

Manatee County, Florida | July 2026

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

Hurricanes Debby, Helene, and Milton



Change Log

The following table summarizes HUD submission and/or 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 (June 24, 2025)	Action Plan submitted to HUD.
Version 2 (July 31, 2025)	Home Recovery Program updated to include homeowner reimbursement described in page 81

Action Plan Substantial Amendment #1 Summary

Public Comment

To be completed after the end of the 30-day public comment period.

Amendment Summary

The purpose of this Action Plan Amendment (APA) is to make amendments that meet one of the following Substantial APA criteria:

- A change in program benefit or eligibility criteria;
- The addition or deletion of an activity or program;
- An allocation or 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.

The amendment updates clarifies Manatee County's Home Recovery Program framework to better align with the County's recovery needs to allow eligible homeowners to apply for the reimbursement of documented, eligible expenses related to 2024 Hurricane damage repairs or reconstruction. The award cap is \$75,000 based on eligible expenses. The amendment also clarifies program, contracting and lead agency and method of distribution requirements for the Home Recovery Program, Rental Recovery Program and Infrastructure Recovery and Resilience Programs.

Version (Date)	Section Update/Revision	Summary of Changes
Version 1 (June 24, 2025)	Not Applicable	Action Plan submitted to HUD.
Version 2 (To be submitted to HUD on September, XX, 2026)	Updated Table of Contents and Index Figures	Updated the Table of Contents and Index of Figures to reflect the revised document structure and newly added content.
	Connection Between Proposed Programs and Projects to Unmet Needs and Mitigation Needs	Updated this section to include additional information regarding the incorporation of the Reimbursement Pathway and its relationship to identified unmet and mitigation needs.
	Housing Grantee Program #1: Home Recovery Program	Clarified program requirements related to the selection of contractors for the direct assistance pathways, including rehabilitation, reconstruction, replacement, and elevation activities. Added information on the replacement award cap.
	Housing Grantee Program #1: Home Recovery Program – Reimbursement Pathway	Added program details for the new Reimbursement Pathway, including eligibility and implementation considerations. Updated the application processing phases to incorporate this pathway into program operations.
	Housing Grantee Program #2: Rental Recovery Program	Clarified program requirements related to the selection of contractors for the direct assistance pathways, including rehabilitation, reconstruction, and elevation activities.
	Infrastructure Grantee Program #1: Infrastructure Recovery and Resilience Program	Added program option to allow for eligible municipalities to be Subrecipients to the County.

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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 allocations by proposed program in the Action 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	Estimated Percentage of Mitigation Set-Aside	Estimated Percentage to Overall LMI Benefit
Administration (5%)	\$12,635,000	5%	-	-
Planning	\$2,520,000	1%	-	-
Subtotal Planning and Administration	\$15,155,000	6%	-	-
Home Recovery Program	\$75,556,000	29.90%	0%	80%
Rental Recovery Program	\$20,000,000	7.91%	0%	100%
Buyout and Safe Housing Program	\$12,000,000	4.75%	0%	70%
Infrastructure Recovery & Resiliency Program	\$125,000,000*	49.46%	100%	70%
Infrastructure Match Program	\$5,000,000	1.98%	0%	70%
Subtotal Programs	\$237,556,000	94%	100%	75.71%**
Grant Total	\$252,711,000	100%	100%	71.17%

*Includes the County's entire mitigation set-aside of \$32,962,000.

**Reflects the proportion of LMI benefit calculated only from program delivery funds (\$237,556,000) with administration and planning (\$15,155,000) excluded.

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.

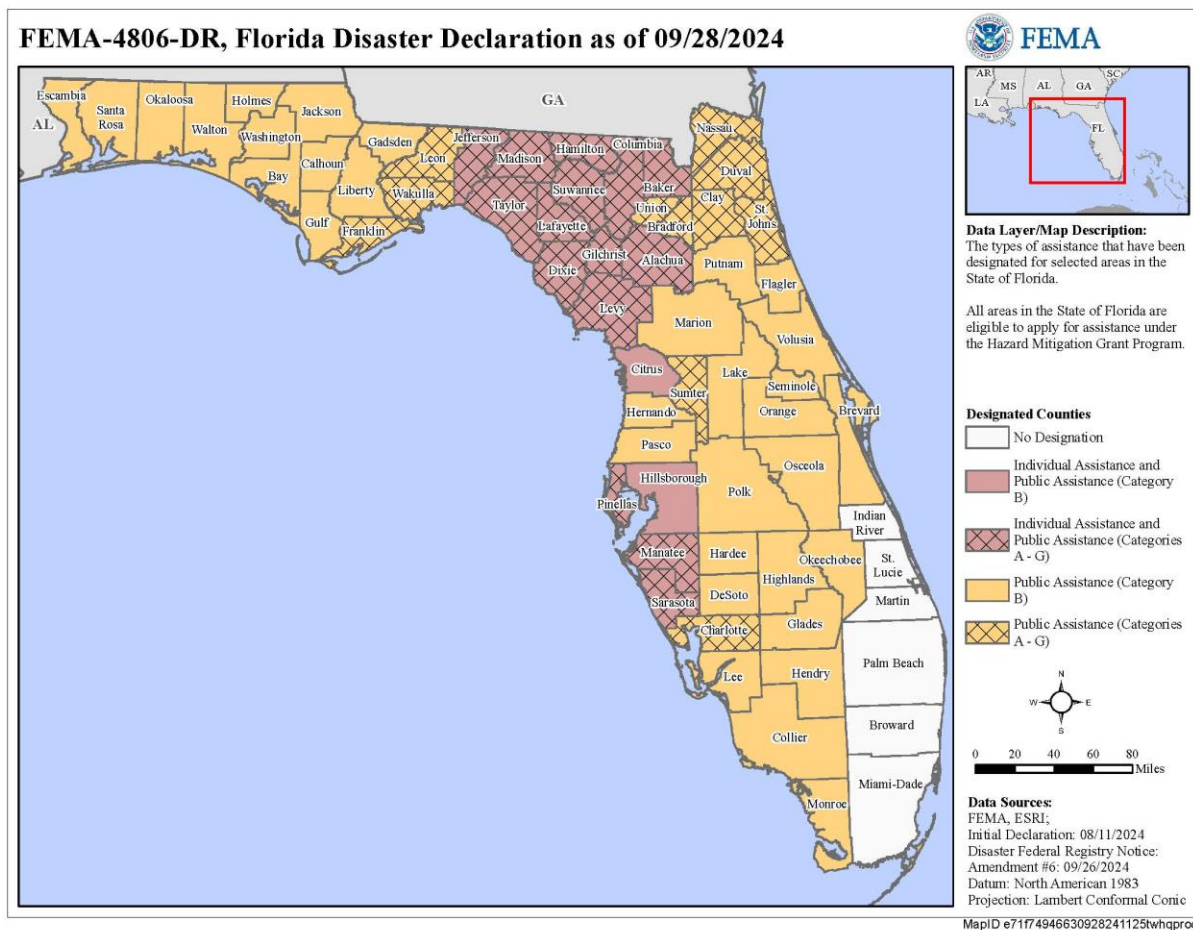
Hurricane Debby

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.¹ Wastewater treatment systems were overwhelmed, resulting in the

¹ 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.² 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.³

Figure 1 – Hurricane Debby Disaster Declaration



Source: FEMA Designated Areas: Disaster 4806.⁴

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.⁵ Due to the storm's severity, the request was expedited before completion of Joint Preliminary Damage Assessments (PDAs), conducted

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

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

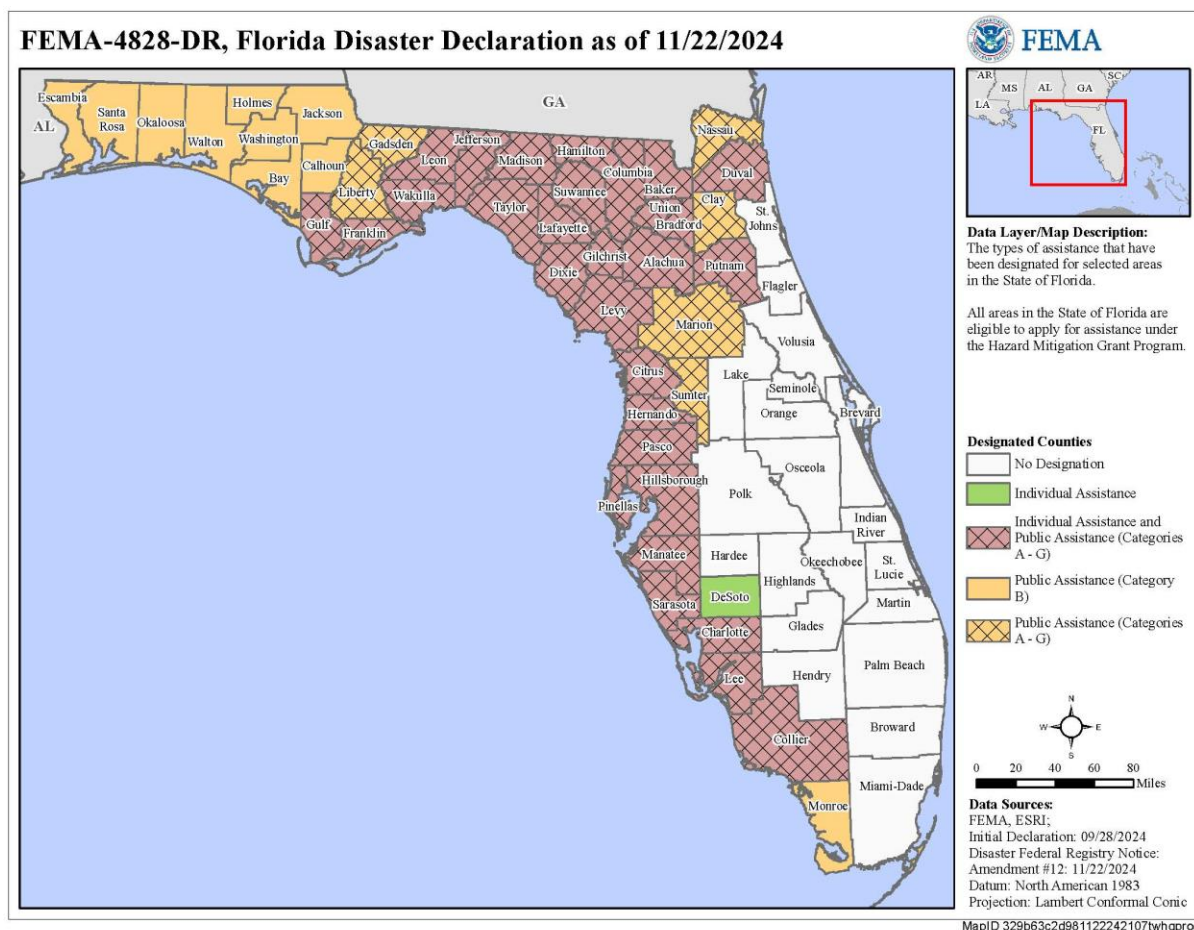
⁴ Source: [Designated Areas: Disaster 4806](#). FEMA. 2024.

⁵ 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.⁶

Hurricane Helene

Figure 2 – Hurricane Helene Disaster Declaration



Source: FEMA Designated Areas: Disaster 4828.⁷

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,⁸ with overall storm surge levels in the four to six foot range, leading to extensive coastal inundation and infrastructure

⁶ Source: Preliminary Damage Assessment Report: FEMA-4806-DR-FL, FEMA. 2024.

⁷ Source: Designated Areas: Disaster 4828, FEMA. 2024.

⁸ Source: Tropical Cyclone Report: Hurricane Helene, National Hurricane Center. 2025

impacts.⁹ 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.¹⁰ 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.¹¹ Due to the storm's catastrophic impacts, the request was expedited and granted prior to the completion of Preliminary Damage Assessments.¹²

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.¹³ These impacts were compounded by saturated soil conditions from prior storms, contributing to transportation and utility disruptions.¹⁴

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.¹⁵

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

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

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

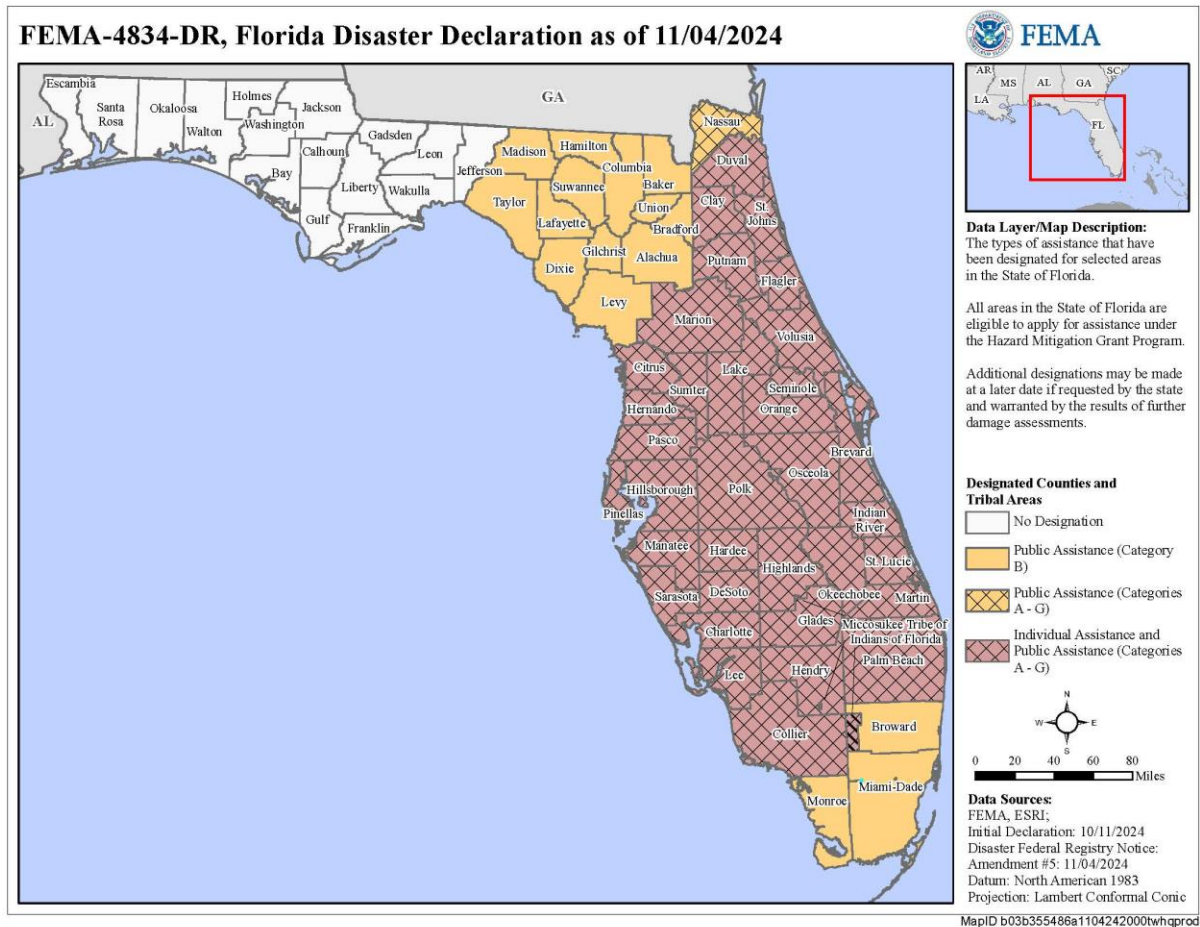
¹² Source: [Preliminary Damage Assessment Report: FEMA-4828-DR-FL](#). FEMA. 2024.

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

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

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

Figure 3 – Hurricane Milton Disaster Declaration



Source: FEMA Designated Areas: Disaster 4834.¹⁶

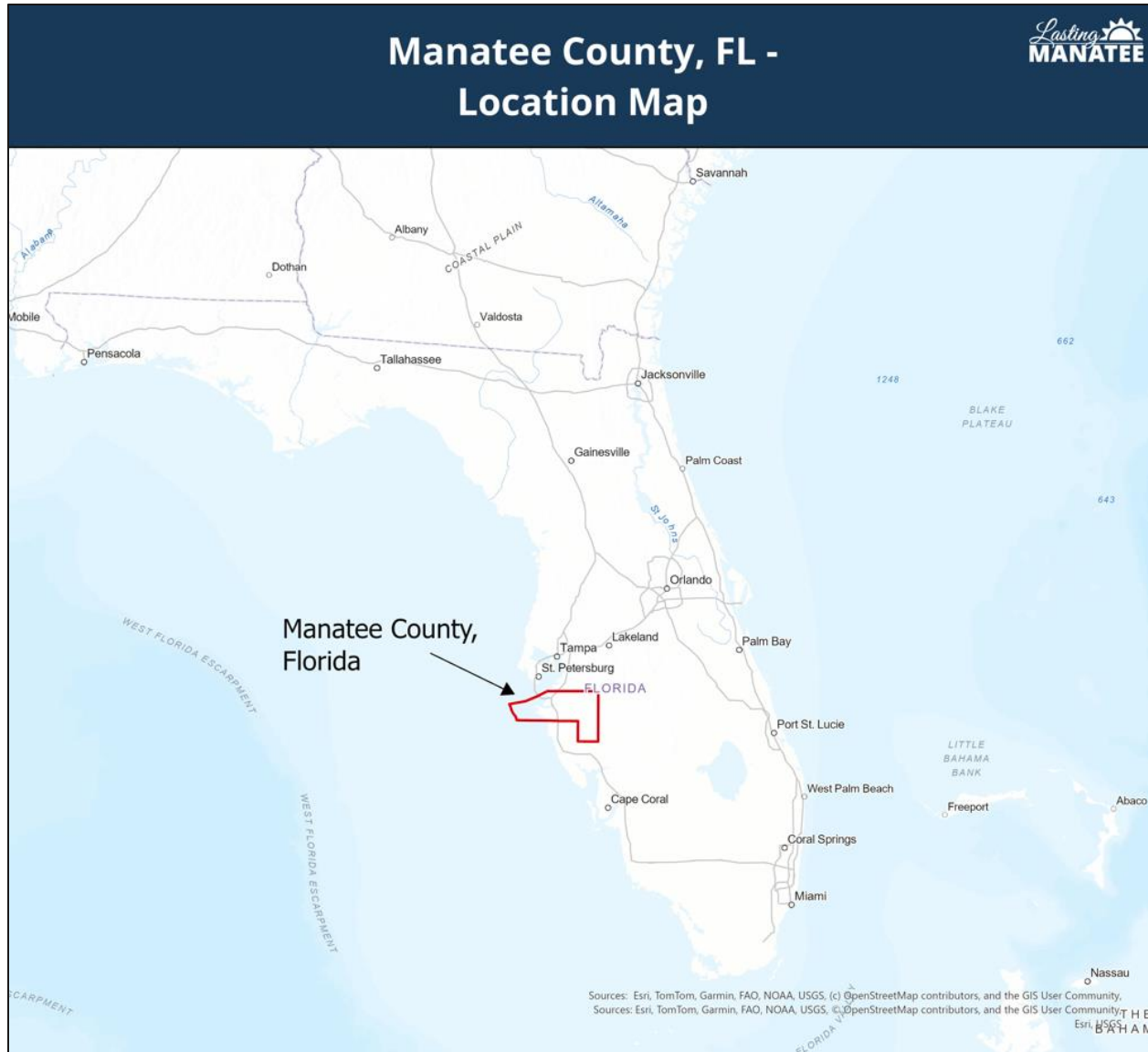
Most Impacted and Distressed Areas

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.

¹⁶ Source: [Designated Areas: Disaster 4834](#), FEMA. 2024.

Figure 4 – Location of Manatee County, Florida



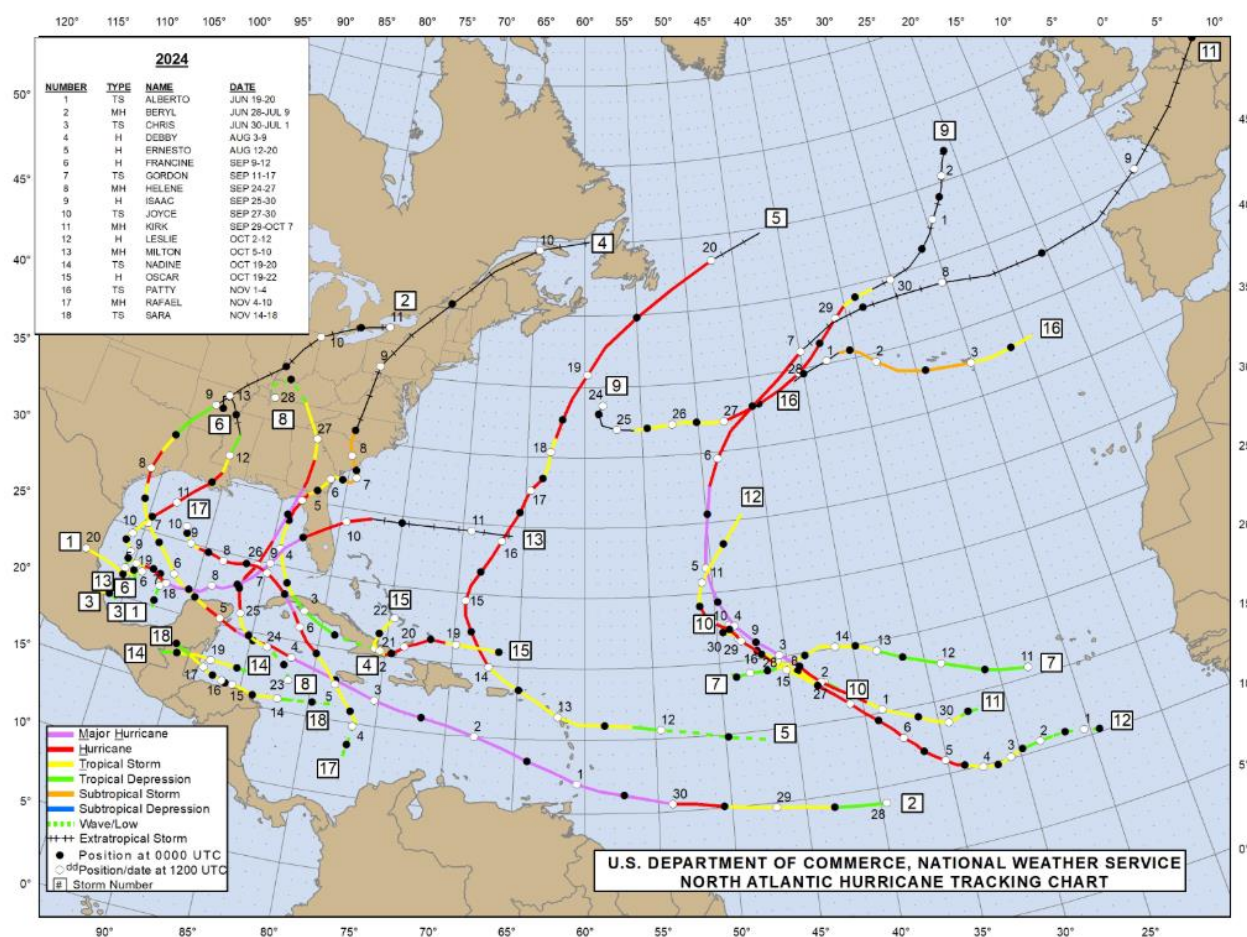
Overview of the Impacts of the Qualifying Disaster

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 \$1.66 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



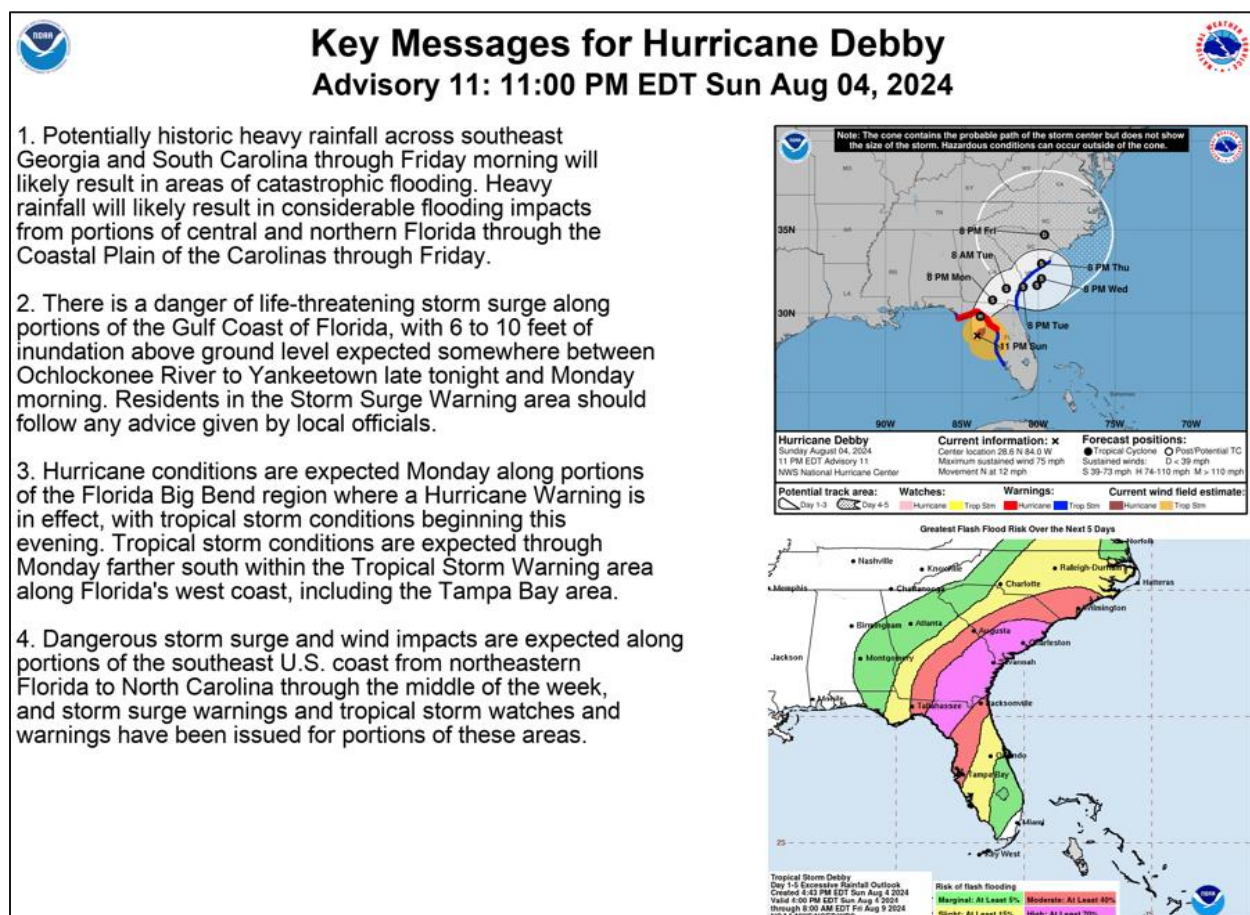
Source: National Hurricane Center¹⁷

¹⁷ 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.¹⁸ 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.¹⁹

Figure 6 – National Hurricane Center Advisory for Hurricane Debby



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

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

Source: National Hurricane Center²⁰

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.²¹ 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.²² Storm surge observed in Port Manatee peaked at 2.4 feet above MHHW.²³

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.²⁴ 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.²⁵ 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 2023.²⁶ Aerial imagery collected by the NOAA Remote Sensing Division

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

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

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

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

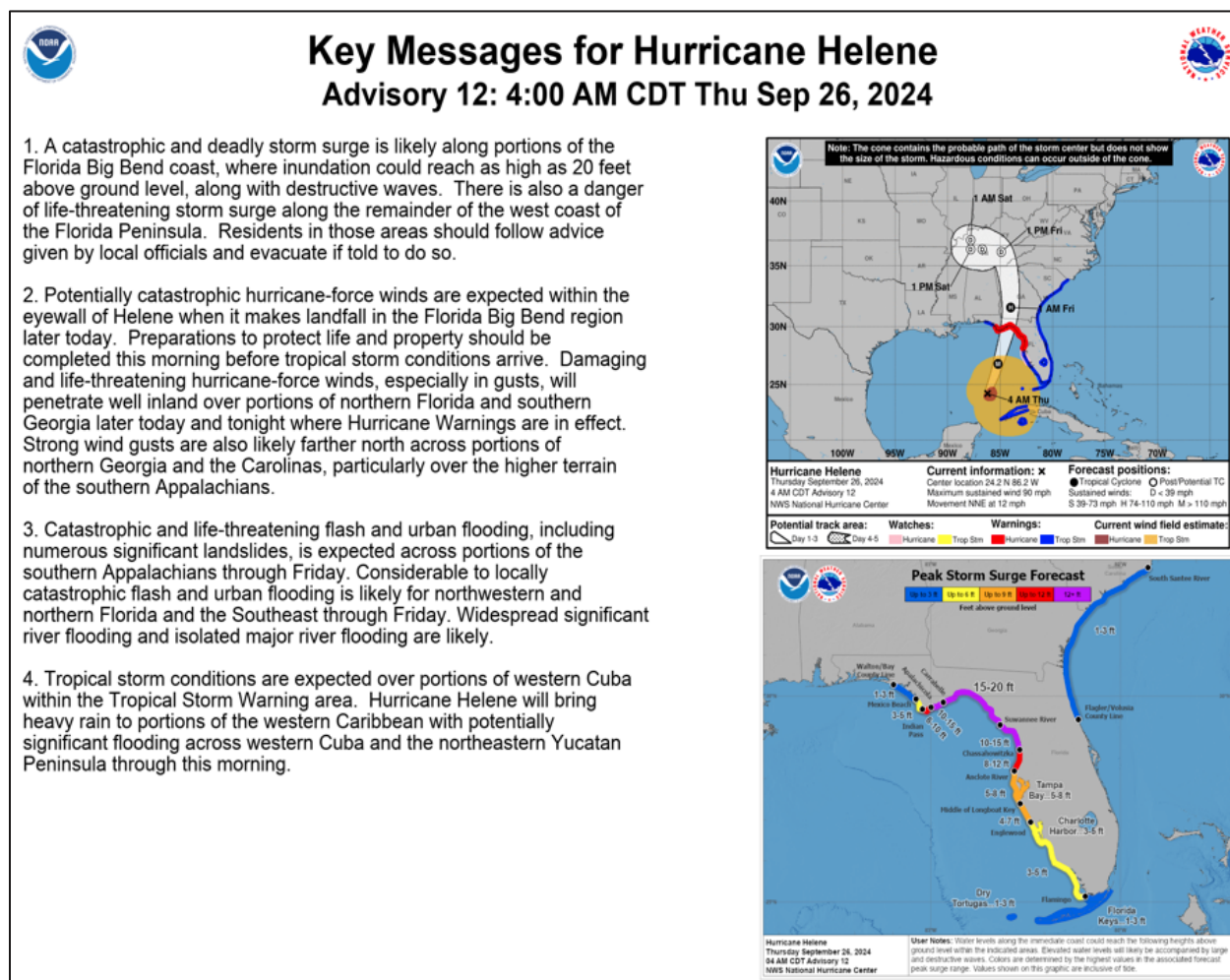
²⁴ Source: [How Many Hurricanes Have Made Landfall in Florida this Year?](#) WTSP. 2024.

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

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

shows that many homes were removed from foundations leaving only the slab and stilts where the elevated home once was.²⁷

Figure 7 – National Hurricane Center Advisory for Hurricane Helene



Source: National Hurricane Center²⁸

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 26.²⁹ 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.³⁰

²⁷ Source. [Hurricane Helene Tropical Cyclone Report](#). National Hurricane Center. 2025.

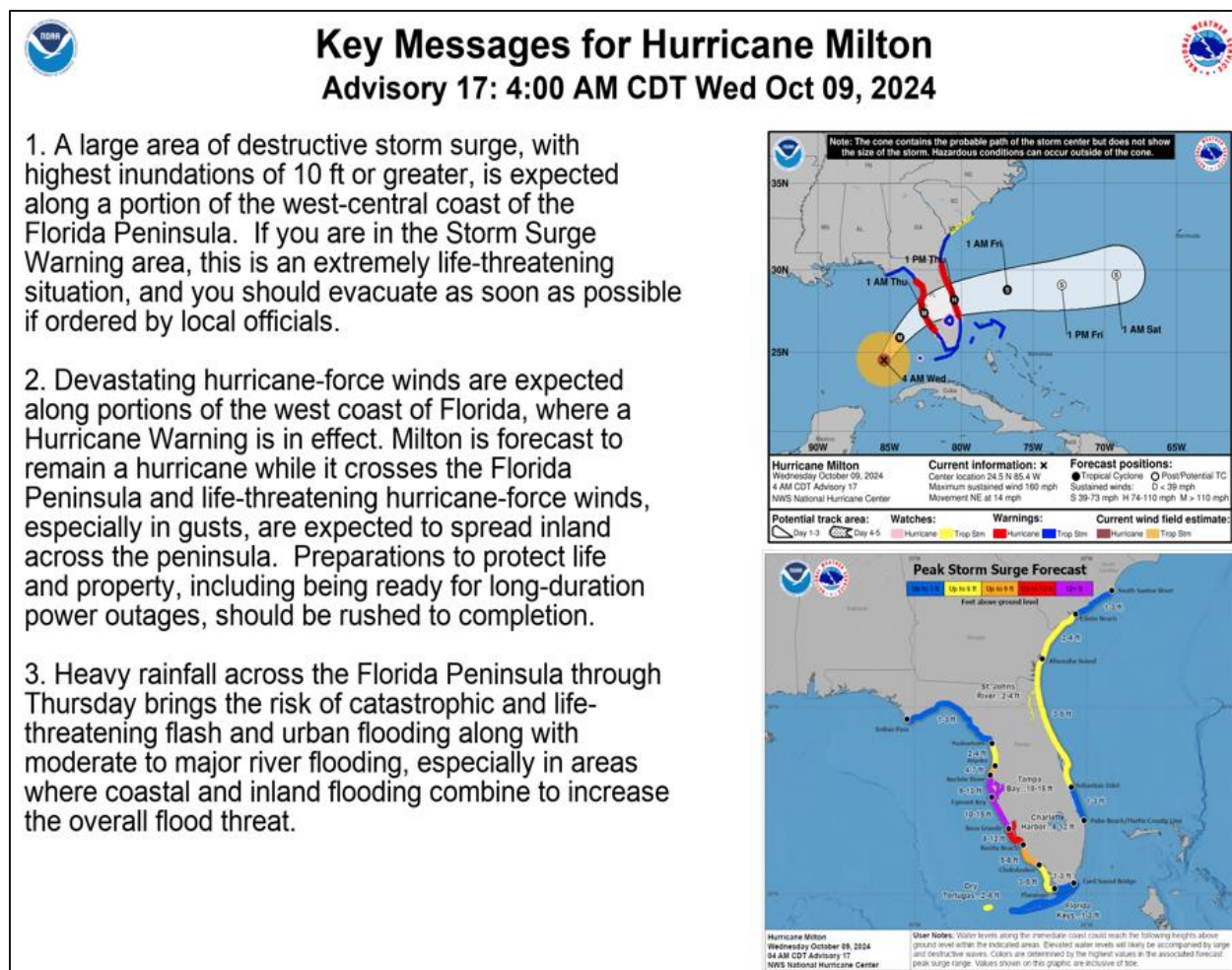
²⁸ Source: [Key Messages for Hurricane Helene](#). National Hurricane Center. 2024.

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

³⁰ Source. [Hurricane Helene Tropical Cyclone Report](#). National Hurricane Center. 2025.

Hurricane Milton Impacts

Figure 8 – National Hurricane Center Advisory for Hurricane Milton



Source: National Hurricane Center³¹

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.³² There were

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

³² 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.³³

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.³⁴ 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 9th Street, 8.52 inches at Curiosity Creek, 8.48 inches at Carr Drain, and 8.44 inches at Palma Sola Drain.³⁵

Storm surge from Milton measured 5.04 feet over MHHW with significant waves on top,³⁶ 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
Total Allocation	\$252,711,000

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. While the County will retain responsibility for overall program administration and all inherently governmental functions, including compliance, monitoring, performance management, and reporting, certain program

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

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

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

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

activities may be carried out by eligible subrecipients under agreements with the County. The County reserves the ability to implement programs either directly or through subrecipients and will provide oversight to ensure compliance with HUD requirements and achievement of program objectives. 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.

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	Program Allocation Amount	Percent of Program Allocation
Administration	-	-	\$12,635,000	5%
Housing	\$483,471,574	39.12%	\$107,556,000	42.56%

Eligible Cost Category	Unmet Need	Percent of Total Unmet Need	Program Allocation Amount	Percent of Program Allocation
Infrastructure	\$747,963,219.02	60.53%	\$130,000,000	51.44%
Economic Revitalization	\$4,306,199	0.35%	\$0	-
Planning	-	-	\$2,520,000	1%
Total	\$1,235,740,992.02	100%	\$252,711,000	100%

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 Notice³⁷ and the HUD AAN.³⁸ 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.

³⁷ 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.

³⁸ 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.

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	National Oceanic and Atmospheric Administration (NOAA) , National Weather Service (NWS)
Presidential Disaster Declaration Areas	FEMA
Most Impacted and Distressed Area	HUD
Housing Impact Data	FEMA Individual Assistance (IA) , Small Business Administration (SBA) , National Flood Insurance Program (NFIP) , Manatee County Housing Authority , Housing Authority of the City of Bradenton
Infrastructure Impact Data	FEMA Public Assistance (PA) , Stakeholder Consultations
Economic Impact Data	Small Business Administration (SBA) , Stakeholder Consultations
Socioeconomic and Demographic Data	U.S. Census Bureau (Decennial Census and American Community Survey)
Low- and Moderate-Income Data	HUD
Homelessness, Unsheltered Populations	Suncoast Partnership to End Homelessness, Inc. , HUD & Homelessness Data Exchange (HDX) Homeless Point-in-Time Count
Mitigation	Manatee County Local Mitigation Strategy Plan

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.³⁹
- **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.⁴⁰
- **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)⁴¹ 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.
- **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 awards⁴² 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

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

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

⁴¹ 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.

⁴² Source: [Understanding FEMA Verified Loss](#). FEMA. 2017.

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 441,095,⁴³ 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.⁴⁴ With a large population of retirees, the age of the County's population exceeds state (42.40 years⁴⁵) and national (38.50 years⁴⁶) averages, with a median age of 49.40 years,⁴⁷ indicating a potential need for age-specific services, healthcare, and accessible infrastructure to support an aging demographic. These 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

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

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

⁴⁵ Source: [Florida Population](#). World Population Review. 2025.

⁴⁶ Source: [United States Population](#). World Population Review. 2025

⁴⁷ Source: [Manatee County Population](#). World Population Review. 2025.

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%
Total	441,095	100%

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

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,⁵⁰ 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.⁵¹
- 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.⁵²

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

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

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

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

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

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.⁵³ *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.⁵⁴ **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%

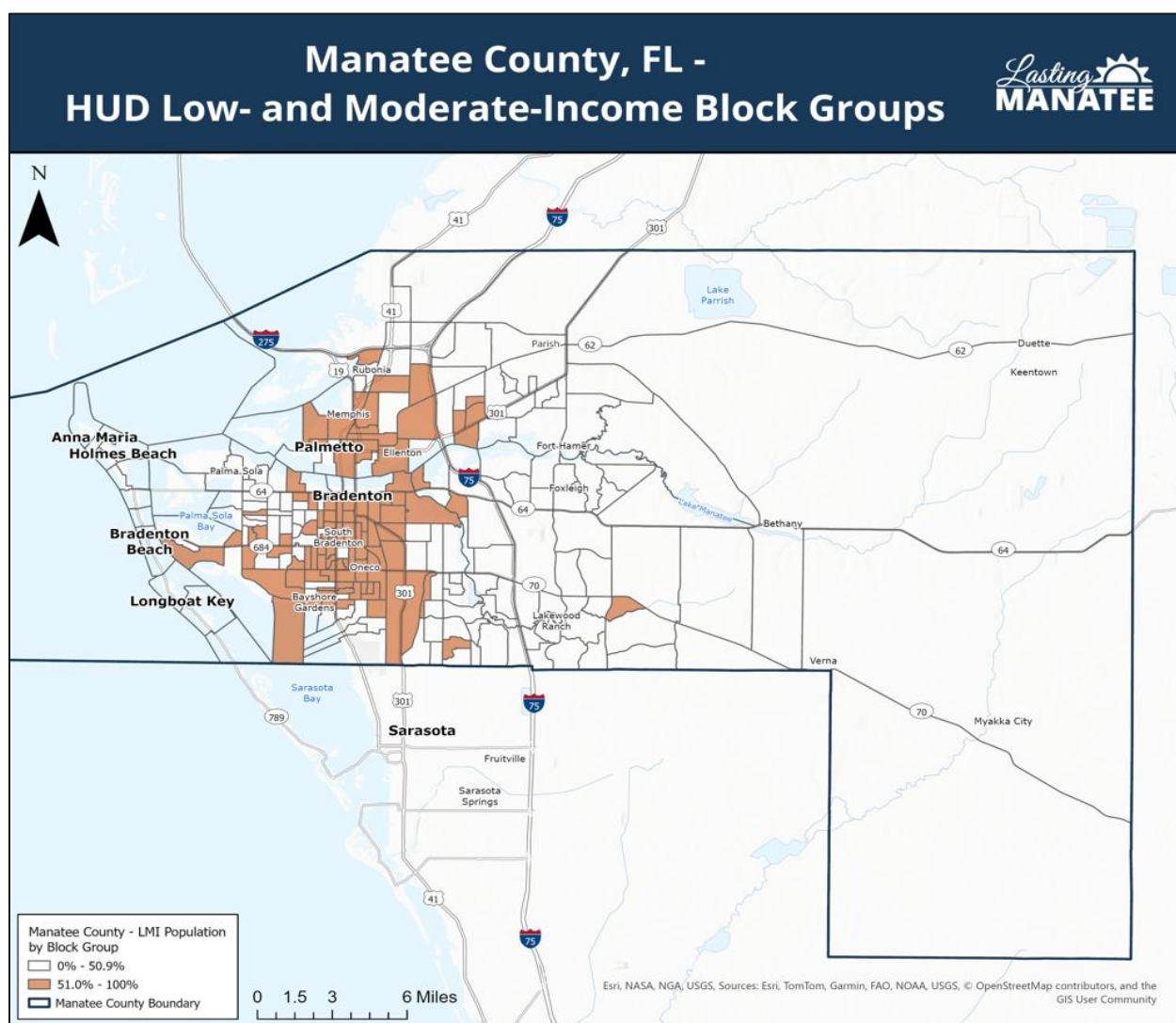
Source: HUD ACS 5-Year 2016-2020 Low- and Moderate-Income Summary Data by Local Governments⁵⁵

Figure 9 – Manatee County LMI Block Groups

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

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

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



Source: HUD ACS 5-Year 2016-2020 Low- and Moderate-Income Summary Data by Block Group⁵⁶

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.

⁵⁶ Source: LMISD – All Block Groups, Based on 2016-2020 ACS. Hud Exchange. 2024.

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

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

The County utilized business loan application data from the SBA to estimate its unmet economic revitalization needs. Specifically, the County utilized 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 \$1,235,740,992.02 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	\$367,607,749	\$483,471,574	39.12%
Infrastructure	\$843,786,066.10	\$95,822,847.08	\$747,963,219.02	60.53%
Economic Revitalization	\$31,819,860	\$27,513,661	\$4,306,199	0.35%
Total	\$1,726,685,249.10	\$490,944,257.08	\$1,235,740,992.02	100%

Housing

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.

Figure 10 – Hurricane Helene Residential Flooding



Source: Manatee County Government

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.).⁵⁷

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.⁵⁸ 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.⁵⁹ 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

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

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

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

renters are considered severe housing cost burdened, totaling 50.42 percent among the two categories.⁶⁰

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.⁶¹ 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.⁶² 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 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.⁶³

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,⁶⁴ 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

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

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

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

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

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

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 Reports⁶⁵

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

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, 2025⁶⁶

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.⁶⁷ 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.⁶⁸ Single-family homes make up the majority of the County's 125,853 owner-

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

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

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

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

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.⁶⁹

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 Units⁷⁰

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 Data⁷¹

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.⁷² The HACB manages a

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

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

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

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

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.⁷³ 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.

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

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

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

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.

Figure 11 – Hurricane Milton Modular Home Damage



Source: Manatee County Government

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 households⁷⁴ and 40,174 rental households in the County.⁷⁵

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, 2025.⁷⁶

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, 2025.⁷⁷

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%

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

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

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

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

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
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%
Total	56,792	58.50%	40,174	41.38%	116	0.12%	97,082	100%

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of March 1, 2025⁷⁸

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.

⁷⁸ Source: [Housing Assistance Program Data - Renters v2](#), FEMA Open Data, 2024.

- **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.
- **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, 2025⁷⁹

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, 2025⁸⁰

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

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

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.⁸¹ 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.

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, 2025.⁸²

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
Total	7,421	5,847	6,735	427	\$862,317,465.55

Source: Manatee County Development Services

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

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

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.

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%

Income Category	Units with Homeowners' Insurance	Percentage of Total with Homeowners' Insurance	Units without Homeowners' Insurance	Percentage of Total without Homeowners' Insurance
\$120,001-\$175,000	4,792	8.44%	335	0.59%
>\$175,000	3,874	6.82%	401	0.71%
Total	40,341	71.03%	16,451	28.97%

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of March 1, 2025.⁸³

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 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%

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

Income Category	Units with Flood Insurance	Percentage of Total with Flood Insurance	Units without Flood Insurance	Percentage of Total without Flood Insurance
>\$175,000	1,531	2.70%	2,744	4.83%
Total	8,456	14.89%	48,336	85.11%

Source: Open FEMA Individual Assistance Valid Registrant Dataset as of March 1, 2025.⁸⁴

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.

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, 2025⁸⁵

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 1978.⁸⁶ 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 \$424,000,⁸⁷ this equates to approximately \$45.4 million in residential property repeatedly exposed to flood risk. These figures highlight the

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

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

⁸⁶ Source: [Repetitive Loss Structure](#). FEMA. 2020.

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

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
Total	195

Source: OpenFEMA Dataset: NFIP Multiple Loss Properties V1 – as of December 17, 2024⁸⁸

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 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	2,262	548	\$29,042,116

Source: SBA Disaster Loan Data as of May 22, 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.

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

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.⁸⁹ 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.

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

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

Data	Households / Units	Average Real Property Loss	Source of Average Real Property Loss	Estimated Total Loss
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
Total Housing Loss				\$851,079,323

Table 27 – Summary of Housing Assistance Received

Data	Count	Average Assistance Received	Total Assistance
FEMA IA Payments to Repair Homes	4,938	\$8,061.62	\$39,808,291
SBA Disaster Home Loan Assistance	548	\$52,997	\$29,042,116
NFIP Identified Payments	5,719	\$52,239.44	\$298,757,342
Total Housing Assistance			\$367,607,749

Table 28 – Total Housing Unmet Need

Category	Total
Total Housing Damage	\$851,079,323
Total Housing Assistance Received	\$367,607,749
Total Housing Unmet Need	\$483,471,574

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.⁹⁰

The primary source of the County's drinking water is the Lake Manatee Reservoir, formed by the Lake Manatee Dam.⁹¹ The reservoir covers a surface area of about 1,450 acres⁹² 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.⁹³ To supplement its surface water

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

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

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

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

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.⁹⁴

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.⁹⁵ 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.⁹⁶

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.⁹⁷ 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 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,⁹⁸ and special needs⁹⁹ 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 72.¹⁰⁰ The

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

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

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

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

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

⁹⁹ Source: [Manatee County Special Needs Registry](#). Manatee County. 2024.

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

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.¹⁰¹ Air travel is served by the Sarasota-Bradenton International Airport (SRQ), providing commercial air service with limited freight capacity on passenger flights.¹⁰² Rail service is provided by CSX Transportation and the Seminole Gulf Railway.¹⁰³

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.¹⁰⁴ 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.¹⁰⁵

Infrastructure Disaster Damage and Impacts

Figure 12 – Hurricane Helene Damage on Anna Marie Island



Source: Manatee County Government

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

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

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

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

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

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.¹⁰⁶ During Hurricane Debby, 13.49 inches of rain fell in 48 hours, approaching the 100-year flood threshold of 14.2 inches and resulting in flash flooding across major inland basins.¹⁰⁷ Helene brought a storm surge of four to six feet, inundating low-lying coastal zones and overwhelming protective dune systems.¹⁰⁸ Uprooted trees damaged water mains, while blocked stormwater infrastructure contributed to persistent standing water and localized overland flooding.¹⁰⁹ Sanitary sewer systems were compromised by storm-related inflows, and multiple sanitary sewer overflows released untreated wastewater during peak storm periods.¹¹⁰ 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.¹¹¹

During Hurricane Helene, over 72,000 County homes and businesses lost power.¹¹² 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.¹¹³ 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.¹¹⁴ 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.¹¹⁵

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

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

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

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

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

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

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

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

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

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

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.¹¹⁶ Reports indicated that canal systems in Braden River and Gamble Creek were unable to convey water efficiently, contributing to extensive ponding and delayed drainage.¹¹⁷

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, 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.¹¹⁸

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

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

¹¹⁷ Source: [Clogged Manatee Waterways Made Hurricane Flood Worse](#). Bradenton Herald. 2025.

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

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.¹¹⁹ 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

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.¹²⁰ 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

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

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

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.¹²¹

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

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.¹²²

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.¹²³ Additionally, the Manatee Avenue and Cortez Road bridges were closed due to safety concerns during Hurricane Helene.¹²⁴ Damage to these structures disrupted transportation and impeded the delivery of essential services to affected neighborhoods.

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

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

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

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

SeaPort Manatee, a critical hub for the region's economy, sustained over \$200 million in damages due to Hurricane Milton.¹²⁵ 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. 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.

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.

Estimated FEMA PA figures for County municipalities are identified in *Table 30*. During the consultation process, it was determined that the MCHA and HACB did not have any FEMA PA claims.

Per the data, the unmet needs for the 25 percent non-federal cost share for all of Manatee County, Categories C-G, are estimated at \$31,940,949.03.

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

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
Total	\$64,253,571.97	\$48,190,178.98	\$16,063,393

Source: Data Compiled by Manatee County

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*	\$63,510,224.13	\$47,632,668.10	\$15,877,556
County Government	\$64,253,571.97	\$48,190,178.98	\$16,063,393
Total	\$127,763,796.10	\$95,822,847.08	\$31,940,949

Source: Information collected during the consultation process

*Includes all FEMA PA data made available by municipalities 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	\$31,940,949
Standalone Projects	\$716,022,270
Total Estimated Unmet Need	\$747,963,219

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.¹²⁶

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.¹²⁷ Tourism accounts for an estimated \$2.2 billion in annual economic activity and supports roughly 30,000 jobs.¹²⁸ Hospitality alone employs approximately 6.6 percent of the local workforce, with strong performance continuing into early 2024.¹²⁹ Agriculture remains a longstanding pillar of the economy, with over 220,000 acres in production and approximately 750 farms employing 7,700 workers.¹³⁰

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.¹³¹ As Florida's manufacturing sector expanded, the port's strategic location and infrastructure development helped bolster regional growth, streamline trade, and attract private investment.¹³²

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.¹³³ Helene further

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

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

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

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

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

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

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

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

disrupted production in the County, impacting approximately 119,968 acres of agricultural land and causing an estimated \$6.78 million in production losses.¹³⁴ Milton caused between \$43.24 million and \$94.30 million across 119,960 acres of affected farmland in the County.¹³⁵ Many producers delayed winter crop planting, affecting yields into the next season.¹³⁶

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 2024.¹³⁷

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.¹³⁸ 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

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.¹³⁹ The City of Bradenton Beach reported in a press release that an estimated 90-95 percent of the City was destroyed by Helene.¹⁴⁰ Similarly, Anna Maria Island reported 845 properties with major damage.¹⁴¹ 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

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

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

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

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

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

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

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

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

42,000 jobs (direct and indirect) in Florida,¹⁴² sustained over \$200 million in damages due to Milton, leading to a disruption in the flow of goods.¹⁴³

WORKFORCE

As businesses closed for repairs and tourism temporarily slowed, many workers found themselves furloughed or unemployed in the weeks immediately after the storms.¹⁴⁴ 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.¹⁴⁵ 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.¹⁴⁶ 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.¹⁴⁷ While weekly national jobless claims were decreasing in mid-October, Florida’s shot upward due to storm-related layoffs and work interruptions.¹⁴⁸ Thousands of those claims came from the 31 disaster-declared counties (including Manatee County) where businesses were damaged and unable to operate normally.¹⁴⁹

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.

According to SBA data, \$27,513,661 in combined loan funds were distributed for Disaster Business Loans (Physical Damage) and Economic Injury Disaster Loans (*Table 34*).

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

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

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

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

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

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

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

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

Table 33 – Total Loans Approved by the SBA

Item	Business/EIDL Loans
Total Loan Amounts	634

Source: Small Business Administration Data for Manatee County, FL DR-4806, DR-4828, and DR-4834, Date: May 22, 2025

Table 34 – SBA Funds Distributed

Operational Category	Total Funds Distributed
Disaster Business Loan (Physical Damage)	\$18,796,061
Economic Injury Disaster Loan	\$8,717,600
Total	\$27,513,661

Source: Small Business Administration Data for Manatee County, FL DR-4806, DR-4828, and DR-4834, Date: May 22, 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 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 \$30,997,232, with SBA payouts to businesses totaling \$27,513,661. The current total unmet needs are \$3,483,571.

Table 35 – SBA Funds Distributed

SBA Category Description	Count	Impact
Category 1: SBA approved applicants with verified losses < \$12,000	202	\$1,512,840

SBA Category Description	Count	Impact
Category 2: SBA approved applicants with verified losses between \$12,000 and \$29,999	78	\$2,172,805
Category 3: SBA approved applicants with verified losses between \$30,000 and \$64,999	88	\$4,076,900
Category 4: SBA approved applicants with verified losses between \$65,000 and \$149,999	80	\$6,924,260
Category 5: SBA approved applicants with verified losses > \$150,000	54	\$11,482,361
Sub-Total	502	\$26,169,166
Category 1: SBA declined applicants with verified losses < \$12,000	75	\$84,129.48
Category 2: SBA declined applicants with verified losses between \$12,000 and \$29,999	19	\$354,756.73
Category 3: SBA declined applicants with verified losses between \$30,000 and \$64,999	19	\$843,182.03
Category 4: SBA declined applicants with verified losses between \$65,000 and \$149,999	10	\$1,030,378.82
Category 5: SBA declined applicants with verified losses > \$150,000	9	\$2,515,619.06
Sub-Total	132	\$4,828,066
Total Verified Loss	634	\$30,997,232
Total Loans Distributed by SBA	335	\$27,513,661
Total Unmet Need	-	\$3,483,571

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 \$822,628 was identified.

Table 36 – Standalone Projects and Related Unmet Need

Item	Estimated Number of Projects	Estimated Unmet Need
Standalone Economic Revitalization Projects	3	\$822,628

Source: Information collected during the consultation process

Summary of Economic Revitalization Unmet Need

Table 37 – Summary of Economic Revitalization Unmet Need by Program

Economic Revitalization Unmet Need by Program	Estimated Unmet Need
SBA Applicants (Approved and Denied)	\$3,483,571
Standalone Projects	\$822,628
Total Estimated Unmet Need	\$4,306,199

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 38 – 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, 2025¹⁵⁰

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.

¹⁵⁰ 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.¹⁵¹ 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.¹⁵² These values allow the County to prioritize threats and guide targeted mitigation efforts. For the purposes of this MNA, *Table 39* omits all technological and human-caused hazards, and illustrates the natural hazards most relevant to CDBG-DR mitigation planning.

Table 39 – Hazard Risk Assessment and LMS Ranking

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

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

Hazard	Total Risk Value	LMS Risk Ranking
Hurricane	375.4	1
Flood	203.9	3
Tornado	186.5	4
Earthquake	169.9	5
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 Update¹⁵³

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

¹⁵³ Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County, 2020.

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 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 40 – 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 Database¹⁵⁴

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.

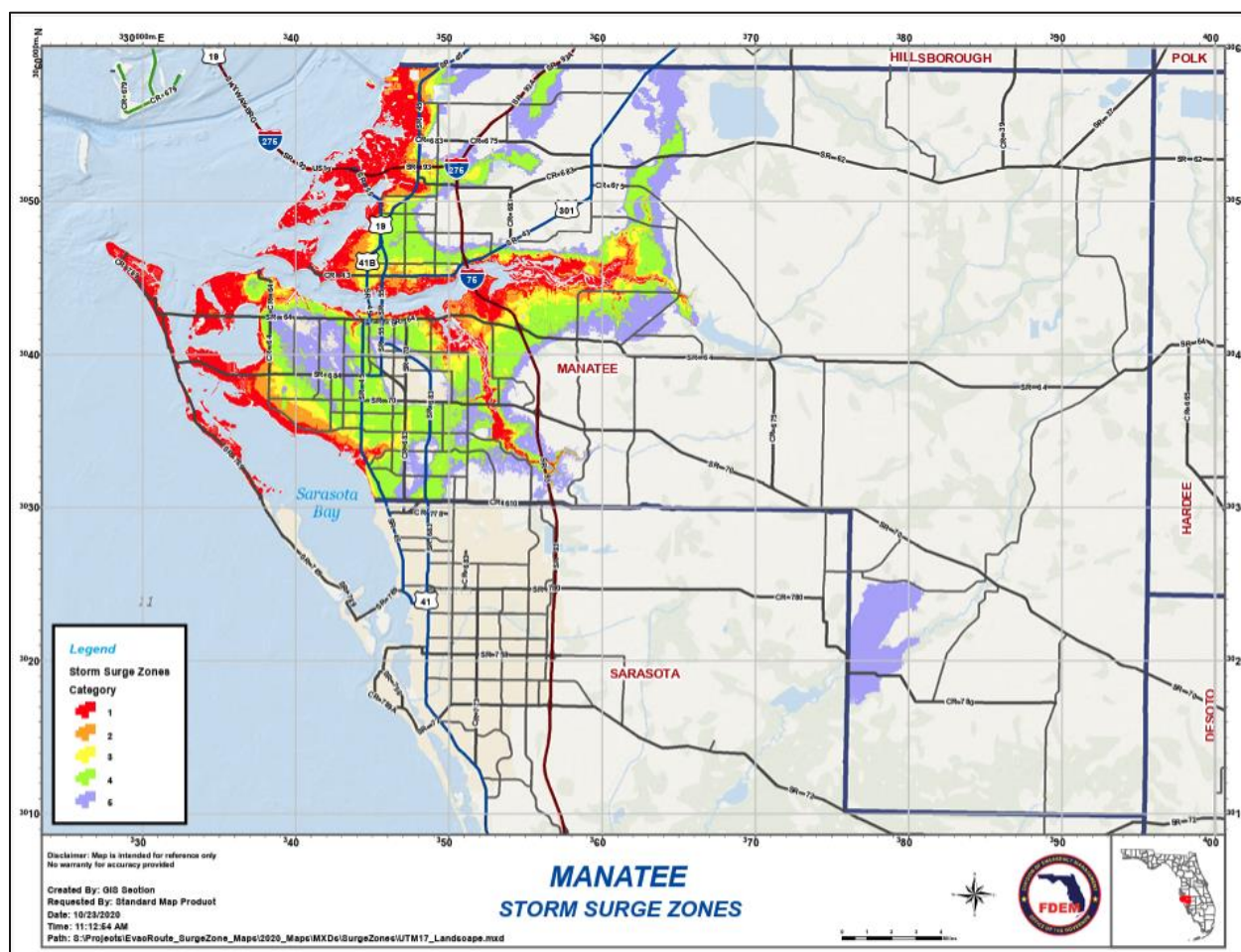
¹⁵⁴ Source: [Storm Events Database](#). NOAA. 2025.

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, 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 Maps¹⁵⁵

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

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

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.¹⁵⁶ 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 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.¹⁵⁷ 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,¹⁵⁸ 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

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

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

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

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:¹⁵⁹

1. Short-Duration Flooding: typically caused by intense thunderstorms or frontal systems.
2. Freshwater Flooding: resulting from excessive rainfall during tropical storms or hurricanes.
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.¹⁶⁰ 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,¹⁶¹ and Hurricane Debby in 2024, which produced over 18 inches of rain and caused an estimated \$56 million in damages.¹⁶² 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.¹⁶³

Figure 14 – Manatee County Flood Hazard Areas

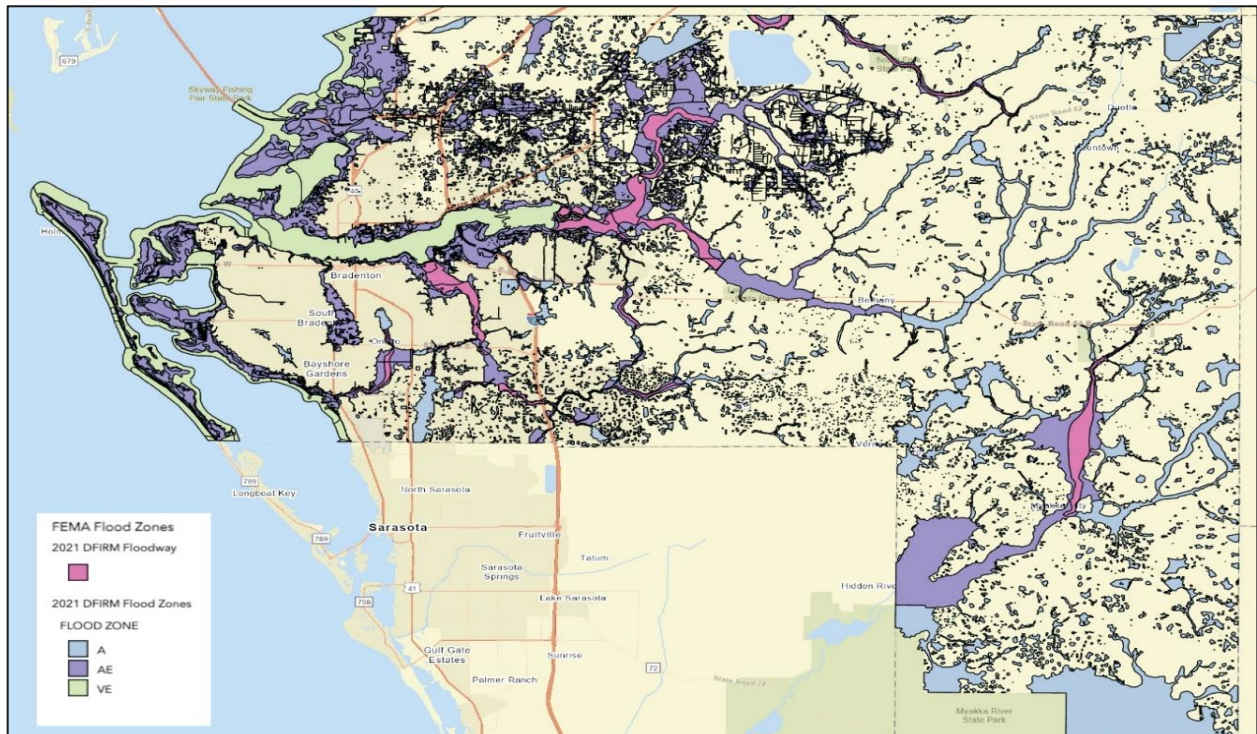
¹⁵⁹ Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County. 2020.

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

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

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

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



Source: Manatee County Flood Zone and Floodplain Management Section¹⁶⁴

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.¹⁶⁵ Lightning occurs in all thunderstorms and can strike anywhere (air and ground).

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

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

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.¹⁶⁶

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.¹⁶⁷ Tornadoes 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.¹⁶⁸ The probability of an F0/F1 tornado is High in the County with most occurring in June-August.¹⁶⁹ 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.¹⁷⁰

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.¹⁷¹ While tornadoes are typically short-lived and localized,

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

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

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

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

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

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

their intense winds and unpredictable formation make them a significant hazard requiring continued monitoring, public education, and preparedness efforts.¹⁷²

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.¹⁷³

The LMS and Debby, Helene, and Milton Post-Hurricanes Session Final Report (2025)¹⁷⁴ 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.

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.¹⁷⁵

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 1982.¹⁷⁶ Strategies such as stormwater system enhancements, property elevations, and residential hardening can be implemented to reduce long-term exposure to flooding and high winds.

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

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

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

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

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

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.¹⁷⁷

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

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, affecting communities with

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

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

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.¹⁷⁹

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.¹⁸⁰

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 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.¹⁸¹ 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 41* does not represent an all-inclusive list of mitigation strategies to address the risks identified in this MNA.

Table 41 – Hazard-Specific Mitigation Strategies for Risk Reduction

¹⁷⁹ Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County, 2024.

¹⁸⁰ Source: [Local Mitigation Strategy Plan 2019 Update](#). Manatee County, 2020.

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

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.
	Emergency Preparedness & Response	Enhance early warning systems; retrofit public shelters; educate public on storm prep and safety.
Tornadoes	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*¹⁸²

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.

¹⁸² Source: *Local Mitigation Strategy Plan 2019 Update*, Manatee County, 2020.

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:

- 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 42* 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 42 – 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 43 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 43 – 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
Total	\$322,562,866.16	\$146,485,256.55	\$176,077,609.61

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 60 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 owner occupants and 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 Fair Housing Act prohibits discrimination based on physical, mental, or emotional disability. To ensure program accessibility for displaced persons with disabilities, the County will provide reasonable accommodations in accordance with County and program policies.

Reasonable accommodations may include physical changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). The County will coordinate with all subrecipients, vendors, and County departments to minimize the displacement of persons with disabilities. Should any proposed projects or activities cause the displacement of people with disabilities, even temporarily, the County will collaborate with the impacted individual(s) to determine the necessary accommodation(s), (e.g., an accessible temporary dwelling unit), and will make reasonable efforts to accommodate.

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.

Action Plan Amendment #1 - Unmet Needs Updated

This amendment responds to citizen comments and specific requests received by the County to provide a reimbursement option for eligible homeowners who incurred out-of-pocket costs to address disaster-related unmet recovery needs resulting from the 2024 Hurricanes. Accordingly, the amendment expands the Home Recovery Program to allow reimbursement of documented, eligible expenses associated with qualifying repairs or reconstruction, subject to program eligibility requirements, verification of costs and payment, duplication-of-benefits review, and other applicable CDBG-DR requirements.

In spring 2026, HRP launched the Pre-Application to begin processing and providing intake support to interested applicants. The original Action Plan and HRP guidance stated that HRP would not be providing reimbursement of incurred disaster recovery expenses. However, as of July 6th, 2026, at least 300 applicants completed the question in the Pre-Application requesting reimbursement support. Additionally, the County has received several requests submitted to the Lasting Manatee general inbox requesting reimbursements. Based on the feedback from outreach and intake staff, the population of reimbursement needs is greater

than those who are applying. HRP will continue to prioritize vulnerable households by reviewing applicants already being processed due to their incomplete status of repairs. Then the reimbursement period will proceed with LMI applicants who are not already in the application process.

Allocation and Award Caps

Table 44 – 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	Reimbursement, 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 used for projects without a direct tie to the 2024 Hurricanes.	\$125,000,000	49.46%
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%
Total:		\$252,711,000	100%
Funds that have not been allocated:		\$0	0%

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 45 – Grantee Administration Activity Overview

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

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. Should the County elect to provide administrative funding to subrecipients, those costs will be paid from and count toward the County's overall administrative cap. No additional administrative funding beyond the maximum allowable amount will be available. 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 46 – Grantee Planning Activity Overview

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

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 47 – 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%
TOTAL	\$107,556,000	42.56%

Grantee Program #1: Home Recovery Program (HRP)

Table 48 – Home Recovery Program Details

Program Title	Home Recovery Program
Total Budget/CDBG-DR Allocation	\$75,556,000
Eligible Activities Referenced to Title I of Housing and Community Development Act of 1974 (42 USC 5305(a)) or HUD Revised Universal Notice	\$5305(a)(1) – Acquisition \$5305(a)(3) – Code Enforcement \$5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing \$5305(a)(5) – Removal of Architectural Barriers \$5305(a)(7) – Disposition \$5305(a)(8) – Public Services \$5305(a)(9) – Non-Federal Match \$5305(a)(11) – Relocation Payments \$5305(a)(13) – General Administrative and Planning Activities \$5305(a)(14) – Assistance to Non-Profit Entities

Program Title	Home Recovery Program
	• §5305(a)(15) – Assistance to Neighborhood-Based Organizations • §5305(a)(20) – Housing Services • §5305(a)(24) – Direct Assistance for Homeownership Activities • §5305(a)(25) – Tornado Shelters • §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction • FR Notice – New Housing Construction (as modified by HUD guidance) • FR Notice – Mitigation (consistent with CDBG-DR Mitigation requirements under the Revised Universal Notice)
National Objective(s) - Referenced to 24 CFR 570, Subpart C and/or HUD Revised Universal Notice	• LMI Benefit through Housing - 24 CFR 570.208(a)(3) • Urgent Need (UN) - 24 CFR 570.208(c)
Lead Agency and Method of Distribution	• 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. • Distribution of funds will occur through direct implementation. Homeowners will submit applications to the County to apply for assistance. The County will pay contractors directly for eligible repair, reconstruction, replacement, or elevation work performed under the HRP. Homeowners eligible for reimbursement assistance will be reimbursed directly for eligible expenses incurred on or after the 2024 Hurricanes and prior to submitting an application to the County.
Program Description	• The HRP will provide direct assistance to eligible owner-occupants whose primary residences were damaged or destroyed by the 2024 Hurricanes. The program will support the rehabilitation (repairs), reconstruction (rebuilding), elevation of homes, and replacement of MHUs to restore safe housing for LMI households. Homeowners may also apply for the reimbursement of documented, eligible expenses related to 2024 Hurricane damage repairs or reconstruction.
Eligible Geographic Area	• Eligible area is the entirety of Manatee County, FL.
Other Eligibility Criteria	• Application intake will be phased based on household income level, beginning with households at or below 50% of AMI.

Program Title	Home Recovery Program
Maximum Amount of Assistance per Beneficiary	• Direct Assistance: • Rehabilitation: Up to \$250,000. • Reconstruction and/or Elevation: Up to \$450,000. • MHU Replacement: Up to \$450,000 • Reimbursement: Up to \$75,000
Maximum Income of Beneficiary	• 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.
Mitigation Measures	• 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.
Reducing Impediments to Assistance	• 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.

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. The County may also reimburse homeowners for eligible repair and reconstruction expenses related to 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;
 - Demolishing and re-building a unit in substantially the same manner, including elevating homes which are substantially damaged in special flood hazard areas;
- and

Reimbursement of eligible, documented expenses related to 2024 Hurricane damage repairs or reconstruction.

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

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.

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 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.

Application

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. LMI homeowners seeking reimbursement will be processed in Phase IV after the County has addressed the needs of applicants in Phases I-III. Households with incomes between 80 percent and 120 percent of AMI will be considered only after all LMI applicants' needs have been addressed. 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.

Table 49 – Application Phasing Criteria for HRP Applicants

Application Phase	Phase I	Phase II	Phase III	Phase IV*	Phase V
Household Income of 50% of AMI and Below	✓			✓	
Household Income of Between 51% and 80% of AMI		✓	✓	✓	
Household Income of Between 80% and 120% of AMI*					✓
Household <u>has</u> Member(s) Under 18, Over 62, and/or with a Disability		✓			
Household <u>does not have</u> Member(s) Under 18, Over 62, and/or with a Disability			✓		

*The County will process applications for LMI households seeking reimbursement in Phase IV.

**Applications from households with incomes between 80 percent and 120 percent of AMI will be processed in Phase V 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.

Awards and Contractor Choice for Direct Assistance

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.

The County will procure contractors to produce a list of vetted contractors to perform work related to rehabilitation, construction, elevation and MHU replacement that meet the County's quality standard. Homeowners will then have the option of selecting a contractor from the County pre-selected contractor's list to complete the work. 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 resilience to 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.

Homeowner Reimbursement

To reduce the financial burden on homeowners who completed disaster related repairs to their primary residence following the 2024 Hurricanes, the County may provide reimbursement for eligible, documented out-of-pocket repair and reconstruction expenses, pursuant to Section III.B.14.b of the Revised Universal Notice. Eligible costs must meet the following criteria:

Be directly related to necessary repairs or reconstruction resulting from one or more of the 2024 Hurricanes; Be incurred after the 2024 Hurricanes and prior to the submission of an application to the County and Has not received financial assistance from another federal source for the same eligible activity or expense. The County will conduct a site inspection to verify that completed repairs are eligible, code-compliant, and ensure the home meets decent, safe, and sanitary standards. Homeowners with a property located in a SFHA will be required to obtain and maintain flood insurance prior to receiving reimbursement.

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 50 – Rental Recovery Program Details

Program Title	Rental Recovery Program
Total Budget/CDBG-DR Allocation	• \$20,000,000
Eligible Activities Referenced to Title I of Housing and Community Development Act of 1974 (42 USC 5305(a)) or HUD Revised Universal Notice	• §5305(a)(1) – Acquisition • §5305(a)(3) – Code Enforcement • §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing • §5305(a)(5) – Removal of Architectural Barriers • §5305(a)(7) – Disposition • §5305(a)(8) – Public Services • §5305(a)(9) – Non-Federal Match • §5305(a)(11) – Relocation Payments • §5305(a)(13) – General Administrative and Planning Activities • §5305(a)(14) – Assistance to Non-Profit Entities • §5305(a)(15) – Assistance to Neighborhood-Based Organizations • §5305(a)(20) – Housing Services • §5305(a)(25) – Tornado Shelters • §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction • FR Notice – New Housing Construction (as modified by HUD guidance)

Program Title	Rental Recovery Program
	FR Notice – Mitigation (consistent with CDBG-DR Mitigation requirements under the Revised Universal Notice)
National Objective(s) Referenced to 24 CFR 570, Subpart C and/or HUD Revised Universal Notice	LMI Benefit through Housing - 24 CFR 570.208(a)(3)
Lead Agency and Method of Distribution	- 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. - 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.
Program Description	- 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 HOME Fair Market Rents; however, the County may impose lower rent limits for assisted units. - Contractors will be screened by the County and property owners will choose a contractor. Contractors will be paid directly by the program.
Eligible Geographic Area	Eligible area is the entirety of Manatee County, FL.
Other Eligibility Criteria	- Assistance is limited to rental properties with seven (7) or fewer units that were damaged 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;

Program Title	Rental Recovery Program
	reconstructed units are required to maintain that condition for twenty (20) years. • LMI tenants occupying assisted units must prove Florida residency.
Maximum Amount of Assistance per Beneficiary	• Property Owners: • Rehabilitation: Up to \$250,000 per unit. • Reconstruction and/ or Elevation: Up to \$425,000 per unit. • Public Housing Authorities: Up to \$1,000,000 total
Maximum Income of Beneficiary	• Property owner must lease all assisted units to households at or below 80% of AMI. • There are no income limits for property owners.
Mitigation Measures	• 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.
Reducing Impediments to Assistance	• 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.

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

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.

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

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

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.

Awards and Contractor Choice for Direct Assistance

The County will procure contractors to produce a list of vetted contractors to perform work related to rehabilitation, construction, and elevation of rental properties that meet the County's quality standard. Property owners will then have the option of selecting a contractor that has been screened by the County to complete the work. 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 resilience to 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.

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 51 –Buyout and Safe Housing Program Details

Program Title	Buyout and Safe Housing Program
Total Budget/CDBG-DR Allocation	\$12,000,000
Eligible Activities Referenced to Title I of Housing and Community Development Act of 1974 (42 USC 5305(a)) or HUD Revised Universal Notice	§5305(a)(1) – Acquisition §5305(a)(4) – Clearance and Demolition §5305(a)(5) – Removal of Architectural Barriers §5305(a)(7) – Disposition §5305(a)(11) – Relocation Payments §5305(a)(13) – General Administrative and Planning Activities §5305(a)(20) – Housing Services §5305(a)(24) – Direct Assistance for Homeownership Activities - FR Notice – Mitigation (consistent with CDBG-DR Mitigation requirements under the Revised Universal Notice)
National Objective(s) – Referenced to 24 CFR 570, Subpart C and/or HUD Revised Universal Notice	- LMI Benefit on Area Basis – 24 CFR 570.208(a)(1) - LMI Benefit through Housing - 24 CFR 570.208(a)(3) - Urgent Need (UN) - 24 CFR 570.208(c)
Lead Agency and Method of Distribution	- 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. - 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. - Property owners will apply for buyout assistance.
Program Description	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. The program is open to all eligible applicants; however, the County will prioritize applications and properties located in strategic areas identified by the County.

Program Title	Buyout and Safe Housing Program
	• 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. • 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.
Other Eligibility Criteria	• Damage to the property must be attributable to the 2024 Hurricanes. • Assistance is limited to single-family residences and mobile and manufactured homes located in repetitive loss and flood-prone areas. • Property must have been owner-occupied at the time of the qualifying disaster. • 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. • Title must be clear, or heirship must be appropriately documented. • Applicants must provide proof of ownership and, if applicable, primary residency at the time of the 2024 hurricanes. • Buyout properties must comply with environmental review standards under 24 CFR Part 58. • Applicants may be eligible for a one-time Safe Housing Incentive payment if relocating to a safer area.
Eligible Geographic Area	• Eligible area is entirety of Manatee County, FL.
Maximum Amount of Assistance per Beneficiary	• Up to \$450,000 (see additional information below).
Maximum Income of Beneficiary	• 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.
Mitigation Measures	• All buyout properties will be permanently deed-restricted to open space, recreational, or flood mitigation use. • Post-demolition land management may include reseeded, tree planting, or other minimal site stabilization. • No future residential, commercial, or industrial construction will be allowed.

Program Title	Buyout and Safe Housing Program
Reducing Impediments to Assistance	• Case management support for applicants needing help with paperwork, documentation, or relocation planning. • Flexible ownership documentation, in accordance with program guidelines. • Relocation benefits available pursuant to Uniform Relocation Act and County RARAP. • Appeals and grievance processes are available for eligible and benefit disputes.

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 1978.¹⁸³

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 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

¹⁸³ Source: [Repetitive Loss Structure](#). FEMA. 2020.

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;¹⁸⁴

¹⁸⁴ 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.

- 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

The program is open to all eligible applicants; however, the County will prioritize applications and properties located in strategic areas identified by the County. 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 review process to prioritize households as follows:

Table 52 – Application Phasing Criteria for BSH Applicants

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

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 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.¹⁸⁵

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 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

¹⁸⁵ 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.

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 53 – 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%
TOTAL	\$130,000,000	51.44%

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

Grantee Program #1: Infrastructure Recovery and Resilience Program

Table 54 – Infrastructure Recovery and Resilience Program Details

Program Title	Infrastructure Recovery and Resilience Program
Total Budget/CDBG-DR Allocation	\$125,000,000 (includes \$32,962,000 for mitigation)
Eligible Activities Referenced to Title I of Housing and Community Development Act of 1974 (42 USC 5305(a)) or HUD Revised Universal Notice	§5305(a)(1) – Acquisition §5305(a)(2) – Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements §5305(a)(3) – Code Enforcement §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing §5305(a)(5) – Removal of Architectural Barriers §5305(a)(7) – Disposition §5305(a)(9) – Non-Federal Match §5305(a)(11) – Relocation Payments §5305(a)(13) – General Administrative and Planning Activities §5305(a)(14) – Assistance to Non-Profit Entities §5305(a)(15) – Assistance to Neighborhood-Based Organizations §5305(a)(25) – Tornado Shelters §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction - FR Notice – Mitigation (consistent with CDBG-DR Mitigation requirements under the Revised Universal Notice)

Program Title	Infrastructure Recovery and Resilience Program
National Objective(s) - Referenced To 24 CFR 570, Subpart C and/or HUD Revised Universal Notice	• LMI Benefit on Area Basis – 24 CFR 570.208(a)(1) • LMI Benefit for Limited Clientele Activities – 24 CFR 570.208(a)(2) • Urgent Need – 24 CFR 570.208(c)
Lead Agency and Method of Distribution	• Manatee County will administer the program and, as the Responsible Entity, will undertake necessary environmental reviews per 24 CFR 58. • Manatee County is the lead agency and will oversee projects to address unmet needs related to infrastructure. • 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). Municipalities may be subrecipients of the County, or the County may manage and oversee projects on behalf of the municipalities • 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.
Program Description	• The Program will address critical unmet public infrastructure needs resulting from 2024 Hurricanes with a focus on resilience and long-term recovery. • The Program may also include the rehabilitation, reconstruction, and/or acquisition of facilities that are currently or will be designated for emergency sheltering. • 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.
Eligible Geographic Area	• 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.
Other Eligibility Criteria	• N/A
Maximum Amount of Assistance per Beneficiary	• For County infrastructure projects: • Maximum award of \$50,000,000 per eligible project. • Minimum award of \$500,000 per eligible project.

Program Title	Infrastructure Recovery and Resilience Program
	- Project awards will be made within each municipality's allocation. For municipality infrastructure projects: - Maximum Award: \$30,000,000 per project - Minimum Award: \$100,000 per eligible project
Maximum Income of Beneficiary	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.
Mitigation Measures	- Applicants must identify specific mitigation actions as part of the basic application and include costs in the funding request. - The County will evaluate each infrastructure project for mitigation opportunities that improve long-term community resilience. - All proposed mitigation actions must demonstrate a measurable reduction in risk to residential areas and supporting infrastructure.
Reducing Impediments to Assistance	The County will establish program criteria that guide eligible applicants to investments that benefit LMI communities.

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 55 – 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 56 – Infrastructure Match Program Details

Program Title	Infrastructure Match Program
Total Budget/CDBG-DR Allocation	• \$5,000,000
Eligible Activities Referenced to Title I of Housing and Community Development Act of 1974 (42 USC 5305(a)) or HUD Revised Universal Notice	• §5305(a)(1) – Acquisition • §5305(a)(2) – Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements • §5305(a)(3) – Code Enforcement • §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing • §5305(a)(5) – Removal of Architectural Barriers • §5305(a)(7) – Disposition • §5305(a)(9) – Non-Federal Match • §5305(a)(11) – Relocation Payments • §5305(a)(13) – Administrative Costs • §5305(a)(14) – Assistance to Non-Profit Entities • §5305(a)(15) – Assistance to Neighborhood-Based Organizations

Program Title	Infrastructure Match Program
	• §5305(a)(25) – Tornado Shelters • §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction • FR Notice – Mitigation (consistent with CDBG-DR Mitigation requirements under the Revised Universal Notice)
National Objective(s) - Referenced To 24 CFR 570, Subpart C and/or HUD Revised Universal Notice	• LMI Benefit on Area Basis – 24 CFR 570.208(a)(1) • LMI Benefit for Limited Clientele Activities – 24 CFR 570.208(a)(2) • Urgent Need – 24 CFR 570.208(c)
Lead Agency and Method of Distribution	• Manatee County will administer the program and, as the Responsible Entity, will undertake necessary environmental reviews per 24 CFR 58. • Manatee County is the lead agency and will oversee projects to address unmet needs related to County-owned infrastructure. • 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. • 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.
Program Description	• 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.
Eligible Geographic Area	• 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.
Other Eligibility Criteria	• N/A
Maximum Amount of Assistance per Beneficiary	• Maximum Award: \$5,000,000 per project. • Minimum Award: \$150,000 per project.
Maximum Income of Beneficiary	• 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.

Program Title	Infrastructure Match Program
Mitigation Measures	• Applicants must identify specific mitigation actions as part of the basic application and include costs in the funding request. • The County will evaluate each infrastructure project for mitigation opportunities that improve long-term community resilience.
Reducing Impediments to Assistance	• The County will establish program criteria that guide eligible applicants to investments that benefit LMI communities.

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 57 – 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	\$747,963,219.02	60.53%	100%	\$32,962,000	100%
Total	\$747,963,219.02	60.53%	100%	\$32,962,000	100%
Funds that have not been allocated				\$0	0%
Grant Total (Recovery funds + Mitigation + Unallocated):				\$252,711,000	100%

Table 58 – 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
Total:	\$32,962,000	70%	-

*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.

Pursuant to section III.B.10.c of the Revised Universal Notice, in cases where CDBG-DR funds are used to supplement other Federal assistance, the County may adopt, without review or public comment, any environmental review, approval, or permit performed by another Federal agency (e.g., FEMA), so long as the actions proposed for the CDBG-DR funds are substantially the same. If the activity is modified so the Federal agency's environmental review no longer covers the activity, the County will re-evaluate and supplement the Federal

agency's environmental review to comply with 24 CFR Part 58. If the existing review cannot be adopted, a new environmental review will be completed in accordance with HUD regulations in 24 CFR Part 58. To adopt an environmental review completed by another Federal agency, the County must:

- Obtain a completed electronic or paper copy of the Federal agency's review and retain a copy of the full file in its environmental review record.
- Review the scope of work completed by the Federal agency's review and verify that the scope of work is substantially the same with a memo to file in its environmental review record.
- Notify HUD on the RROF (HUD-Form 7015.15) that an environmental review completed by a Federal agency review is being used, and include the name of the other Federal agency, the name of the project, and the date of the project's review as prepared by the Federal agency.

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 consulted 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.

Table 59 – Consultation in Developing the Action Plan

Partners Consulted	Description of Consultation
Federal Partners (FEMA, SBA)	The County received FEMA Individual Assistance (IA) and Small Business Administration Disaster Loan Data through data sharing agreements. Data was used for the completion of the unmet needs assessment.
Local/State Government	The County consulted with each municipality and relevant Manatee County Departments during scheduled stakeholder meetings and via direct email prior to finalizing the Action Plan. All municipalities provided information related to unmet needs and data related to FEMA Public Assistance (PA).
Nongovernmental Organizations	The County consulted with the Suncoast Partnership to End Homelessness and Step Up Suncoast during scheduled consultation meetings and via direct email to collect damages and unmet needs 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 consulted with the LMS prior to finalizing the Action Plan. Additionally, the County contacted FDEM to coordinate HRP efforts with the Elevate Florida Program and will continue these efforts into implementation.
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 consulted with the Suncoast Partnership to End Homelessness during a scheduled consultation meeting and via direct email to collect damages and unmet needs prior to finalizing the Action Plan.
Public Housing Authorities	The County consulted with the two Public Housing Authorities in Manatee County (Manatee County Housing Authority and the Housing Authority of the City of Bradenton) during scheduled stakeholder meetings and via direct email to collect damages and unmet needs 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 consulted with Step Up Suncoast during a scheduled stakeholder meeting and via direct email to collect unmet needs data and provide an overview of CDBG-DR funding prior to finalizing the Action Plan.
State Housing Finance Agencies	The County contacted the Florida Housing Finance Corporation (FHFC) to discuss ongoing recovery efforts and potential funding

Partners Consulted	Description of Consultation
	opportunities prior to finalizing the Action Plan. The County will continue these coordination efforts with FHFC into implementation.
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. 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 are summarized and considered in the final Action Plan submitted to HUD.

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 held two public hearings and one CDBG-DR Workshop at which point public comment was received regarding the Action Plan. The details of these sessions are provided below:

Table 60 – 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 3, 2025	Public Hearing - John Marble Recreation Center, 3675 53 rd Avenue East, Bradenton, FL 34203	6:30 PM-8:00PM EDT
June 10, 2025	CDBG-DR Workshop - GT Bray Recreation Center, 5502 33 rd Avenue Drive West, Bradenton, FL 34209	6:30 PM-8:00 PM EDT
June 12, 2025	Public Hearing - Eternity Temple Church, 716 29 th Street, East, Palmetto, FL 34221	6:00 PM-8:00 PM EDT

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

Information on the hearings was 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, 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 ran from May 21, 2025, to June 20, 2025. The draft Action Plan was available electronically on the County's CDBG-DR website at www.mymanatee.org/lastingmanatee. Hard copies of the draft Action Plan were made available at each public library in the Manatee County Library System and by the Government Relations Department upon request.

Methods to submit comments on the Action Plan included the following:

- In person at public hearings
- Via email at: cdbg.dr@mymanatee.org
- Online at: 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 was reviewed and responded to by the County, then incorporated into the Action Plan. A revised Action Plan that includes the public comments and responses was submitted to HUD and available on the County's CDBG-DR website at 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 or 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. 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 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.

Public Comments and Responses on Draft Action Plan

As required by the Revised Universal Notice, the County is providing a full accounting of public comments received between May 21, 2025, and June 20, 2025, on the draft Action Plan. Comments were collected via several means pursuant to the County's Citizen Participation Plan for its CDBG-DR funding. The County has provided a response to each comment.

Table 61 – Consideration of Public Comments

Comment Number	Comment Received	County Response
1	I am a Manatee County resident. We were flooded during Hurricane Debbie. We have a business, an Airbnb business there in Bradenton, and we're still trying to rebuild from all the damage and we're having a hard time getting the funds to complete this thing or to get it back to where it was. So again, I'm wanting to know how this Manatee county, grant, the lasting Manatee grant project, if we can, get funds from that to rebuild our, our business. Please let me know. Thank you.	The Rental Recovery Program supports recovery of 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.
2	My question is about the allocation for the CDBG DR funds, specifically the housing programs overview, which totals \$107,556,000. I am curious how much of this amount will be allocated towards affordable housing development, and I understand that might not be said in stone yet, but just wanted to discuss with someone to see if there's any indication or	The County's CDBG-DR Action Plan does not currently allocate funds for new affordable housing development. The intention of the County is to restore hurricane-damaged homes.

	any information that could be shed on that subject. Thank you so much. Have a great day.	
3	Dear Lasting Manatee, We would like to suggest that funds from the lasting manatee grant be allocated toward helping those who have applied for, and are accepted into the elevate Florida program. If someone's application is accepted by the elevate Florida program, they will receive 75% toward the cost of elevating their home in a flood zone. The applicant is responsible for the remaining 25%, which will still be quite costly, and will exclude many from being able to accept the 75%. The goal is to help people preserve their homes and stay in their communities. So many of our friends and neighbors are selling and moving, because they can't afford to repair their homes from the flood damage caused by the recent hurricanes. We are trying to stay and repair our home of 33 years, but because we are single level, we live in fear of being flooded all over again. the elevated homes in our community fared much better than us, so we have applied to elevate Florida. We are hopeful, but worry that even if we are accepted, we won't be able to afford the 25%. We are not the only ones in our predicament. While Holmes Beach has become considerably wealthy and considered a tour destination there are many multi generation families here still. We are a 3rd generation family. We went to school here, worked here, raised our family and now we are in fear of being priced out of our home because we cant afford to make these changes to protect our home. Being retired low income trying to live off social security we don't have excess funds available. Returning to work isn't a option either.	Homeowners participating in the Elevate Florida program may be eligible for assistance with the 25% cost share under the Home Recovery Program if they meet program eligibility requirements.

	We hope you will consider helping us, and all the others who are in need of assistance to make their homes safer, and stay in the communities that we call home. Thank you for your consideration	
4	Dear Manatee County Grants Administration Team, I serve as the Executive Director of Harbor58, a local nonprofit serving youth aging out of foster care in Manatee County. Our work centers on providing transitional housing, mentorship, and life skills programming to help these young adults build stable, independent futures. I've reviewed the draft CDBG-DR Action Plan and wanted to inquire whether our transitional housing pilot might qualify under the Rental Recovery or other housing-related programs. We are currently operating a small-scale rental property and working to expand capacity in direct response to the housing and stability challenges exacerbated by the 2024 hurricane season. Our residents are low-income by definition, and many experienced displacement, trauma, or instability related to the storms. We'd welcome the opportunity to discuss whether our program aligns with HUD's CDBG-DR goals—and how we might partner in this critical season of recovery and rebuilding.	The Rental Recovery Program supports recovery of rental properties that are intended for long-term residential use (i.e., 12 months or more) by low- and moderate-income tenants. If Harbor58's units sustained damage as a result of one or more of the 2024 Hurricanes, they may be eligible under the Rental Recovery Program, subject to verification of impact and compliance with rental requirements.
5	I'm vice president of the Board of Directors of Bayshore on the Lake phase one. It is a 280 unit Condominium Association and I would like to have more information on the program development, and I have two primary questions right now. I believe we are mainly low and middle income facility association, and I'd like to know, what the cutoff amounts will be for low and middle income. I would guess we're at least 15 % low income and the rest would be	The low- and moderate-income threshold is 80% of area median income (AMI) and is set by Federal statute. HUD provides annual updates on an annual basis, adjusted for household size. For example, the 80% AMI level for a family of four in Manatee County in 2025 is \$86,100. Eligibility for assistance will depend on unit damage, household income, and compliance with program requirements.

	middle income. And 2nd question other than what those cutoff amounts would be, would be how do I find out with all 280 owners what their income level is? If there's anything I can do to help with program development, I was board president for three and a half years, recently stepped down to vice president. And, I would love to have more information.	Homeowners and owners of rental properties intended for long-term use (i.e., 12 months or more) may apply directly with the County when applications become available.
6	We've met a few times at some of the walk throughs for CDBG funded projects. I was at a walk through today and I had some questions related to the overall funding for some of the County programs and mentioned to touch base with you. I was generally just looking to see if any of the money allocated within the Draft Action Plan for the CDBG-DR funds can/will be allocated for additional funds for HLMP. Funds for the County's HLMP are running low and I was just seeing if any of these programs would be able to benefit from the CDBG-DR allocations.	The County does not have Hurricane Loss Mitigation Program (HLMP) funds. While similar in purpose, HMLP is a separate state-funded program and not supported through this Action Plan.
7	I hope this message finds you well! I've been reviewing the Manatee County Draft Action Plan for CDBG-DR and would appreciate clarification regarding the eligibility of new affordable housing development under the current programs. Specifically, I'd like to confirm whether any portion of the allocated funding—such as through the Rental Recovery Program or other related initiatives—can be used to support the new construction of affordable rental housing, particularly for developments that target low- to moderate-income households. Additionally, are there any limits or caps on funding requests for such projects, if eligible? Thank you in advance for your guidance, and I look forward to your response.	The County's CDBG-DR Action Plan does not include a program for new affordable housing development. The intention of the County is to restore hurricane damaged homes.

8	I don't know if my suggestion will qualify as part of this grant, but it is something that has been desperately needed for many years. Manatee County does not have nearly enough vehicles and/or boats associated with emergency response organizations (county EM, fire departments, Public Safety, etc.) that are capable of rescuing people from flooded areas. Most often, brush trucks are used for high water rescues because they are off-road capable & able to get through several feet of water. Currently, there are no brush trucks in service west of I-75 and so they needed to be brought in for rescues on the island during Debby & Helene. That left east county vulnerable with reduced rescue capacity when they needed it. There are also very few boats available & even fewer that have a low-enough draft to be able to reach people in flooded houses/areas. There were fewer rescues needed during Milton because more people evacuated than for the previous 2 storms	The County appreciates the comment, but CDBG-DR funds may not be used to purchase equipment except in specific circumstances.
9	Plan looks good, but please move it along quickly we need help out here	The County is committed to rapidly launching programs while ensuring compliance with HUD requirements. Program timelines will be posted on the Lasting Manatee website as they become available.
10	I think that a considerable amount of the Lasting Manatee grant funds should be used to upgrade their homes in East Manatee County between First Street East & I-75 / Manatee Ave & SR 64. Giving them the opportunity to get new roofs, windows, new paint, etc.	The County encourages income-eligible homeowners and rental property owners with remaining hurricane damage to apply for CDBG-DR funding through Lasting Manatee when applications become available.
11	in response to the lasting manatee (cdbg-dr) draft action plan, we would like to suggest that a portion of the grant funds be allocated toward the safety, protection, and preservation of homes in high risk hurricane, tropical storm, and flood zones. many of the residents in these areas are in great need of financial assistance	The County's CDBG-DR Action Plan includes funding for housing restoration and protection activities, including the 25% cost share associated with the Elevate Florida Program, for households that meet program eligibility requirements.

	to help cover the costs associated with making their homes safer more secure against the wind and water damage caused by tropical storms and hurricanes. we have lost too many friends and neighbors, who have had to sell their homes (at a loss) and move, because they could not afford to repair the damage from the recent hurricanes. the funds could assist homeowners in some of the following areas: home elevation financial offset of 25% required funds for the elevate florida program, including housing assistance during the elevation process hurricane impact doors hurricane impact windows hurricane roofing clips/straps/third nail, etc. flood barriers/panels backwater preventer valves waterproofing membrane hurricane shutters the goal is to provide assistance to those living in high risk areas with preventive measures that will help protect and preserve their lives and homes. the benefit of reducing wind and water damage could be enormous, not just for the homeowners, but for the entire community. in addition to many financial benefits such as reduced cost of aftermath cleanup, decreased insurance claims, and all the ramifications of displaced home (and business) owners, the most significant benefit would be the increased safety and protection of the homeowners and their families. we hope you will consider helping those of us who are in need of assistance to make our homes stronger and safer. we want to stay in the communities that we love, and have worked so hard to be a part of. thank you for your consideration	
12	I have been following along via your emails on lasting Manatee. I live in the city of Bradenton. Will that exclude me from applying for funds to help me in mitigation of my home? I do fall into the low income category. I have received an insurance settlement by mediation and it is not	City of Bradenton residents are eligible to apply for assistance under the County's CDBG-DR programs. Receipt of insurance does not result in automatic disqualification; however, any assistance received will be reviewed for duplication of benefits. Applicants must

	enough to help me complete projects. I live in evacuation zone B off the Manatee river. I appreciate your help	demonstrate the remaining unmet need and meet all program eligibility requirements.
13	OWNERSHIP OF EVER SECTOR PNC BANKS BUILDING AND LOCATIONS	Insufficient context provided for the County to respond.
14	There are many needs at this location. We need help with getting the repairs done ASAP or some other help by some other source. There are many old trees that have fallen in the yard that need to be removed. One big tree has fallen on the house. Needs to be moved. The house is unlivable. Need to be rebuilt.	Households with significant damage, including tree impacts and structural loss, may be eligible for CDBG-DR funded repair or reconstruction. Eligibility is based on documentation, unmet need, and compliance with program requirements.
15	Recommend use of ecological mitigation as opposed to structural engineering. History shows us God wins over manmade structures every time, usually resulting in large loss of life. By focusing on natural alternatives, you will also be looking at more labor intensive work, an opportunity to hire from within the low income community. Contracts should require the majority of labor costs should be paid to workers within the impacted community. In this community home owners insurance isn't required for houses paid off a generation ago, but is unaffordable due to shifts under current gubernatorial administration. These people need help. Delays in funding hurt the community.	The County's mitigation strategy includes both structural and nature-based solutions. Ecological mitigation will be considered where feasible and effective. Program guidelines will encourage local hiring, and infrastructure projects will be evaluated for labor opportunities and community benefit. Insurance affordability is acknowledged. The County is committed to rapidly launching programs while ensuring compliance with HUD requirements. Program timelines will be posted on the Lasting Manatee website as they become available.
16	Can a homeowner get reimbursement for home repairs?	The County does not anticipate reimbursing homeowners for repairs at this time but may evaluate reimbursement in the future.
17	1. Need reimbursement for repairs done prior to funding availability. 2. Need alternative sources of funding to address immediate needs of housing impacted by previous storms. Need a wholistic approach to use funding in immediate need!	The County does not anticipate reimbursing homeowners for repairs at this time but may evaluate reimbursement in the future. The County acknowledges and appreciates comment regarding the use of a wholistic approach. The Lasting Manatee website makes

		non-CDBG-DR housing resources available via the Other Resources tab.
18	I think you ought to have buy out of homes for pre-hurricane value without regard ie. for percentage of income providing people qualify financially. Thank you.	The County is bound by the statutory requirement that at least 70% of CDBG-DR funds be expended for activities that benefit low- and moderate-income persons. Applicants with a household income up to 120% of the Area Median Income (AMI) for Manatee County may qualify for assistance under the Buyout and Safe Housing Program if all program eligibility requirements are met.
19	As a 4th generation Cortezian, home owner, board president of the Cortez Village Historical Society, and member of the FISH (Florida Institute for Saltwater Heritage) board, I urge you to give serious consideration to the needs of Cortez - specifically the historic village and the area known as Sunny Shores. These areas of Cortez are low income, low-lying, historically under-served and under-represented. These areas suffered significantly during the 2024 storms, primarily from the flooding caused by Hurricane Helene, but also the winds of Hurricane Milton. Cortez is an important residential and commercial community and center of commercial fishing for the entire region. Our infrastructure - homes, community spaces, drainage and more - took on a lot of damage and our return to normalcy has been slow. Many residents have had to leave the area - some temporarily and some permanently. I urge you to consider what might be done for Cortez to help with infrastructure recovery and resiliency through this important program. Thank you.	Lasting Manatee is committed to supporting the restoration and hardening of Manatee County via the various programs identified in the Action Plan. The County aims to address current and future disaster impacts throughout Manatee County through long-term investments in housing and infrastructure.
20	As a 4th generation Cortezian, home owner, board president of the Cortez Village Historical Society, and member of the FISH (Florida Institute for Saltwater Heritage) board, I urge you to give serious consideration to the needs	Lasting Manatee is committed to supporting the restoration and hardening of Manatee County via the various programs identified in the Action Plan. The County aims to address current and future disaster impacts

	of Cortez - specifically the historic village and the area known as Sunny Shores. These areas of Cortez are low income, low-lying, historically under-served and under-represented. These areas suffered significantly during the 2024 storms, primarily from the flooding caused by Hurricane Helene, but also the winds of Hurricane Milton. Cortez is an important residential and commercial community and center of commercial fishing for the entire region. Our infrastructure - homes, community spaces, drainage and more - took on a lot of damage and our return to normalcy has been slow. Many residents have had to leave the area - some temporarily and some permanently. I urge you to consider what might be done to help Cortez with infrastructure recovery and resiliency through this important program. Thank you.	throughout Manatee County through long-term investments in housing and infrastructure.
21	I am a permanent resident of Cortez, a Manatee County property owner and taxpayer for more than 30 years, vice-president of the Cortez Village Historical Society and a member of both the Florida Institute for Saltwater Heritage and Organized Fishermen of Florida. Cortez meets all the criteria and priority factors for funding through Lasting Manatee, especially for much-needed storm water mitigation measures. Cortez is a low-income community, with more than 50% LMI. Cortez historic village and surrounding neighborhoods comprising the Cortez Census Designated Place represents almost one percent of total county population. Cortez is a low-lying area prone to flood inundation. Cortez is historically significant and an important tourism resource. Cortez is a locus of employment in the fishing, boatyard and restaurant industries. We strongly advocate for development and implementation of a stormwater mitigation plan. Cortez is subject to much infrastructure work that benefits the	Lasting Manatee is committed to supporting the restoration and hardening of Manatee County via the various programs identified in the Action Plan. The County aims to address current and future disaster impacts throughout Manatee County through long-term investments in housing and infrastructure.

	county but not necessarily the Cortez community, including Cortez Road bridge replacement and the planned development of a boat ramp and large parking facility at the former Seafood Shack site. The Lasting Manatee funding will enable the county to add infrastructure improvements that truly benefit the Cortez community, not just tourists, boating enthusiasts and island residents who use Cortez for their enjoyment and convenience. We have an opportunity to help Cortez become a more sustainable community, which will benefit our residents and the county as a whole.	
22	Please help to return Cortez Village and Sunny Shores specifically to wholeness after the devastation fraught by hurricane Helene and hurricane Milton. Cortez is an important historic city in Florida and should be preserved and enhanced. The community was devastated last fall and needs any and all help it can get to come back to health and to what it was before the hurricanes struck. People and businesses are still hurting greatly and need assistance. Help preserve old Florida!	Lasting Manatee is committed to supporting the restoration and hardening of Manatee County via the various programs identified in the Action Plan. The County aims to address current and future disaster impacts throughout Manatee County through long-term investments in housing and infrastructure.
23	Please consider the historic village of Cortez and the area known as Sunny Shores. It is low income, low-lying, historically under-served and under-represented. These areas suffered significantly during the 2024 storms, primarily from the flooding caused by Hurricane Helene, but also the winds of Hurricane Milton. Cortez is an important residential and commercial community and center of commercial fishing for the entire region. It's homes, community spaces, drainage and more - took on a lot of damage and its return to normalcy has been slow. Many residents have had to leave the area - some temporarily and some permanently. I urge you to consider what might	Lasting Manatee is committed to supporting the restoration and hardening of Manatee County via the various programs identified in the Action Plan. The County aims to address current and future disaster impacts throughout Manatee County through long-term investments in housing and infrastructure.

	be done for Cortez to help with infrastructure recovery and resiliency.	
24	As a new homeowner to the village (April 2024) and as a member of the board of the Cortez Village Historical Society I have witnessed firsthand the devastation to our community. The village is an historic overlay on the National Register and it is imperative that everything that can be done to assist in the preservation of the overlay and to the people of the community be done. To lose this designation would be disastrous to the community as well as the County. Please be sure to include Cortez in this new funding opportunity.	Lasting Manatee is committed to supporting the restoration and hardening of Manatee County via the various programs identified in the Action Plan. The County aims to address current and future disaster impacts throughout Manatee County through long-term investments in housing and infrastructure.
25	To whom it may concern We are a general contractor who are currently working with the CDBG-DR program in Sarasota County and are interested in applying to perform construction work for the upcoming program in Manatee County. Have a few questions: 1) Will a Program manager to administer and manage the construction phase be selected by Manatee County who will then in turn hire the contractors to perform the construction work or will Manatee County hire the general contractors directly ? 2) If a management company is to be hired by the county has this company been selected at this point ? If so who is this company ? 3) If a Program management company has not been selected when is this scheduled to occur ? Lastly, is it possible for our company to be added to an email list to be notified for updates similar to the questions above for this program ?	The County will invite contractors to submit information to participate in the Home and Rental Recovery Programs and will conduct a baseline screen for each contractor's eligibility to participate in the programs. Interested vendors are encouraged to subscribe for email updates on the Lasting Manatee website and register as a vendor with Manatee County via DemandStar. Information regarding current and upcoming contracting opportunities, in addition to any awarded contracts, will be published on the Lasting Manatee website as required by HUD. We are currently in the process of developing the guidelines for the Home and Rental Recovery Program policies and procedures, which will, once published, provide the answers to your questions.
26	To Whom this Should Concern,	The County appreciates the comment, but as noted, these requirements have been removed

On behalf of Home Innovation Research Labs, I respectfully request that Manatee County amend its Community Development Block Grant Disaster Recovery (CDBG-DR) Draft Action Plan to include green building programs as a requirement for all CDBG-DR funded residential reconstruction and new construction projects. Recognition of Green Building Programs Manatee County's current draft Action Plan identifies several high-risk hazards including severe storm, hurricane and tropical storm, tornado, flood, etc. within the Risk Informed Hazard Analysis section. A proven strategy for mitigating these risks during reconstruction is the implementation and rigorous verification of above-code construction practices- an approach that is inherent of green building programs. We respectfully request that the following programs be explicitly referenced within table 46- Home Recovery Program Details and table 48- Rental Recovery Program Details, under the section 'Mitigation Measures' on pages 80 and 87 respectively. This inclusion would provide clear directions to stakeholders and promote the consistent use of hazard-resistant construction practices and materials. 1. ICC-700 National Green Building Standard (NGBS) Green 2. Enterprise Green Communities 3. LEED (New Construction, Homes, Midrise) In particular, we advocate for Manatee County to recognize the NGBS in the final action plan. The NGBS is rigorous yet cost-effective for all different types of residential construction. A comprehensive high performance building certification like NGBS Green offers a holistic approach that ensures long-term community resilience, energy independence and grid	by HUD. The County will comply with the building requirements identified by HUD and will evaluate building standards for inclusion in the Home and Rental Recovery Program policies and procedures.
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resilience, and reduced resident operational costs, while also prioritizing local materials, improving occupant well-being, and promoting health benefits. Implementing such programs during large scale reconstruction is an opportunity to ensure community self-sufficiency and long-term economic gains.

Unlike programs focused only on structural safety or energy savings, comprehensive green building frameworks integrate design, construction, durability, efficiency, and occupant well-being. These approaches are especially critical during post-disaster recovery.

A green building program is most impactful when adopted for large-scale construction efforts, such as those undertaken in the aftermath of a disaster, where entire communities are being rebuilt from the ground up. In these scenarios, sustainable design practices- like heat island mitigation through reflective surfaces and green roofs, or the use of permeable landscaping to manage stormwater- offer exponentially greater benefits when applied across a broad area. Not only do these strategies enhance environmental performance and resilience, but their effectiveness compounds at scale, transforming entire neighborhoods into more livable, energy-efficient spaces while potentially preventing future flooding and extreme temperature events.

BUILT TO LAST: Why Grantees Should Continue to Require Green and Energy-Efficient Construction for CDBG-DR-Funded Housing

While the federal government has removed its mandate for green and energy-efficient building standards under the Community Development Block Grant- Disaster Recovery (CDBG-DR) program, grantees still have the authority to uphold these requirements in their action plans- and strong reasons to do so.

Maintaining these standards is not about ideology. It's about responsible spending of federal resources, long-term resilience, and ensuring housing is affordable and meets the needs of disaster-impacted communities.

1. More affordable to live in: Energy-efficient homes drastically reduce utility bills for residents, making them more affordable. For low- and moderate-income households, lower energy costs mean greater housing stability and less risk of utility shut offs or displacement. The modest upfront investment- typically just 1-3% of construction costs- is more than recouped through lower utility bills, fewer repairs, and reduced damage in future disaster events. These homes are not only built to last- but they're also built to save. Builders also make better material and design choices thus reducing material waste or waste due to ineffective designs.
2. More durable, resilient, and able to shelter in place: Green and energy-efficient construction improves the durability of buildings and reduces vulnerability to storm damage, flooding, and extreme heat or cold. Critically, these homes are better equipped to maintain safe indoor conditions during power outages or weather events- allowing residents to safely shelter in place. That's especially vital for seniors, people with medical needs, and households without access to evacuation resources- and it reduces the burden on local emergency responders and jurisdictions who would otherwise need to rescue and shelter vulnerable residents during a disaster.
3. Healthier, safer indoor environments: Green-certified homes use better ventilation, moisture control, and low-emission materials, reducing indoor air

pollution, mold, and allergens. This directly contributes to healthier residents and reduced public health burdens- especially for children, the elderly, and those with respiratory conditions.

4. Verified quality and compliance: Green certification programs require third-party verification to ensure that homes meet all stated performance criteria. This provides critical quality assurance for public investments and reduces the risk of substandard construction. In post-disaster contexts, where local building departments are often overwhelmed, third-party verification helps jurisdictions confirm compliance and eligibility for reimbursement without stretching thin municipal resources.
5. Strengthening Energy Independence & Grid Resilience: A strong and self-reliant energy infrastructure is critical to national and economic security. Incorporating energy-efficient building strategies ensures that homes and communities reduce unnecessary energy consumption, lowering strain on an already overburdened power grid, and minimizing reliance on foreign energy sources. By reducing peak energy demand, these strategies also improve grid stability and reduce the likelihood of outages, which is especially critical in disaster-prone areas like Manatee County.
6. Long Term Resilience through Self Sufficiency and National Security: Resilient and high-performance buildings make homeowners self-reliant at the times of natural disasters, reducing the impact of hazards and the need for large federal funds in recovery efforts. If residents can shelter in place during and immediately after a disaster, it reduces the burden on government resources, including

emergency shelters, medical aid, and disaster response efforts, ultimately lowering overall recovery costs. Additionally, it minimizes displacement, preserves community stability, and accelerates economic recovery by allowing businesses and services to resume operations more quickly.

7. Job Creation: Incentivizing innovative and high-performance construction in disaster-affected areas not only creates good-paying American jobs but also empowers local communities to rebuild stronger, safer, and more resilient. By cutting red tape and promoting private-sector innovation, we can put hardworking Americans back to work, reduce dependence on government aid, and ensure communities are better prepared for future challenges- all while strengthening our economy.
8. Market Choice: Green buildings are popular because Americans want healthier, stronger, and higher-quality homes. While Washington shouldn't be imposing one-size-fits-all mandates, federal recovery dollars should be used to incentivize smarter, more resilient rebuilding. By recognizing all credible national green building programs, Manatee County would allow developers to select the program that they are most familiar with or works best for their construction processes and budget. This ensures that new homes would not only be more efficient to operate and better equipped to withstand future disasters but would do so cost-effectively. By encouraging the construction of high-performance homes, we ensure that taxpayer dollars are invested in long-term solutions- creating communities that are stronger, more energy-efficient, and better

prepared for the future. The best time to implement these improvements is during new construction or rebuilding, maximizing the impact of federal recovery efforts while giving homeowners the freedom to choose the best options for their needs.

Bottom line: It's a smarter, safer, and more equitable use of federal funds. Grantees should continue to require green and energy-efficient standards not because they are federally mandated- but because they work. They create homes that are more affordable, healthier, safer, and more resilient. They stretch taxpayer dollars and ensure federal recovery funds support long-term community recovery- not just short-term fixes.

National Green Building Standard (NGBS) Overview

The NGBS was the first residential green building rating system to undergo the full consensus process and receive approval from the American National Standards Institute (ANSI), ensuring it was developed by the industry, for the industry. Since 2008, each version of the NGBS has been ANSI-approved, reflecting the expertise and commitment of housing professionals. The 2008, 2012, and 2020 versions were developed with support from the National Association of Home Builders (NAHB) and the International Code Council (ICC). This industry-driven collaboration solidifies the NGBS as the leading green standard for residential construction, providing builders with practical, flexible, and cost-effective pathways to high-performance homes.

The NGBS is also the first solely residential high-performance building standard to be one of the ICC suites of I-codes that form a

complete set of comprehensive and coordinated building codes.

As one of the I-Codes, the NGBS is written in code language to make it easy for industry professionals and contractors to understand. I believe this is one reason the NGBS has been successful even in areas where it is not part of the building code and is used as an above-code program. For a residential building to comply, the building must contain enough practices from each of the six categories to meet the required threshold points.

The six categories of green practices are:

- Lot & Site Development
- Resource Efficiency
- Energy Efficiency
- Water Efficiency
- Indoor Environmental Quality
- Homeowner Education

A program like NGBS Green aligns with a market-driven approach because it is industry-accepted, practical, affordable, and avoids burdensome mandates. As one of the I-Codes, the NGBS is written in clear, code-compliant language, making it easy for industry professionals and contractors to apply without excessive government red tape. Unlike rigid regulations, the NGBS succeeds even in areas where it is not required, demonstrating that voluntary, performance-based solutions can drive widespread adoption.

By allowing flexibility in how builders achieve high-performance homes- while ensuring key green building principles are met- the NGBS supports innovation, job creation, and local decision-making. It also helps ensure that federal recovery dollars are invested wisely, encouraging energy-efficient and resilient rebuilding without unnecessary government interference. This approach promotes economic growth, homeowner choice, and

long-term savings, making it a commonsense solution that benefits both the housing industry and communities.

Homes and multifamily buildings can attain one of four potential certification levels: Bronze, Silver, Gold, or Emerald. The NGBS was specifically designed so that no one category of practice is weighed as more important than another.

Unlike other green building rating systems, the NGBS contains an expansive array of green building practices aimed at all phases of the development process: design, construction, verification, and operation. This provides the flexibility builders and developers need to ensure their green projects reflect their geographic location, climatic region, cost constraints, and the type of project they are constructing.

About Home Innovation Research Labs

Home Innovation Research Labs serves as Adopting Entity and provides certification services to the NGBS. Home Innovation is a 60-year-old internationally recognized research facility located in Upper Marlboro, Maryland. Our Laboratory Services Division is an ISO-accredited third-party test lab, inspection agency, and certification body. Our work is solely focused on the residential construction industry, and our mission is to improve the affordability, performance, and durability of housing by helping overcome barriers to innovation. Our core competency is as an independent, third-party product testing and certification lab, making us uniquely suited to administer a green certification program for residential buildings. Our staff is comprised of mechanical, structural, and electrical engineers; planners; economists; architects; former builders, remodelers, and contractors; and lab technicians. Combined, they possess

an unparalleled depth of knowledge and experience in all facets of market analysis and building science research and testing. Why is this important? Because behind every building seeking NGBS compliance, stands a team of experts on a mission to help them succeed. Participation in NGBS Green brings our building science expertise to each project team at no additional cost.

Program Statistics to Date

Home Innovation has certified 18,441 multifamily buildings, representing 648,810 dwelling units, and 31,857 single-family homes. Currently, there are 8,063 multifamily buildings in progress, representing an additional 366,926 dwelling units, and 9,363 single-family homes. I believe that this indicates we have been successful in designing a green certification program that is affordable and flexible, while remaining rigorous.

Local Certification Activity

Area building professionals are familiar with the NGBS and Home Innovation's certification process.

Florida consistently ranks among the top ten states for annual NGBS Green certification activity. In 2024, Virginia was #2 for multifamily certification volume and #1 for single-family certification volume 1.

Summary

I urge Manatee County to specify green building programs in the final action plan for all applicable projects, maximizing long-term sustainability and resilience for disaster-impacted communities.

We are happy to discuss this further with you or staff.

Thank you for your consideration. I look forward to working with you to promote

	resilient home construction in Manatee County.	
27	Billionaire Babies Academy, INC: I have submitted a few emails regarding my organization and other Residents in our communities. As I have stated, we definitely need funds for a bigger space to house our program that helps our kids and families in the community. I need another bus for more means of transportation and a much bigger building to offer what we bring to the community on a larger scale! Also, residents that are in great need of assistance from the storm damage that they still trying to recover from: Ceiling, Doors, Hot Water Heater, Shed 93 years old had to repair her porch, need windows, Doors, kitchen cabinets and a new fence Needs entire repair inside her home, new ceiling, floors, kitchen, bathrooms Needs repairs throughout her home Needs repairs throughout Historical Property needs Restoration Property needs new roof, ceiling, floors, doors & more Home needs to be redone Roof, ceiling floors, Kitchen Roof, ceiling, floors, doors & more Ceiling, floors, windows & more House needs to be redone If you have not already can you please list any Residents or organizations from the Rubonia area that are in need of assistance from the funds that will be allocated.	The County appreciates the comment but CDBG-DR funds may not be used to purchase equipment except in specific circumstances. The County encourages income-eligible homeowners with remaining hurricane damage to apply for CDBG-DR funding through Lasting Manatee when applications become available. No funds have been allocated at this time. The County anticipates that programs will launch in 2026 following HUD's approval of the Action Plan and execution of the grant agreement.

	I am asking how funds have already been allocated to others such as NAACP and others if we're being asked to state what we need. Do we have to write grant proposals to receive our funds as well? How can we all receive the help that we need from the funds? Thank you,	
28	To whom it may concern, Please find below and attached comments from Family Oriented Community United Strong, Inc. (FOCUS) on the Lasting Manatee Draft Action Plan. I have been asked to submit these by the Co-Executive Directors who are Manatee County residents and FOCUS is a Florida and 501(c)(3) nonprofit located in and serving Tallevast in Manatee County. These comments are also being submitted via the webform on the Lasting Manatee website. June 19, 2025 Dear Lasting Manatee Staff, We respectfully submit these comments on the Community Development Block Grant – Disaster Relief (CDBG-DR) Draft Action Plan (the Action Plan or the Plan) approved by the Manatee County Board of County Commissioners (BCC) in May 2025, on behalf of Family Oriented Community United Strong, Inc. (FOCUS) and the Tallevast community in unincorporated southwest Manatee County. FOCUS is a twenty+ year old Florida nonprofit, recognized as a federal 501(c)(3) nonprofit organization whose mission is to Protect Tallevast & Its Legacy. Early on FOCUS work centered on community revitalization. Tallevast is a historic African American community founded by freed slaves and migrant workers in the late 1800s, even predating the Sarasota-Bradenton Airport.	This comment was received twice via email and webform. The County appreciates the comment on the County's CDBG-DR Action Plan. CDBG-DR funding is, by statute, intended to address unmet needs arising from the qualifying disasters and those needs are defined, in part, by understanding assistance previously provided by other resources. The Action Plan was developed in accordance with HUD's CDBG-DR requirements including a county-wide unmet needs assessment, public input, and regulatory guidance. In developing the Action Plan, the County met with the required stakeholders identified by HUD to satisfy consultation requirements (see Table 59 in the Plan for a complete list of stakeholders consulted). The County additionally held five public meetings – exceeding the two required by HUD – to solicit input on unmet needs and the proposed programs within the Action Plan (see Table 60 for complete list of the public meetings held by the County). The County recognizes the projects submitted by your organization related to stormwater improvements and emergency access and evacuation projects. These projects, along with the other projects submitted by the community via the County's project submission portal, were included in the unmet needs assessment in the development of the Action Plan (refer to

Despite numerous challenges the community grew and thrived for more than a century, but things changed when Lockheed Martin reported soil and groundwater contamination in the community in the late 1990s. By 2012 when the Florida Department of Environmental Protection (FDEP) approved a cleanup plan the groundwater contamination extended horizontally for 200 acres and vertically, site COCs were found in all aquifer units including the Florida Aquifer – the primary source of groundwater drinking supply in Florida.

Despite the community working closely with Manatee County at the time of the contamination discovery to preserve this historic residential community and revitalize it by adding necessary infrastructure for residential and residentially related growth, including by securing significant CDBG funding to build infrastructure including public water systems, sewer, stormwater and traffic and pedestrian safety improvements, all of this work ceased. It is also important to note that these grants operated beginning in the late 1980s and into the 1990s, but portions of the work funded, particularly on the east side of the community, were not conducted despite being funded due to challenges with the railroad. While working on these issues, Manatee County chose to reallocate funds to other parts of the County despite those funds being secured for Tallevast, using Tallevast demographics and challenges in the applications.

As previously indicated, the contamination reporting by Lockheed then ceased all efforts on this funded work in Tallevast. However, due to the discovery that the drinking and irrigation wells in the community were contaminated, the United States Environmental Protection Agency (USEPA) mandated immediate completion of connecting all residents to the recently

Tables 31, 37, and 43 in the Plan for standalone project submissions). The County has reserved approximately 80 percent of CDBG-DR funds allocated to infrastructure for unincorporated areas within Manatee County, which includes areas such as Tallevast. Following approval of the Action Plan, the County will conduct additional outreach with groups such as yours to further clarify projects for potential funding. However, addressing previously existing groundwater contamination may be outside the scope of the grant.

For all parties interested in working with CDBG-DR funding, it is important to understand the distinction between the 70 percent overall low-and moderate-income (LMI) benefit requirement and the 51 percent LMI standard applicable on an activity-by-activity basis. At least 70 percent of the County's entire CDBG-DR grant must be expended for activities that benefit LMI persons and the Action Plan provides a projection of how each program will contribute to that goal (see Table 1 in the Plan).

Within each of the specified programs, most funded activities will meet the CDBG national objective of providing LMI benefit. One way that projects and activities can provide LMI benefit is on an area benefit basis. In this instance, the County determines the service area for the activity and then uses American Community Survey (ACS) data provided by the Census Bureau and HUD to determine whether the service area is at least 51 percent LMI. If so, 100 percent of the cost of that activity can be counted toward the 70 percent overall benefit requirement. All program policies and procedures will be made available on the Lasting Manatee website following approval by HUD and will identify application timelines and funding allocations by County and municipality.

The LMI waiver for infrastructure activities mentioned in your comment was automatically

available public water system and the closing of these wells. However, all other work, even the funded work, ceased and now more than twenty-five years later, none of this infrastructure work has been undertaken. Between 2019 and 2021, FOCUS and others in the Tallevast community requested that the County return to these unfinished projects. This included meetings requesting the County pursue new CDBG funding. None of these requests received any action by the County – not even any proposals as far as we know. Then in 2022-23 to rectify this, then-Commissioner Servia sought and secured American Rescue Plan (ARP) Funding of \$5,000,000 to complete the sewer infrastructure for the remaining residents in the community. Manatee County then sat on these funds and did not undertake the project. Ultimately in 2024 Manatee County made the decision to rescind the funds for this project and reallocate them with several other projects, stating that they could no longer be completed within the required period. The funds were instead reallocated to Manatee County staff salaries – records show as reported by the Sarasota Herald Tribune that over \$50,000,000 of incomplete ARP projects were removed from projects and reallocated to County staff salaries. The records also demonstrate that Manatee County then developed a list of projects, which was articulated as those which should have been completed under the ARP to be completed using other County resources. However, no one in Tallevast was informed about this list and the list did not ever include the Tallevast sewer project. Other than a small study on the sewer funded around the time of the reallocation, the County has not sought nor prioritized any other funding towards the sewer project, despite having more than enough funds at least twice during the last forty years. It is also important to note that

granted by HUD to all 47 grantees that received funding under the recent \$12 billion appropriation. The waiver will enable grantees to gain a proportional LMI credit for investments in infrastructure and mitigation activities that have substantial community-wide impact but do not meet the 51 percent LMI area benefit standard. The County may opt to fund activities which require use of this waiver but must still expend at least 70 percent of the overall grant for activities that benefit LMI persons.

The County is implementing a phased LMI priority for the housing program as evidenced by Table 49 in the Plan. This will help to ensure that LMI households have the greatest possible opportunity to benefit from this program and that prioritization will help enable the County to achieve the overall 70 percent LMI benefit standard for the CDBG-DR grant.

Finally, the County does not anticipate requesting additional waivers with the submission of the Action Plan to HUD but reserves the right to do so in the future.

stormwater and traffic and pedestrian improvements and safety mechanisms had also previously been funded through CDBG grants, promises from Lockheed Martin, and other resources – but not performed.

Although Lockheed Martin began its approved cleanup in 2013, its own predictions are fifty years to complete the cleanup and its ten-year progress shows that the cleanup is not operating as predicted so it is likely that such timeframe could be longer. Additionally, some of the contamination is in the shallowest aquifer and in Tallevast this means very close to the surface because of the high water table. The east side of the community, which has no sewer option due to the County failing to complete the funded infrastructure projects, is located in the area where some of the highest levels of shallow contamination are found. Additionally, Lockheed's annual Remedial Action Status Reports (RASRs) have consistently indicated that Lockheed's ability to keep the contamination from spreading in this area in this aquifer has been unsuccessful. The last RASR (2024) and interim reporting in late 2024 and 2025 acknowledge that this shallow (USAS) contamination in the southeast of the community had again moved further to the southeast than it had ever been before – due to 1) the hurricanes raising of the water table and inability to deal with accumulated stormwater, causing a co-mingling and 2) that Manatee County required shut down of Lockheed's cleanup system numerous times after each of the three major 2024 storms. It is also important to note that there are inherent health and safety risks with use of septic tanks, those risks are increased if the septic tank and disposal area are flooded but imagine how much greater risk there is if a high water table with cancer-causing substances and standing

stormwater now work together to move that contamination.

Additionally, this stormwater accumulation due to outdated infrastructure issues also made roads, both public and private, in Tallevast impassable during the 2024 storms including making one-lane of parts of Tallevast Road impassable – residents say for the first-time. EVERY property in Tallevast must access Tallevast Road to get in and out of the community as there is no other east-west road that connects to US 301 or 15th Street, the north-south connectors that border the community (there are no north-south through roads in Tallevast). While this limited residents' abilities to access their properties it also means that any needed emergency services or other disaster relief service providers would not have been able to access these properties either.

Further, though the roads made impassable are of particular concern, even where passable the limitations on roads that did not rise to impassability still created increased safety concerns for traffic and pedestrians. Due to incomplete infrastructure projects not only have the roads not been enhanced, repaired, or in some instances even maintained, most of Tallevast Road has no sidewalk. There are also no pedestrian crossings except one; there are no traffic calming devices; stop signs at the railroad track have long-since been removed; there are no traffic lights in the residential portion of the community; and streetlights throughout the community are limited. All of these pose health and safety risks in Tallevast, but the addition of the more frequent extreme weather events – and specifically those in 2024 – have added to the list of risks as well as making risk items long-on the list even more grave.

We are sure that some of you are wondering why we have chosen to begin this letter on the

Draft Action Plan to give you a short but hopefully compelling history of Tallevast, but if you really understand the CDBG Program and its goals, as well as the specific goals of the CDBG-DR Program it should be clear that these issues in Tallevast are exactly the types of issues designed to be addressed, as well as Tallevast exemplifying the targeted communities. Understanding this and evaluating how the Action Plan would receive the above projects is illustrious in evaluating the soundness of the Action Plan.

First, we applaud the County and consultants on the amount of time and work put into the Plan development. Second, we do believe that the overarching approach of the Plan was aimed at the goals of the CDBG and CDBG-DR Programs. Third, we feel that the County prioritizing housing and infrastructure projects above other projects which would also meet the definition of appropriate projects under the Program, is a strong choice as both of these have extensive needs in Manatee County and it creates the opportunity for projects that have the ability to have significant, timely, tangible impact. The underpinnings of this decision seem well-researched and thought out. Additionally, we believe that parts of the report include a good level of detail. However, despite these positives we do have some concerns about the Plan and the County's approach and criteria upon which funding is granted to applicants. Most of these concerns deal with

- an overreliance on using data of those already being served with related assistance to target
 - the past and future outreach,
 - define the unmet needs, and
 - define the CDBG-DR beneficiaries of the County's Projects,

- some critical decisions which are not sufficiently defined nor the basis for those decisions sufficiently explained, and
- a lack of detail in specific areas.

Overreliance on Using Data of Those Already Being Served

A lot of discussion in the Unmet Needs part of the Plan focuses on what needs have been met and where those resources have not stretched far enough for those receiving the assistance. While these are potentially aligned with the goals of the CDBG-DR, if the intent were to just augment funding of other programs or to replicate the beneficiary criteria of those programs, than the federal government could have done so without this specific program – CDBG-DR.

For outreach in development of the Plan the County indicates that it met with many of those who had submitted the 160 project ideas. Specifically, it indicates it met directly with Cities within the County and other submitters. The specific criteria used to determine who they met with were not defined in the Plan. We submitted three project ideas and reached out to Lasting Imagine staff but were not offered a meeting.

Additionally, for future outreach about the Projects the outreach is defined as primarily with cities, nongovernmental organizations specializing on housing, and then general public outreach. It is unclear why other nongovernmental organizations including community based organizations in LMI communities who advocate for the community on housing, infrastructure, community development/revitalization, quality of life issues, and/or related issues were not included in direct outreach in the past or as this moves forward. Other than the individual residents in

these communities they are the ones at ground zero.

One of the serious flaws in the Plan is not specifically doing targeted outreach in LMI communities nor engaging these community based organizations. Both should have been included to help define unmet needs.

This is critically important and a serious misstep in the development of the Action Plan as the residents, particularly in unincorporated areas, who live in LMI communities tend to be more insulated and less likely to be aware of or take advantage of programs without direct intervention. This intervention can happen when someone like a FEMA representative goes into the community, but can also be facilitated if, FEMA or in this case Lasting Manatee asks a community-based organization in the area to help with that outreach. Related, many in LMI communities have experienced disappointment with government services which can lead to mistrust or a feeling of a lack of futility, which keeps them from engaging in government assistance programs. By using community-based organizations as a partner these issues can often be overcome. Lasting Manatee also does not appear to discuss anything in the Plan that indicates that they attempted to ask people if they had disaster impacts that may have gone unreported and/or wholly unaddressed. Without discourse to this specifically in LMI communities it is impossible for the Plan to have an accurate assessment of unmet needs in the CDBG targeted residents/communities.

Further as it relates to both defining unmet needs but also in defining beneficiaries it is important to remember that many of the direct disaster relief assistance is based primarily on the impact of disasters, and the type and extent of the impact is how potential beneficiaries are defined. Some are wholly devoid of income-

level considerations and for others that do include these they are peripheral to the program. The decision to run this particular Program through CDBG was intentional. Although the Plan correctly defines the three National Objectives of the CDBG Program as Benefiting low- and moderate-income persons; Preventing or eliminating slums or blight; and Meeting urgent needs and is correct in stating that projects need not meet all three. The overall program is defined as “aim[ing] to develop viable urban communities by providing decent housing, a suitable living environment, and expanded economic opportunities, principally for low- and moderate-income residents.” Further, as stated in the report while local governments are given flexibility in how it uses its funds to meet its specific needs, it does define specific eligible activities. On its face it appears that the County has exercised its flexibility but will still conform with making sure projects meet the specific eligible activities. However, probably most importantly, all of this is overlayed with a lens in CDBG of making sure that at least 70% of the funds are used in low to moderate income communities. Although the County does acknowledge this in the plan many times, its reference to census block data and aggregate determinations of 51% within a census block coupled with a lot of information about the County generally and areas of the County without indicating whether they are LMI communities raises concerns. Further, without indicating whether the projects selected will give priority to those with higher concentrations of LMI residents or those with lower incomes and higher needs that concern is compounded. It would be our recommendation that the criteria be more specific to not only acknowledge these as criteria that need to be met but to also define a scoring approach that awards more points

based on LMI. Specifically, we believe that it would be in keeping with the core tenets of the CDBG program to allow additional points based on what the average income of the beneficiaries is. Related, if there is a small concentration of LMI residents within a census block, the 51% helps assure that they are not disqualified by the dilution of residents with higher income in the same census block, but the County's Projects should allow for smaller groups to demonstrate their LMI without inclusion of the whole census block. There are instances too where beneficiaries could be spread between multiple census blocks but the Projects would receive higher ratings if they can demonstrate that they serve only LMI residents. The County Action Plan should specifically allow for these considerations by clearly defining the process.

We have raised, many times, the over-reliance on census block data as a serious flaw in many Manatee County decision-making processes including preference for certain grants or other funding dollars. Tallevast has about 80 homes and about 250 residents. Although almost all are LMI their average income is diluted by nearby wealthier neighborhoods included in the same census block. However, to add insult to injury, Tallevast itself is divided between two census blocks, which further skews their data if a program is over-reliant on census block data.

Some critical decisions are not sufficiently defined nor are they the basis for those decisions sufficiently explained

This over reliance on census block data also underpins some critical decisions in the Plan which are not sufficiently defined nor the basis for those decisions sufficiently explained. Specifically, on page 100 it states in a table in smaller print "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." On its face it may seem that the use of the waivers could help factual situations like there is in Tallevast but use of the waivers are less about demonstrating that a group of beneficiaries should be served because they meet the criteria even if many around them do not, but the waiver does not allow for a different characterization of that smaller population as we previously recommended, instead, it allows more people who are not LMI to benefit from the program. As stated above, we believe the first effort with a CDBG grant should be for Manatee County to actually prioritize funding to low income residents, then moderate income residents, and only if these applied for needs are met should funds be allocated to Projects where the beneficiaries are a mix of LMI residents and others. Without such safeguards defined the use of waivers can make it easier to bypass the objectives of the Program.

Additionally, using waivers can create additional burdens on the administrators of the projects because the waivers require proper documentation, justification, and support for that justification. This can be time consuming but also breeds opportunity for more errors and abuse. If errors occur it opens the County up to legal challenges. The additional documentation can also make it harder to track funds and to assess their impact because some of the requirements you are seeking to waive are requirements aimed at transparency and accountability. Further, if using waivers, it is recommended that the municipality be clear on how this is being done.

To the best of our assessment, the Plan does not even explain the waiver provisions identified, let alone provide specificity about how they will exercise it. Additionally, in the certification appendix the County states that it will not seek waivers as part of the submittal of the Action Plan but may seek them later, but as indicated previously in the tables outlining the projects on pages 100 and 104, it says it will seek waivers. Our belief is that the Draft Action Plan should correct these inconsistencies and if Manatee County intends to use waivers to specifically indicate how. Another concern with the use of waivers is that it can impact residents' and other stakeholders' trust in the Program. Therefore, making the election of waivers clear and setting forth a process in the Draft Action Plan would be prudent.

Our belief is that this is the minimum resolution of this issue but instinctively we believe that the County should tread lightly in applying waivers. Why the County would spend the bulk of the Plan saying over and over that the focus is the 70% LMI, but then throw in references to the 51% if census block and then include an obscure federal regulation reference to waivers and less than 51% feels problematic unless there is a rating system that includes lower income levels as a means to award more points in evaluating applications. Then adding the vague and inconsistent references to waivers starts the whole Program off with potential suspicion.

Another decision not sufficiently defined nor explained is the allocation of funds to cities and the County by % of population. It would seem given the purpose of the CDBG-DR Program that this should have taken into consideration the % of the LMI population as well impacts from the storm. On page 74 the statement that the per cent population also "aligns with" LMI is vague. If the % LMI and the % population are

equivalent, then it should say so. Since it does not it would seem to say they are not equivalent. If they are not equivalent then the Plan should acknowledge this and discuss how they differ and why one approach was preferable over the other. Similarly, there should have been some effort to then explain how the chosen method also considers the hurricanes' impacts as they relate to unmet needs principally in LMI communities, but none of this is done.

Also, the Plan indicates that using this approach – total population % - was approved by the Board of County Commissioners. We have not seen any documentation that indicates that the information we believe should have been included in the Action Plan to show how this decision was made was provided to the Board of County Commissioners before that approval. This seems like a really major decision in the Plan and failing to show a thorough and thoughtful process on this that ties it back to the CDBG-DR Program is a failure that should be rectified.

Failure to Provide Important Detail

Both of the previous two sections include some element of failures to provide detail but there are some other general areas where it seems like more detail should have also been included. There is little reference to specific geographic locations in the County which have unmet needs. In fact, other than references to the cities, there is little community identification. Where there is geographic description, it seems to be in the description of unmet hurricane impact needs and it describes areas without any indication of whether they are LMI communities. It is unclear how you can assess unmet needs of hurricane impacts for CDBG funding without documenting impacts in any LMI communities. As discussed earlier, we are concerned that the County's failure to

specifically try to accumulate data or conduct outreach in LMI communities is setting the program up to not approve projects in these communities or at least not to prioritize them. Whether this is intentional or not, if only the data in the Plan will be used then it seems unlikely that these grants will in fact reach the communities who should be prioritized via CDBG.

The Criteria description also does not provide significant detail. The Plan should devote more time to flushing out the criteria and the process by which that criteria will be applied. Such detail will promote fairness, faith in process, and clarity for applicants and all stakeholders.

We also did not see a discussion of project application timelines. It is clear that some of this is dependent on the timing between now and HUD's response to the Action Plan, but it would be good to include basic timeframes as part of the application process and criteria discussion that should be augmented.

The purpose of the Action Plan is to help guide the County and create workability and transparency for grantees and other stakeholders during the implementation of the Program. While we think there are good aspects of the Plan, we do have serious concerns that the above deficiencies do not accomplish these goals. Further, moving the Program forward without addressing these deficiencies may taint the process from the start.

We appreciate the opportunity to comment on the Draft Action Plan and to hopefully collaborate with the County to improve the Plan and processes to make the CDBG-DR Program a success.

29	Please consider adding a reimbursement program to your Homeowner Recovery program. Lots of people already have made repairs to make their homes livable, and this program can't serve them. Many don't have time to wait and have depleted their savings fixing their homes. By having a program that gives people reimbursement for work they had done (like the one in Sarasota) then our community will have greater impact and you can serve more people.	The County does not anticipate reimbursing homeowners for repairs at this time but may evaluate reimbursement in the future.
30	The housing program has no provision for reimbursing residents for work already performed. Many homeowners borrowed against their retirement or took loans to fund repairs to their homes. These fixed income or no-income homeowners are penalized by not being able to participate and now have depleted assets. Please consider making reimbursement part of your housing program even if it just partial reimbursement.	The County does not anticipate reimbursing homeowners for repairs at this time but may evaluate reimbursement in the future.
31	To get help from Lasting Manatee do I need to hire a contractor, or will the county assign one to me and help manage them? At the public meeting someone said that the county pays the contractors directly. Who approves the payments and what if I am not happy with the contractor?	The County will invite contractors to submit information to participate in the Home and Rental Recovery Programs and will conduct a baseline screen for each contractor's eligibility to participate in the programs. Homeowners will then have the option of selecting a contractor that has been screened by the County to complete the work. The program will verify that all work has been completed prior to issuing payment directly to the contractor.
32	To whom it may concern, I am a 3rd generation resident of the Cortez Fishing Village. I am a F.I.S.H. (Florida Institute of Saltwater Heritage) board member who has fought hard to save our fishing heritage and protect our shore line from over development. I feel that we have been devastated by back to back hurricanes Hanean and Milton to the point we need to be considered for relieve. Sunny Shores just to the	Lasting Manatee is committed to supporting the restoration and hardening of Manatee County via the various programs identified in the Action Plan. The County aims to address current and future disaster impacts throughout Manatee County through long-term investments in housing and infrastructure.

	north of our village has been devastated even more. Many of our neighbors have not even been able to return and may not know of these relief funds. That is why I would like to speak on their behalf, as they may not be able to, thank you	
33	Hello I reside in Cortez, FL. I am a resident, property owner, Board member and treasurer of Florida Institute for Saltwater Heritage (FISH), as well as a past Commissioner of District 3 Manatee County Board of County Commission. I have been out of town for over a month, I would have otherwise attended one of your public meetings. Though I personally survived the 3 hurricanes of 2024, without significant damage, as a resident of Cortez I have watched the impact they have had on my friends and neighbors who reside, many for generations, in this historic community. I urge you to give serious consideration to the needs of Cortez communities, specifically the historic village and the area known as Sunny Shores. These areas of Cortez are low income, low-lying, historically under-served and under-represented. These areas suffered significantly during the 2024 storm season, beginning with increased tides and rain that came with hurricane Deby, followed by flooding caused by Hurricane Helene. Helene's flood waters impacted over 90% of the Village homes with tidal surge averaging over 3.5 feet entering many historic homes. Less than 2 weeks later the winds of Hurricane Milton only added to devastation. Cortez is a center of commercial fishing for the County and the entire SW coast region of Florida. It is an important residential and commercial community. Many residents have had to leave the area - some temporarily and some permanently. I urge you to consider what	Lasting Manatee is committed to supporting the restoration and hardening of Manatee County via the various programs identified in the Action Plan. The County aims to address current and future disaster impacts throughout Manatee County through long-term investments in housing and infrastructure. The County encourages income-eligible homeowners with remaining hurricane damage to apply for CDBG-DR funding through Lasting Manatee when applications become available.

	might be done for Cortez to help the hard working commercial fishermen whose homes and lively hood were impacted by these 3 storms. Citizens who do not have the financial means to rebuild their homes. Most had no homeowner or flood insurance and many are wary of government. Once again I urge you to consider what might be done for Cortez to help families rebuild their homes, as well as with infrastructure recovery and resiliency through this important program. Thank you and I look forward to discussing how best to help these two important and deserving communities.	
34	Hello, Hi is in need of kitchen cabinets/ a sink/ Floor base boards an entire roof and windows with some paint or replastering on the outside.	The County encourages income-eligible homeowners with remaining hurricane damage to apply for CDBG-DR funding through Lasting Manatee when applications become available.