Florida Climate Center. 2024.

<sup>35</sup> Source. [Hurricane Milton Tropical Cyclone Report](#). National Hurricane Center. 2025.

<sup>36</sup> Source. [Hurricane Milton Tropical Cyclone Report](#). National Hurricane Center. 2025.

through the Disaster Recovery Grant Reporting (DRGR) system and other HUD-required systems. The County has branded its CDBG-DR efforts under the “Lasting Manatee” initiative.

## Environmental Review Responsibilities

The County is the Responsible Entity assuming the authority for the decision making and completion of environmental reviews in compliance with 24 CFR 58.4. To carry out these responsibilities, the County will hire an individual with extensive environmental review experience to manage this critical process. With vendor support, the County will conduct environmental assessments, environmental reviews, or environmental impact statements for CDBG-DR assisted activities, as appropriate, and will make determinations as to activities that are categorically exempt or categorically excluded from these requirements. The County will process necessary filings such as the Finding of No Significant Impact (FONSI) or the Request for Release of Funds (RROF) as required under 24 CFR 58, Subpart E. The County does not intend for any municipality to carry out environmental review procedures.

## CDBG-DR Website

The CDBG-DR language in the Disaster Relief Supplemental Appropriations Act, 2025, requires that each grantee establish and maintain a comprehensive disaster recovery website. The County has established and will host the website for CDBG-DR funds allocated for the 2024 Hurricanes at: [www.mymanatee.org/lastingmanatee](http://www.mymanatee.org/lastingmanatee).

This CDBG-DR page will include the information required by HUD’s guidance in section III.B.8. of the Revised Universal Notice. This will include the Action Plan and subsequent amendments, program application information, a portal for applicants to track the progress of their applications, program guidance, procurement contracts, quarterly performance reports, and other pertinent information.

## Compliance with Applicable Statutes

Pursuant to I.C.1.c. of the Revised Universal Notice, the County will use CDBG-DR funds in a manner that complies with applicable statutes, which include:

- Section 109 of the HCD Act (42 U.S.C. 5309);
- Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.);
- Title VII of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.);
- Title VIII of the Civil Rights Act of 1968 (The Fair Housing Act) (42 U.S.C. 3601-19);

- Sections 504 and 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794);
- The Americans with Disabilities Act of 1990 (42 U.S.C. 12131 et seq.); and
- Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) (Public Law 104-193).

## Unmet Needs and Mitigation Needs Summary

Table 4 below provides an overview of the County's \$252,711,000 allocation of CDBG-DR funding across programs that address damaging impacts of the 2024 Hurricanes. As the available CDBG-DR funding is less than the County's estimated unmet recovery needs, it is targeted in two ways:

- To principally deliver benefit to individuals, households, and communities with the fewest resources to recover, pursuant to the federal statutory requirement that at least 70 percent of all CDBG-DR funds be expended for activities that benefit low- and moderate-income (LMI) individuals; and
- The directive of the federal appropriation law which directly references the "restoration of housing and infrastructure, economic revitalization, and mitigation..."

While the need to comply with these fundamental requirements establishes outer boundaries for use of the funds, the County has substantial latitude in the mix of specific programs, funding levels for activities, and overall implementation. The choices reflected herein are informed not just by data on damage but also by consultation with and feedback from impacted individuals, communities, and other stakeholders. The framing for these choices can be found in subsequent sections of this Action Plan.

*Table 4 – Unmet Needs and Proposed Allocations*

Eligible Cost Category	Unmet Need	Percent of Total Unmet Need	CDBG-DR Allocation Amount	Percent of CDBG-DR Amount*	Estimated Percent of CDBG-DR Mitigation Set-Aside	Estimated Percent to HUD-Identified MID Area	Estimated Percentage to LMI
Administration (5% cap)	-	-	\$12,635,000	5%	-	-	-
Housing	\$512,513,690	40.63%	\$107,556,000	42.56%	0%	100%	TBD
Infrastructure	\$748,149,055.99	59.31%	\$130,000,000	51.44%	100%	100%	TBD

Eligible Cost Category	Unmet Need	Percent of Total Unmet Need	CDBG-DR Allocation Amount	Percent of CDBG-DR Amount*	Estimated Percent of CDBG-DR Mitigation Set-Aside	Estimated Percent to HUD-Identified MID Area	Estimated Percentage to LMI
Economic Revitalization	\$822,628	0.07%	\$0	N/A	N/A	N/A	N/A
Planning	-	-	\$2,520,000	1%	N/A	N/A	-
<b>Total</b>	<b>\$1,261,485,373.99</b>	<b>40.63%</b>	<b>\$252,711,000</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>\$252,711,000</b>

# Unmet Needs Assessment

## Methodology and Data Sources

Unmet needs are calculated for each of the HUD defined sectors (housing, infrastructure, and economic revitalization) based on guidance provided by HUD in the Revised Universal Notice and AAN. Specifically, the Revised Universal Notice provides guidance on how to complete an unmet needs assessment (UNA) including data sources, methodological processes, and how to estimate unmet needs for each sector.

HUD defines “unmet needs” as the resources broadly necessary to recover from a disaster that are not likely to be addressed by other sources of funds, by accounting for the various forms of assistance available to, or likely to be available to, affected communities (e.g., FEMA Public Assistance funds) and individuals (e.g., estimated homeowner’s insurance proceeds), other federal assistance, or any other funding sources to avoid a duplication of benefits (DOB). Any remaining need, after accounting for all support, represents the overall unmet need. The County’s current unmet needs across HUD’s defined sector categories (housing, infrastructure, and economic revitalization) are detailed in the following sections:

- Housing Unmet Need
- Infrastructure Unmet Need
- Economic Revitalization Unmet Need

This UNA follows the processes described in the Revised Universal Notice<sup>37</sup> and the HUD AAN.<sup>38</sup> The results of the unmet need assessment are used to determine a baseline of unmet need by category and then used as the basis for the creation of recovery programs.

## Overview of Data

Since the 2024 Hurricanes occurred between August and October 2024, various data sources are not yet available, including complete data sets for FEMA Public Assistance (PA) and Small Business Administration (SBA) disaster loans. As a result, the best available data as of March 1, 2025, has been used to complete this UNA and more complete data will be incorporated into this Action Plan, as necessary, when available.

The County also considered qualitative input from the public, local officials, housing authorities, and community-based organizations to supplement available quantitative data and help identify potentially underreported or emerging needs.

The sources of data utilized for this assessment include those listed in *Table 5*. They are more fully described in the following pages.

*Table 5 – Data Sources Utilized in the Assessment*

Data	Source
Hurricane Impacts and Weather Data	<a href="#">National Oceanic and Atmospheric Administration (NOAA)</a> , <a href="#">National Weather Service (NWS)</a>
Presidential Disaster Declaration Areas	<a href="#">FEMA</a>
Most Impacted and Distressed Area	<a href="#">HUD</a>
Housing Impact Data	<a href="#">FEMA Individual Assistance (IA)</a> , <a href="#">Small Business Administration (SBA)</a> , <a href="#">National Flood Insurance Program (NFIP)</a> , <a href="#">Manatee County Housing Authority</a> , <a href="#">Housing Authority of the City of Bradenton</a>
Infrastructure Impact Data	<a href="#">FEMA Public Assistance (PA)</a> , Stakeholder Consultations
Economic Impact Data	<a href="#">Small Business Administration (SBA)</a> , Stakeholder Consultations
Socioeconomic and Demographic Data	<a href="#">U.S. Census Bureau (Decennial Census and American Community Survey)</a>

<sup>37</sup> Source: [Common Application, Waivers, and Alternative Requirements for Community Development Block Grant Disaster Recovery Grantees: The Universal Notice \(90 FR 4759\) \(Updated March 19, 2025\)](#). U.S. Department of Housing and Urban Development. 2025.

<sup>38</sup> Source: [Allocations for Community Development Block Grant Disaster Recovery and Implementation of the CDBG-DR Consolidated Waivers and Alternative Requirements Notice \(90 FR 4759\)](#). U.S. Department of Housing and Urban Development. 2025.

Data	Source
Low- and Moderate-Income Data	<a href="#">HUD</a>
Homelessness, Unsheltered Populations	<a href="#">Suncoast Partnership to End Homelessness, Inc., HUD &amp; Homelessness Data Exchange (HDX) Homeless Point-in-Time Count</a>
Mitigation	<a href="#">Manatee County Local Mitigation Strategy Plan</a>

Multiple data sources were used to understand the full extent of unmet needs in the County following the 2024 Hurricanes. It is important to note that the data in this assessment reflects the best available data as of March 1, 2025, and reflects needs at that point.

- **American Community Survey:** The Census Bureau conducts the American Community Survey (ACS) to capture socioeconomic and demographic data. The Census Bureau annually surveys a portion of the country every year, with a full cycle occurring every five years.<sup>39</sup>
- **HUD & Homelessness Data Exchange (HDX) Homeless Point-in-Time Count:** The Point-in-Time (PIT) Count is an annual count that HUD requires every Homeless Continuum of Care (CoC) to conduct during a designated week in January. The PIT County attempts to account for the number of individuals housed in emergency shelters, transitional housing, Safe Havens, and those who are unsheltered. As the data only includes individuals sleeping outside and in shelters, it does not capture those experiencing homelessness who are sleeping in motels or staying with friends or relatives temporarily.<sup>40</sup>
- **HUD Low- and Moderate-Income Data (LMI):** The LMI data used in this UNA is available on the HUD Exchange in two formats:
  - Geographically at the block group, tract, county, and state levels to estimate the number of LMI and non-LMI individuals and determine area benefit; and
  - At the household level to determine eligibility for CDBG-DR programs. HUD limits calculate the very low (50 percent of area median income) income limit, extremely low income, and low (80 percent of area median income)<sup>41</sup> income limit for one person to eight person families for every county and state in the United States. These limits are recalculated annually by HUD.

<sup>39</sup> Source: [The Importance of the American Community Survey and the Decennial Census](#). U.S. Census Bureau. 2020.

<sup>40</sup> Source: [Enumerating the Hidden Homeless: Strategies to Estimate the Homeless Gone Missing From a Point-in-time Count](#). Journal of Official Statistics. 2014.

<sup>41</sup> For purposes of the CDBG program, low- and moderate-income is defined as total household income at or below 80% of Area Median Income (AMI) as defined by HUD. AMI is calculated yearly at the state level with each county and for certain metropolitan areas having defined income limits.

- **FEMA Individual Assistance (IA):** The FEMA IA Program is the primary source of data on impacted households and for calculating the unmet housing recovery needs for CDBG-DR grantees. Following a disaster, homeowners and renters voluntarily register for FEMA IA. FEMA Verified Loss awards<sup>42</sup> are intended to be used to aid with repair/replacement to restore the home to habitable conditions. FEMA IA data only reflects the cost to repair a home to habitable conditions and often underestimates need. However, the data available at the household level, including a range of income and real property damage estimates, allows for an analysis consistent with the unmet needs calculation outlined in the Revised Universal Notice.
- **National Flood Insurance Program (NFIP):** FEMA NFIP provides flood insurance to property owners, renters, and businesses with coverage including buildings and personal property (contents). NFIP data for each disaster reflects the number of claims filed, total payouts, average claim amounts, and other insurance maintained by an applicant.
- **Public Housing Damage:** The County collected damage and unmet needs from the two public housing authorities operating in the County: the Manatee County Housing Authority and the Housing Authority of the City of Bradenton.
- **Small Business Administration (SBA):** The SBA disaster loan program is a recovery resource available to impacted households. The program provides homeowners with loans for housing repairs and provides detailed information as SBA loan estimates are based on inspections and often include the full cost to restore a home.

## Manatee County Profile

### Population

With a population of 441,095,<sup>43</sup> the County is anticipated to see substantial growth over the next two decades with an estimated population of 472,700 in 2035 and 520,900 in 2045, according to the University of Florida.<sup>44</sup> With a large population of retirees, the age of the County's population exceeds state (42.40 years<sup>45</sup>) and national (38.50 years<sup>46</sup>) averages, with a median age of 49.40 years,<sup>47</sup> indicating a potential need for age-specific services, healthcare, and accessible infrastructure to support an aging demographic. These

<sup>42</sup> Source: [Understanding FEMA Verified Loss](#). FEMA. 2017.

<sup>43</sup> Source: [Annual Estimates of the Resident Population for Counties: April 1, 2020 to July 1, 2023](#). US Census Bureau. 2023.

<sup>44</sup> Source: [Projections of Florida Population by County, 2020-2045, with Estimates for 2015](#). University of Florida, Bureau of Economic and Business Research. 2016

<sup>45</sup> Source: [Florida Population](#). World Population Review 2025.

<sup>46</sup> Source: [United States Population](#). World Population Review. 2025

<sup>47</sup> Source: [Manatee County Population](#). World Population Review. 2025.

population trends directly inform the County's UNA by highlighting the scale and type of services, housing, and infrastructure that must be considered in disaster recovery efforts now and into the future. *Table 6* provides a summary of the County's population by municipality and unincorporated County.

*Table 6 – Population by Manatee County Municipality*

Municipality	Population Estimate	Percent Estimate
Anna Maria, City of	1,008	0.23%
Bradenton, City of	57,076	12.94%
Bradenton Beach, City of	916	0.21%
Holmes Beach, City of	3,027	0.69%
Longboat Key, Town of	2,575	0.58%
Palmetto, City of	13,577	3.08%
Unincorporated Manatee County	362,916	82.28%
<b>Total</b>	<b>441,095</b>	<b>100%</b>

Source: *Census Incorporated Places: 2020 to 2023 Annual Estimates*; <sup>48</sup> *Census Annual Estimates of the Resident Population for Counties: April 1, 2020, to July 1, 2023* <sup>49</sup>

## HUD Low- and Moderate-Income (LMI) Data

### HUD Income Limits

HUD income limits are important in assessing and identifying the unmet needs for Low- and Moderate-Income (LMI) households impacted by a disaster. Proposed CDBG-DR programs and projects must prioritize activities that benefit LMI persons to meet HUD's overall LMI benefit requirement. At least 70 percent of CDBG-DR funds must be expended for activities that benefit LMI persons. As defined by HUD, LMI households have incomes at or below 80 percent of the Area Median Income (AMI), adjusted for household size. Income limits vary by geographic location and household size and are updated annually by HUD.

- In Manatee County, <sup>50</sup> the AMI for 2025 is \$106,100 and a household of four is considered LMI if earning a gross income of \$86,100 or less. <sup>51</sup>

<sup>48</sup> Source: [Incorporated Places: 2020 to 2023](#). US Census Bureau. 2023.

<sup>49</sup> Source: [Annual Estimates of the Resident Population for Counties: April 1, 2020 to July 1, 2023](#). US Census Bureau. 2023.

<sup>50</sup> Manatee County is part of the North Port-Sarasota-Bradenton, FL MSA according to HUD.

<sup>51</sup> Source: [FY 2025 Income Limits Summary for North Port-Bradenton-Sarasota, FL MSA](#). HUD. 2025

- The AMI for the state of Florida, for 2025 is \$95,300 and a household of four is considered LMI if earning a gross income of \$76,250 or less.<sup>52</sup>

These income limits are used to determine eligibility for direct assistance programs (e.g., housing rehabilitation) and to establish area benefit eligibility based on census block group data.

## LMI Population

HUD provides areawide LMI estimates using 2016-2020 ACS data.<sup>53</sup> *Table 7* provides the underlying data used by HUD to determine the overall LMI percentage for the County. According to HUD's Low- and Moderate-Income Summary Data (LMISD) by Local Governments, based on 2016-2020 ACS, approximately 45.60 percent of the County's population qualifies as LMI.<sup>54</sup> **Note, discrepancies between HUD's population figures and more current Census estimates elsewhere in this UNA are due to HUD's reliance on earlier ACS data for LMISD calculations.**

*Table 7 – LMI Population for Manatee County*

County	Total LMI Population	Total Population	Percent LMI
Manatee	177,685	389,630	45.60%

Source: HUD ACS 5-Year 2016-2020 Low- and Moderate-Income Summary Data by Local Governments<sup>55</sup>

A census block group qualifies as LMI if at least 51 percent of its population meets income thresholds. In the County, 101 of 206 block groups meet this threshold. These areas reflect geographic variation in income levels and help identify where CDBG-DR resources can be used to support area-wide benefit.

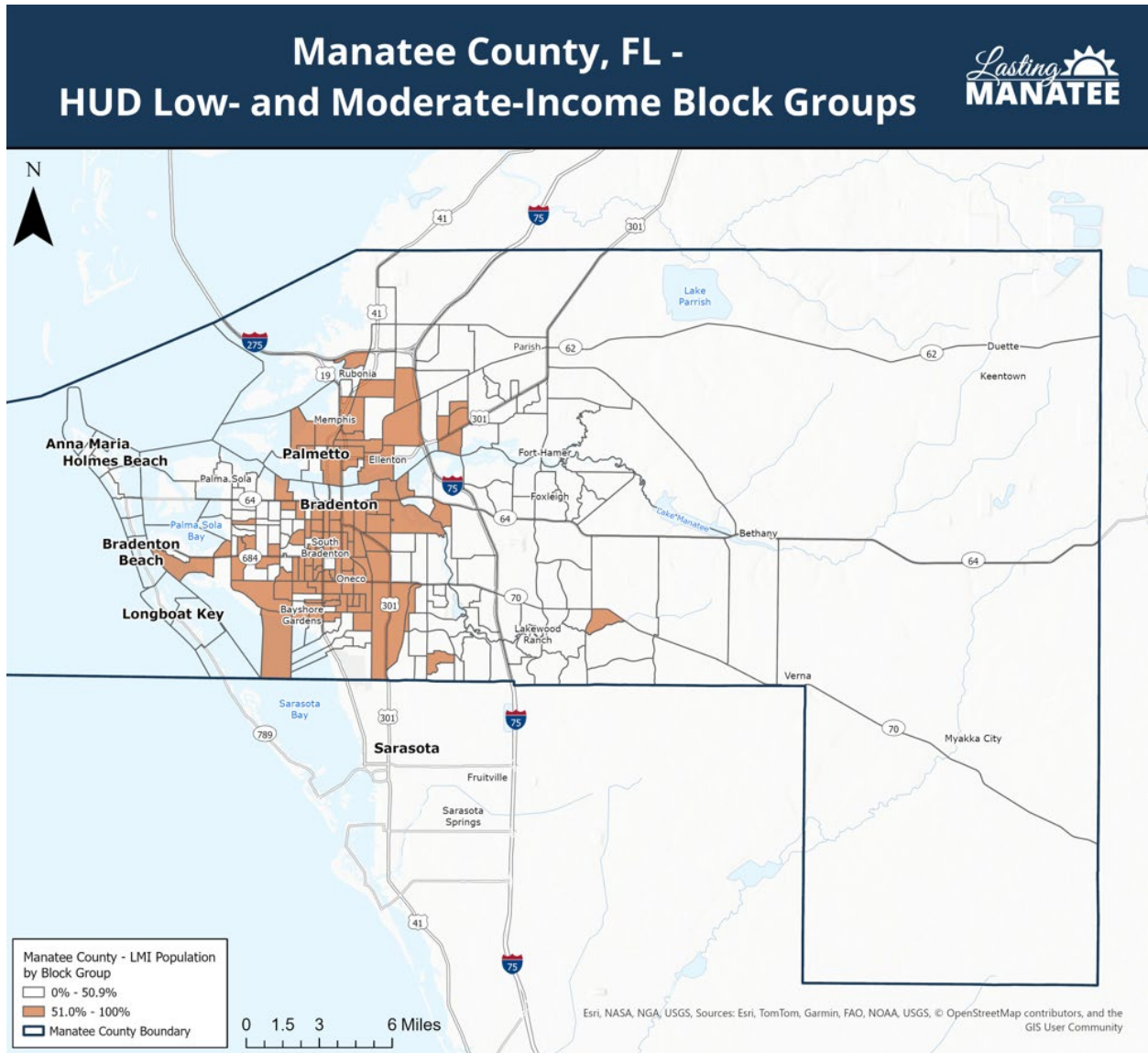
<sup>52</sup> Source: [FY 2025 State Income Limits for Florida](#). HUD. 2025.

<sup>53</sup> Source: [ACS 5-Year 2016-202 Low-and Moderate-Income Summary Data](#). HUD Exchange. 2024.

<sup>54</sup> Source: [LMISD by Local Governments, Based on 2016-2020 ACS](#). HUD. 2024.

<sup>55</sup> Source: [LMISD by Local Governments, Based on 2016-2020 ACS](#). Hud Exchange. 2024.

Figure 9 – Manatee County LMI Block Groups



Source: HUD ACS 5-Year 2016-2020 Low- and Moderate-Income Summary Data by Block Group<sup>56</sup>

## Evaluate the Impacts of the Three Core Aspects of Recovery

### Summary of Housing Methodology

To calculate the Housing unmet needs, the County used FEMA IA and NFIP data to identify impacted residential units, calculated the value of housing losses, and tabulated against the assistance received. Housing repair and replacement values were determined using U.S.

<sup>56</sup> Source: [LMISD – All Block Groups, Based on 2016-2020 ACS](#). Hud Exchange. 2024.

Census for median housing value and the HUD damage multiplier data as provided in the AAN.

SBA homeowner disaster loan data for the 2024 Hurricanes has been requested but was unavailable at the time of this UNA. Where data was incomplete, the County applied conservative assumptions to avoid outstanding unmet needs and to make sure DOB was appropriately addressed. Additional information regarding the methodology utilized to determine the housing unmet needs can be found in the *Housing Unmet Needs* section.

## Summary of Infrastructure Methodology

Infrastructure unmet needs were estimated using the 25 percent non-federal cost share of FEMA PA Category C-G projects as well as the full cost of standalone recovery projects submitted to the County during the consultation process that are not addressed by other funding sources. FEMA PA project data was reviewed to determine total estimated project costs and identify gaps in funding based on federal share limitations. Unmet needs beyond those captured by FEMA PA were gathered from municipalities and local agencies through direct consultation and stakeholder engagement. Additional information regarding the methodology utilized to determine the Infrastructure Unmet Needs can be found in the *Infrastructure Unmet Need* section.

## Summary of Economic Revitalization Methodology

When SBA data is received, the County will utilize business loan application data from the SBA to estimate its unmet economic revitalization needs. Specifically, the County will utilize the SBA data element “Current Total Verified Loss (estimate)” for a subset of operational categories and subtracted loan disbursement that had been made. Additional information regarding the methodology to be utilized to determine the Economic Revitalization Unmet Needs can be found in the *Economic Revitalization Unmet Need* section.

*Table 8* presents a cross-sector summary of estimated direct and indirect recovery needs, financial assistance that has been obligated or is available, the resulting unmet need, and each sector’s share of the total. These estimates reflect the best available data as of March 1, 2025. The County estimates more than \$1,261,485,373 in total unmet needs across housing, infrastructure, and economic revitalization resulting from the 2024 Hurricanes. Unmet needs were calculated by subtracting all known financial assistance from the total estimated recovery need.

*Table 8 – Quantified Disaster Impacts, Other Financial Assistance, and Remaining Unmet Need*

Category	Direct and Indirect Need (A)	Financial Assistance Budgeted and Available (B)	Unmet Need (A-B)	Percent of Total Unmet Need
Housing	\$851,079,323	\$338,565,633	\$512,513,690	40.63%
Infrastructure	\$796,339,234.97	\$48,190,178.98	\$748,149,055.99	59.31%
Economic Revitalization	\$822,628	\$0	\$822,628	0.07%
<b>Total</b>	<b>\$1,648,241,185.97</b>	<b>\$386,755,811.98</b>	<b>\$1,261,485,373.99</b>	<b>100%</b>

## Housing

*Figure 10 – Hurricane Helene Residential Flooding*



Source: Manatee County Government

The County conducted a housing assessment to determine the impacts of the 2024 Hurricanes on emergency shelters, interim and permanent housing, public housing units, affordability, and damages to residential homes and rental units. The goal of this assessment

is to identify the greatest recovery needs that have not been addressed by other funding sources, guiding the allocation of CDBG-DR funds for housing recovery, restoration, and hardening.

## Housing Profile

Housing types within the County include single-family homes, multi-family units, and mobile homes. Of the estimated 214,510 dwelling units within the County, the percentage across types shows 60.50 percent single-family, 25.39 percent multi-family, 13.94 percent mobile homes, and less than one percent classified as “other” (e.g., boat, RV, van, etc.).<sup>57</sup>

Pre-disaster housing affordability challenges have been significantly exacerbated by the 2024 Hurricanes. The average median home value in the County is \$424,000 compared to the state average of \$381,000 for Florida.<sup>58</sup> Housing affordability affects both renters and homeowners in the County. Of the 156,255 households identified in HUD’s Comprehensive Housing Affordability Strategy (CHAS) data for the County, 28.96 percent meet the definition of housing cost burdened or severe housing cost burdened.<sup>59</sup> Renters in the County experience cost burden at a much higher rate than owners. Approximately 25.14 percent of County renters are considered housing cost burdened, and an additional 25.28 percent of renters are considered severe housing cost burdened, totaling 50.42 percent among the two categories.<sup>60</sup>

To further illustrate the renter affordability landscape, the 2024 HOME Program Fair Market Value (FMV) for a 2-bedroom unit in Manatee County shows a problematic trend. From 2020 to 2024, Fair Market Rent (FMR) values increased by 48.77 percent, indicating a significant decline in housing affordability.<sup>61</sup> Since 2022, FMR values have surged by an average of 14.48 percent per year, highlighting the growing affordability issues affecting renters in the County.<sup>62</sup> Affordability issues have extended to Public Housing Authorities with significant increases in the per unit cost of housing choice vouchers over the past five years. Since 2020, the per unit cost of housing choice vouchers offered by the Manatee County Housing

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<sup>57</sup> Source: [Selected Housing Characteristics, ACS 5-Year Estimates Detailed Tables for Manatee County, Florida](#). U.S. Census Bureau. 2023.

<sup>58</sup> Source: [ACS Median Value \(Dollars\) for Florida and Manatee County, FL](#). U.S. Census Bureau. 2023

<sup>59</sup> Source: [Median Value in Dollars for Florida and Manatee County, FL](#). U.S. Census Bureau. 2023.

<sup>60</sup> Source: [Comprehensive Housing Affordability Strategy, Consolidated Planning/SHAS Data](#). HUD Office of Policy Development and Research. 2024.

<sup>61</sup> Source: [2024 HOME Rent Limits in Florida](#). HUD Exchange. 2024

<sup>62</sup> Source: [2024 HOME Rent Limits in Florida](#). HUD Exchange. 2024

Authority has seen a cumulative increase of 96.12 percent, while the Housing Authority of the City of Bradenton has seen an increase of 73.43 percent.<sup>63</sup>

## Emergency Shelters, Interim, and Permanent Housing

Meeting homelessness challenges in the County is a County-wide collaborative effort comprising numerous individuals, agencies, and organizations. The Suncoast Partnership to End Homelessness, Inc., a regional Continuum of Care (CoC) serving Manatee and Sarasota counties, is the lead agency responsible for collecting homeless data, conducting homeless needs assessments, and developing community-supported strategies. The Suncoast Partnership to End Homelessness, Inc., receives HUD and state funding for several homeless assistance programs and is responsible for planning, coordinating, and monitoring the delivery of services to the homeless.

This section will be updated with impacts and unmet needs following the consultation process with the Suncoast Partnership to End Homelessness, Inc.

Table 9 shows that in the 2024 Point-in-Time Count,<sup>64</sup> conducted on January 29, 2024, 1,157 individuals were counted as experiencing homelessness on that night. Most of the individuals experiencing homelessness were unsheltered, meaning they were camping, sleeping in cars, or otherwise on the street. It is important to note that as a regional CoC, the Suncoast Partnership to End Homelessness, Inc., reported combined Manatee and Sarasota counties data.

Table 9 – 2024 Point-in-Time Count

Estimate Type	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Manatee County Estimate*	258	245	654	1,157
Disaster Declared Area Estimate	10,229	4,265	16,868	31,363
Statewide Estimate	10,229	4,265	16,868	31,363

Source: HUD Exchange CoC Homeless Populations and Subpopulations Reports<sup>65</sup>

\*FL-500 Continuum of Care services Manatee and Sarasota counties.

<sup>63</sup>Source: [U.S. Department of Housing and Urban Development \(HUD\) Housing Choice Voucher Data Dashboard](#). U.S. Department of Housing and Urban Development. 2025.

<sup>64</sup> The 2025 Point-in-Time Count data, collected in January 2025, will not be available until the last quarter of 2025.

<sup>65</sup> Source: [CoC Homeless Populations and Subpopulations Reports, FL-500: Sarasota, Bradenton/Manatee, Sarasota Counties CoC](#). Hud Exchange. 2024.

FEMA provides several forms of housing assistance to disaster survivors, including Transitional Sheltering Assistance (TSA) and multiple options for interim housing, including Rental Assistance and Direct Housing through Direct Lease and Temporary Transportable Housing Units (TTHUs). For permanent housing, FEMA provides Repair and Replacement assistance. *Table 10* illustrates the information reported by FEMA reported as of March 1, 2025.

*Table 10 – Households Receiving FEMA TSA Assistance*

Assistance	Hurricane Debby	Hurricane Helene	Hurricane Milton
Rental Assistance	135	714	396
Checked In to TSA	0	587	671
Reported Shelter Need	653	2,886	9,665

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of March 1, 2025<sup>66</sup>

## Owner- and Renter-Occupied Single-Family and Multi-Family Housing

According to 2023 ACS 5-Year Estimates, there are a total of 168,504 occupied housing units within the County.<sup>67</sup> Owner-occupied housing units account for 74.69 percent of all occupied housing units, while renter-occupied households account for 25.31 percent of all occupied housing units.<sup>68</sup> Single-family homes make up the majority of the County's 125,853 owner-occupied housing units, accounting for an approximate 77.49 percent of all owner-occupied housing units. This is followed by mobile homes, which account for 13.41 percent, and multi-family units, accounting for 9.10 percent of all owner-occupied housing units. Comparatively, most renter-occupied households reside in multi-family units, accounting for 56.52 percent of all renter-occupied housing units, followed by single-family homes at 38.17 percent, and mobile homes at 5.31 percent.<sup>69</sup>

*Table 11 – Owner- and Renter-Occupied Households in Manatee County*

Number of Owner-Occupied Units	Percentage of Owner-Occupied Units	Number of Renter-Occupied Units	Percentage of Renter-Occupied Units
125,853	74.69%	42,651	25.31%

Source: 2023 ACS 5-Year Estimates Subject Tables – S2504 Physical Housing Characteristics for Occupied Housing Units<sup>70</sup>

<sup>66</sup> Source: [Housing Assistance Program Data - Owners v2](#). FEMA Open Data. 2024.

<sup>67</sup> Source: [Physical Housing Characteristics for Occupied Housing Units in Florida, ACS 5-Year Estimates](#). U.S. Census Bureau. 2023.

<sup>68</sup> Source: [Physical Housing Characteristics for Occupied Housing Units in Florida, ACS 5-Year Estimates](#). U.S. Census Bureau. 2023.

<sup>69</sup> Source: [Physical Housing Characteristics for Occupied Housing Units in Manatee County, FL, ACS 5-Year Estimates](#). U.S. Census Bureau. 2023.

<sup>70</sup> Source: [Physical Housing Characteristics for Occupied Housing Units in Manatee County, FL](#). U.S. Census Bureau. 2023.

Disaster impacts on owner- and rental-occupied housing are described in the subsequent *FEMA Individual Assistance Data* section.

## Public Housing, HUD-Assisted Housing, and Other Affordable Housing

Public housing serves as a critical resource for low-income households, providing affordable and stable housing options to those in need. Assessing the extent of disaster-related damage to public housing infrastructure, as well as the challenges experienced by public housing residents during recovery, is essential to ensuring a comprehensive approach to disaster recovery planning.

*Table 12 – The Housing Choice Vouchers, Low Income Housing Tax Credit (LIHTC), and Public Housing Units in Manatee County*

County	Total Housing Choice Vouchers	Total LIHTC Units	Total Public Housing Dwelling Units
Manatee	577	3,047	477

Source: HUD Geospatial Storefront / HUD Open Data<sup>71</sup>

There are two Public Housing Authorities operating within the County: the Manatee County Housing Authority (MCHA) and the Housing Authority of the City of Bradenton (HACB). The MCHA manages 80 public housing units in Pine Village Subdivision, Manatee Villas, and North and South Village, and administers 1,075 housing choice vouchers.<sup>72</sup> The HACB manages a total of 123 public housing units across two public housing complexes (Sugg Apartments and Page Apartments), in addition to two standalone single-family units, and administers 183 housing choice vouchers.<sup>73</sup> The MCHA and HACB waiting lists for public housing units and tenant-based vouchers are currently closed with an approximate waiting period of six months to two years.

The County consulted with MCHA and HACB during the development of the UNA to collect information speaking to the impacts of the 2024 Hurricanes and remaining unmet needs. MCHA reported damage to 71 units which are currently being repaired with insurance proceeds; however, MCHA indicated an unmet need of \$390,590.92 related to the insurance deductible. HACB reported minimal damage which has all been addressed, and no remaining needs related to the 2024 Hurricanes.

<sup>71</sup> Source: [Housing Choice Vouchers by Tract](#). HUD Open Data Site. 2024.

<sup>72</sup> Source: [Housing Choice Voucher Data Dashboard](#). U.S. Department of Housing and Urban Development. 2024.

<sup>73</sup> Source: [Housing Choice Voucher Data Dashboard](#). U.S. Department of Housing and Urban Development. 2024.

Table 13 identifies the impacts on and remaining unmet needs of MCHA and HACB collected during the consultation process.

*Table 13 – Damaged Housing Authority Properties*

Housing Authority	Total Properties	Total Damaged Properties	Damaged Units	Remaining Unmet Need
Manatee County Housing Authority	4	4	71	\$390,590.92
Housing Authority of the City of Bradenton	4	0	0	\$0

*Source: Data collected during the consultation process*

## Housing Disaster Damage and Impacts

*Figure 11 – Hurricane Milton Modular Home Damage*



*Source: Manatee County Government*

The 2024 Hurricanes resulted in significant housing impacts in the County, with each storm leading to varying degrees of damage over a period of less than three months. In early August, Hurricane Debby brought heavy rainfall causing widespread flooding and structural damage

to homes. At the end of September, Hurricane Helene produced strong onshore winds and pushed large amounts of water onshore, generating record high storm surge levels along the coast. Less than two weeks later, in early October, Hurricane Milton brought devastating wind damage throughout the County. The compounding impacts of three hurricanes caused cumulative stress on the housing stock, affecting both owner- and renter- occupied units and increasing the number of displaced households. Feedback collected from the public during the development of the UNA illustrated a wide variety of impacts with households identifying immediate solutions, such as repairs, and long-term solutions, including improved drainage to prevent future flooding, as priorities to recovery. This highlights the need for the restoration of housing within the County.

## FEMA Individual Assistance

The FEMA IA Program is the primary basis for establishing housing unmet recovery needs for CDBG-DR grantees. The data from this program captures information about applicants who register for assistance from FEMA. However, some households do not register with FEMA, leaving a gap between the impact reflected in the data and the true impact of the disaster. Despite these limitations, it is the best data source for identifying individual and household disaster unmet needs for housing recovery. The following section provides an overview of the County's housing impacts as a result of the 2024 Hurricanes.

A total of 97,082 households registered for FEMA IA assistance, including 56,792 owner-occupied households<sup>74</sup> and 40,174 rental households in the County.<sup>75</sup>

*Table 14 – FEMA IA Owner-Occupied Overview*

County	Applicants	Inspections	Inspected with Damage	Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Manatee	56,792	14,139	8,310	4,937	8,413	\$9,298

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of March 1, 2025<sup>76</sup>

<sup>74</sup> Source: [Housing Assistance Program Data - Owners v2](#). FEMA Open Data. 2024.

<sup>75</sup> Source: [Housing Assistance Program Data - Renters v2](#). FEMA Open Data. 2024.

<sup>76</sup> Source: [Housing Assistance Program Data - Owners v2](#). FEMA Open Data. 2024.

Table 15 – FEMA IA Rental Tenants Overview

County	Applicants	Inspections	Inspected with Damage	Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Manatee	40,174	9,389	8,078	1,909	3,976	\$1,390

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of March 1, 2025<sup>77</sup>

Table 16 shows FEMA IA applicants by housing type. The highest number of applications came from applicants with a residence type classified as housing/duplex units (54,150), apartment units (15,903), and mobile home units (14,382). House/duplex units accounted for 55.78 percent of all FEMA IA applicants in the County.

Table 16 – FEMA IA Applicants by Housing Type

Residence Type	# of Owner-Occupied	Owner Occupied % of Total	# of Rentals	Rentals % of Total	# of Unknown Type	Unknown Type % of Total	Total # of Applicants	Unit Type % of Total
Apartment	11	0.01%	15,888	16.37%	4	0%	15,903	16.38%
Assisted Living Facility	0	0%	37	0.04%	0	0%	37	0.04%
Boat	105	0.11%	27	0.03%	2	0%	134	0.14%
College Dorm	0	0%	6	0.01%	0	0%	6	0.01%
Condo	3,081	3.17%	1,281	1.32%	6	0.01%	4,368	4.50%
Correctional Facility	0	0%	2	0.00%	0	0%	2	0%
House / Duplex	37,062	38.18%	17,037	17.55%	51	0.05%	54,150	55.78%
Military Housing	0	0%	10	0.01%	0	0%	10	0.01%
Mobile Home	12,142	12.51%	2,194	2.26%	46	0.05%	14,382	14.81%
Other	2,333	2.40%	2,214	2.28%	5	0.01%	4,552	4.69%
Townhouse	1,635	1.68%	1,301	1.34%	1	0%	2,937	3.03%
Travel Trailer	423	0.44%	177	0.18%	1	0%	601	0.62%
<b>Total</b>	<b>56,792</b>	<b>58.50%</b>	<b>40,174</b>	<b>41.38%</b>	<b>116</b>	<b>0.12%</b>	<b>97,082</b>	<b>100%</b>

<sup>77</sup> Source: [Housing Assistance Program Data - Renters v2](#). FEMA Open Data. 2024.

The AAN outlines the following damage categories by owner-occupied and rental units:

FEMA Inspected Owner Unit:

- **Minor-Low:** Less than \$3,000 of FEMA inspected real property damage.
- **Minor-High:** \$3,000 to \$7,999 of FEMA inspected real property damage.
- **Major-Low:** \$8,000 to \$14,999 of FEMA inspected real property damage and/or 1 to 3.9 feet of flooding on the first floor.
- **Major-High:** \$15,000 to \$28,800 of FEMA inspected real property damage and/or 4 to 5.9 feet of flooding on the first floor.
- **Severe:** Greater than \$28,800 FEMA inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

FEMA Inspected Owner Units – Personal Property:

- **Minor-Low:** Less than \$2,500 of FEMA inspected personal property damage.
- **Minor-High:** \$2,500 to \$3,499 of FEMA inspected personal property damage.
- **Major-Low:** \$3,500 to \$4,999 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor.
- **Major-High:** \$5,000 to \$9,000 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
- **Severe:** Greater than \$9,000 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

FEMA Inspected Rental Units:

- **Minor-Low:** Less than \$1,000 of FEMA inspected personal property damage.
- **Minor-High:** \$1,000 to \$1,999 of FEMA inspected personal property damage or determination of “Moderate” damage by the FEMA inspector.
- **Major-Low:** \$2,000 to \$3,499 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor or determination of “Major” damage by the FEMA inspector.
- **Major-High:** \$3,500 to \$7,500 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.

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<sup>78</sup> Source: [Housing Assistance Program Data - Renters v2](#). FEMA Open Data. 2024.

- **Severe:** Greater than \$7,500 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor or determination of “Destroyed” by the FEMA inspector.

FEMA real property damage estimates indicate that there are approximately 1,702 (15.40 percent) owner-occupied units and 421 (10.89 percent) renter-occupied units that suffered major-high or severe damage.

The following tables provide a breakdown of FEMA IA applicants:

*Table 17 – HUD-defined Damage Categories for Owner-Occupied Units*

County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe	Total
Manatee	4,667	2,383	2,301	1,512	190	11,053

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of March 1, 2025<sup>79</sup>

*Table 18 – HUD-defined Damage Categories for Rental Units*

County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe	Total
Manatee	2,054	1,050	341	369	52	3,866

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of March 1, 2025<sup>80</sup>

## Damage Assessment and Real Property FEMA Verified Loss (RPFVL)

FEMA inspections are used to verify losses related to real and personal property. The findings from the FEMA inspection establish the FEMA-Real Property FEMA Verified Loss (RPFVL) amount, defined as the total dollar amount of IA eligible disaster-caused damage to real property as verified by FEMA.<sup>81</sup> After the FVL is determined, FEMA may reduce the amount by losses covered in whole or in part by insurance to determine award amounts.

Table 19 provides the total number of IA applicants with RPFVL, total RPFVL identified by FEMA, and average RPFVL per applicant within the County.

<sup>79</sup> Source: [Housing Assistance Program Data - Renters v2](#). FEMA Open Data. 2024.

<sup>80</sup> Source: [Housing Assistance Program Data - Renters v2](#). FEMA Open Data. 2024.

<sup>81</sup> Source: [Individual Assistance Program and Policy Guide \(IAPPG\), Version 1.1](#). Federal Emergency Management Agency (FEMA). 2021.

Table 19 – FEMA IA Applicants with RPFVL, Total RPFVL, and Average RPFVL in Manatee County

Estimated IA Applicants with RPFVL	Estimated Total RPFVL	Average RPFVL per Applicant
8,413	\$78,224,443	\$9,298

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of March 1, 2025<sup>82</sup>

## County Damage Assessments

Following each disaster, the County's Development Services Department performed residential inspections to facilitate recovery and ensure community safety. Damaged structures were assigned *Affected*, *Minor*, *Major*, or *Destroyed* damage classifications with estimated damage totals. Table 20 provides a breakdown of the number of residential structures by damage classification and estimated damage for the 2024 Hurricanes.

Table 20 – Post-Storm County Damage Assessments

Disaster	Affected	Minor	Major	Destroyed	Estimated Damages
Debby	55	90	173	0	\$57,166,386.95
Helene	702	2,315	946	344	\$332,747,652.95
Milton	6,664	3,442	5,616	83	\$472,403,425.65
<b>Total</b>	<b>7,421</b>	<b>5,847</b>	<b>6,735</b>	<b>427</b>	<b>\$862,317,465.55</b>

Source: Manatee County Development Services

## Insurance

Insurance is a vital tool for disaster recovery, helping households rebuild and recover following catastrophic events. Flood insurance and homeowners' insurance are essential for providing financial protection against property damage. However, significant gaps in insurance coverage, particularly among lower-income households, leave many survivors without sufficient resources to rebuild.

The following analysis examines the availability of flood and homeowners' insurance across income categories and highlights payouts through the NFIP, which have been deducted from housing damage totals to determine the unmet need. Due to data limitations, including the lack of detailed NFIP data, this analysis relies on available open data to assess insurance coverage across income categories and estimate NFIP payouts.

<sup>82</sup> Source: [Housing Assistance Program Data - Renters v2](#). FEMA Open Data. 2024.

## HOMEOWNERS' INSURANCE COVERAGE

Of the 56,792 households analyzed, 40,341, or 71.03 percent, reported coverage, as shown in *Table 21*. However, significant gaps remain. Households earning \$15,000–\$60,000 represent the largest share of uninsured units, accounting for 60.32 percent (9,923 households) of all uninsured units analyzed. This lack of coverage places these households at heightened risk of financial hardship in the event of a disaster.

The data also indicates that insurance coverage is strongly correlated with income. Among households earning over \$60,000, 86.80 percent had homeowners' insurance, leaving only 13.20 percent uninsured. Conversely, for those earning under \$30,000, only 46.26 percent had coverage, while 53.74 percent remained uninsured, highlighting gaps in financial protection against disasters.

*Table 21 – The Number of Owner-Occupied Units with and without Homeowners' Insurance*

Income Category	Units with Homeowners' Insurance	Percentage of Total with Homeowners' Insurance	Units without Homeowners' Insurance	Percentage of Total without Homeowners' Insurance
No Stated Income	1,456	2.56%	1,339	2.36%
<\$15,000	1,193	2.10%	1,758	3.10%
\$15,000-\$30,000	4,312	7.59%	4,636	8.16%
\$30,001-\$60,000	10,818	19.05%	5,287	9.31%
\$60,001-120,000	13,896	24.47%	2,695	4.75%
\$120,001-\$175,000	4,792	8.44%	335	0.59%
>\$175,000	3,874	6.82%	401	0.71%
<b>Total</b>	<b>40,341</b>	<b>71.03%</b>	<b>16,451</b>	<b>28.97%</b>

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of March 1, 2025<sup>83</sup>

## FLOOD INSURANCE COVERAGE

As shown in *Table 22*, flood insurance coverage is extremely limited across all income categories. Of the 56,792 households analyzed, only 8,456, or 14.89 percent, reported having flood insurance. It should be noted that the data available for this analysis did not include information on whether the home was in a Special Flood Hazard Area (SFHA), where flood

<sup>83</sup> Source: [Housing Assistance Program Data - Renters v2](#). FEMA Open Data. 2024.

insurance is typically required for a mortgage. Therefore, low rates of flood insurance coverage may be attributed to the location of homes outside of SFHAs.

Households earning between \$30,001 and \$60,000 represent the largest share of uninsured households, encompassing 29.76 percent (14,385 households) of all households reporting no flood insurance, followed by those in the \$60,001–\$120,000 range at 28.61 percent (13,831 households), and those in the \$0–\$30,000 range at 22.95 percent (11,095 households). Data indicates that flood insurance coverage is generally low across all income levels, with particularly limited participation among LMI households.

*Table 22 – The Number of Owner-Occupied Units with and without Flood Insurance*

Income Category	Units with Flood Insurance	Percentage of Total with Flood Insurance	Units without Flood Insurance	Percentage of Total without Flood Insurance
No Stated Income	401	0.71%	2,394	4.22%
<\$15,000	169	0.30%	2,782	4.90%
\$15,000-\$30,000	635	1.12%	8,313	14.64%
\$30,001-\$60,000	1,720	3.03%	14,385	25.33%
\$60,001-\$120,000	2,760	4.86%	13,831	24.35%
\$120,001-\$175,000	1,240	2.18%	3,887	6.84%
>\$175,000	1,531	2.70%	2,744	4.83%
<b>Total</b>	<b>8,456</b>	<b>14.89%</b>	<b>48,336</b>	<b>85.11%</b>

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of March 1, 2025<sup>84</sup>

## National Flood Insurance Program (NFIP) Payouts

The County participates in the National Flood Insurance Program (NFIP), and a substantial number of properties across the County carry flood insurance policies through the program. Following the 2024 Hurricanes, claims activity increased reflecting widespread flood-related damage to homes located within and near designated Special Flood Hazard Areas (SFHAs).

The NFIP provides flood insurance coverage to property owners, renters, and businesses, helping to offset the financial impacts of flooding. *Table 23* highlights total payouts under the NFIP in the County for single-family residential structures.

<sup>84</sup> Source: [Housing Assistance Program Data - Renters v2](#). FEMA Open Data. 2024.

*Table 23 – Total NFIP Payouts in Manatee County*

County	Number of Payouts	Total Payouts
Manatee	5,719	\$298,757,342

Source: OpenFEMA Dataset: FEMA NFIP Redacted Claims V2 – as of February 3, 2025<sup>85</sup>

## REPETITIVE LOSS PROPERTIES

A critical indicator of flood vulnerability in the County is the rising number of FEMA-designated Repetitive Loss properties. FEMA defines Repetitive Loss properties as a structure that has at least two paid flood losses greater than \$1,000 each in any 10-year period since 1978.<sup>86</sup> According to FEMA's NFIP Repetitive Loss dataset, there have been 562 residential structures identified as Repetitive Loss dating back to 1982.

As illustrated in *Table 24*, 191 residential properties have received Repetitive Loss designation in the last two years with a 22 percent increase in designations from 2023 to 2024.

Using the County's median home value of \$424,000,<sup>87</sup> this equates to approximately \$45.4 million in residential property repeatedly exposed to flood risk. These figures highlight the urgent need for targeted mitigation and infrastructure improvements – particularly stormwater, drainage, and elevation measures – to reduce flood exposure in these high-risk zones.

*Table 24 – Residential Repetitive Loss Properties in Manatee County*

Year	Residential Properties
2023	88
2024	107
<b>Total</b>	<b>195</b>

Source: OpenFEMA Dataset: NFIP Multiple Loss Properties V1 – as of December 17, 2024<sup>88</sup>

## Small Business Administration (SBA) Home Loans

The SBA provides low-interest, long-term disaster loans to homeowners and renters to repair or replace uninsured or underinsured disaster-damaged property. These loans, which offer up to \$500,000 for real estate repairs and \$100,000 for personal property are a crucial

<sup>85</sup> Source: [FEMA NFIP Redacted Claims - v2](#). FEMA. 2025.

<sup>86</sup> Source: [Repetitive Loss Structure](#). FEMA. 2020.

<sup>87</sup> Source: [ACS Median Value \(Dollars\) for Florida and Manatee County, FL](#). U.S. Census Bureau. 2023

<sup>88</sup> Source: [NFIP Multiple Loss Properties- v1](#). FEMA. 2024.

resource in disaster recovery, offering financial support where other forms of assistance fall short. Interest rates are capped at 4 percent, with repayment terms of up to 30 years.

Table 25 provides the number of loans submitted, approved, and the total disbursements within the County.

*Table 25 – Total SBA Home Loans in Manatee County*

County	# of Loan Applications	# Approved	Total Disbursed
Manatee	TBD	TBD	TBD

Source: SBA Disaster Loan Data Updated MONTH DAY, 2025

## Summary of Housing Unmet Need

Table 26 provides a summary of housing losses in the County using data from FEMA IA applicants, NFIP claims, and census data for median home values. To determine housing losses, the County assumes properties under the “Major-Low” damage category are not substantially damaged and do not need substantial rehabilitation. The highest FEMA Real Property Damage recorded was \$14,985 for properties in the “Major-Low” damage category and below, which is below the median building value of \$318,000 for owner-occupied units.

Because the substantial damage threshold requires that damages exceed 50 percent of total building value, the County used 49 percent of the total building value to estimate the property loss per unit for “Major-High” damaged units. For “Severe” damaged properties, the County assumes that these properties were substantially damaged and need to be fully rebuilt. The County estimated the full cost of replacement by using 75 percent of the 2023 U.S. Census ACS 1-year median owner-occupied housing unit value to estimate the property loss per unit for “Severe” damaged properties.

According to HUD, landlords are expected to have insurance unless their rental unit is occupied by a tenant with income below the Federal poverty level or 50 percent AMI – whichever is greater.<sup>89</sup> As a result, this summary only includes FEMA IA applicants renting a unit with a reported income at or below 50 percent AMI for the North Port-Sarasota-Bradenton, FL MSA.

<sup>89</sup> Source: [Federal Register Notice](#). Vol. 90, No 10. Federal Register. 2025.

Table 26 – Summary of Housing Losses

Data	Households / Units	Average Real Property Loss	Source of Average Real Property Loss	Estimated Total Loss
Minor-Low Damage to FEMA IA Applicants (All Home Types)	6,721	\$619.95	FEMA IA Value of Real Property Damage	\$4,166,699
Minor-High Damage to FEMA IA Applicants (All Home Types)	3,433	\$4,029.33	FEMA IA Value of Real Property Damage	\$13,832,688
Major-Low Damage to FEMA IA Applicants (All Home Types Except Mobile Homes)	1,777	\$79,500.00	25% of full cost of repair	\$141,271,500
Major-Low Damage to FEMA IA Applicants (Mobile Home Units)	865	\$77,058.00	HUD Federal Register Notice Mobile Home Multiplier	\$66,655,170
Major-High Damage to FEMA IA Applicants (All Home Types Except Mobile Homes)	1,337	\$155,820.00	49% of full cost of repair	\$208,331,340
Major-High Damage to FEMA IA Applicants (Mobile Home Units)	544	\$98,463.00	HUD Federal Register Notice Mobile Home Multiplier	\$53,563,872
Severe Damage to FEMA IA Applicants (All Home Types Except Mobile Homes)	174	\$318,000.00	75% of Median Home Value in Manatee County	\$55,332,000
Severe Damage to FEMA IA Applicants (Mobile Home Units)	68	\$134,834.00	HUD Federal Register Notice Mobile Home Multiplier	\$9,168,712
FEMA IA Applicant Damage Subtotal	14,919	-	-	\$552,321,981
NFIP Identified Damages	5,719	\$52,239.44	NFIP Claims	\$298,757,342
<b>Total Housing Loss</b>				<b>\$851,079,323</b>

*Table 27 – Summary of Housing Assistance Received*

<b>Data</b>	<b>Count</b>	<b>Average Assistance Received</b>	<b>Total Assistance</b>
FEMA IA Payments to Repair Homes	4,938	\$8,061.62	\$39,808,291
SBA Disaster Home Loan Assistance	TBD	TBD	TBD
NFIP Identified Payments	5,719	\$52,239.44	\$298,757,342
<b>Total Housing Assistance</b>			<b>\$338,565,633</b>

*Table 28 – Total Housing Unmet Need*

<b>Category</b>	<b>Total</b>
Total Housing Damage	\$851,079,323
Total Housing Assistance Received	\$338,565,633
<b>Total Housing Unmet Need</b>	<b>\$512,513,690</b>

## Summary of Community Feedback on Housing Needs

During the development of the UNA, the County held two public meetings to solicit input on the greatest impacts and remaining needs after the 2024 Hurricanes. Housing was ranked as the greatest priority for recovery with many participants noting flooding, an abundance of blue tarps on roofs, and a remaining need for repairs, replacement, reconstruction, elevation, and buyouts. Housing impacts identified during the public meetings include, but are not limited to, destroyed homes, water intrusion (rain and flooding), mold, roof damage, broken windows and doors, and other interior damage resulting in unlivable dwelling units.

## Infrastructure

Manatee County's infrastructure systems are central to the County's disaster recovery and long-term resilience. The 2024 Hurricanes severely tested the County's capacity to deliver essential services, revealing that infrastructure damage not only disrupts utilities and access, but also fundamentally delays or prevents housing recovery. Recognizing this, the County has prioritized infrastructure improvements that directly support the restoration and habitability of homes. This section presents the County's infrastructure profile, the storm-related impacts to these systems, associated project needs, and the County's strategic focus on infrastructure as a critical enabler of housing recovery.

## Infrastructure Profile

The County operates a countywide potable water system serving approximately 147,298 active accounts across unincorporated areas of the County, as well as Bradenton Beach, Holmes Beach, and Anna Maria. In addition, the County provides wholesale water service to the neighboring jurisdictions of Palmetto, Longboat Key, Bradenton, and parts of Sarasota County.<sup>90</sup>

The primary source of the County's drinking water is the Lake Manatee Reservoir, formed by the Lake Manatee Dam.<sup>91</sup> The reservoir covers a surface area of about 1,450 acres<sup>92</sup> and supplies raw surface water to the Lake Manatee Water Treatment Plant, which is capable of treating and distributing up to 84 million gallons per day.<sup>93</sup> To supplement its surface water resources, the County utilizes groundwater drawn from the Floridan Aquifer via seven 1,200-foot-deep wells located in the eastern part of the County.<sup>94</sup>

The County owns three regional wastewater treatment plants – the North Regional, Southwest, and Southeast Water Reclamation Facilities – serving most County residents with 135,000 sewer connections via a system spanning approximately 1,400 miles of sewer pipelines with over 600 lift stations.<sup>95</sup> The County's reclaimed water network, consisting of approximately 943,276 linear feet (179 miles) of transmission mains, two booster pump stations, and one re-pump station, recycles approximately 62 percent of wastewater flow as reclaimed water for non-potable uses.<sup>96</sup>

The County's Stormwater Management Division maintains a network of approximately 503 miles of storm pipes, 655 miles of roadside ditches, 181 miles of maintained canals, 14,669 inlets, and 758 acres of maintained or permitted stormwater ponds.<sup>97</sup> The County also manages a real-time monitoring network consisting of 40 Campbell Scientific stream elevation and rain sensor systems and eight Ambient locations to support flood forecasting, emergency response, and infrastructure planning.

The County maintains a broad network of public facilities providing essential government, safety, health, and community services. Recreational and community engagement needs are

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<sup>90</sup> Source: [Manatee County Water Program Overview](#). Manatee County Water Division. 2025.

<sup>91</sup> Source: [Lake Manatee Dam Projects](#). Manatee County Government. 2024.

<sup>92</sup> Source: [Bathymetry of Lake Manatee](#). US Geological Survey. 2009.

<sup>93</sup> Source: [Manatee County Comprehensive Plan, Element 9 – PUBLIC FACILITIES](#). Manatee County. 2023.

<sup>94</sup> Source: [2023 Water Quality report for Manatee County, FL](#). Manatee County, Utilities Department. 2023.

<sup>95</sup> Source: [Greenhouse Gas Audit for Manatee County, FL, Suggestions Towards a Goal of Net Zero Carbon Footprint](#). Community Sustainability Partnership (CSP). 2020.

<sup>96</sup> Source: [Natural Wonders and Manmade Marvels, CST's glass-fused-to-steel liquid storage tanks help maintain Florida's lush environment](#). Wastewater Digest. 2019.

<sup>97</sup> Source: [Mott Corporation Signs \\$40 million agreement with U.S. dairy farm for Advanced Filtration Systems](#). Wastewater Digest. 2025.

met through nearly 40 parks and two fully equipped recreation centers including the G.T. Bray Recreation Center, a 140-acre multi-purpose complex serving west Bradenton residents, and the Bradenton Area Convention Center, which accommodates large-scale community functions and regional events. The County's Emergency Management Division manages 21 general population, pet-friendly,<sup>98</sup> and special needs<sup>99</sup> emergency shelters to protect residents during disasters. These shelters are strategically located throughout the County to serve various evacuation levels.

The County's transportation infrastructure integrates highways, rail, maritime, and air transport facilities. Interstate 75 serves as the primary freight and passenger corridor, supported by other major routes, including US 41, US 301, SR 64, SR 70, and SR 72.<sup>100</sup> The County maintains a network of approximately 500 bridges, several of which are considered vital to regional mobility as they travel over bodies of water and connect coastal communities.

Public transit is provided by Manatee County Area Transit (MCAT), which operates 15 fixed bus routes with a fleet of approximately 40 buses.<sup>101</sup> Air travel is served by the Sarasota-Bradenton International Airport (SRQ), providing commercial air service with limited freight capacity on passenger flights.<sup>102</sup> Rail service is provided by CSX Transportation and the Seminole Gulf Railway.<sup>103</sup>

SeaPort Manatee is one of Florida's 15 major seaports and an economic lifeline for the region. It features 10 deep-draft berths and over 1 million square feet of warehouse space for cargo operations.<sup>104</sup> Annually, Port Manatee averages approximately 11 million tons of cargo including containerized goods, bulk commodities (like petroleum, citrus juice, and construction materials), and project cargo.<sup>105</sup>

## Infrastructure Disaster Damage and Impacts

The County experienced widespread damage to public infrastructure due to the 2024 Hurricanes. Torrential rainfall and storm surge overwhelmed stormwater drainage systems across the County, causing roadways to flood and hindering emergency response access.<sup>106</sup> During Hurricane Debby, 13.49 inches of rain fell in 48 hours, approaching the 100-year flood

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<sup>98</sup> Source: [Pet-Friendly Emergency Shelter Guidelines](#). Manatee County. 2024.

<sup>99</sup> Source: [Manatee County Special Needs Registry](#). Manatee County. 2024.

<sup>100</sup> Source: [Transform 2045 Long Range Transportation Plan](#). Sarasota/Manatee MPO. 2020.

<sup>101</sup> Source: [Manatee County Area Transit Overview](#). The Global Transit Guidebook. 2025.

<sup>102</sup> Source: [Transform 2045 Long Range Transportation Plan](#). Sarasota/Manatee MPO. 2020.

<sup>103</sup> Source: [Transform 2045 Long Range Transportation Plan](#). Sarasota/Manatee MPO. 2020.

<sup>104</sup> Source: [Seaport Manatee sustains record-level cargo activity in fiscal 2023](#). Seaport Manatee. 2023.

<sup>105</sup> Source: [Seaport Manatee sustains record-level cargo activity in fiscal 2023](#). Seaport Manatee. 2023.

<sup>106</sup> Source: [Post Hurricane Impacts and Recovery Session – Summary Report](#). Tampa Bay Regional Planning Council. Debby, Helene, and Milton. 2025.

threshold of 14.2 inches and resulting in flash flooding across major inland basins.<sup>107</sup> Helene brought a storm surge of four to six feet, inundating low-lying coastal zones and overwhelming protective dune systems.<sup>108</sup> Uprooted trees damaged water mains, while blocked stormwater infrastructure contributed to persistent standing water and localized overland flooding.<sup>109</sup> Sanitary sewer systems were compromised by storm-related inflows, and multiple sanitary sewer overflows released untreated wastewater during peak storm periods.<sup>110</sup> Saltwater intrusion and power outages led to the failure of multiple coastal lift stations, resulting in disrupted wastewater treatment operations in low-lying and coastal areas of the County.<sup>111</sup>

*Figure 12 – Hurricane Helene Damage on Anna Marie Island*



*Source: Manatee County Government*

<sup>107</sup> Source: [Local Mitigation Strategy Plan 2024 Draft Update](#). Manatee County. 2024.

<sup>108</sup> Source: [Local Mitigation Strategy Plan 2024 Draft Update](#). Manatee County. 2024.

<sup>109</sup> Source: [Post Hurricane Impacts and Recovery Session – Summary Report](#). Tampa Bay Regional Planning Council. Debby, Helene, and Milton. 2025.

<sup>110</sup> Source: [Post Hurricane Impacts and Recovery Session – Summary Report](#). Tampa Bay Regional Planning Council. Debby, Helene, and Milton. 2025.

<sup>111</sup> Source: [Post Hurricane Impacts and Recovery Session – Summary Report](#). Tampa Bay Regional Planning Council. Debby, Helene, and Milton. 2025.

During Hurricane Helene, over 72,000 County homes and businesses lost power.<sup>112</sup> Just weeks later, Hurricane Milton caused even more extensive outages; at the storm's peak, 127,420 Florida Power & Light (FPL) customers within the County were reported without electricity, representing approximately 59 percent of all County customers served by FPL.<sup>113</sup> These consecutive outages disrupted water pressure systems, stormwater pumps, traffic controls, and operations at public facilities dependent on electrical infrastructure. SeaPort Manatee sustained substantial damage during Hurricane Milton, with the reported loss of 10 of its 13 on-site warehouses and three of its docking facilities, for a total estimated infrastructure loss of \$225 million.<sup>114</sup> Road blockages from debris and flooding were widespread across the County, with transportation corridors severely impacted by deposited sand, fallen vegetation, and storm-related obstructions.<sup>115</sup>

## STORMWATER MANAGEMENT

The 2024 Hurricanes brought prolonged and intense rainfall to the County, exposing vulnerabilities in the County's stormwater infrastructure and creating compounding challenges for housing recovery. High volumes of rainwater and surge exceeded the capacity of local drainage systems in multiple neighborhoods. Low-lying communities and newly developed residential areas, such as portions of Lakewood Ranch, experienced unexpected flooding where water had previously drained effectively.<sup>116</sup> Reports indicated that canal systems in Braden River and Gamble Creek were unable to convey water efficiently, contributing to extensive ponding and delayed drainage.<sup>117</sup>

These stormwater-related impacts delayed the ability of residents to return to their homes and created logistical challenges for initiating damage assessments, housing repairs, and utility restoration. In several areas, stormwater overflows rendered roads and driveways impassable for extended periods, limiting access to homes and delaying the delivery of materials and recovery services.

The County has recognized that the hardening and functionality of its stormwater infrastructure are foundational to housing stability and post-disaster recovery. In response, the County has launched targeted efforts to enhance its stormwater management capacity,

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<sup>112</sup> Source: [Thousands are still without power as Sarasota-Manatee begins a long recovery](#), Herald-Tribune. 2024.

<sup>113</sup> Source: [FPL Customers in Sarasota, Manatee Face Post-Milton Outages](#), Observer. 2024.

<sup>114</sup> Source: [State Emergency Response Team Provides Update on Hurricane Milton Recovery Efforts](#), Florida Division of Emergency Management. 2024.

<sup>115</sup> Source: [Post Hurricane Impacts and Recovery Session – Summary Report](#), Tampa Bay Regional Planning Council. Debby, Helene, and Milton. 2025.

<sup>116</sup> Source: [Newly Built Lakewood Ranch Neighborhood Trapped by Flood Streets After Debby](#), Fox 13 Tampa Bay. 2024.

<sup>117</sup> Source: [Clogged Manatee Waterways Made Hurricane Flood Worse](#), Bradenton Herald. 2025.

including improvements to conveyance systems, retention areas, and canal operations in residential zones. As part of its long-term stormwater improvement strategy, the County plans to invest in areas where system performance failed or where repeated flooding has occurred – even in previously low-risk zones.<sup>118</sup>

By prioritizing stormwater improvements, the County aims to reduce future flood risk, support the expedited re-occupancy of homes after storm events, and protect both public and private investments in residential recovery. The County's CDBG-DR investments will focus on infrastructure systems that directly enable safe and sustainable housing restoration in communities most impacted by the 2024 Hurricanes and susceptible to future disasters.

## **WATER SUPPLY**

The 2024 Hurricanes disrupted the County's water supply infrastructure, creating widespread obstacles to housing recovery. In advance of Hurricane Helene, potable water service was preemptively shut off to the barrier island communities to prevent backflow contamination from storm surge. Widespread power outages following the storms disrupted water pressure, triggering boil water notices. A formal advisory was issued for Anna Maria Island due to potential saltwater intrusion and pressure loss, requiring residents to boil water until quality was confirmed. These advisories, mandated by the Florida Department of Health (DOH), remained in effect for several days, compounding challenges for displaced and sheltering residents.<sup>119</sup> Temporary bottled water distribution points were established, but not all affected households had access or capacity to store water, leaving many without a safe, reliable water source.

For many homes, lack of potable water was the primary impediment to re-occupancy. Power-dependent well pumps and pressure systems remained offline in rural and unincorporated areas. In multifamily housing, pressure loss and water quality concerns delayed habitability inspections and extended displacement. These cascading failures underscore that safe, functional water infrastructure is a prerequisite for restoring livability. Without reliable systems in place, even lightly damaged homes face impediments to re-occupancy. Therefore, the County has identified investments in resilient water infrastructure critical to enable housing recovery in the implementation of its CDBG-DR recovery efforts.

## **WASTEWATER SYSTEMS**

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<sup>118</sup> Source: [Manatee County's \\$2 Million Stormwater Management Plan: Protecting Neighborhoods from Hurricane Season Flooding](#). Farmonaut. N.D.

<sup>119</sup> Source: [Boil Water Advisory Issued for Anna Maria Island After Hurricane Helene](#). Tampa Bay 10. 2024.

The 2024 Hurricanes placed significant strain on the County's wastewater infrastructure, highlighting system vulnerabilities that affected service in several areas. During Hurricane Debby, Bradenton reported the discharge of 3.5 million gallons of partially treated wastewater into the Manatee River due to heavy rainfall exceeding system capacity. The County's North Regional Water Reclamation Facility also experienced smaller discharges onto plant grounds.<sup>120</sup> These events, driven by stormwater inflow and temporary power disruptions, affected service reliability and created conditions that required additional cleanup and monitoring in nearby neighborhoods.

The impact on County wastewater systems emphasizes the relationship between infrastructure and housing recovery. In some low-lying residential areas, backups and overflows delayed re-occupancy and required enhanced sanitation efforts. For households with young children, seniors, or individuals with health sensitivities, consistent and safe wastewater service is critical to returning home safely. Investments in strengthening and modernizing wastewater systems will help reduce future service disruptions, support safe and timely housing recovery, and increase overall community hardening.

## **PUBLIC FACILITIES**

During Hurricane Milton, the County activated 16 school-based shelters to accommodate evacuees, including general population, pet-friendly, and special needs shelters. As of October 8, 2024, approximately 2,546 individuals sought refuge in these facilities, with notable concentrations at Virgil Mills Elementary School in Palmetto and Jessie P. Miller Elementary School in Bradenton.<sup>121</sup>

The increased reliance on emergency shelters during the 2024 Hurricanes highlighted the critical role these facilities serve in protecting residents, particularly those from flood-prone areas and households with limited means to evacuate. Challenges such as power outages and capacity constraints emphasize the importance of resilient and accessible shelter infrastructure. Investments to modernize these facilities, including upgrades to backup power systems, expanded capacity, and improved accessibility features, are essential to ensure continuity of operations during disasters. These improvements will help minimize displacement, accelerate housing recovery, and strengthen community resistance in future emergencies.

## **TRANSPORTATION**

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<sup>120</sup> Source: [3.5 Million Gallons of Partially Treated Sewage Spills into Manatee River](#). Spectrum News. 2024.

<sup>121</sup> Source: [Manatee County Orders Evacuations for Levels A, B, C](#). ABC 7. 2024.

Heavy rainfall and storm surge led to widespread road closures across the County. Key routes such as State Road 64 between Dam Road and County Road 675, Upper Manatee River Road, and Verna Bethany Road experienced flooding and, in some cases, structural damage, including a bridge collapse over the Manatee River.<sup>122</sup>

Bridges, vital for connecting communities, also suffered damage. The County had to barricade three bridges, including those at Gamble Creek in Parrish, to prevent further deterioration.<sup>123</sup> Additionally, the Manatee Avenue and Cortez Road bridges were closed due to safety concerns during Hurricane Helene.<sup>124</sup> Damage to these structures disrupted transportation and impeded the delivery of essential services to affected neighborhoods.

SeaPort Manatee, a critical hub for the region's economy, sustained over \$200 million in damages due to Hurricane Milton.<sup>125</sup> The port's infrastructure, including warehouses and berths, was compromised, affecting the flow of goods and materials essential for rebuilding efforts.

Investing in the resilience of infrastructure is essential for effective disaster response, housing recovery, and mitigating future storm impacts.

### **Total Cost and Need for FEMA PA Projects**

The PA Program is administered by FEMA and managed at the state level by the Florida Division of Emergency Management (FDEM). As a reimbursement-based program with cost-share requirements, FEMA may reimburse approved applicants up to 75 percent of eligible costs.

The County analyzed preliminary project data related to the 2024 Hurricanes that will be claimed under FEMA PA. It is essential to note that the data collected is preliminary, and all costs and categories of work are subject to change pending final FEMA determinations and assessments. *Table 29* provides a breakdown of the estimated costs claimed by the County, distributed by PA Category for all three disasters. Estimated FEMA PA figures for County municipalities and PHAs will be identified in *Table 30*. Category A – Debris Removal (\$94,922,810) and Category B – Emergency Protective Measures (\$15,788,668.88) totals are excluded from these figures as CDBG-DR funds are not used for these cost categories.

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<sup>122</sup> Source: [Tropical Weather Floods Roads in Sarasota, Manatee Counties](#). Observer. 2024.

<sup>123</sup> Source: [Manatee County Barricades Bridges](#). ABC 7. 2024.

<sup>124</sup> Source: [Here Are the Latest Local Road Closures Due to Hurricane Helene](#). Sarasota Magazine. 2024.

<sup>125</sup> Source: [SeaPort Manatee Reports Record Fiscal 2024 Activity as Hurricane Recovery Advances](#). AJOT. 2024.

Of the three disasters, PA costs associated with Hurricane Helene are the greatest with an estimated \$41,456,800 in Categories C-G damages. This is followed by Hurricane Milton, with an estimated \$17,590,421.97, and Hurricane Debby with an estimated \$5,206,350. Cumulatively, Category F – Utilities, has the highest cost at an estimated \$25,991,500.90 followed by Category G – Other at \$25,047,094.67.

Per the data, the unmet needs for the 25 percent non-federal cost share, Categories C-G, are estimated at \$16,063,393.00.

*Table 29 – The Total Estimated Non-Federal Cost Share by FEMA PA Categories C-G for Manatee County Government*

PA Category	Estimated Total Project Cost (Federal and Non-Federal Share)	Estimated Federal Cost Share (75%)	Estimated Non-Federal Cost Share (25%)
C – Roads and Bridges	\$4,905,000	\$3,678,750	\$1,226,250
D – Water Control Facilities	\$0	\$0	\$0
E – Building and Equipment	\$8,309,976.40	\$6,232,482.30	\$2,077,494.10
F – Utilities	\$25,991,500.90	\$19,493,625.68	\$6,497,875.23
G – Other	\$25,047,094.67	\$18,785,321	\$6,261,773.67
<b>Total</b>	<b>\$64,253,571.97</b>	<b>\$48,190,178.98</b>	<b>\$16,063,393</b>

Source: Data Compiled by Manatee County

Detailed PA figures in *Table 30* will be updated following consultation with County municipalities and PHAs.

*Table 30 – The Estimated Cost per PA Applicant Type for FEMA PA Categories C-G*

Applicant Type	Estimated Total Project Cost (Federal and Non-Federal Share)	Estimated Federal Cost Share (75%)	Estimated Non-Federal Cost Share (25%)
City or Township Government	TBD	TBD	TBD
County Government	\$64,253,571.97	\$48,190,178.98	\$16,063,393
Public Housing Authority	TBD	TBD	TBD
<b>Total</b>	<b>\$64,253,571.97</b>	<b>\$48,190,178.98</b>	<b>\$16,063,393</b>

Source: Information collected during the consultation process

## Total Cost and Need for Standalone Projects

During the development of the Action Plan, the County implemented a survey to solicit potential projects and unmet needs from stakeholders including County departments, local municipalities, non-profit organizations, the private sector, and residents with an emphasis on disaster tie-back and LMI benefit. The County facilitated additional consultations with stakeholders to discuss CDBG-DR eligibility criteria and unmet needs in their respective community. During the review of the standalone projects received, the County screened projects for eligibility, disaster tie-back, LMI benefit, and mitigation. Based on the detailed review of all projects submitted, an unmet need of \$716,022,270 was identified. Of the 65 infrastructure projects submitted by stakeholders, 38 projects totaling \$471,977,179.60 were for drainage improvements and/or flood reduction – signaling an overwhelming need to address the flooding sustained during the 2024 Hurricanes.

*Table 31 – Standalone Projects and Related Unmet Need*

Item	Estimated Number of Projects	Estimated Unmet Need
Standalone Infrastructure Projects	65	\$716,022,270

*Source: Information collected during the consultation process*

## Summary of Infrastructure Unmet Need

*Table 32 – Summary of Infrastructure Unmet Need by Program*

Infrastructure Unmet Need by Program	Estimated Unmet Need
PA (Cat C-G) Non-Federal Cost Share	\$16,063,393
Standalone Projects	\$716,022,270
<b>Total Estimated Unmet Need</b>	<b>\$732,085,663</b>

## Summary of Community Feedback on Infrastructure Needs

During the development of the UNA, the County held two public meetings to solicit input on the greatest impacts and remaining needs after the 2024 Hurricanes. Infrastructure and mitigation were ranked as the greatest priorities for recovery following housing. Participants noted extensive flooding, the inability to access critical resources such as food and water due to the inundation of roads, and the need for drainage improvements along the Braden River to prevent future housing damage and displacement.

## Economic Revitalization

The County conducted an economic unmet needs assessment to determine the impacts of the 2024 Hurricanes on the County's economy, including, but not limited to, small businesses, hospitality, and tourism. The purpose of this assessment is to identify the greatest remaining recovery needs that have not been addressed by other funding sources, guiding the allocation of CDBG-DR funds for economic recovery, revitalization, and resilience.

### Economic Profile

The County is a key economic hub in the Tampa Bay region, contributing significantly to Florida's overall output through a diverse mix of industries. In the years preceding the 2024 Hurricanes, the County experienced sustained growth, with GDP rising from \$16.7 billion in 2020 to approximately \$24 billion in 2023 and unemployment at 3 percent.<sup>126</sup>

Tourism and hospitality form a cornerstone of the County's local economy. Designated a "high impact tourism" area under Florida law, the County generates over \$30 million in tourist tax revenue per year and sees more than \$600 million in annual rental revenue.<sup>127</sup> Tourism accounts for an estimated \$2.2 billion in annual economic activity and supports roughly 30,000 jobs.<sup>128</sup> Hospitality alone employs approximately 6.6 percent of the local workforce, with strong performance continuing into early 2024.<sup>129</sup> Agriculture remains a longstanding pillar of the economy, with over 220,000 acres in production and approximately 750 farms employing 7,700 workers.<sup>130</sup>

Manufacturing and logistics are vital to the County's economic makeup. SeaPort Manatee – the closest U.S. deepwater port to the Panama Canal – drives much of this activity. The port's annual economic impact surged to over \$5.1 billion by 2023, supporting more than 37,000 jobs.<sup>131</sup> As Florida's manufacturing sector expanded, the port's strategic location and infrastructure development helped bolster regional growth, streamline trade, and attract private investment.<sup>132</sup>

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<sup>126</sup> Source: [Manatee County GDP & Employment Data \(2020-2023\)](#). U.S. Bureau of Economic Analysis. 2023.

<sup>127</sup> Source: [Long-term planning in Manatee County pays even longer-term dividends](#). Business Observer. 2024.

<sup>128</sup> Source: [Long-term planning in Manatee County pays even longer-term dividends](#). Business Observer. 2024.

<sup>129</sup> Source: [Employment by Industry in Manatee County](#). Statistical Analysis. 2025.

<sup>130</sup> Source: [Manatee County Agriculture](#). Florida Farm Bureau. 2025.

<sup>131</sup> Source: [Annual Economic Impact Report](#). SeaPort Manatee. 2022.

<sup>132</sup> Source: [Annual Economic Impact Report](#). SeaPort Manatee. 2022.

## Disaster Damage and Impact on Local Economy

The economic losses sustained due to the 2024 Hurricanes led to immediate and long-term impacts across agriculture, tourism, small business activity, and employment across the region. Immediate losses were followed by long-term economic consequences as businesses struggled to reopen, revenue declined, and key sectors faced compounding challenges that extended beyond the initial recovery period.

### AGRICULTURAL SECTOR

Agricultural producers across the County faced persistent disruptions due to the 2024 Hurricanes. Hurricane Debby caused localized flooding and delays in planting schedules, contributing to broader Statewide losses in vegetables, melons, and row crops estimated at \$32.1 million, along with damage to irrigation systems and infrastructure.<sup>133</sup> Helene further disrupted production in the County, impacting approximately 119,968 acres of agricultural land and causing an estimated \$6.78 million in production losses.<sup>134</sup> Milton caused between \$43.24 million and \$94.30 million across 119,960 acres of affected farmland in the County.<sup>135</sup> Many producers delayed winter crop planting, affecting yields into the next season.<sup>136</sup>

### TOURISM

The compounding impacts of the 2024 Hurricanes to the County's tourism led to temporary closures and reduced visitor travel to the area. The County's tourist development tax collections saw a year-over-year decline of 8.4 percent, decreasing from approximately \$2.3 million in December 2023 to \$1.9 million in December 2024.<sup>137</sup>

Tourism infrastructure and lodging capacity were particularly affected on the barrier islands. By November 2024, an estimated 40-60 percent of hospitality businesses on Anna Maria Island remained closed; the County side of Longboat Key, similarly, faced operational continuity challenges with an estimated 20-40 percent remaining closed.<sup>138</sup> Several island communities imposed temporary rental restrictions immediately after the storms for safety, contributing to a near standstill in bookings in October. By late November 2024, 50 percent of vacation rental properties in the Bradenton/Anna Maria Island area resumed operations.

### COMMERCE

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<sup>133</sup> Source: [UF/IFAS Preliminary Hurricane Debby Report](#). University of Florida. 2024

<sup>134</sup> Source: [UF/IFAS Preliminary Hurricane Helene Report](#). University of Florida. 2024

<sup>135</sup> Source: [UF/IFAS Preliminary Hurricane Milton Report](#). University of Florida. 2024

<sup>136</sup> Source: [UF/IFAS Preliminary Hurricane Milton Report](#). University of Florida. 2024

<sup>137</sup> Source: [County tourist tax receipts continue downward trend](#). The Islander. 2024.

<sup>138</sup> Source: [Tourism groups work to boost tourism for season after two hurricanes](#). Your Observer (Sarasota/Manatee). 2024.

Disruption to commerce in the County occurred through both physical damage and loss of business activity, with preliminary reports identifying 52 commercial structures completely destroyed in unincorporated Manatee County alone.<sup>139</sup> The City of Bradenton Beach reported in a press release that an estimated 90-95 percent of the City was destroyed by Helene.<sup>140</sup> Similarly, Anna Maria Island reported 845 properties with major damage.<sup>141</sup> Businesses that escaped structural damage faced indirect losses such as prolonged power outages, road closures, and beach cleanup efforts which impacted operations well after the storms.

Critical economic infrastructure in the County was not spared, which had broader implications for commerce and supply chains. SeaPort Manatee, responsible for more than 42,000 jobs (direct and indirect) in Florida,<sup>142</sup> sustained over \$200 million in damages due to Milton, leading to a disruption in the flow of goods.<sup>143</sup>

## WORKFORCE

As businesses closed for repairs and tourism temporarily slowed, many workers found themselves furloughed or unemployed in the weeks immediately after the storms.<sup>144</sup> Service industry and hospitality employees were among the most affected – hotel staff, restaurant workers, retail clerks, and others saw their workplaces shut down or operating at limited capacity, leading to lost wages.<sup>145</sup> From late September through October 2024, unemployment claims spiked dramatically in Florida, reflecting job losses in counties like Manatee that were hit by the hurricanes. Statewide data show that the week following Milton (mid-October 2024) saw 10,574 new unemployment filings, the highest one-week total of the year – a jump of over 4,000 claims from the prior week.<sup>146</sup> This surge in jobless claims was directly attributed to the hurricane impact, as Florida's trend sharply diverged from the national unemployment pattern at that time.<sup>147</sup> While weekly national jobless claims were decreasing in mid-October, Florida's shot upward due to storm-related layoffs and work interruptions.<sup>148</sup> Thousands of those claims came from the 31 disaster-declared counties

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<sup>139</sup> Source: [Hurricane Helene damage tops \\$358M in unincorporated Manatee](#). Business Observer. 2024.

<sup>140</sup> Source: [Post Hurricane Helene Roadway Clearing Reports, City of Bradenton Beach Press Release](#). 2024.

<sup>141</sup> Source: [Helene damage estimates in Sarasota, Manatee surpass \\$1 billion](#). Business Observer (Sarasota, Manatee). 2024.

<sup>142</sup> Source: [Sarasota manufacturer reports \\$10M revenue loss from hurricanes](#). Business Observer. 2024.

<sup>143</sup> Source: [Sarasota manufacturer reports \\$10M revenue loss from hurricanes](#). Business Observer. 2024.

<sup>144</sup> Source: [Floridians who lost jobs after Hurricane Helene can get additional help from state](#). Florida Politics Journal. 2024.

<sup>145</sup> Source: [How Hurricanes Milton and Helene Will Impact U.S. Jobs](#). Forbes. 2024.

<sup>146</sup> Source: [New weekly jobless claims spike big in Florida after Hurricane Milton](#). Florida Politics Journal. 2024.

<sup>147</sup> Source: [New weekly jobless claims spike big in Florida after Hurricane Milton](#). Florida Politics Journal. 2024.

<sup>148</sup> Source: [New weekly jobless claims spike big in Florida after Hurricane Milton](#). Florida Politics Journal. 2024.

(including Manatee County) where businesses were damaged and unable to operate normally.<sup>149</sup>

### Small Business Administration (SBA) Data

The SBA makes low-cost disaster loans available to qualified businesses. For businesses within the County that had experienced damage, financial assistance through SBA's Disaster Business Loans (Physical Damage) were made available. Additionally, for small businesses, small agricultural cooperatives, and most private nonprofit organizations that had sustained substantial economic injury, Economic Injury Disaster Loans (EIDL) were readily available for application. **Disaster loan data was requested from the SBA but was unavailable at the time of Action Plan publication for public comment. This section will be completed following the receipt of SBA data.**

According to SBA data, [\$TBD] in combined loan applications were submitted for Disaster Business Loans (Physical Damage) and Economic Injury Disaster Loans (*Table 34*).

*Table 33 – Total Loans Approved by the SBA*

Item	Business/EIDL Loans
Total Loan Amounts	TBD

Source: Small Business Administration Data for Manatee County, FL DR-4806, DR-4828, and DR-4834, Date: MONTH DAY, 2025

*Table 34 – SBA Funds Distributed*

Operational Category	Total Funds Distributed
Disaster Business Loan (Physical Damage)	TBD
Economic Injury Disaster Loan	TBD
<b>Total</b>	<b>TBD</b>

Source: Small Business Administration Data for Manatee County, FL DR-4806, DR-4828, and DR-4834, Date: MONTH DAY, 2025

### Summary of Economic Revitalization Unmet Need

HUD uses a categorization method for determining economic revitalization unmet needs. This method requires a calculation of damage to real estate (repair, rebuild, relocate) and contents (machinery, furniture, inventory), with each SBA application classified into one of five categories based on their respective damage estimates. According to HUD guidelines, if a property loses \$30,000 or more in real estate and contents, we estimate the unmet needs

<sup>149</sup> Source: [Floridians who lost jobs after Hurricane Helene can get additional help from state](#). Florida Politics Journal. 2024.

for small businesses by multiplying the middle damage estimates for the categories below by the number of small businesses that were denied an SBA loan. This includes businesses that were denied a loan before an inspection because of low credit or income, or when a decision has not been made, assuming the damage is similar for those denied before and after inspection.

Table 35 reflects the sum of verified losses to real estate, furniture, machinery, and inventory while also taking into account denied and/or unapproved loan applications resulting in a total verified loss of [\$TBD], with SBA payouts to businesses totaling [\$TBD]. The current total unmet needs are [\$TBD]; however, it is vital to note that SBA data and economic impacts are still being calculated. This assessment will continue to be updated as additional information and data is collected.

*Table 35 – SBA Funds Distributed*

SBA Category Description	Count	Impact
Category 1: SBA approved applicants with verified losses < \$12,000	TBD	TBD
Category 2: SBA approved applicants with verified losses between \$12,000 and \$29,999	TBD	TBD
Category 3: SBA approved applicants with verified losses between \$30,000 and \$64,999	TBD	TBD
Category 4: SBA approved applicants with verified losses between \$65,000 and \$149,999	TBD	TBD
Category 5: SBA approved applicants with verified losses > \$150,000	TBD	TBD
Sub-Total	TBD	TBD
Category 1: SBA declined applicants with verified losses < \$12,000	TBD	TBD
Category 2: SBA declined applicants with verified losses between \$12,000 and \$29,999	TBD	TBD

SBA Category Description	Count	Impact
Category 3: SBA declined applicants with verified losses between \$30,000 and \$64,999	TBD	TBD
Category 4: SBA declined applicants with verified losses between \$65,000 and \$149,999	TBD	TBD
Category 5: SBA declined applicants with verified losses > \$150,000	TBD	TBD
Sub-Total	TBD	TBD
Total Verified Loss	TBD	TBD
Total Loans Distributed by SBA	TBD	TBD
Remaining Unmet Need	TBD	TBD
Total Unmet Need	TBD	TBD

## Summary of Community Feedback on Economic Revitalization Needs

During the development of the UNA, the County held two public meetings to solicit input on the greatest impacts and remaining needs after the 2024 Hurricanes. Economic Revitalization was seen as the last remaining priority for recovery with participants.

## Public Services

The County assessed unmet needs related to disaster recovery by reviewing other assistance offered by FEMA. FEMA disbursed approximately \$71.28 million in Other Needs Assistance (ONA) to County survivors of the 2024 Hurricanes. Most of this assistance was directed towards miscellaneous needs, including food, clothing, and other essential items to support full recovery from the disasters.

Although FEMA has offered substantial aid, the County recognizes the continuing financial needs of residents affected by successive disasters. Therefore, the County plans to adopt a comprehensive recovery strategy, coordinating disaster relief with housing rehabilitation, replacement, reconstruction, and elevation programs to support impacted individuals in all facets of their recovery.

Table 36 – Disaster Relief Assistance

Description	Hurricane Debby	Hurricane Helene	Hurricane Milton
Total Number of Applicants	4,881	17,966	74,235
Other Needs Assistance (ONA) Award Amount	\$2,835,445.29	\$26,046,438.18	\$42,398,772.14

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of March 1, 2025<sup>150</sup>

Additional unmet needs related to public services will be requested during the consultation process.

## Mitigation Needs Assessment

Located on Florida’s Gulf Coast, the County is highly susceptible to various natural hazards, including hurricanes, tropical storms, flooding, extreme heat, and wildfires. The region’s geographic location, coastal exposure, and growing population require a proactive approach to disaster mitigation. This Mitigation Needs Assessment (MNA) provides a thorough evaluation of the County’s current hazards, existing mitigation initiatives, and opportunities to bolster resilience through targeted strategies.

The MNA serves as a foundational document for assessing risks and guiding decision-making processes to mitigate future disaster impacts. This report draws on historical disaster data, research, and the County’s FEMA-approved Local Mitigation Strategy (LMS), including the draft 2024 LMS Update, ensuring alignment with local, State, and Federal mitigation priorities. As of the date of Action Plan publication, the County has finalized the draft five-year 2024 LMS Update and is preparing for submission to FEMA. To provide the most recent County assessment of disaster hazards and risks, data from the 2024 LMS Update has been incorporated into this MNA. The County remains committed to refining its mitigation strategies and will update the MNA as necessary upon FEMA approval of the 2024 LMS Update. Through this assessment, the County aims to identify and prioritize risk reduction measures that protect lives, safeguard infrastructure, and promote long-term sustainability.

Understanding the evolving nature of hazard risks is critical to maintaining the County’s economic stability and community well-being. This document analyzes potential hazards and provides actionable recommendations to strengthen local mitigation efforts.

<sup>150</sup> Source: [Housing Assistance Program Data - Owners v2](#). FEMA Open Data. 2024.

## Purpose and Objectives

This MNA establishes a data-driven framework for reducing disaster risks in the County. By identifying vulnerabilities, analyzing hazard impacts, and evaluating existing mitigation programs, the MNA provides a roadmap for proactive risk reduction – informing the County's utilization of Community Development Block Grant Disaster Recovery (CDBG-DR) funds. The assessment also aligns with Revised Universal Notice and AAN requirements, ensuring mitigation efforts meet Federal and State guidelines, while supporting long-term community preparedness and hazard reduction.

The objectives of this report are to:

- **Assess Historical Disaster Impacts:** Examine past disasters, including hurricanes, floods, wildfires, and extreme heat events, to identify patterns in hazard occurrence and their effects on residents, infrastructure, and economic stability.
- **Analyze Sector-Specific Impacts:** Determine how hazards disrupt transportation, utilities, healthcare, and emergency response operations, and evaluate cascading effects on public safety and economic activity.
- **Assess Geographic and Community Vulnerabilities:** Evaluate how different areas of the County are uniquely impacted by hazards based on geographic features, population density, and land use. It also considers the cascading effects on critical infrastructure.
- **Identify Risk Reduction Strategies:** Based on hazard risk analysis, this assessment identifies initiatives, including mitigation projects, policy changes, and community engagement strategies in alignment with the LMS.
- **Support Data-Driven Decision-Making:** This assessment utilizes hazard data, including long-term weather trends, to ensure that mitigation planning is based on empirical evidence and aligns with best practices in risk reduction.

This report is designed to provide clear, fact-based findings that can be sourced directly from historical disaster data and mitigation planning documents. It serves as a resource to inform the County's CDBG-DR allocation, risk reduction strategies, and long-term hazard mitigation planning.

## Manatee County Local Mitigation Strategy

The LMS is the County's FEMA-approved Hazard Mitigation Plan (HMP) for identifying and addressing disaster risks through targeted mitigation initiatives. It is a multi-jurisdictional planning document developed in coordination with municipal governments, emergency

management officials, public works departments, and key community stakeholders. The LMS is updated on a five-year cycle to reflect evolving hazard data, community needs, and regulatory requirements.

The LMS development process follows Federal and State guidance and incorporates risk assessments, public engagement, and project prioritization. The LMS Working Group, composed of local emergency managers, government agencies, and private stakeholders, oversees LMS implementation and updates. It evaluates vulnerabilities, mitigation strategies, and funding opportunities to maintain a coordinated approach to disaster risk reduction.

## Summary of LMS Hazard Risk Scores

The County's risk assessment follows the Threat and Hazard Identification and Risk Assessment (THIRA) framework and includes: (1) hazard identification, (2) vulnerability analysis, and (3) impact/consequence assessment. The assessment is informed by the THIRA framework and incorporates both historical and statistical data, literature reviews, and expert input from local and state stakeholders. Each hazard is scored using a standardized approach based on four key factors: frequency, duration, speed of onset, and magnitude.<sup>151</sup> These metrics collectively inform the County's prioritization of risks for planning and mitigation purposes.

The County's FEMA-approved LMS evaluated a broad range of hazards – natural, technological, and human-caused – using a standardized scoring system. 33 hazards were assigned a Total Risk Value, reflecting the combined influence of its likelihood, the community's vulnerability, and its potential consequences.<sup>152</sup> These values allow the County to prioritize threats and guide targeted mitigation efforts. For the purposes of this MNA, *Table 37* omits all technological and human-caused hazards, and illustrates the natural hazards most relevant to CDBG-DR mitigation planning.

*Table 37 – Hazard Risk Assessment and LMS Ranking*

Hazard	Total Risk Value	LMS Risk Ranking
Hurricane	375.4	1
Flood	203.9	3
Tornado	186.5	4
Earthquake	169.9	5

<sup>151</sup> Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2020.

<sup>152</sup> Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2020.

Hazard	Total Risk Value	LMS Risk Ranking
Tsunami	153.9	7
Harmful Algal Blooms	126.6	10
Wildfire	125.3	11
Severe Storm	95	19
Drought	89.5	21
Sinkholes	71.5	27
Space Weather	38.9	32
Winter Storm	27.2	33

Source: Manatee County Local Mitigation Strategy Plan 2019 Update<sup>153</sup>

## Risk-Informed Approach to Natural Hazard Selection

For the purposes of this Mitigation Needs Assessment, the focus narrows specifically to natural hazards that pose significant and recurring risks to the County. In support of this targeted assessment – and to ensure that the allocation of CDBG-DR funds is grounded in measurable risk – a frequency-based analysis of natural hazard events recorded between 2014 and 2024 was conducted using data from the National Oceanic and Atmospheric Administration (NOAA) Storm Events Database. This analysis supports the identification of the most prevalent natural hazard threats in the County while aligning with risks identified in the County’s THIRA-based assessment.

Using hazard frequency as a decision-making lens provides a practical complement to the probabilistic and impact-based scoring used in the County’s THIRA. While the THIRA framework evaluates the potential consequences of a broad range of hazards, frequency analysis ensures that CDBG-DR mitigation investments are directed toward hazards with both recent and recurring histories of disruption – those most likely to recur and for which future damages can be effectively reduced through targeted mitigation efforts.

As required by HUD’s Revised Universal Notice, this risk-based prioritization also considers the potential availability of other funding sources. Where complementary Federal or State resources may already be directed toward certain hazards, CDBG-DR funds will be

<sup>153</sup> Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2020.

strategically applied to address unmet needs and critical gaps that remain unaddressed or underfunded, ensuring effective and non-duplicative use of recovery resources.

This assessment therefore builds on the foundation of the County's THIRA-based LMS by incorporating a focused, data-driven and risk-informed hazard identification strategy.

## Risk-Informed Hazard Analysis

A review of NOAA Storm Events data between 2014 and 2024 indicates that severe storms, hurricanes and tropical storms, and tornadoes have been the most frequently recorded natural hazard events in the County, with flooding and storm surge also occurring with notable regularity.

*Table 38 – 10-Year NOAA Storm Event Summary for Manatee County (2014-2024)*

Hazard	Number of Events
Severe Storm	37
Hurricane & Tropical Storm	25
Tornado	14
Flood	11
Storm Surge	6

Source: NOAA Storm Events Database<sup>154</sup>

These natural hazards align with those identified in the County's LMS and THIRA risk assessment. This alignment demonstrates that the frequency-based approach does not diverge from the County's broader risk framework. Rather, it enhances the County's risk prioritization by incorporating recurrence and historical impact – supporting the selection of CDBG-DR mitigation activities in accordance with risk-informed funding guidance.

## Local Hazard Conditions and Vulnerability Overview

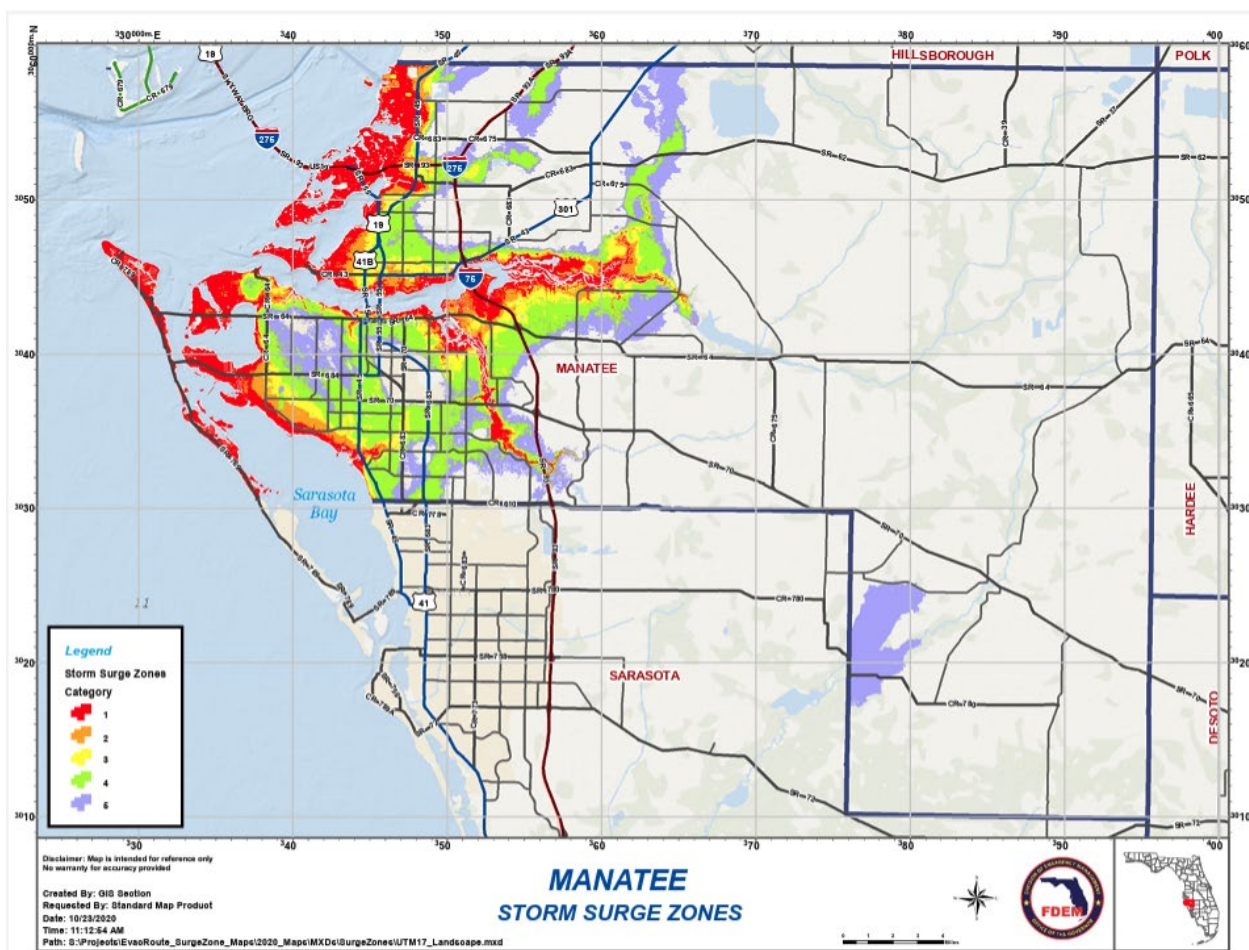
### Hurricanes, Tropical Storms, and Storm Surge

The County's location along Florida's Gulf Coast places it at significant risk for tropical storms and hurricanes, some of the most destructive natural hazards affecting the region. These storms bring a combination of high winds, heavy rainfall, storm surge, and tornadoes,

<sup>154</sup> Source: [Storm Events Database](#). NOAA. 2025.

resulting in severe property damage, power outages, inland and coastal flooding, and long-term economic impacts.

Figure 13 – Manatee County Storm Surge Zones



Source: Florida Division of Emergency Management Disaster Preparedness Maps<sup>155</sup>

Storm surge is one of the most devastating consequences of hurricanes in the County, particularly along the barrier islands and coastal areas. Historic storm surge events have reached up to 19 feet in some areas along the coast, with lower but still significant levels pushing floodwaters inland. In 2024, Hurricane Helene generated a four- to six-foot storm surge, pushing sand inland to depths of three to five feet and eroding the shoreline by 10 to 15 feet.<sup>156</sup> These impacts left entire sections of the coastline vulnerable to future storms, requiring extensive restoration efforts that will take years to complete. Hurricane Milton, which followed weeks later, intensified these conditions, bringing additional flooding and

<sup>155</sup> Source: [Manatee County Disaster Storm Surge Zone Map](#). Florida Division of Emergency Management. 2020.

<sup>156</sup> Source: [Local Mitigation Strategy Plan 2024 Draft Update](#). Manatee County. 2025.

further altering the shoreline. Even in areas farther inland, storm surge flooding has proven to be a serious threat, particularly along riverfront properties, where backflow from heavy rainfall and rising water levels can cause widespread damage to homes and businesses.

Inland flooding is another persistent hazard brought on by tropical storms and hurricanes, with historical rainfall totals nearing 20 inches in a single storm event. Hurricane Debby in 2024 was a prime example, bringing over 18 inches of rain in 24 hours.<sup>157</sup> The heavy downpours overwhelmed drainage systems and led to record-breaking flooding in flood-prone neighborhoods, submerging roads and requiring numerous rescues from stranded vehicles and homes. Even in areas outside of designated flood zones, hurricanes frequently bring excessive rainfall that backs up stormwater infrastructure, leading to prolonged street and property flooding that can take days to subside.

Wind damage from hurricanes varies based on the intensity of the storm, but even lower-category hurricanes and strong tropical storms can cause significant destruction. Hurricane Milton made landfall in 2024 with winds reaching 120 mph,<sup>158</sup> toppling trees, damaging power lines, and tearing roofs off buildings. Many past storms have caused extensive power outages lasting days or even weeks, particularly in inland communities where tree canopies are dense and vulnerable to strong winds. The repeated impacts of hurricanes over the years have reinforced the need for improved wind-resistant construction methods, hardened power infrastructure, and emergency backup systems to sustain essential services during prolonged outages.

## Flooding

Flooding is one of the most frequent and damaging natural hazards affecting the County, caused by hurricanes, tropical systems, storm surge, heavy rainfall, riverine overflow, and inadequate drainage systems. Flooding can impact both coastal and inland areas, with major flood-prone locations including the Manatee River, Little Manatee River, Bowlees Creek, Wares Creek, Terra Ceia Bay, Palma Sola Bay, and Sarasota Bay.

The County has identified four primary types of flooding in the LMS:<sup>159</sup>

1. Short-Duration Flooding: typically caused by intense thunderstorms or frontal systems.
2. Freshwater Flooding: resulting from excessive rainfall during tropical storms or hurricanes.

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<sup>157</sup> Source: [Local Mitigation Strategy Plan 2024 Draft Update](#). Manatee County. 2025.

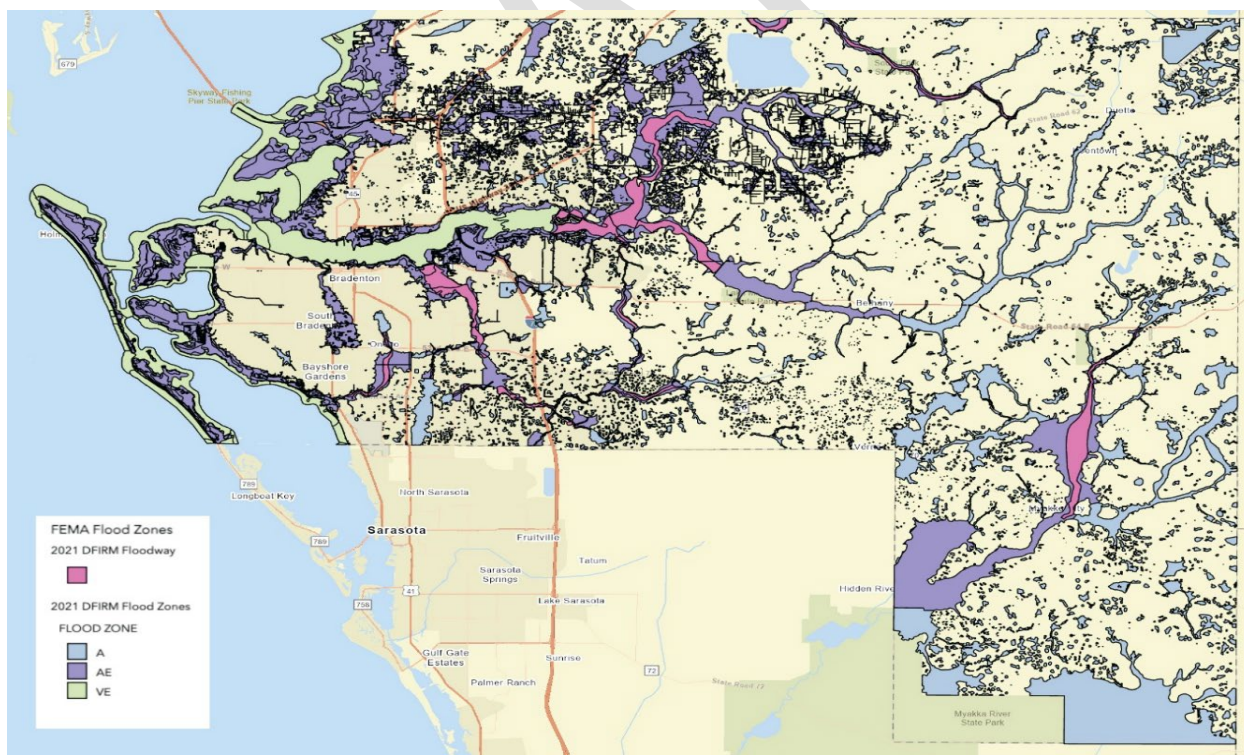
<sup>158</sup> Source: [Local Mitigation Strategy Plan 2024 Draft Update](#). Manatee County. 2025.

<sup>159</sup> Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2020.

3. Drainage Flooding: worsened by alterations to natural flow patterns, a high-water table, and insufficient stormwater infrastructure.
4. Coastal Tidal Flooding: a chronic issue along the County's shoreline, caused by high tides, wind action, and storm surge.

The County is divided into flood zones based on probability and elevation data. High-risk areas (i.e., AE and VE floodplains) experience a one percent annual chance of flooding (i.e., 100-year flood event), while lower-risk areas (i.e., X500 and X zones) face reduced flood probability.<sup>160</sup> Historical flood events highlight the County's vulnerability, including the August 2017 flood, which brought over 23 inches of rain in 24 hours and damaged 130 buildings,<sup>161</sup> and Hurricane Debby in 2024, which produced over 18 inches of rain and caused an estimated \$56 million in damages.<sup>162</sup> As urbanization expands east of I-75, development pressures and aging stormwater infrastructure continue to increase flood risks, making floodplain management and drainage improvements essential for long-term community resilience.<sup>163</sup>

*Figure 14 – Manatee County Flood Hazard Areas*



<sup>160</sup> Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2020.

<sup>161</sup> Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2020.

<sup>162</sup> Source: [Local Mitigation Strategy Plan 2024 Draft Update](#). Manatee County. 2024.

<sup>163</sup> Source: [Local Mitigation Strategy Plan 2024 Draft Update](#). Manatee County. 2024.

## Severe Storms

Severe storms are a frequent and unpredictable hazard in the County, capable of producing damaging winds, hail, lightning, and heavy rainfall. These storms typically develop rapidly and can strike with little warning, leading to property damage, power outages, localized flooding, and direct threats to life and safety. Unlike hurricanes, which have extended lead times for preparation, severe storms can form and intensify within minutes, making them difficult to anticipate and mitigate in real-time.

Hazardous conditions associated with thunderstorms include tornadoes, lightning, hailstorms, downburst and microburst winds, and flooding. Strong downburst – concentrated, straight-line winds driven by sinking air – exists with thunderstorms. They are created by falling rain and sinking air and can have winds that exceed 125 mph. A separate wind phenomenon is the “microburst,” which is comprised of narrowly concentrated downdrafts that can exceed speeds of 150 mph.<sup>165</sup> Lightning occurs in all thunderstorms and can strike anywhere (air and ground).

While hurricanes and tropical storms pose the greatest storm-related threat, severe thunderstorms occur far more frequently and remain a consistent and dangerous hazard for the County. These storms are responsible for crop damage, vehicle losses, structural impacts, and disruptions to transportation and emergency response operations. The combination of high winds, hail, lightning, and flash flooding makes severe storms a complex and recurring risk, requiring continuous monitoring and preparedness efforts to minimize their impact on communities.<sup>166</sup>

## Tornadoes

Tornadoes are a high-intensity, low-frequency hazard in the County, capable of producing destructive winds, structural damage, and life-threatening conditions. While Florida is not part of the traditional “Tornado Alley,” the Tampa Bay area is ranked as one of the most tornado-prone areas in the State, according to the National Weather Service.<sup>167</sup> Tornadoes

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<sup>164</sup> Source: [Manatee County Public and Emergency Management Interactive Map](#). Manatee County. 2025.

<sup>165</sup> Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2020.

<sup>166</sup> Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2020.

<sup>167</sup> Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2020.

in the County are most common from June to August and are often associated with severe thunderstorms and tropical systems, though they can form at any time of year.

Since 1955, the National Climate Data Center has recorded 88 tornadoes in the County. These tornadoes resulted in two deaths, 25 injuries and nearly \$4.25 million in property damage.<sup>168</sup> The probability of an F0/F1 tornado is High in the County with most occurring in June-August.<sup>169</sup> The probability of an F2/F3 tornado is classified as Medium, mostly occurring during tropical storms and hurricanes. Comparatively, the likelihood of F3/F4/F5 tornadoes occurring is classified as Low, according to the National Weather Service.<sup>170</sup>

The entire County is vulnerable to tornadoes, but manufactured and mobile homes, unanchored buildings, and large-span commercial structures are at particularly high risk. Tornadoes generate large amounts of airborne debris, leading to additional damage from flying objects and collapsing structures. As development expands east of I-75, the risk of property damage from tornadoes may increase, particularly in areas with rapid population growth and exposed infrastructure.<sup>171</sup> While tornadoes are typically short-lived and localized, their intense winds and unpredictable formation make them a significant hazard requiring continued monitoring, public education, and preparedness efforts.<sup>172</sup>

## Disaster Impact and Vulnerability

The County has experienced significant natural hazard impacts, revealing vulnerabilities in housing, critical infrastructure, economic activity, and community stability. The 2024 Hurricanes have reinforced the need for proactive mitigation strategies to reduce future risks. However, the impact of these storms does not exist in isolation. The County has a long history of destructive hurricanes, flooding, and infrastructure failures, reinforcing the need to analyze past impacts to guide future mitigation priorities.<sup>173</sup>

The LMS and Debby, Helene, and Milton Post-Hurricanes Session Final Report (2025)<sup>174</sup> offers insight into the County's disaster impacts and ongoing challenges. This section examines both the recent storm impacts and historical disaster trends affecting the County's housing, infrastructure, and economic activity.

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<sup>168</sup> Source: [Local Mitigation Strategy Plan 2024 Draft Update](#). Manatee County. 2024.

<sup>169</sup> Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2020.

<sup>170</sup> Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2020.

<sup>171</sup> Source: [Local Mitigation Strategy Plan 2024 Draft Update](#). Manatee County. 2024.

<sup>172</sup> Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2020.

<sup>173</sup> Source: [Local Mitigation Strategy Plan 2024 Draft Update](#). Manatee County. 2024.

<sup>174</sup> Source: [Debby, Helene, Milton Post-Hurricanes Session: Final Report](#). Tampa Bay Regional Planning Council. 2025.

## Housing

The County's housing sector has historically faced repeated impacts from natural hazards, particularly flooding, high winds, and coastal erosion. As a coastal community, the County is highly vulnerable to heavy rainfall events and storm surge, which have contributed to persistent flooding in low-lying areas. These conditions have led to structural damage, displacement of residents, and long-term economic strain on homeowners and local infrastructure. Additionally, strong winds have compromised roofing systems and weakened building structures, increasing the risk of subsequent damage in future events.<sup>175</sup>

The County's mitigation strategy has evolved to address these recurring challenges by prioritizing resilient construction, floodplain management, and infrastructure improvements. A significant portion of the housing stock is located in areas susceptible to repetitive loss, with 562 repetitive loss properties since 1982.<sup>176</sup> Strategies such as stormwater system enhancements, property elevations, and residential hardening can be implemented to reduce long-term exposure to flooding and high winds.

## Critical Infrastructure

The County's infrastructure has historically faced significant impacts from natural hazards, including flooding, high winds, and coastal erosion. Utilities, drainage systems, roads, and bridges have been repeatedly affected by extreme weather events, leading to disruptions in transportation, utility services, and emergency response capabilities, with subsequent impacts on housing and the economy. Flooding has been particularly challenging, overwhelming stormwater systems and causing prolonged road closures, while high winds have damaged power lines and critical facilities, resulting in extended outages and costly repairs. The County's coastal infrastructure remains vulnerable to erosion and storm surge, threatening public assets and requiring ongoing mitigation efforts.<sup>177</sup>

To address these challenges, the County has implemented a range of mitigation strategies focused on strengthening infrastructure resilience. Investments in stormwater management, and hardened utility systems aim to reduce vulnerabilities and improve recovery times following disasters. The County has also prioritized flood mitigation projects, including improved drainage infrastructure and the elevation of critical assets, to reduce the risk of service disruptions. Recognizing the increasing risks posed by disasters, as well as the

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<sup>175</sup> Source: [Local Mitigation Strategy Plan 2024 Draft Update](#). Manatee County. 2024.

<sup>176</sup> Source: [FEMA NFIP Multiple Loss Properties – v1](#). FEMA. 2024.

<sup>177</sup> Sources: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2024.

downstream benefits of resilient infrastructure to safeguard housing, the County continues to integrate mitigation into its infrastructure development.<sup>178</sup>

## Economic Activity

The County's economy has historically been vulnerable to natural disasters, with impacts most pronounced in key sectors such as tourism, agriculture, retail, and infrastructure-dependent industries. Severe weather events, particularly flooding and high winds, have led to widespread business closures, disruptions in supply chains, and loss of revenue for small businesses. The County's reliance on tourism has made it particularly susceptible to economic downturns following disasters, as prolonged recovery periods and damage to coastal attractions often result in decreased visitor numbers and revenue losses for local businesses.

In addition to direct damages, disasters have impacted low-income residents and small business owners, creating additional economic challenges for recovery and long-term stability. Flooded commercial areas, damaged infrastructure, and power outages have contributed to job losses and temporary business shutdowns, disproportionately affecting communities with fewer financial resources to recover. A significant portion of the County's businesses and workforce are located in high-risk areas, making it critical to implement mitigation measures that reduce economic disruption. As part of its mitigation strategy, the County has focused on strengthening commercial resilience through hazard mitigation planning, business continuity programs, and infrastructure improvements aimed at reducing future losses.<sup>179</sup>

## Community Displacement

The County has experienced significant community displacement due to natural disasters, particularly in high-risk areas prone to flooding, storm surge, and coastal erosion. A considerable portion of the population resides in locations vulnerable to extreme weather events, with approximately 7.7 percent of the County's housing units situated in high-hazard areas.<sup>180</sup>

The County has recognized the impacts of displacement, noting that renters and lower-income households are more likely to experience long-term housing instability after a

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<sup>178</sup> Sources: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2024.

<sup>179</sup> Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2024.

<sup>180</sup> Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2020.

disaster. The influx of new developments in flood-prone areas has further strained infrastructure and increased susceptibility to displacement. To address these risks, the County has prioritized mitigation efforts such as enhancing flood resilience serving residential areas, improving evacuation planning, and supporting buyout programs for repetitive loss properties when cost effective.<sup>181</sup> These initiatives aim to reduce the frequency and severity of displacement while fostering a more resilient and sustainable community.

## Mitigation Strategies

Effective mitigation strategies are critical to reducing the impacts of recurring natural hazards. The strategies identified in *Table 39* address Hurricanes and Tropical Storms, Flooding, Severe Storms, Tornadoes, and Storm Surge, ensuring a uniform approach to risk reduction and community resilience. Each strategy supports LMS goals and provides a framework that informs the County's utilization of CDBG-DR funds. It is important to note that *Table 39* does not represent an all-inclusive list of mitigation strategies to address the risks identified in this MNA.

*Table 39 – Hazard-Specific Mitigation Strategies for Risk Reduction*

Hazard	Category	Mitigation Strategy
Hurricane & Tropical Storm	Structural Mitigation	Reinforce critical infrastructure (e.g., shelters, hospitals); implement wind-resistant construction per Florida Building Code; upgrade stormwater systems; elevate/floodproof buildings in risk zones.
	Community Resilience & Preparedness	Improve evacuation routes; expand shelters outside flood zones; promote retrofitting and public education.
Flooding	Coastal & Floodplain Management	Preserve natural barriers (dunes, wetlands); build seawalls/surge barriers; restrict floodplain development.
	Infrastructure & Land Use Planning	Update floodplain maps; enhance stormwater systems; enforce elevation/floodproofing standards.
	Community-Based Flood Mitigation	Support voluntary buyouts in repetitive loss areas; conduct flood risk outreach; promote NFIP participation.
Severe Storms	Structural Hardening	Install lightning protection systems; use impact-resistant roofing/windows; manage trees to reduce debris.

<sup>181</sup> Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County, 2020.

Hazard	Category	Mitigation Strategy
Tornadoes	Emergency Preparedness & Response	Enhance early warning systems; retrofit public shelters; educate public on storm prep and safety.
	Building & Infrastructure Resilience	Build safe rooms/shelters; adopt enhanced wind-load codes; harden electrical grid to withstand wind events.
	Community Preparedness & Response	Expand siren/mobile alerts; educate on tornado safety; enforce zoning setbacks in high-risk areas.
Storm Surge	Land Use & Zoning	Limit development in Coastal High Hazard Areas; apply setbacks and Adaptation Action Areas.
	Structural Mitigation	Elevate roads and shelters in surge zones; retrofit critical facilities; construct protective seawalls.
	Natural & Green Infrastructure	Preserve dunes, wetlands, and mangroves to buffer surge impacts; support beach re-nourishment efforts.

Source: *Local Mitigation Strategy Plan 2019 Update*<sup>182</sup>

The County's risk-based assessment directly informs the prioritization and selection of CDBG-DR-funded mitigation activities by identifying hazards with the highest likelihood, severity, and potential impact. In addition to CDBG-DR resources, the County actively evaluates and leverages other available funding sources to address unmet mitigation needs, in accordance with HUD's Revised Universal Notice requirement to ensure the non-duplication of benefits.

Many of these mitigation efforts can be achieved through existing Federal and State grant programs, such as FEMA's Hazard Mitigation Grant Program (HMGP), CDBG-DR, and Flood Mitigation Assistance (FMA). The LMS provides guidance on identifying and securing funding sources for these projects, ensuring that mitigation initiatives are both feasible and sustainable.

## Mitigation Needs Assessment

The County's investment in CDBG-DR activities will integrate preparedness and mitigation measures into the project design. The County will develop program guidelines that require hazard mitigation measures to be integrated into CDBG-DR programs, projects, and activities where cost-effective risk reduction can be achieved. Activities funded by the CDBG-DR mitigation set-aside do not require disaster tie-back; however, they must:

<sup>182</sup> Source: *Local Mitigation Strategy Plan 2019 Update*. Manatee County. 2020.

- Be an eligible CDBG activity;
- Meet a National Objective under the CDBG program; and
- Address current or future risks identified in the FEMA approved HMP

The County's CDBG-DR allocation includes a required set-aside of \$32,962,000 for mitigation activities. Mitigation activities are defined by HUD as those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters. The County will continue to coordinate and collaborate on mitigation activities for the Action Plan and subsequent substantial amendments to the Plan with internal and external stakeholders.

## FEMA Hazard Mitigation Grant Program Projects

The County received allocations of FEMA HMGP funding through FDEM for the 2024 Hurricanes. *Table 40* provides the estimated Federal and non-Federal cost share amounts for the HMGP funding allocated for the three disasters. HMGP requires a 25 percent match for all awarded projects. Due to the significant costs of recovering from three consecutive disasters, the County and municipalities may need assistance meeting the match requirements for these projects. The use of funds to fulfill match requirements for CDBG-DR eligible activities is authorized in accordance with the Revised Universal Notice.

*Table 40 – Cumulative HMGP Allocation and Related Unmet Need*

Disasters	Estimated Total HMGP Project Cost (Federal and Non-Federal Share)	Estimated Federal Cost Share (75%)	Estimated Non-Federal Cost Share (25%)
Hurricane Debby, Hurricane Helene, Hurricane Milton	\$195,313,675.40	\$146,485,256.55	\$48,828,418.85

Source: FDEM Notices of Funding Availability, DR-4806, DR-4828, and DR-4834

## Mitigation Unmet Need

*Table 41* reflects the total unmet need related to Mitigation based on the estimated non-Federal cost share of the HMGP funds available to the County and mitigation projects related to housing and infrastructure collected by the County during the consultation process.

*Table 41 – CDBG-DR Mitigation Set-Aside Needs Assessment*

Categories Affected	Total Need (A)	Financial Assistance Budgeted and Available (B)	Unmet Need (A-B)
Infrastructure	\$127,249,190.76	\$0	\$127,249,190.76
HMGP	\$195,313,675.40	\$146,485,256.55	\$48,828,418.85
<b>Total</b>	<b>\$322,562,866.16</b>	<b>\$146,485,256.55</b>	<b>\$176,077,609.61</b>

# Connection Between Proposed Programs and Projects to Unmet Needs and Mitigation Needs

The County experienced widespread damage to housing, infrastructure, and the economy as a result of 2024 Hurricanes. The UNA identified the greatest concentration of unmet need in the infrastructure sector, which accounts for approximately 59 percent of the total unmet needs. While housing needs remain significant, the data highlights the extensive damage to infrastructure systems – particularly in residential areas where essential services such as drainage and utility systems were disrupted. The scale of unmet need and the interdependency between systems informs the County's program design and funding priorities.

To facilitate resilient and comprehensive recovery, the County developed a strategy that integrates housing, infrastructure, and mitigation investments to directly address documented unmet needs. Recognizing that housing recovery is contingent upon the restoration and resilience of supporting infrastructure systems, the County will place a focus on infrastructure projects that enable the safe repair, redevelopment, and future protection of homes – particularly those occupied by LMI households.

As detailed in the UNA, the 2024 Hurricanes produced severe rainfall and flooding, with Debby bringing over 18 inches of rain, causing waterways to rise by more than 20 feet and the Lake Manatee reservoir to swell to 18 billion gallons – exceeding its 6-billion-gallon capacity. Hurricane Helene produced significant storm surge along the Gulf Coast, contributing to widespread inundation in low-lying coastal and riverine communities within the County. Hurricane Milton followed with an additional 13 inches of rain, further straining stormwater and sewer systems that support residential areas. These infrastructure failures directly contributed to direct housing damage, prolonged displacement, and delays in response and recovery services.

To address these needs, the County will implement the Home Recovery Program (HRP) and Rental Recovery Program (RRP), which will provide assistance to LMI households for the rehabilitation, reconstruction, and elevation of storm-damaged homes. The County will also implement a separate Buyout and Safe Housing (BSH) Program to buy out high-risk properties at pre-disaster fair market value (FMV) and support relocation to safer areas

through financial incentives and permanent land conversion to open space. Recognizing that 55.78 percent of FEMA IA applicants in the County reside in single-family homes or duplexes, many which are located in areas where infrastructure failures limit habitability and access, the County's housing recovery efforts will be supported by significant infrastructure investments.

The Infrastructure Recovery and Resiliency Program (IRRP) will fund the restoration and hardening of public systems that support housing stability, including stormwater systems, water/sewer utilities, and other essential infrastructure. IRRP projects will reduce risk and enable housing recovery, particularly in neighborhoods with high levels of unmet housing need, repeated flood loss, or prolonged infrastructure disruption. Eligible activities may include stormwater capacity upgrades, utility system reinforcement, public facility improvements, and other projects that directly mitigate damage to homes and facilities or restore access and services to residential areas. On May 6, 2025, the Manatee County Board of County Commissioners (BCC) approved a framework to establish allocations of IRRP funds to each municipality and unincorporated County based on population. While the allocations were determined by population size, this method aligns with areas that also have higher concentrations of LMI populations, supporting the implementation of activities with LMI benefit.

To leverage outside resources, the County will also implement the Infrastructure Match Program, which will provide CDBG-DR funds to satisfy non-Federal cost share requirements for FEMA PA, HMGP, and other eligible infrastructure investments. Many FEMA-eligible infrastructure projects – such as those involving drainage and public utilities – are essential to rebuilding housing and restoring safe, functional communities.

Property acquisition will be allowed as a supporting eligible activity under the planned programs, where necessary to implement infrastructure improvements or mitigation measures. In cases where acquisition or construction activities result in involuntary displacement, the County will comply with all applicable provisions of the Uniform Relocation Assistance and Real Property Acquisition Act (URA) and implement a Residential Anti-Displacement and Relocation Assistance Plan (RARAP).

To minimize the displacement of persons and other entities that may be affected by the activities outlined in this Action Plan, the County will coordinate with all subrecipients, vendors, and County departments to minimize displacement. The County will plan and implement programs that minimize, whenever possible, the displacement of individuals and families. To lessen the adverse impacts of any displacement that may occur, the County will

provide relocation activities as described in 24 CFR 42, 24 CFR 570.606, and 49 CFR 24.2(d)(1) through (6). If an identified project results in owner occupants or tenants leaving their homes involuntarily (being displaced), the tenants may be eligible for Relocation Assistance under the URA. These requirements apply to the relocation of any displaced person as defined at 49 CFR 24.2(a)(9). Displaced persons under this definition must be fully informed about their right and entitlement to relocation assistance and payments provided by the URA and its implementing regulations. The County and its subrecipients will adhere to all requirements in 49 CFR 24.

The County does not propose specific programs to fund economic revitalization and public services with CDBG-DR funds given the size of the allocation and competing demand for housing and infrastructure activities.

The County's proposed programs are a direct response to the unmet needs identified in the UNA. Funding allocations for housing, infrastructure, and mitigation are closely coordinated to ensure that homes are not only repaired, but that the systems those homes depend on are restored and strengthened. By aligning infrastructure and mitigation activities with areas of highest housing need, the County will promote a more resilient recovery, reduce risk, and enable long-term housing stability.

## Allocation and Award Caps

*Table 42 – CDBG-DR Program Allocation and Funding Thresholds*

Program	Description	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration (5% cap)	Administrative costs associated with the life of the grant.	\$12,635,000	5%
Home Recovery Program	Rehabilitation, reconstruction, replacement, and/or elevation of owner-occupied homes.	\$75,556,000	29.90%
Rental Recovery Program	Rehabilitation, reconstruction, and/or elevation of rental units.	\$20,000,000	7.91%
Buyout and Safe Housing Program	Home buyouts in repetitive loss and flood-prone areas.	\$12,000,000	4.75%
Infrastructure Recovery and Resiliency Program	Repair, replacement, or improvement of infrastructure and facilities. Mitigation funds will be	\$125,000,000	49.46%

Program	Description	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
	used for projects without a direct tie to the 2024 Hurricanes.		
Infrastructure Match Program	CDBG-DR funds will be used to satisfy the non-Federal cost share requirement for infrastructure projects.	\$5,000,000	1.98%
Planning (15% cap)	Support the development of the Action Plan, UNA, and completion of planning activities in support of CDBG-DR funded recovery activities.	\$2,520,000	1%
<b>Total:</b>		<b>\$252,711,000</b>	<b>100%</b>
<b>Funds that have not been allocated:</b>		<b>\$0</b>	<b>0%</b>

# Funding Criteria

## Pre-Agreement Costs

The County has prepared and submitted to HUD an Action Plan for Administrative Costs (“Administrative Action Plan”) as authorized under section 1.B. of the Revised Universal Notice. Assuming HUD’s approval of the Administrative Action Plan, the County will use CDBG-DR to address various administrative costs associated with establishment of the CDBG-DR program, including pre-agreement costs as outlined in that plan. Such costs may include the salaries, benefits, and direct operating expenses incurred by the Lasting Manatee team and the vendors providing technical support for the planning of the CDBG-DR programs.

In accordance with III.B.14 of the Revised Universal Notice, the County will seek reimbursement of program-related pre-agreement costs incurred on or after August 10, 2024, the date of the Presidential disaster declaration associated with Hurricane Debby, which also encompasses the subsequent impacts of Hurricanes Helene and Milton. Reimbursable costs must be necessary, reasonable, and consistent with the activities outlined in this Action Plan. These costs may include environmental reviews, damage assessments, policies and procedure development, and other eligible costs required to establish program operations and determine activity eligibility. The County may also seek

reimbursement for eligible activity delivery and project costs associated with the programs identified in this Action Plan.

## General Exception Criteria

Exceptions to maximum award amounts will be based on criteria identified in program policies, such as physical accessibility and accommodation requests under various Federal laws or measures to address program recognized environmental conditions which can be addressed through construction measures necessary to mitigate the consequences of those conditions. The County will establish policies and procedures for applicants to apply for an exception. All exceptions to maximum award limitations are subject to the availability of CDBG-DR funds.

## Administration

*Table 43 – Grantee Administration Activity Overview*

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration Total	\$12,635,500	5%
<b>Total</b>	<b>\$12,635,000</b>	<b>5%</b>

The County submitted an Administrative Action Plan, pursuant to section I.B. of the Revised Universal Notice, requesting \$2,527,000, or approximately 20 percent of the overall amount available for administration under the County's CDBG-DR grant. Administrative funds received via the Administrative Action Plan were used for staff time, Action Plan development, CDBG-DR program design, and other eligible activities related to the development, oversight, and management of CDBG-DR funds.

The County will, overall, utilize \$12,635,000 of the total CDBG-DR award for administrative costs associated with the life of the grant. This represents the maximum amount permissible for administrative costs per the CDBG-DR appropriation language of Public Law 118-158 and HUD's requirements under the Revised Universal Notice. The County may seek to recover pre-award and/or pre-applications costs related to administrative expenses consistent with the guidance provided by III.B.14. of the Revised Universal Notice. Such costs may be incurred back to the date of the presidential disaster declaration dates (August 10, 2024, for DR-4806; September 28, 2024, for DR-4828; and October 11, 2024, for DR-4834).

# Planning

To the extent possible, Planning will support the development of the Action Plan, UNA, and completion of planning costs in support of CDBG-DR funded recovery activities.

*Table 44 – Grantee Planning Activity Overview*

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Planning	\$2,520,000	1%
<b>Total</b>	<b>\$2,520,000</b>	<b>1%</b>

# Housing

The County proposes implementing the following housing programs to address housing damage caused by the 2024 Hurricanes. The programs will address needs across the housing spectrum, specifically the homeowner and small rental segments, prioritizing LMI households. To the extent that special-needs assistance housing has been impacted by the storms, those units may also be eligible for assistance for reconstruction and repair funding.

## Housing Programs Overview

*Table 45 – Grantee Housing Programs Overview*

Eligible Cost Category	CDBG-DR Allocation Amount	Percent of CDBG-DR Allocation
Home Recovery Program	\$75,556,000	29.90%
Rental Recovery Program	\$20,000,000	7.91%
Buyout and Safe Housing	\$12,000,000	4.75%
<b>TOTAL</b>	<b>\$107,556,000</b>	<b>42.56%</b>

## Grantee Program #1: Home Recovery Program (HRP)

*Table 46 – Home Recovery Program Details*

Program Title	Home Recovery Program
<b>Total Budget/CDBG-DR Allocation</b>	<ul style="list-style-type: none"> <li>\$75,556,000</li> </ul>
<b>Eligible Activities</b>	<ul style="list-style-type: none"> <li>\$5305(a)(1) – Acquisition</li> <li>\$5305(a)(3) – Code Enforcement</li> </ul>

Program Title	Home Recovery Program
Referenced to Title I of Housing and Community Development Act of 1974 (42 USC 5305(a)) or HUD Revised Universal Notice	<ul style="list-style-type: none"> <li>• §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing</li> <li>• §5305(a)(5) – Removal of Architectural Barriers</li> <li>• §5305(a)(7) – Disposition</li> <li>• §5305(a)(8) – Public Services</li> <li>• §5305(a)(9) – Non-Federal Match</li> <li>• §5305(a)(11) – Relocation Payments</li> <li>• §5305(a)(13) – General Administrative and Planning Activities</li> <li>• §5305(a)(14) – Assistance to Non-Profit Entities</li> <li>• §5305(a)(15) – Assistance to Neighborhood-Based Organizations</li> <li>• §5305(a)(20) – Housing Services</li> <li>• §5305(a)(24) – Direct Assistance for Homeownership Activities</li> <li>• §5305(a)(25) – Tornado Shelters</li> <li>• §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction</li> <li>• FR Notice – New Housing Construction (as modified by HUD guidance)</li> <li>• FR Notice – Mitigation (consistent with CDBG-DR Mitigation requirements under the Revised Universal Notice)</li> </ul>
<b>National Objective(s) -</b> Referenced to 24 CFR 570, Subpart C and/or HUD Revised Universal Notice	<ul style="list-style-type: none"> <li>• LMI Benefit through Housing - 24 CFR 570.208(a)(3)</li> <li>• Urgent Need (UN) - 24 CFR 570.208(c)</li> </ul>
<b>Lead Agency and Method of Distribution</b>	<ul style="list-style-type: none"> <li>• The Grants Administration Division within the Government Relations Department of Manatee County will serve as the lead agency responsible for program administration. The County will manage the program with contractor support and, as the Responsible Entity, will undertake all necessary environmental reviews in accordance with 24 CFR Part 58.</li> <li>• Distribution of funds will occur through direct implementation. The County will invite contractors to submit information to participate in the HRP and will conduct a baseline screen for each contractor's eligibility to participate in the program. Homeowners will have the option of selecting a contractor that has been screened by the County. The County will pay contractors directly for eligible repair, reconstruction, replacement, or elevation work performed under the HRP. Homeowners will submit applications to the County to apply for assistance.</li> </ul>
<b>Program Description</b>	<ul style="list-style-type: none"> <li>• The HRP will provide direct assistance to eligible owner-occupants whose primary residences were damaged or destroyed by the 2024 Hurricanes. The</li> </ul>

Program Title	Home Recovery Program
	program will support the rehabilitation (repairs), reconstruction (rebuilding), and elevation of homes to restore safe housing for LMI households. Contractors will be screened by the County and homeowners will choose a participating contractor. Contractors will be paid directly by the program.
Eligible Geographic Area	<ul style="list-style-type: none"> <li>Eligible area is the entirety of Manatee County, FL.</li> </ul>
Other Eligibility Criteria	<ul style="list-style-type: none"> <li>Application intake will be phased based on household income level, beginning with households at or below 50% of AMI.</li> </ul>
Maximum Amount of Assistance per Beneficiary	<ul style="list-style-type: none"> <li>Rehabilitation: Up to \$250,000.</li> <li>Reconstruction and/or Elevation: Up to \$450,000.</li> </ul>
Maximum Income of Beneficiary	<ul style="list-style-type: none"> <li>Households at or below 80% of AMI will be prioritized. Assistance provided to households between 80% and 120% of AMI is dependent on the availability of funds.</li> </ul>
Mitigation Measures	<ul style="list-style-type: none"> <li>Mitigation and residential hardening will be key components of rehabilitation and reconstruction efforts. Elevation of properties will be eligible as mitigation and other property-specific measures.</li> </ul>
Reducing Impediments to Assistance	<ul style="list-style-type: none"> <li>Case management services will be provided to applicants. Housing counseling and certain legal services will also be available. The staged application process and related outreach will include a focus on low-income households.</li> </ul>

To address the housing recovery needs of homeowners in the County after the 2024 Hurricanes, the County will implement the Home Recovery Program (HRP). The HRP will prioritize eligible applicants based on income, age, and disability status.

The funds allocated for this program will be used to rehabilitate (repair), reconstruct (rebuild), and/or elevate single-family, owner-occupied homes that were damaged by the 2024 Hurricanes. All rehabilitated, reconstructed, or elevated housing units must include disaster resilience measures to promote better outcomes during major storms. Activities funded by this program include, but are not limited to:

- Rehabilitating/repairing existing structures, including substantial rehabilitation to bring the property up to local codes and standards;
- Reconstructing/rebuilding seriously damaged or destroyed units;
- Replacement of manufactured housing units or similar units; and
- Demolishing and re-building a unit in substantially the same manner, including elevating homes which are substantially damaged in special flood hazard areas.

The County may utilize CDBG-DR funds to satisfy the 25 percent non-Federal cost share for eligible HRP applicants receiving elevation assistance via the Florida Division of Emergency Management (FDEM) Elevate Florida Program. Applicants receiving elevation assistance via Elevate Florida may be eligible for rehabilitation assistance if all eligibility requirements of the HRP are met.

For this program, the County will be the Responsible Entity and will carry out the environmental review procedures under 24 CFR 58.

### **Homeowner Eligibility Criteria**

- Meet applicable income eligibility guidelines.
- Primary residences only – second homes or rental units not eligible.
- Owned and occupied the damaged property at the time of 2024 Hurricanes and still own the damaged home.
- Must be able to demonstrate compliance with Federal requirement to obtain and maintain flood insurance, where required, if unit previously received Federal disaster assistance.

### **Program Requirements**

Homeowners must agree to occupy the property as their principal residence, maintain a homestead exemption, and maintain required insurance coverage. Insurance requirements include:

- Applicants must agree to obtain and maintain homeowners' insurance on the assisted property through the duration of the forgivable loan.
- Applicants living in a Special Flood Hazard Area (SFHA) who receive Federal assistance under this program must comply with Federal requirement to obtain and maintain flood insurance (through NFIP).

For all HRP activities (including homeowners receiving reimbursement) using CDBG-DR funds, a mortgage and promissory note will be executed and recorded in Manatee County, Florida's, official records before or at the time of completion. If the property remains a primary homesteaded residence for five (5) years, the mortgage will be satisfied and not require repayment. However, if the property is sold, transferred, leased, refinanced, or not owner-occupied during this period, the prorated balance of the mortgage (amortized at 20 percent per year) will become due. Requests for subordination will be evaluated individually. Properties will be monitored annually during the mortgage term, which may include random site checks to ensure they remain owner-occupied.

## **Manufactured Housing Units (MHUs)**

Damaged MHUs that were part of the County's permanent housing stock at the time of the 2024 Hurricanes may be eligible for assistance using CDBG-DR funds, in accordance with HUD Notice CPD-2023-10. MHUs located within the Special Flood Hazard Area (SFHA) will be considered for buyout assistance through the Buyout and Safe Housing Program to reduce future flood risk and support long-term resilience. MHUs located outside of the SFHA that sustained storm-related damage may be eligible for rehabilitation or replacement, subject to a determination based on factors including, but not limited to, cost reasonableness, feasibility of repair, extent of damage, and compliance with program standards. Specific thresholds and criteria for replacement will be detailed in the program's policies and procedures. Assistance does not include land acquisition.

## **Application, Awards, and Contractor Choice**

The County will prioritize very low- and low-income households, with the greatest prioritization for households with incomes at or below 50 percent of AMI. Secondary criteria include households with members aged 62 and older, children under 18, or individuals with physical accessibility needs or disabilities. Applications from households with incomes between 80 percent and 120 percent of AMI will be accepted in Phase IV only after the County has addressed the needs of LMI persons. Households with incomes above 120 percent of AMI are ineligible for assistance under this program.

The County shall procure an implementation contractor to assist with the HRP and intake centers for applicants. This contractor will focus on outreach and program accessibility. Together, they will develop a comprehensive outreach campaign and provide services to ensure eligible households can apply. All information provided by applicants will be verified by the County or its contractor.

The County will provide a pre-construction inspection to verify disaster tieback and prepare a preliminary scope of work. HRP awards will be scaled based on the cost of repair and may include funding for mitigation and resilience actions, such as elevating and hardening, to reduce risks and protect public investment in assisted units. Furthermore, to reduce the impacts of future disasters on LMI homeowners, the County may allocate significant portions of program funding to mitigation actions.

To provide homeowners with the flexibility to select contractors to complete necessary rehabilitation, reconstruction, and/or elevation of their home, the County will invite contractors to submit information to participate in the HRP and will conduct a baseline

screen for each contractor's eligibility to participate in the program. This process would not be an endorsement or recommendation of any contractor but would produce a list of contractors who have an identifiable track record of work in Manatee and surrounding counties and meet all necessary requirements. As the County is statutorily required to have and enforce policies that minimize waste, fraud, and abuse, the County will implement this process to protect both homeowners and public funds.

Homeowners will then have the option of selecting a contractor that has been screened by the County to complete the work. In limited circumstances, a homeowner may ask the County to screen a contractor not otherwise involved in the HRP and the County will develop policies to outline those circumstances for implementation. The program will verify that all work has been completed prior to issuing payment directly to the contractor. Homeowners must enter into agreements with the County outlining the program's terms and conditions.

The County's approach to mitigation for the HRP aligns with Section III.D.4. of the Revised Universal Notice, which defines mitigation activities as "those that increase disasters and reduce or eliminate the long-term risk of loss of life, injury, or damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters." Construction standards will adhere to all applicable State and County code and with HUD's standards stated in the Revised Universal Notice governing all residential building reconstruction.

Housing units assisted through the HRP must benefit LMI persons or meet Urgent Need (UN) criteria as outlined in 24 CFR 570.208(a)(3) and 24 CFR 570.208(c), respectively, and modified by the Revised Universal Notice. While the HRP will primarily serve LMI households, the County may serve households above 80 percent of AMI under the Urgent Need National Objective after LMI housing needs have been substantially addressed, and only where clear and documented unmet housing need exists resulting from the 2024 Hurricanes. This may include cases involving individuals with disabilities, elderly homeowners, or other special circumstances that present impediments to recovery despite income. The County may evaluate the use of Neighborhood Revitalization Strategy Area (NRSA) designation to enhance LMI targeting for delivery.

All housing activities will address unmet needs in the HUD-identified MID (Manatee County) and will require all participants to demonstrate that damage to the home can be tied back to the 2024 Hurricanes. Recognizing that HRP funds may not cover all needs, the priority will be to ensure that at least 70 percent of HRP funds will be expended for activities that meet the criteria for the LMI Housing National Objective.

The following provides the phases of award that be utilized by the County:

*Table 47 – Application Phasing Criteria for HRP Applicants*

Application Phase		Phase I	Phase II	Phase III	Phase IV
Household Income	50% of AMI and Below	✓			
	Between 51% and 80% of AMI		✓	✓	
	Between 80% and 120% of AMI*				✓
Household Member(s) Under 18, Over 62, and/or with a Disability	Yes		✓		
	No			✓	

\* Applications from households with incomes between 80 percent and 120 percent of AMI will be accepted in Phase IV only after all eligible households at or below 80 percent of AMI have been assisted.

The County will monitor the application portal and may halt or delay accepting new applicants until prioritized households are fully processed.

### Duplication of Benefits / Second Homes and Vacation Residences

A review of potential duplication of benefits (DOB) is necessary for all CDBG-DR funded activities to ensure the assistance supplements other resources. Applicants must provide information on all recovery assistance received, as required by the Stafford Act. The County will issue guidance for the DOB process, available on its disaster recovery website and any duplicative funds will be deducted from the CDBG-DR award.

The Revised Universal Notice defines second homes as a home that is not the primary residence of the owner, a tenant, or any occupant at the time of the disaster or at the time of application for CDBG-DR assistance. Second homes, vacation residences, and short-term, seasonal, and vacation rental properties are not eligible for assistance under the HRP. Applicants who purchased or moved into a damaged property after the FEMA disaster declaration date for the hurricane that caused damage are also ineligible.

**The funds awarded under the HRP may not be used for the following actions:**

- Forced mortgage payoffs.
- Compensation payments.
- Temporary housing assistance benefits, including mortgage and rental assistance.
- Reconstruction of housing units in a [designated floodway](#).

- Assistance for those who fail to demonstrate compliance with Federal requirement to obtain and maintain flood insurance, where required, if unit previously received Federal disaster assistance.

The County will develop comprehensive operating policies and procedures for the HRP to clarify the points mentioned and provide working guidance for implementation of the program.

## Grantee Program #2: Rental Recovery Program (RRP)

*Table 48 – Rental Recovery Program Details*

Program Title	Rental Recovery Program
<b>Total Budget/CDBG-DR Allocation</b>	<ul style="list-style-type: none"> <li>• \$20,000,000</li> </ul>
<b>Eligible Activities</b> Referenced to Title I of Housing and Community Development Act of 1974 (42 USC 5305(a)) or HUD Revised Universal Notice	<ul style="list-style-type: none"> <li>• §5305(a)(1) – Acquisition</li> <li>• §5305(a)(3) – Code Enforcement</li> <li>• §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing</li> <li>• §5305(a)(5) – Removal of Architectural Barriers</li> <li>• §5305(a)(7) – Disposition</li> <li>• §5305(a)(8) – Public Services</li> <li>• §5305(a)(9) – Non-Federal Match</li> <li>• §5305(a)(11) – Relocation Payments</li> <li>• §5305(a)(13) – General Administrative and Planning Activities</li> <li>• §5305(a)(14) – Assistance to Non-Profit Entities</li> <li>• §5305(a)(15) – Assistance to Neighborhood-Based Organizations</li> <li>• §5305(a)(20) – Housing Services</li> <li>• §5305(a)(25) – Tornado Shelters</li> <li>• §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction</li> <li>• FR Notice – New Housing Construction (as modified by HUD guidance)</li> <li>• FR Notice – Mitigation (consistent with CDBG-DR Mitigation requirements under the Revised Universal Notice)</li> </ul>
<b>National Objective(s)</b> Referenced to 24 CFR 570, Subpart C and/or	<ul style="list-style-type: none"> <li>• LMI Benefit through Housing - 24 CFR 570.208(a)(3)</li> </ul>

Program Title	Rental Recovery Program
HUD Revised Universal Notice	
Lead Agency and Method of Distribution	<ul style="list-style-type: none"> <li>The Grants Administration Division within the Government Relations Department of Manatee County will serve as the lead agency responsible for program administration. The County will manage the program with contractor support and, as the Responsible Entity, will undertake all necessary environmental reviews in accordance with 24 CFR Part 58.</li> <li>Distribution of funds will occur through direct implementation. The County will invite contractors to submit information to participate in the RRP and will conduct a baseline screen for each contractor's eligibility to participate in the program. Property owners will have the option of selecting a contractor that has been screened by the County. The County will pay contractors directly for eligible repair, reconstruction, replacement, or elevation work performed under the RRP. Property owners will submit applications to the County to apply for assistance.</li> </ul>
Program Description	<ul style="list-style-type: none"> <li>The RRP will provide direct assistance to eligible property owners, including the Manatee County Housing Authority (MCHA) and Housing Authority of the City of Bradenton (HACB), whose rental properties were damaged or destroyed by the 2024 Hurricanes. The property owner must agree to lease all assisted units in the property at a rent affordable to a tenant with an income at or below 80% of AMI. Rehabilitated units are required to maintain that condition for ten (10) years; reconstructed units are required to maintain that condition for twenty (20) years. Affordable rents will not exceed <a href="#">HOME Fair Market Rents</a>; however, the County may impose lower rent limits for assisted units.</li> <li>Contractors will be screened by the County and property owners will choose a contractor. Contractors will be paid directly by the program.</li> </ul>
Eligible Geographic Area	<ul style="list-style-type: none"> <li>Eligible area is the entirety of Manatee County, FL.</li> </ul>
Other Eligibility Criteria	<ul style="list-style-type: none"> <li>Assistance is limited to rental properties with seven (7) or fewer units that were damaged by the 2024 Hurricanes.</li> <li>The property owner must agree to lease all assisted units in the property at a rent affordable to a tenant with an income at or below 80% of AMI. Rehabilitated units are required to maintain that condition for ten (10) years; reconstructed units are required to maintain that condition for twenty (20) years.</li> <li>LMI tenants occupying assisted units must prove Florida residency.</li> </ul>
Maximum Amount of Assistance per Beneficiary	<ul style="list-style-type: none"> <li>Property Owners: <ul style="list-style-type: none"> <li>Rehabilitation: Up to \$250,000 per unit.</li> <li>Reconstruction and/ or Elevation: Up to \$425,000 per unit.</li> </ul> </li> </ul>

<b>Program Title</b>	<b>Rental Recovery Program</b>
	<ul style="list-style-type: none"> <li>Public Housing Authorities: Up to \$1,000,000 total</li> </ul>
<b>Maximum Income of Beneficiary</b>	<ul style="list-style-type: none"> <li>Property owner must lease all assisted units to households at or below 80% of AMI.</li> <li>There are no income limits for property owners.</li> </ul>
<b>Mitigation Measures</b>	<ul style="list-style-type: none"> <li>Mitigation and residential hardening will be key components of rehabilitation and reconstruction efforts. Elevation of properties will be eligible as mitigation and other property-specific measures.</li> </ul>
<b>Reducing Impediments to Assistance</b>	<ul style="list-style-type: none"> <li>The County will implement streamlined intake and eligibility processes, provide application assistance, accept multiple forms of ownership and income documentation where appropriate, and offer clear guidance on program requirements. Special outreach efforts will target landlords to expand participation among owners in supporting LMI households.</li> </ul>

To address rental housing recovery needs of the County after the 2024 Hurricanes, the County will implement the Rental Recovery Program (RRP) for rental units. While primarily targeting privately-owned rental properties, the RRP will also offer assistance to the two public housing authorities (PHAs) that operate in the County. Applications submitted by owners of rental units will be reviewed in the order in which they are received but applications may be submitted by the eligible PHAs at any time and will receive priority consideration. Policies and procedures applicable to PHA transactions will be outlined at the end of this program description.

The funds allocated for this program will be used to rehabilitate (repair), reconstruct (rebuild), and/or elevate rental properties with seven (7) or fewer units that were damaged by the 2024 Hurricanes. All rehabilitated, reconstructed, or replaced housing units must include disaster resilience measures to promote better outcomes during major storms. Activities funded by this program include, but are not limited to:

- Rehabilitating/repairing existing structures, including substantial rehabilitation to bring the property up to local codes and standards;
- Reconstructing/rebuilding seriously damaged or destroyed units; and
- Demolishing and re-building a unit in substantially the same manner, including elevating homes which are substantially damaged in special flood hazard areas.

For this program, the County will be the Responsible Entity and will carry out the environmental review procedures under 24 CFR 58.

## Property Owner Eligibility Criteria

- Owned the damaged property at the time of 2024 Hurricanes and still own the damaged unit.
- No current code enforcement or law enforcement complaints against the property and/or property owner.
- Must be able to demonstrate compliance with Federal requirement to obtain and maintain flood insurance if unit previously received Federal disaster assistance.

## Program Requirements

A participating property owner must agree to lease all assisted units (i.e., 100 percent) to LMI tenants at affordable rents and maintain required insurance coverage. Insurance requirements include:

- Applicants must agree to obtain and maintain homeowners' insurance on the assisted property throughout the duration of the forgivable loan.
- Applicants living in a SFHA who receive Federal assistance under this program must comply with Federal requirement to obtain and maintain flood insurance (through NFIP).

For all RRP activities using CDBG-DR funds, a mortgage and promissory note will be executed and recorded in Manatee County, Florida's, official records before or at the time of completion. If all assisted units are leased to LMI tenants at affordable rents for the duration of the forgivable loan, the mortgage will be satisfied and not require repayment. Affordable rents will not exceed [HOME Fair Market Rents \(FMR\)](#); however, the County may impose lower rent limits for assisted units. If the property is sold, transferred, leased to a non-qualified tenant, refinanced without permission, or otherwise fails to meet program requirements during the duration of the forgivable loan, the prorated balance of the mortgage will become due. Terms of the forgivable loan include:

- Rehabilitated units: Ten (10) years, amortized at ten (10) percent per year.
- Reconstructed units: 20 years, amortized at five (5) percent per year.

Requests for subordination will be evaluated individually. Property owners will be required to maintain tenant information which will enable the County to verify occupancy by LMI households. Properties will be monitored annually during the mortgage term, which may include random site checks.

## Application, Awards, and Contractor Choice

Applications submitted by owners of rental units will be reviewed in the order in which they are received.

To provide property owners with the flexibility to select contractors to complete necessary rehabilitation, reconstruction, and/or elevation of their home, the County will invite contractors to submit information to participate in the RRP and will conduct a baseline screen for each contractor's eligibility to participate in the program. This process would not be an endorsement or recommendation of any contractor but would produce a list of contractors who have an identifiable track record of work in Manatee and surrounding counties and meet all necessary requirements. As the County is statutorily required to have and enforce policies that minimize waste, fraud, and abuse, the County will implement this process to protect both property owners and public funds.

Property owners will then have the option of selecting a contractor that has been screened by the County to complete the work. In limited circumstances, a property owner may ask the County to screen a contractor not otherwise involved in the RRP and the County will develop policies to outline those circumstances for implementation. The program will verify that all work has been completed prior to issuing payment directly to the contractor. Property owners must enter into agreements with the County outlining the program's terms and conditions.

The RRP's awards will be scaled based on the cost of repair and may include funding for mitigation and resilience actions, such as elevating and hardening, to reduce risks and protect public investment in assisted units. Furthermore, to reduce the impacts of future disasters on LMI tenants, the County may allocate significant portions of program funding to mitigation actions.

The County's approach to mitigation aligns with Section III.D.4. of the Revised Universal Notice, which defines mitigation activities as "those that increase disasters and reduce or eliminate the long-term risk of loss of life, injury, or damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters." Construction standards will adhere to all applicable State and County code and with HUD's standards stated in the Revised Universal Notice governing all residential building reconstruction.

Housing units assisted through the RRP must benefit LMI persons as outlined in 24 CFR 570.208(a)(3), modified by the Revised Universal Notice. All housing activities will address unmet needs in the HUD-identified MID (Manatee County) and will require all participants to

demonstrate that damage to the property can be tied back to the 2024 Hurricanes. 100 percent of RRP funds will be expended for activities that meet the criteria for the LMI Housing National Objective.

The County shall procure an implementation contractor to assist with the RRP and intake centers for applicants. This contractor will focus on outreach and program accessibility. Together, they will develop a comprehensive outreach campaign and provide services to ensure eligible households can apply.

All information provided by applicants will be verified by the County or its contractor.

### **Duplication of Benefits / Second Homes and Vacation Residences**

A review of potential duplication of benefits (DOB) is necessary for all CDBG-DR funded activities to ensure the assistance supplements other resources. Applicants must provide information on all recovery assistance received, as required by the Stafford Act. The County will issue guidance for the DOB process, available on its disaster recovery website and any duplicative funds will be deducted from the CDBG-DR award.

The RRP may support rehabilitation, reconstruction, and elevation of eligible rental properties that are intended for long-term residential use (i.e., 12 months or more). Properties used as short-term, seasonal, or vacation rentals are not eligible for assistance. LMI tenants occupying assisted units must prove Florida residency.

### **The funds awarded under the RRP may not be used for the following actions:**

- Forced mortgage payoffs.
- Compensation payments.
- Temporary housing assistance benefits, including mortgage and rental assistance.
- Reconstruction of housing units in a [designated floodway](#).
- Assistance for those who fail to demonstrate compliance with Federal requirement to obtain and maintain flood insurance, where required, if unit previously received Federal disaster assistance.

The County will develop comprehensive operating policies and procedures for the RRP to clarify the points mentioned and provide working guidance for implementation of the program.

### **PHA Considerations**

The Manatee County Housing Authority (MCHA) and Housing Authority of the City of Bradenton (HACB) may apply for funding under the RRP to address recovery needs

associated with units under their management. Up to \$1 million of the RRP is set-aside for the PHAs with the understanding that this may involve reimbursement of pre-agreement costs already paid, including insurance deductibles. The County will outline in its RRP policies and procedures the criteria for the PHAs to apply for and obtain CDBG-DR funding for eligible costs.

## Grantee Program #3: Buyout and Safe Housing (BSH)

*Table 49 –Buyout and Safe Housing Program Details*

Program Title	Buyout and Safe Housing Program
<b>Total Budget/CDBG-DR Allocation</b>	<ul style="list-style-type: none"> <li>\$12,000,000</li> </ul>
<b>Eligible Activities</b> Referenced to Title I of Housing and Community Development Act of 1974 (42 USC 5305(a)) or HUD Revised Universal Notice	<ul style="list-style-type: none"> <li>§5305(a)(1) – Acquisition</li> <li>§5305(a)(4) – Clearance and Demolition</li> <li>§5305(a)(5) – Removal of Architectural Barriers</li> <li>§5305(a)(7) – Disposition</li> <li>§5305(a)(11) – Relocation Payments</li> <li>§5305(a)(13) – General Administrative and Planning Activities</li> <li>§5305(a)(20) – Housing Services</li> <li>§5305(a)(24) – Direct Assistance for Homeownership Activities</li> <li>FR Notice – Mitigation (consistent with CDBG-DR Mitigation requirements under the Revised Universal Notice)</li> </ul>
<b>National Objective(s) –</b> Referenced to 24 CFR 570, Subpart C and/or HUD Revised Universal Notice	<ul style="list-style-type: none"> <li>LMI Benefit on Area Basis – 24 CFR 570.208(a)(1)</li> <li>LMI Benefit through Housing - 24 CFR 570.208(a)(3)</li> <li>Urgent Need (UN) - 24 CFR 570.208(c)</li> </ul>
<b>Lead Agency and Method of Distribution</b>	<ul style="list-style-type: none"> <li>The Grants Administration Division within the Government Relations Department of Manatee County will serve as the lead agency responsible for program administration. The County will manage the program with contractor support and, as the Responsible Entity, will undertake all necessary environmental reviews in accordance with 24 CFR Part 58.</li> <li>Distribution of funds will occur through direct implementation. The County will manage the administration of the Program, including the selection and oversight of qualified vendors or contractors to assist with appraisal, title services, and closing activities.</li> <li>Property owners will apply for buyout assistance.</li> </ul>

Program Title	Buyout and Safe Housing Program
Program Description	<ul style="list-style-type: none"> <li>• The BSH Program will buy out mobile and manufactured homes as well as single-family residences located in repetitive loss and flood-prone areas that were substantially damaged by the 2024 Hurricanes. The program aims to permanently reduce future risk by removing structures from hazardous locations and returning the land to open space use.</li> <li>• Participation in the BSH Program is voluntary. However, in the rare circumstances where properties are necessary for project continuity or community resilience and voluntary participation cannot be secured, condemnation or eminent domain may be considered as a last resort, in accordance with applicable laws and regulations.</li> <li>• Participation is voluntary. Eligible homeowners will receive pre-disaster fair market value compensation for their property and may also qualify for a Safe Housing Incentive to assist them in relocating to a safer area.</li> </ul>
Other Eligibility Criteria	<ul style="list-style-type: none"> <li>• Damage to the property must be attributable to the 2024 Hurricanes.</li> <li>• Assistance is limited to single-family residences and mobile and manufactured homes located in repetitive loss and flood-prone areas.</li> <li>• Property must have been owner-occupied at the time of the qualifying disaster.</li> <li>• The owner must voluntarily agree to sell and sign a Buyout Agreement. In rare cases where voluntary participation cannot be secured and the property is critical for community resilience, condemnation or eminent domain may be considered.</li> <li>• Title must be clear, or heirship must be appropriately documented.</li> <li>• Applicants must provide proof of ownership and, if applicable, primary residency at the time of the 2024 hurricanes.</li> <li>• Buyout properties must comply with environmental review standards under 24 CFR Part 58.</li> <li>• Applicants may be eligible for a one-time Safe Housing Incentive payment if relocating to a safer area.</li> </ul>
Eligible Geographic Area	<ul style="list-style-type: none"> <li>• Eligible area is entirety of Manatee County, FL.</li> </ul>
Maximum Amount of Assistance per Beneficiary	<ul style="list-style-type: none"> <li>• Up to \$450,000 (see additional information below).</li> </ul>
Maximum Income of Beneficiary	<ul style="list-style-type: none"> <li>• The program will prioritize assistance to LMI households earning at or below 80% AMI, as defined by HUD. Assistance may also be available to non-LMI households.</li> </ul>

Program Title	Buyout and Safe Housing Program
Mitigation Measures	<ul style="list-style-type: none"> <li>• All buyout properties will be permanently deed-restricted to open space, recreational, or flood mitigation use.</li> <li>• Post-demolition land management may include reseeding, tree planting, or other minimal site stabilization.</li> <li>• No future residential, commercial, or industrial construction will be allowed.</li> </ul>
Reducing Impediments to Assistance	<ul style="list-style-type: none"> <li>• Case management support for applicants needing help with paperwork, documentation, or relocation planning.</li> <li>• Flexible ownership documentation, in accordance with program guidelines.</li> <li>• Relocation benefits available pursuant to Uniform Relocation Act and County RARAP.</li> <li>• Appeals and grievance processes are available for eligible and benefit disputes.</li> </ul>

The BSH Program is a voluntary residential buyout program, as defined by HUD in Section III.D.5.h of the Revised Universal Notice. The BSH Program will offer pre-disaster fair market value (FMV) for eligible properties and is intended to permanently remove flood-prone residential structures from risk through conversion of the land to open space, floodplain management, or other public benefit uses. This is distinct from a standard acquisition.

The BSH Program addresses the needs identified in the UNA, which documented significant residential damage due to the 2024 Hurricanes – particularly within flood-prone areas, Special Flood Hazard Areas (SFHAs), and repetitive loss zones. The program targets these at-risk properties to mitigate future hazard risks and enhance long-term community resilience.

The BSH Program will utilize CDBG-DR funds to buy out single-family residences or mobile and manufactured homes with repetitive loss designation and provide a relocation incentive for applicants to relocate to safer areas. FEMA defines a Repetitive Loss property as a structure that has at least two paid flood losses greater than \$1,000 each in any 10-year period since 1978.<sup>183</sup>

Participation in the BSH Program is voluntary. The County will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) voluntary acquisition requirements and will issue voluntary participation notices to all applicants prior to initiating negotiations. In rare circumstances where voluntary participation cannot be secured and the

<sup>183</sup> Source: [Repetitive Loss Structure](#). FEMA. 2020.

property is determined to be critical for community resilience, condemnation or eminent domain may be considered as a last resort, in accordance with applicable laws and regulations. Buyout properties will be maintained in perpetuity as open space or for uses consistent with flood mitigation goals and will be deed-restricted against future development. Properties may be used only for open green space, recreational areas, or floodplain management purposes. The County may evaluate the use of NRSA designation to enhance LMI targeting for delivery.

The County will manage the BSH Program with contractor support, including but not limited to appraisers, environmental consultants, title agents, and closing agents. County staff will oversee eligibility reviews, DOB analyses, relocation incentive payments, compliance tracking, and reporting activities.

### **Homeowner Eligibility Criteria**

- Property is a single-family residence or a mobile and manufactured home.
- Owned and occupied the damaged property at the time of the 2024 Hurricanes and still own the damaged home.
- Damaged property must meet the definition of a Repetitive Loss property, as defined by FEMA.

### **Eligible Activities**

- Voluntary buyout of primary residences affected by the 2024 Hurricanes. In rare cases where voluntary participation cannot be secured and the property is determined critical for community resilience, condemnation or eminent domain may be considered as a last resort.
- Demolition and clearance of structures.
- Environmental remediation of sites (if necessary).
- Reasonable moving expenses for displaced households.
- Optional relocation assistance, including:
  - Down payment assistance for the purchase of replacement housing
  - Temporary rental assistance
- Safe Housing Incentive payments to encourage relocation to lower-risk areas.
- Site restoration for open space, floodplain management, green infrastructure, or passive recreation uses.

## Ineligible Activities

- Buyouts of second homes, vacation residences, and short-term, seasonal, and vacation rental properties;<sup>184</sup>
- Use of acquired properties for residential, commercial, or industrial development;
- Any activity not explicitly authorized under Section 105(a) of the HCDA, as amended, or not consistent with the Revised Universal Notice; and
- Costs related to the rehabilitation or reconstruction of structures acquired through the buyout program, unless explicitly approved through a HUD waiver.

## Application and Awards

Applicants must submit an application during the open application period. Outreach efforts will include public notices, website postings, and direct engagement with the public. The County will utilize a phased application process to prioritize households as follows:

*Table 50 – Application Phasing Criteria for BSH Applicants*

Application Phase		Phase I	Phase II	Phase III
Household Income	50% of AMI and Below	✓		
	Between 51% and 80% of AMI		✓	
	Between 80% and 120% of AMI*			✓
Repetitive Loss Property	Yes	✓	✓	✓

Applications will be accepted following program launch and remain open until funds are exhausted or the HUD performance period expires, whichever comes first.

Upon completion of eligibility verification, DOB analysis, and property valuation, the County will execute buyout agreements with eligible property owners. Funds will be disbursed directly at closing to the bought-out properties, which will be subsequently dedicated to permanent open space use.

## Safe Housing Incentive

The County will make reasonable efforts to minimize displacement of residents and to provide relocation support consistent with HUD and URA requirements. The Safe Housing

<sup>184</sup> A second home is defined as a dwelling unit that is not the primary residence of the owner, a tenant, or any occupant at the time of the disaster. Documentation such as tax records, drivers licenses, homestead exemptions, or utility bills may be used to verify primary residency status.

Incentive is designed to facilitate voluntary relocation to safer housing, reduce displacement burdens, and promote housing stability post-disaster. In accordance with section III.D.5.i. of the Revised Universal Notice:

- Households that relocate to a property outside of the SFHA or any mapped high-risk flood zone will be eligible to receive a Safe Housing Incentive.
- The incentive is intended to offset costs associated with purchasing or renting replacement housing in safer locations and to encourage permanent relocation away from flood-prone areas.
- The Safe Housing Initiative will not exceed \$50,000 per eligible household to relocate outside of high-risk areas, subject to availability of program funds. The incentive amount will be determined based on household income to ensure that projected housing payments do not exceed 35 percent of the household's gross monthly income.<sup>185</sup>

#### **Additional Details:**

- Paid at the time of relocation, after proof of safe location purchase or lease agreement.
- Incentive eligibility is contingent on relocation to verified non-hazard areas outside of SFHA and local high-risk zones.
- Safe Housing Incentive is separate from property buyout and other relocation benefits. If a property owner wishes to provide their own independent appraisal, the County will permit submission of a second appraisal for review, The independent appraisal must:
  - Be performed by a state-certified and licensed appraiser, and comply with the Uniform Standards of Professional Appraisal Practice (USPAP);
  - Establish the property's pre-disaster fair market value (FMV) based on a valuation date prior to the 2024 hurricanes;
  - Be conducted at the homeowner's expense, with no reimbursement provided by the program.
  - Property owners must submit their independent appraisal within 30 calendar days of receiving the County's initial offer, Submissions received after this deadline will not

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<sup>185</sup> Consistent with federal affordability standards, including HUD guidelines for housing cost burden thresholds, which define affordable housing as housing costs not exceeding 30 percent to 35 percent of gross monthly household income.

be considered unless an extension has been granted by the County based on extenuating circumstances.

### **Maximum Amount of Assistance per Beneficiary**

The County will offer buyouts to eligible property owners at an amount up to 100 percent of the property's pre-disaster fair market value (FMV), determined by a qualified appraisal as of the most recent assessment prior to the 2024 Hurricanes. The County will evaluate requests to utilize post-storm FMV individually.

The maximum amount of assistance available per beneficiary shall not exceed \$450,000, inclusive of all eligible buyout costs. However, in cases where justified by individual property valuation, household needs, or relocation considerations, assistance amounts may exceed \$450,000 with prior County approval and consistent with CDBG-DR program requirements and cost reasonableness standards.

To further encourage relocation outside high-risk areas, the County may provide additional relocation incentives for properties located within the Special Flood Hazard Area (SFHA).

Final assistance amounts will be adjusted based on a DOB analysis, in compliance with the Stafford Act, 44 CFR Part 206, and HUD requirements. The DOB review will be conducted in accordance with HUD's DOB guidance, and final award amounts will reflect any required deductions. Priority will be given to LMI households.

## **Infrastructure**

The County's Infrastructure Programs are designed to implement eligible improvements or repairs to publicly owned physical assets that provide essential services to the community. These programs are structured to emphasize infrastructure investments that directly enable the recovery, repair, and long-term stability of housing, particularly in areas with high concentrations of storm damage or unmet housing need.

The County will fund infrastructure projects that reduce risks, improve system performance, and enhance resilience in neighborhoods where infrastructure disruptions have limited habitability, accessibility, or safety of homes. Population growth further intensifies the need for reliable infrastructure systems that can withstand disaster impacts and support a larger residential base. These initiatives are intended to restore and protect the public systems that housing depends on, such as drainage, potable water, and wastewater infrastructure, ensuring that homes can be safely reoccupied following a disaster.

By aligning infrastructure and housing goals, the County will support community-wide recovery and foster long-term residential stability. Projects may include both traditional improvements and nature-based solutions, with a shared emphasis on enhancing resiliency to future disasters and prevent repetitive damage.

## Infrastructure Programs Overview

*Table 51 – Grantee Infrastructure Programs Overview*

Eligible Cost Category	CDBG-DR Allocation Amount	Percent of CDBG-DR Allocation
Infrastructure Recovery & Resilience Program (IRRP)	\$125,000,000*	49.46%
Infrastructure Match	\$5,000,000	1.98%
<b>TOTAL</b>	<b>\$130,000,000</b>	<b>51.44%</b>

\*Includes full \$32,962,000 mitigation set-aside.

## Grantee Program #1: Infrastructure Recovery and Resilience Program

*Table 52 – Infrastructure Recovery and Resilience Program Details*

Program Title	Infrastructure Recovery and Resilience Program
<b>Total Budget/CDBG-DR Allocation</b>	<ul style="list-style-type: none"> <li>\$125,000,000 (includes \$32,962,000 for mitigation)</li> </ul>
<b>Eligible Activities</b> Referenced to Title I of Housing and Community Development Act of 1974 (42 USC 5305(a)) or HUD Revised Universal Notice	<ul style="list-style-type: none"> <li>\$5305(a)(1) – Acquisition</li> <li>\$5305(a)(2) – Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements</li> <li>\$5305(a)(3) – Code Enforcement</li> <li>\$5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing</li> <li>\$5305(a)(5) – Removal of Architectural Barriers</li> <li>\$5305(a)(7) – Disposition</li> <li>\$5305(a)(9) – Non-Federal Match</li> <li>\$5305(a)(11) – Relocation Payments</li> <li>\$5305(a)(13) – General Administrative and Planning Activities</li> <li>\$5305(a)(14) – Assistance to Non-Profit Entities</li> <li>\$5305(a)(15) – Assistance to Neighborhood-Based Organizations</li> </ul>

Program Title	Infrastructure Recovery and Resilience Program
	<ul style="list-style-type: none"> <li>• §5305(a)(25) – Tornado Shelters</li> <li>• §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction</li> <li>• FR Notice – Mitigation (consistent with CDBG-DR Mitigation requirements under the Revised Universal Notice)</li> </ul>
<b>National Objective(s) -</b> Referenced To 24 CFR 570, Subpart C and/or HUD Revised Universal Notice	<ul style="list-style-type: none"> <li>• LMI Benefit on Area Basis – 24 CFR 570.208(a)(1)</li> <li>• LMI Benefit for Limited Clientele Activities – 24 CFR 570.208(a)(2)</li> <li>• Urgent Need – 24 CFR 570.208(c)</li> </ul>
<b>Lead Agency and Method of Distribution</b>	<ul style="list-style-type: none"> <li>• Manatee County will administer the program and, as the Responsible Entity, will undertake necessary environmental reviews per 24 CFR 58.</li> <li>• Manatee County is the lead agency and will oversee projects to address unmet needs related to infrastructure.</li> <li>• Each local municipality will receive an allocation based on their respective population. Within that allocation, funds will be awarded through an application process, with project proposals reviewed by the County for eligibility and alignment with evaluation criteria specified in the IRRP policies and procedures. The application process, including the evaluation criteria, will be published in a Notice of Funding Availability (NOFA). The County will manage and oversee projects on behalf of the municipalities.</li> <li>• All proposed projects must meet the threshold requirements listed below. Staff will review applications and make recommendations based on the evaluation criteria. Final funding decisions will be made by the Board of County Commissioners (BCC), which holds final authority to award project funding.</li> </ul>
<b>Program Description</b>	<ul style="list-style-type: none"> <li>• The Program will address critical unmet public infrastructure needs resulting from 2024 Hurricanes with a focus on resilience and long-term recovery.</li> <li>• The Program may also include the rehabilitation, reconstruction, and/or acquisition of facilities that are currently or will be designated for emergency sheltering.</li> <li>• The Program may include infrastructure projects that improve/harden utility service reliability and reduce flooding risks in neighborhoods, enabling safe repair and re-occupancy of storm-damaged homes.</li> </ul>
<b>Eligible Geographic Area</b>	<ul style="list-style-type: none"> <li>• Eligible applicants include: City of Anna Maria, City of Bradenton, City of Bradenton Beach, City of Holmes Beach, Town of Longboat Key, City of Palmetto, and Manatee County.</li> </ul>
<b>Other Eligibility Criteria</b>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>

Program Title	Infrastructure Recovery and Resilience Program
<b>Maximum Amount of Assistance per Beneficiary</b>	<ul style="list-style-type: none"> <li>For County infrastructure projects: <ul style="list-style-type: none"> <li>Maximum award of \$50,000,000 per eligible project.</li> <li>Minimum award of \$500,000 per eligible project.</li> </ul> </li> <li>Project awards will be made within each municipality's allocation. For municipality infrastructure projects: <ul style="list-style-type: none"> <li>Maximum Award: \$30,000,000 per project</li> <li>Minimum Award: \$100,000 per eligible project</li> </ul> </li> </ul>
<b>Maximum Income of Beneficiary</b>	<ul style="list-style-type: none"> <li>Program will not provide direct benefits to individuals and most projects will rely upon LMI area benefit criteria. The County will utilize HUD's waiver of 24 CFR 570.208(a)(1) and 24 CFR 570.200(a)(3), in accordance with III.D.6.e. of the Revised Universal Notice, to permit proportional counting of funds expended when LMI percentage of population is below 51% for the project service area.</li> </ul>
<b>Mitigation Measures</b>	<ul style="list-style-type: none"> <li>Applicants must identify specific mitigation actions as part of the basic application and include costs in the funding request.</li> <li>The County will evaluate each infrastructure project for mitigation opportunities that improve long-term community resilience.</li> <li>All proposed mitigation actions must demonstrate a measurable reduction in risk to residential areas and supporting infrastructure.</li> </ul>
<b>Reducing Impediments to Assistance</b>	<ul style="list-style-type: none"> <li>The County will establish program criteria that guide eligible applicants to investments that benefit LMI communities.</li> </ul>

The County's Infrastructure Recovery and Resilience Program (IRRP) will deploy CDBG-DR funding to local governments within the County to support the implementation of infrastructure projects which may be funded with up to 100 percent CDBG-DR funding and are necessary to address identified unmet disaster recovery needs arising from the impacts of the 2024 Hurricanes within the County that are not funded by another source.

This program offers funding for infrastructure projects aimed at enhancing the resilience of affected communities against current and future natural hazards. To support local recovery, the County will allocate funding to each municipality. Within that allocation, municipalities will submit individual project applications for eligibility review and alignment with program goals as outlines in the County's Policies and Procedures. Projects must incorporate mitigation elements to promote long-term resilience. Applicants will need to detail costs and benefits in their funding applications, following the guidelines set by the County. Proposed activities should align with local plans and policies, reduce future risks for the recovering

area, and include an assessment of how multiple sources of funds may be leveraged to complete the project. The County encourages applicants to consider the potential for future demand on infrastructure systems, such as increases in residential development and service populations, when submitting projects.

The County will consider a variety of projects such as:

- Projects which demonstrate adaptable and reliable technologies to guard against premature obsolescence and withstand extreme weather events;
- Projects with a substantial amount of alternative funding available;
- “Shovel ready” projects;
- Projects which provide greater benefit to housing recovery;
- Projects with greater LMI benefit; and
- Projects that restore or enhance infrastructure systems, such as drainage or utilities, in areas where housing repairs, reconstruction, or elevation activities are planned or underway.

The County's IRRP will allocate funds for eligible improvements or repairs to publicly owned physical assets. Eligible activities may include, but will not be limited to:

- Repair, rehabilitation, and resilience upgrades to critical infrastructure systems, including flood control and drainage improvements; water and sewer facilities; and stormwater management systems.
- Acquisition, rehabilitation, construction, reconstruction and/or hardening of eligible public facilities that support community services, emergency response, and long-term recovery.

Infrastructure projects funded by CDBG-DR must be designed and built to be resilient against extreme weather events and future impacts. Proposed activities should incorporate sustainable planning and design methods that promote adaptation and resilience, including the use of adaptable and reliable technologies to prevent premature obsolescence of infrastructure. Projects should also demonstrate consideration of future infrastructure needs that may arise due to anticipated growth or increase usage. Eligible projects without a tieback to the 2024 Hurricanes may be funded by the County's mitigation set-aside.

Typical infrastructure activities include the repair, replacement, relocation, or improvement of publicly owned infrastructure and facilities.

## Application Process

The evaluation criteria will reflect HUD's standard approach to competitive programs outlined in the HUD Handbook 2210.17 and summarized below. The County will further define these criteria and the evaluation process when it issues the NOFA.

*Table 53 – Infrastructure Recovery & Resiliency Program Evaluation Framework*

Evaluation Criteria
Capacity of the Applicant
Demonstrated Community Need
Soundness of Approach
Leverage of Additional Resources
Achieving Results

The County will review projects for eligibility and will recommend project awards based on the approaches that are in alignment with the NOFA and evaluation process. Recommended project awards will be presented to the BCC for approval. The BCC has final authority to award project funding and maintains the ability to reject projects that negatively impact the County's ability to maintain compliance with CDBG-DR requirements – including the County's ability to meet the 70 percent overall LMI benefit requirement.

The County will implement this program with vendor support, but the County will be the Responsible Entity and will carry out the environmental review procedures under 24 CFR 58.

## Grantee Program #2: Infrastructure Match Program

*Table 54 – Infrastructure Match Program Details*

Program Title	Infrastructure Match Program
<b>Total Budget/CDBG-DR Allocation</b>	<ul style="list-style-type: none"> <li>\$5,000,000</li> </ul>
<b>Eligible Activities</b> Referenced to Title I of Housing and Community Development Act of 1974 (42 USC 5305(a)) or HUD Revised Universal Notice	<ul style="list-style-type: none"> <li>§5305(a)(1) – Acquisition</li> <li>§5305(a)(2) – Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements</li> <li>§5305(a)(3) – Code Enforcement</li> <li>§5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing</li> <li>§5305(a)(5) – Removal of Architectural Barriers</li> </ul>

Program Title	Infrastructure Match Program
	<ul style="list-style-type: none"> <li>• §5305(a)(7) – Disposition</li> <li>• §5305(a)(9) – Non-Federal Match</li> <li>• §5305(a)(11) – Relocation Payments</li> <li>• §5305(a)(13) – Administrative Costs</li> <li>• §5305(a)(14) – Assistance to Non-Profit Entities</li> <li>• §5305(a)(15) – Assistance to Neighborhood-Based Organizations</li> <li>• §5305(a)(25) – Tornado Shelters</li> <li>• §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction</li> <li>• FR Notice – Mitigation (consistent with CDBG-DR Mitigation requirements under the Revised Universal Notice)</li> </ul>
<b>National Objective(s) - Referenced To 24 CFR 570, Subpart C and/or HUD Revised Universal Notice</b>	<ul style="list-style-type: none"> <li>• LMI Benefit on Area Basis – 24 CFR 570.208(a)(1)</li> <li>• LMI Benefit for Limited Clientele Activities – 24 CFR 570.208(a)(2)</li> <li>• Urgent Need – 24 CFR 570.208(c)</li> </ul>
<b>Lead Agency and Method of Distribution</b>	<ul style="list-style-type: none"> <li>• Manatee County will administer the program and, as the Responsible Entity, will undertake necessary environmental reviews per 24 CFR 58.</li> <li>• Manatee County is the lead agency and will oversee projects to address unmet needs related to County-owned infrastructure.</li> <li>• For non-County owned infrastructure, funds will be distributed to eligible applicants through an application process. Entities/agencies awarded projects will become subrecipients of the County.</li> <li>• Matching grants for CDBG-DR eligible activities that have been awarded by an eligible federal agency (FEMA, FHWA, USACE, USDA) will be requested via an application process for local governments. Recommendations for funding will be presented to the BCC for final evaluation. The BCC has final authority to award project funding.</li> </ul>
<b>Program Description</b>	<ul style="list-style-type: none"> <li>• The Program will provide funding to satisfy the non-Federal cost share requirement for projects that address critical unmet public infrastructure needs resulting from the 2024 Hurricanes with a focus on resilience and long-term recovery.</li> </ul>
<b>Eligible Geographic Area</b>	<ul style="list-style-type: none"> <li>• Eligible applicants include: City of Anna Maria, City of Bradenton, City of Bradenton Beach, City of Holmes Beach, Town of Longboat Key, City of Palmetto, and Manatee County.</li> </ul>
<b>Other Eligibility Criteria</b>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>

<b>Program Title</b>	<b>Infrastructure Match Program</b>
<b>Maximum Amount of Assistance per Beneficiary</b>	<ul style="list-style-type: none"> <li>• Maximum Award: \$5,000,000 per project.</li> <li>• Minimum Award: \$150,000 per project.</li> </ul>
<b>Maximum Income of Beneficiary</b>	<ul style="list-style-type: none"> <li>• Program will not provide direct benefits to individuals and most projects will rely upon LMI area benefit criteria. The County will utilize HUD's waiver of 24 CFR 570.208(a)(1) and 24 CFR 570.200(a)(3), in accordance with III.D.6.e. of the Revised Universal Notice, to permit proportional counting of funds expended when LMI percentage of population is below 51% for the project service area.</li> </ul>
<b>Mitigation Measures</b>	<ul style="list-style-type: none"> <li>• Applicants must identify specific mitigation actions as part of the basic application and include costs in the funding request.</li> <li>• The County will evaluate each infrastructure project for mitigation opportunities that improve long-term community resilience.</li> </ul>
<b>Reducing Impediments to Assistance</b>	<ul style="list-style-type: none"> <li>• The County will establish program criteria that guide eligible applicants to investments that benefit LMI communities.</li> </ul>

The County's Infrastructure Match Program is designed to provide funding to satisfy the non-Federal cost share of Federal disaster recovery programs. The program leverages CDBG-DR funds with the intention of alleviating financial burdens imposed on the County and eligible applicants from the 2024 Hurricanes. The program will provide funding to satisfy the non-Federal cost share required for FEMA PA, HMGP, and other Federally funded projects with a cost share requirement, allowing for improved access to federal disaster recovery funds without straining County and municipal budgets. The Infrastructure Match Program will only provide funding for projects that have a tie back to damage arising from the 2024 Hurricanes.

The County will implement this program with vendor support but the County will be the Responsible Entity and will carry out the environmental review procedures under 24 CFR 58.

The County's Infrastructure Match Program will allocate funds for eligible improvements or repairs to publicly owned physical assets designed to support public services.

Infrastructure projects funded by CDBG-DR must be designed and built to be resilient against extreme weather events and future impacts. Proposed activities should incorporate sustainable planning and design methods that promote adaptation and resilience, including the use of adaptable and reliable technologies to prevent premature obsolescence of infrastructure.

Projects must comply with all Federal statutory cross-cutting requirements that apply to the CDBG-DR funds in accordance with the Revised Universal Notice.

The County may use award CDBG-DR funding to satisfy the non-Federal cost share for projects funded by other Federal agencies including FEMA, the U.S. Army Corps of Engineers (USACE), Environmental Protection Agency (EPA), Federal Highway Administration (FHWA), and Federal Transit Administration (FTA). The use of CDBG-DR funding for these projects will be governed by limitations imposed by various appropriations acts and other statutory restrictions. Eligible CDBG-DR activities funded via State programs with a cost share requirement may be considered for CDBG-DR funding.

## CDBG-DR Mitigation Set-Aside

### CDBG-DR Mitigation Set-Aside Programs Overview

*Table 55 – CDBG-DR Mitigation Set-Aside Allocation Summary*

Eligible Cost Category	Unmet Need	% of Unmet Need	% of Funding to be Expended in HUD-Identified MID	CDBG-DR Mitigation Set-Aside Allocation Amount	% of CDBG-DR Allocation Mitigation Set-Aside
Infrastructure	\$748,149,055.99	59.31%	100%	\$32,962,000	100%
<b>Total</b>	<b>\$748,149,055.99</b>	<b>59.31%</b>	<b>100%</b>	<b>\$32,962,000</b>	<b>100%</b>
Funds that have not been allocated				\$0	0%
Grant Total (Recovery funds + Mitigation + Unallocated):				\$252,711,000	100%

*Table 56 – Grantee CDBG-DR Mitigation Set-Aside Programs Overview*

Eligible Cost Category	CDBG-DR Mitigation Set-Aside Allocation Amount	% of CDBG-DR Allocation for LMI Benefit	Does Program Tie Back to the Disaster(s)
Infrastructure Recovery & Resiliency Program*	\$32,962,000	70%	Yes
<b>Total:</b>	<b>\$32,962,000</b>	<b>70%</b>	-

\*The County's mitigation set-aside of \$32,962,000 has been allocated to the Infrastructure Recovery and Resiliency Program. Eligible projects without a tieback to the 2024 Hurricanes may be funded by the County's mitigation set-aside.

## Environmental Reviews

All activities funded through the County's CDBG-DR programs are subject to environmental review requirements under 24 CFR Part 58. The County, as the Responsible Entity, will conduct and complete an environmental review prior to the commitment of any CDBG-DR funds for site-specific activities.

In cases where another Federal agency (e.g., FEMA) has already completed an environmental review under the National Environmental Policy Act (NEPA), the County may adopt that Environmental Review Record (ERR) pursuant to 24 CFR 58.52, provided the review meets HUD's environmental requirements. If the existing review cannot be adopted, a new environmental review will be completed in accordance with HUD regulations.

No physical work, demolition, or construction involving the use of CDBG-DR funds will begin until the environmental review is complete and an RROF and Authority to Use Grant Funds (AUGF) have been issued by HUD (or deemed received, as applicable).

## General Information

### Citizen Participation

#### Consultation in Developing the Action Plan

While developing the Action Plan, the County has and will continue to consult with local stakeholders and the public to collect unmet needs and develop programs to best support long-term recovery. Following HUD's announcement that CDBG-DR funds would be allocated to Manatee County in January 2025, the County implemented a survey to solicit potential projects and unmet needs from the community. The survey was made available on the County's designated CDBG-DR webpage and with a dashboard summarizing project submissions for transparency. Over 140 projects totaling an estimated \$1.2 billion projects were submitted to the County and evaluated during the development of the Action Plan to determine unmet needs and inform the development of programs.

The Action Plan may be updated as additional information is gathered through consultations and public input.

*Table 57 – Consultation in Developing the Action Plan*

Partners Consulted	Description of Consultation
Federal Partners (FEMA, SBA)	The County received FEMA Individual Assistance (IA) and anticipates receiving Small Business Administration Disaster Loan Data through data sharing agreements. Data was used for the completion of the unmet needs assessment. Once SBA data is received, the unmet needs assessment will be updated.
Local/State Government	The County began the consultation process with each municipality and relevant Manatee County Departments during scheduled stakeholder meetings and via direct email. The County will continue to consult with each municipality during the public comment period. All municipalities provided information related to unmet needs and will provide data related to FEMA Public Assistance (PA).
Nongovernmental Organizations	The County plans to consult with homeless service providers and housing providers during scheduled consultation meetings and via direct email prior to finalizing the Action Plan.
State and Local Emergency Management Agencies with Primary Responsibility for the Administration of FEMA Funds	The County's Emergency Management Division coordinates the Local Mitigation Strategy (LMS) which consists of local jurisdictions and makes recommendations to the Florida Division of Emergency Management (FDEM) with respect to the ongoing list of local hazard mitigation projects. The County plans to consult with the LMS and FDEM prior to finalizing the Action Plan.
Agencies that Manage Local Continuum of Care (CoC)	The Suncoast Partnership to End Homelessness serves as the Lead Agency for the Continuum of Care and maintains data from the Homeless Management Information System and the coordinated entry system. The County plans to consult with the Suncoast Partnership to End Homelessness and other homeless service providers prior to finalizing the Action Plan.
Public Housing Authorities	The County plans to consult with the two Public Housing Authorities in Manatee County (Manatee County Housing Authority and the Housing Authority of the City of Bradenton) prior to finalizing the Action Plan.
HUD-approved housing counseling agencies	Step Up Suncoast serves as the HUD-approved housing counseling agency for Manatee County. The County plans to consult with Step Up Suncoast prior to finalizing the Action Plan.
State Housing Finance Agencies	The County plans to consult with the Florida Housing Finance Corporation during to discuss ongoing recovery efforts and funding prior to finalizing the Action Plan.
Other Stakeholders	Following the announcement of the allocation of CDBG-DR funding to Manatee County, the County created an online survey to solicit potential recovery projects and unmet needs from the community.

Partners Consulted	Description of Consultation
	The County collected over 140 projects and \$1.2 billion in potential recovery projects during this process.

## Public Comment

In accordance with HUD requirements, the County made the Action Plan available for public comment for a 30-day period beginning May 21, 2025, and ending June 20, 2025. All comments will be summarized and considered in the final Action Plan.

## Public Hearings

With the County's CDBG-DR allocation greater than \$100 million but less than \$500 million, the County is required to conduct at least two public hearings on the draft Action Plan in the HUD-Identified MID area as required by section I.C.2.b. of the Revised Universal Notice. Prior to the public comment period, the County held two public engagement meetings to collect unmet needs information. During the public comment period, the County will hold at least two public hearings at which point public comment will be received regarding the Action Plan. The details of the hearings are provided below:

*Table 58 – Public Engagement Meetings and Public Hearings*

Date	Location	Time (EDT)
April 24, 2025	Public Engagement - Eternity Temple Church, 716 29th Street East, Palmetto, FL 34221	6:00 PM-7:30 PM EDT
May 13, 2025	Public Engagement - Manatee County Public Library, 1301 Barcarrota Avenue, Bradenton, FL 34205	6:00 PM-7:30 PM EDT
June 12, 2025	Public Hearing - Eternity Temple Church, 716 29th Street East, Palmetto, FL 34221	6:00 PM-7:30 PM EDT
TBD	Public Hearing - TBD	TBD

All public hearings facilitated by the County will be conducted in accordance with the public hearing standards outlined in the Revised Universal Notice.

Information on the hearings will be disseminated in the MID area in advance of the hearing dates.

## Access to Public Hearings

Citizens and stakeholders have reasonable and timely access to public hearings. The County provides the opportunity for citizens to submit comments orally or in writing at public

hearings. All written and oral comments are treated equally by the County and incorporated in both the response document submitted to HUD with the Action Plan and any substantial amendments.

All in-person public meetings and hearings will be held in locations accessible to all persons with disabilities. Existing federal requirements provide that where physical accessibility is not achievable, the County will give priority to alternative methods of product or information delivery that offer programs and activities to qualified individuals with disabilities in the most integrated setting appropriate under HUD's implementing regulations for Section 504 of the Rehabilitation Act (See 24 CFR part 8, subpart C).

The County's public hearings will be accessible to all individuals with disabilities and will operate without discriminating against or limiting access to participation. To ensure compliance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA), the County will:

- Ensure that all facilities where clients interact face-to-face with program staff are fully accessible and usable by individuals with disabilities.
- Assist program staff in providing both written and verbal communication to program applicants, regardless of their disability, including sign language, braille, interpreters, etc.
- Appropriately address any identified hearing, vision, or mobility limitations in compliance with Section 504 and the ADA.

The County further complies with Section 508 requirements by ensuring accessibility to electronic and information technology for individuals with disabilities. Online materials will also be made accessible for the visually impaired. Printed copies of Action Plans can be made available in large print format upon request.

Anyone who requires a reasonable accommodation, such as an auxiliary aid or service for effective communication, to participate in the County's programs, services, or activities should contact Carmine DeMilio, ADA Compliance Coordinator, at (941) 748-4501, ext. 6016 or [carmine.demilio@mymanatee.org](mailto:carmine.demilio@mymanatee.org), at least three business days prior to any applicable scheduled meeting. If you are deaf/hard of hearing and require the services of an interpreter, please contact the Florida Relay Service at 711.

## Consideration of Public Comments

The public comment period will run from May 21, 2025, to June 20, 2025. The draft Action Plan will be available electronically on the County's CDBG-DR website at

[www.mymanatee.org/lastingmanatee](http://www.mymanatee.org/lastingmanatee). Additionally, hard copies of the draft Action Plan will be made available by the Government Relations Department upon request.

Comments on the Action Plan may be submitted as follows:

- In person at public hearings
- Via email at: [cdbg.dr@mymanatee.org](mailto:cdbg.dr@mymanatee.org)
- Online at: [www.mymanatee.org/lastingmanatee](http://www.mymanatee.org/lastingmanatee)
- Via telephone at: (941) 742-4787
- Via mail at:

Manatee County, Government Relations  
Attn: Lasting Manatee  
1112 Manatee Avenue West  
Bradenton, FL 34205

At the conclusion of the public comment period, all feedback will be reviewed and responded to by the County, then incorporated into the Action Plan. A revised Action Plan that includes the public comments and responses will be submitted to HUD and available on the County's CDBG-DR website at [www.mymanatee.org/lastingmanatee](http://www.mymanatee.org/lastingmanatee).

## Citizen Complaints

Complaints are statements received from citizens regarding issues related to the County's disaster recovery programs, Action Plans, Substantial Action Plan Amendments, quarterly performance reports, or concerns about the unsatisfactory or unacceptable behavior of a County representative executing a disaster recovery program. Complaints will be directed to the appropriate County management staff for investigation and will be addressed with a response within 15 working days, whenever practicable. Citizen complaints can be submitted to:

Manatee County, Government Relations  
Attn: Lasting Manatee  
1112 Manatee Avenue West  
Bradenton, FL 34205  
Telephone: (941) 742-4787

Complaints regarding fraud, waste, or abuse of government funds will be handled in accordance with the County's CDBG-DR policies and, if substantiated, will be forwarded to

the HUD Office of Inspector General (OIG) Fraud Hotline. All subrecipients will be required to develop complaint procedures that align with the requirements set by the County.

## Appeals

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

Adopted policies and statutory and regulatory requirements/guidelines may not be appealed. The County will implement appeal processes for beneficiaries and subrecipients related to program eligibility and program application process. The point of contact and procedure for submitting an appeal is detailed in the appropriate program policies and procedures.

## Modifications to the Action Plan

Recovery needs of the County may change over time. The County will amend the CDBG-DR Action Plan when necessary to address long-term recovery needs and goals. 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 Action Plan.

## Substantial Amendments

The County identifies the following criteria which constitute a substantial amendment:

- A change in program benefit or eligibility criteria;
- The addition or deletion of an activity or program;
- An allocation of reallocation of funds which exceeds or is expected to exceed 10 percent of the current total approved budget;
- Any proposed reduction in the overall benefit requirement which currently requires that at least 70 percent of the full \$252,711,000 CDBG-DR allocation must be expended for activities that benefit LMI persons; or
- Any update to the Action Plan if the original submission was deemed incomplete by HUD.

Pursuant to section I.C.6.a of the Revised Universal Notice, the County will make substantial amendments available for public comment for no less than 30 days. Amendments will be posted on the County's CDBG-DR website at [www.mymanatee.org/lastingmanatee](http://www.mymanatee.org/lastingmanatee). Following the public comment period, the County will address comments received and then submit the substantial amendment for HUD's review and approval. The County will address

any question and make any revisions sought by HUD and, once the amendment is approved, immediately act to implement the amendment. Every amendment to the Action Plan (substantial and non-substantial) will be numbered sequentially, cited in the Action Plan change log, posted on the County's CDBG-DR website, and consolidated into the Action Plan.

### **Non-Substantial Amendments**

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the threshold for substantial amendment thresholds noted above and does not require posting for public comment. The County will notify HUD five (5) business days before the change is effective. All amendments will be numbered sequentially, cited in the Action Plan change log, and posted to the Action Plan as available on the CDBG-DR website.

### **Performance Reports**

Pursuant to III.G.2.c of the Revised Universal Notice, the County will submit quarterly performance reports (QPRs) to HUD through the Disaster Recovery Grant Reporting (DRGR) system no later than 30 calendar days following the end of each quarter. The 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. Pending HUD approval, of a submitted QPR, it will be published on the County's CDBG-DR website at [www.mymanatee.org/lastingmanatee](http://www.mymanatee.org/lastingmanatee) with all personally identifiable information (PII) omitted.

If HUD rejects a QPR, the County will follow the process outlined at III.G.2.c.(ii) of the Revised Universal Notice. Within 30 calendar days of HUD's rejection of the QPR, the County will revise and resubmit the QPR to HUD via DRGR. The County will publish the QPR, with all PII omitted, as approved by HUD, within three calendar days of HUD approval.

Any substantial or non-substantial amendments to the DRGR Action Plan will be submitted at least 45 calendar days prior to the QPR deadline.

Upon closeout of the grant with HUD, the County will shift to annual reporting as described in section III.B.12.e.(3) of the Revised Universal Notice, if necessary.

# Appendix

## Certifications

The County acknowledges that it will administer the CDBG-DR grant consistent with the following certifications required by Federal statute and regulation.

### Certifications Involving Waivers and Alternative Requirement

- a. Uniform Relocation Act (URA) and Residential Anti-displacement and Relocation Plan (RARAP)—the County certifies that it:
  1. will comply with the acquisition and relocation requirements of the Uniform Relocation Act, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements;
  2. has in effect and is following a RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.
- b. Authority of Grantee—the County certifies that the Action Plan for disaster recovery is authorized under state and local law (as applicable) and that the County, and any entity or entities designated by the County, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- c. Consistency with the Action Plan—the County certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.
- d. Citizen Participation—the County certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).
- e. Use of Funds—the County certifies that it is complying with each of the following criteria:
  1. Purpose of the funding. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing,

economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 *et seq.*).

2. Maximum Feasibility Priority. With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
3. Overall benefit. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.
4. Special Assessment. The County will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
  - (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or
  - (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- f. Grant Timeliness—the County certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the County has reviewed the requirements applicable to the use of grant funds.
- g. Order of Assistance—the County certifies that it will comply with the statutory order of assistance listed in Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG-DR assistance for the costs of carrying out the same activity.

Further, as required by Paragraph 64 of HUD's March 19, 2025, memorandum revising Appendix B of HUD's Universal Notice issued on January 8, 2025, the County hereby provides assurance that it shall comply with the following certifications:

- a. General Certifications at 24 CFR 91.225(a)(1), (3), and (7)
- b. Community Development Block Grant Program Certifications at 24 CFR 91.225(b)(5), (6), (7), and (8).

## Waivers

The County does not request any waivers as part of the initial submission of this Action Plan but may seek waivers in the future.

## Standard Form 424

A completed Standard Form 424 will be included in the submission of this Action Plan to HUD.

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# Public Comments and Responses on Draft Action Plan

The County will incorporate comments received during the public comment period, in addition to responses prepared by Lasting Manatee staff, into *Table 59*.

*Table 59 – Consideration of Public Comments*

Comment Received	County Response
TBD	TBD