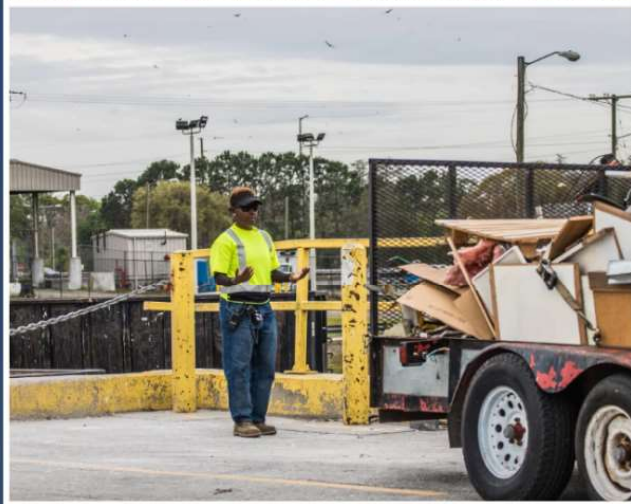




Hillsborough  
County Florida

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

7/10/2025





# TABLE OF CONTENTS

INDEX OF TABLES .....	iv
INDEX OF FIGURES .....	vi
Change Log .....	vii
1.0 Executive Summary .....	1
2.0 Program Summary Table .....	3
3.0 Background .....	4
3.1 Overview .....	8
3.2 Most Impacted and Distressed Areas .....	10
HUD identified MID Areas .....	10
3.3 Overview of the Impacts of the Qualifying Disaster .....	11
4.0 Unmet Needs Assessment .....	25
4.1 Evaluate the Impacts of the Three Core Sectors of Recovery .....	25
4.2 Summary Impact and Unmet Needs .....	27
4.2.1 Housing .....	27
4.2.1.1 Housing Analysis by Type and Tenancy .....	33
4.2.1.1.1 Emergency Shelters, Interim, and Permanent Housing .....	33
4.2.1.1.2 Rental and Owner-Occupied Single Family and Multifamily Housing .....	35
4.2.1.1.3 Mobile Homes .....	38
4.2.2 Median Home Values .....	39
4.2.3 Public Housing (Including HUD-assisted Housing) and Other Affordable Housing .....	41
4.2.4 Homeless Facilities and Services .....	41
4.2.5 Infrastructure .....	41
4.2.6 Public Assistance Data .....	43
4.2.7 Impacted Capital Improvement Projects Data .....	44
4.2.8 Economic Revitalization .....	45
4.2.9 Public Service .....	48
5.0 Mitigation Needs Assessment .....	49
5.1 FEMA National Risk Index Analysis for Hillsborough County .....	50
5.1.1 Historical Record of Known Events in Hillsborough County .....	53
5.2 Connection of Proposed Programs and Projects to Unmet Needs and Mitigation Needs .....	54
6.0 Allocation and Award Caps .....	57
6.1 Funding Criteria .....	57
6.2 Administration .....	57
6.3 Planning .....	57
6.4 Housing Programs .....	58
6.4.1 Housing Program Method of Delivery .....	61
6.5 Infrastructure .....	74
6.5.1 Infrastructure Programs Overview .....	74
6.6 Economic Revitalization .....	78
6.6.1 Economic Revitalization Programs Overview .....	78
6.7 Public Services .....	85
6.7.1 Public Services Programs Overview .....	85
7.0 CDBG-DR Mitigation Set-Aside .....	88
7.1 CDBG-DR Mitigation Set-Aside Programs Overview .....	88
7.1.1 Mitigation Program Descriptions .....	88
7.1.2 General Exception Criteria .....	89
7.1.3 Cross-Cutting Compliance .....	89
8.0 General Information .....	90
8.1 Competitive Project Solicitations .....	90
8.2 Citizen and Stakeholder Engagement .....	90





8.3 Consultation of Developing the Action Plan .....91

8.4 Public Hearings .....92

8.5 Public Comment.....94

    8.5.1 Consideration of Public Comments.....94

8.6 Citizen Complaints .....94

8.7 Modifications to the Action Plan .....95

    8.7.1 Substantial Amendment .....95

    8.7.2 Nonsubstantial Amendment.....95

8.8 Performance Reports.....95

Appendix A - Administration-Only Action Plan.....96

Appendix B - Citizen Participation Plan .....115

Appendix C - Public Comments.....145

Appendix D - Data Sources and Resources .....163

Appendix E - Action Plan Certification Programs.....165



# INDEX OF TABLES

Table 1- Overall Program Summary.....	3
Table 2 - FEMA Individual Assistance Summary .....	13
Table 3 - Low, Low-Moderate, and Low, Moderate and Middle Income (LMMI) – Hillsborough County .....	19
Table 4 - LMI Breakdown for FEMA Applicants .....	21
Table 5 - Disaster Overview .....	25
Table 6 - CDBG-DR Allocation Overview .....	25
Table 7 - Summary Impact and Unmet Needs by Sector .....	26
Table 8 - FEMA Individual Assistance Summary .....	27
Table 9 - Housing Unmet Needs Summary .....	28
Table 10 - FEMA Individual Assistance by HUD Damage Category .....	29
Table 11 - Summary Housing Impacts and Unmet Needs .....	30
Table 12 - Remaining Unmet Needs for FEMA Individual Assistance Applicants and LMI Applicants .....	32
Table 13 - Remaining Unmet Needs for FEMA Individual Assistance Applicants and LMI Applicants with Flood Damage and no Flood Insurance .....	33
Table 14 - Continuum of Care Summary.....	34
Table 15 - Unhoused Population Summary .....	35
Table 16 - FEMA Individual Assistance Applicants by Housing Type .....	35
Table 17 - Calculation of Impact and Support by Owners vs. Renters.....	36
Table 18 - Mobile Homes Impacted.....	38
Table 19 - Infrastructure Unmet Needs Summary.....	42
Table 20 - Damages to Public Infrastructure .....	43
Table 21 - Damages to Public Infrastructure Accounting for Resilience (Increased Cost of Compliance), Increased Cost of Building Materials (32%) and Estimated Local Match (Unmet Needs) .....	44
Table 22 - Median Inspected Loss by Category .....	45
Table 23 - Summary Economic Impacts and Unmet Needs.....	47
Table 24 - Hillsborough County Annualized Frequency Values by Hazard Type with Known Data .....	53
Table 25 - Funds Distribution in Relation to Unmet Needs .....	54
Table 26 - CDBG-DR Mitigation Set-Aside Needs Assessment.....	55
Table 27 - CDBG-DR Program Allocation and Funding Thresholds .....	56
Table 28 - Grantee Administration Activity Overview .....	57
Table 29 - Grantee Planning Activity Overview .....	57
Table 30 - Housing Allocation in Relation to Unmet Needs.....	58
Table 31 - Housing Activities.....	59
Table 32 - Single Family Repair .....	62
Table 33 - Single Family Replacement .....	64
Table 34 - Multifamily Repair and Replacement .....	66
Table 35 - Multifamily Replacement.....	68
Table 36 - Special Population Housing.....	70
Table 37 - Infrastructure in Support of Housing .....	72
Table 38 - Infrastructure Allocation in Relation to Unmet Needs .....	74
Table 39 - Grantee Infrastructure Programs Overview .....	74
Table 40 - Infrastructure Investment + Infrastructure Investment – MIT .....	75
Table 41 - Economic Revitalization Allocation in Relation to Unmet Needs .....	78
Table 42 - Grantee Economic Revitalization Programs Overview .....	78
Table 43 - Workforce Development .....	79
Table 44 - Business Infrastructure .....	81
Table 45 - Technical Assistance .....	83





Table 46 - Grantee Public Services Programs Overview .....	85
Table 47 - Public Service .....	86
Table 48 - CDBG-DR Mitigation Set-Aside Allocation Summary .....	88
Table 49 - Grantee CDBG-DR Mitigation Set-Aside Programs Overview .....	89
Table 50 - Summary of Stakeholder Partners .....	91
Table 51 - Public Hearings & Information Sessions .....	93



## INDEX OF FIGURES

Figure 1 – Hurricane Helene Track. Highest wind speed – 138 mph.....	4
Figure 2 - September 26, 2024, 11:25 PM (EDT) – Hurricane Helene Makes Landfall in Florida .....	5
Figure 3 – Radar image of Helene northward off Florida, September 26 .....	5
Figure 4 - Hurricane Milton Storm Surge Forecast, October 07, 2024 .....	6
Figure 5 - Power outages across Florida as of October 10, 2024, at 4:00 PM EDT.....	7
Figure 6 - Estimated Hurricane Milton total rainfall amounts, observed from 0800 October 09 to 0800 October 11, 2024.....	8
Figure 7 - Presidentially Declared Hurricane Helene Counties in Florida, including Hillsborough County.....	9
Figure 8 - Presidentially Declared Hurricane Milton Counties in Florida, including Hillsborough County .....	10
Figure 9 - FEMA Individual Assistance Applicants by Zip Code.....	12
Figure 10 - Total Real Property Loss for FEMA Individual Assistance Applicants with Real Property Loss by Zip Code .....	14
Figure 11 - Average Real Property Loss for FEMA Individual Assistance Applicants with Real Property Loss by Zip Code.....	16
Figure 12 - FEMA Individual Assistance Applicants with Real Property Loss by Zip Code .....	17
Figure 13 - Composite FEMA Individual Assistance Applicant Score (Applicants + RPFVL Applicants + RPFVL Total + RPFVL Average).....	18
Figure 14 - Low-Moderate Income (<80% AMI) by Block Group across Hillsborough County .....	20
Figure 15 - Assessment of social and demographic characteristics to help identify communities that may need support in preparing for hazards or recovering from disasters by Census Tract across Hillsborough County.....	22
Figure 16 - Bivariate Composite FEMA Individual Assistance Applicant Score (Applicants + .....	24
Figure 17 - Summary Impact and Unmet Needs by Sector.....	26
Figure 18 - FEMA Individual Assistance Applicants by Area .....	28
Figure 19 - Renter populations by Census Tract across Hillsborough County. ....	37
Figure 20 - Mobile Home Percentages by Census Tract .....	39
Figure 21 - Median House Value by Census Tract across Hillsborough County.....	40
Figure 22 - Risk Index Equation .....	50
Figure 23 - Hillsborough County National Risk Index Summary .....	51
Figure 24 - Hillsborough County Hazard Type Risk Index .....	52
Figure 25 - Sample Scoring Distribution .....	90



# Change Log

Version (Date)	Summary of Changes Made
Version 0.1 (May 29, 2025)	Draft Version for Public Comment
Version 0.2 (July 10, 2025)	Updated Draft Version incorporating public comments, responses and applicable allocation adjustments.





## 1.0 Executive Summary

Hillsborough County, situated on Florida's west-central coast, is the state's third-most populous county, with an estimated 1.5M residents. Hillsborough serves as a vital hub within the Tampa–St. Petersburg–Clearwater metropolitan area. The County encompasses approximately 1,266 square miles, including 246 square miles of water, and boasts a diverse demographic composition: 54.8% White, 16.4% Black or African American, 4.4% Asian, and 29.3% Hispanic or Latino residents. With a median age of 37.8 and a median household income of \$75,011, it is estimated that around 13.2% of the population lives below the poverty line. About 61% of housing units in Hillsborough County are owner-occupied and approximately 36% of residents rent their homes or live in apartments.

In September and October 2024, Hurricanes Helene and Milton caused more than \$2.4 billion in damage across Hillsborough County. In response to federally declared disasters nationwide, the U.S. Department of Housing and Urban Development (HUD) allocated \$709,324,000 in CDBG-DR funding to support long-term recovery and address unmet needs in Hillsborough County. These funds are intended to support the most impacted and distressed areas and populations of the County.

Supported by the underlying rules of HUD's traditional CDBG program, the disaster recovery funds are first and foremost intended to support those members of the community who are least likely to be able to self-recover. In support of that mission, three primary sectors compose the CDBG-DR program – housing, infrastructure, and economic revitalization. Each of these three primary categories focuses on efforts to create a more resilient community by applying recovery and mitigation strategies that help our residents recover and reinforce our community against future disasters.

HUD requires a two-pronged approach in developing this action plan: Unmet Needs Analysis (UNA) and a robust community engagement process. The Unmet Needs Analysis revealed unsupported damages exceeding \$1.8 billion. The dollars allocated by HUD are to be used for recovery efforts that align with the Housing and Urban Development (HUD) CDBG-DR National Objectives and meet the local priorities of our most impacted and distressed populations. This assessment evaluates current disaster impacts and areas vulnerable to future hazards, such as increased storm activity and flooding, and guides funding toward reducing these risks to improve long-term community resilience.

Hillsborough County engaged a wide range of stakeholders to strengthen and validate the planning process. These included the City of Tampa, City of Plant City, and City of Temple Terrace; emergency management agencies; housing authorities; social service providers; and various county departments. The County also hosted a three-day internal planning workshop and, during the public comment period, hosted four public educational meetings and five public hearings.

The Unmet Needs Analysis identified three distinct but interrelated categories of need: housing, infrastructure, and economic revitalization. The following categories have been designed to meet the overall needs:

- Housing
  - Single Family Repair and Replacement
  - Multi-Family Repair and Replacement



- Housing for Special Needs Populations
  - Housing Infrastructure
- Infrastructure
  - General Infrastructure
  - Business Infrastructure
  - Infrastructure Investment
- Economic Revitalization
  - Workforce Development
  - Business Technical Assistance
- Planning
- Public Services

The Action Plan establishes a program that will invest \$709,324,000 in public funds for the long-term recovery of Hillsborough County. Of those funds, 70% is anticipated to directly benefit low- and moderate-income populations. The program will see homes constructed and preserved, resilient infrastructure installed, businesses protected, and the fabric of the community strengthened against future storms.

The combined impact of Hurricanes Helene and Milton will have significant and lasting consequences for Hillsborough County. Recovery will require sustained efforts to rehabilitate damaged residential and commercial properties, restore and modernize critical infrastructure, and provide direct support to displaced and affected households and businesses.

The extensive flooding caused by both storms underscores the urgent need for a coordinated, well-resourced, and forward-looking recovery strategy. Long-term planning must prioritize not only the rebuilding of what was lost, but also the implementation of resilience-focused measures designed to reduce the County's vulnerability to future disasters. These measures include the installation of a hardened, more resilient housing stock, improved drainage systems, flood-resistant infrastructure to better protect our homes and businesses and expanded disaster preparedness initiatives.

Damage assessments indicate catastrophic losses totaling approximately \$1.8 billion across Hillsborough County. These include severe damage to housing stock, substantial agricultural losses, widespread infrastructure failure, and record-setting flood levels in areas previously unaffected by high water events. The storms triggered mass evacuations, emergency rescue operations, and have left behind a complex landscape of ongoing recovery needs.

To facilitate a full and effective recovery, Hillsborough County is committed to a comprehensive approach that incorporates housing recovery, mitigation, and long-term resilience in the most impacted and distressed areas. This includes meaningful community engagement, interagency coordination, and strategic investments to ensure the County emerges stronger and better prepared for future disasters.

Hillsborough County is committed to implementing this program within the six-year timeline required by HUD and in collaboration with its stakeholders and community partners.



## 2.0 Program Summary Table

Table 1- Overall Program Summary

Eligible Cost Category	CDBG-DR Allocation Amount	Mitigation Set-Aside Allocation	Toal CDBG-DR + MIT Set-Aside	Total as % of Overall Program	MIT Allocation as % of MIT Set-Aside	% to HUD identified MID Areas	Estimated % to LMI
Administration	\$30,840,150	\$4,626,050	\$35,466,200	5.00%	5.00%	100%	70%
Planning	\$5,000,000		\$5,000,000	0.70%		100%	70%
Housing	\$370,873,393	\$43,947,475	\$414,820,868	58.48%	47.50%	100%	70%
Infrastructure	\$95,267,081	\$43,947,475	\$139,214,556	19.63%	47.50%	100%	70%
Economic Revitalization	\$99,822,376		\$99,822,376	14.07%		100%	70%
Public Service	\$15,000,000		\$15,000,000	2.11%		100%	70%
Total	\$616,803,000	\$92,521,000	\$709,324,000	100.00%	100.00%	100%	70%





Figure 1 – Hurricane Helene Track. Highest wind speed – 138 mph.  
Source: North Carolina State Climate Office

## 3.0 Background

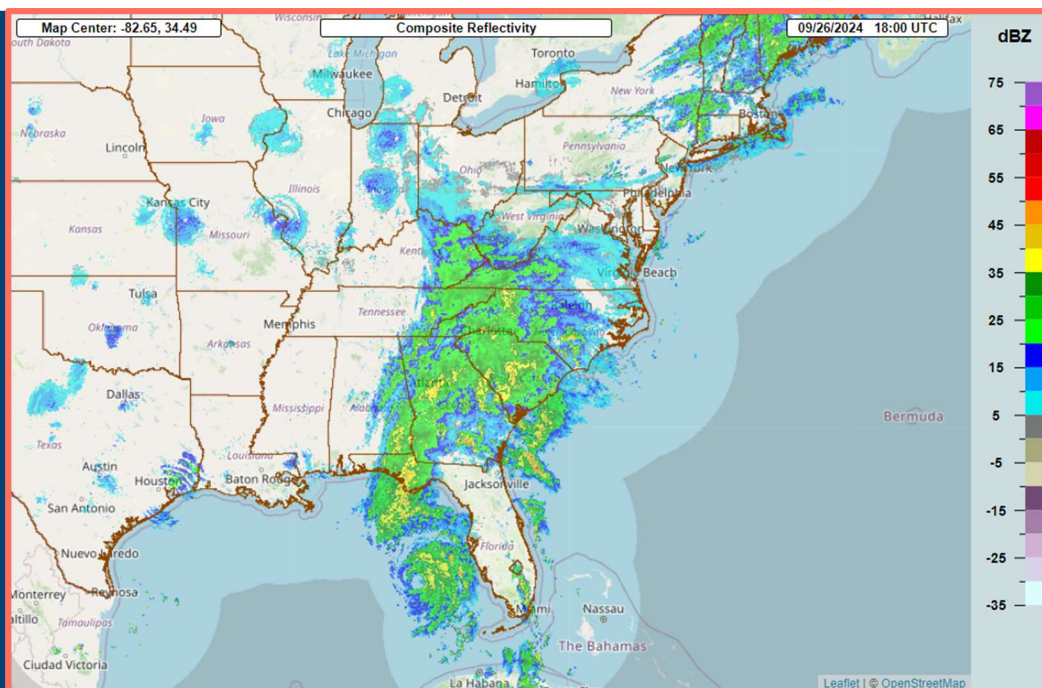
### **Act 1 – Hurricane Helene**

Hurricane Helene, a category 4 hurricane made landfall in Taylor County, Florida on the night of September 26, 2024. Despite landfall being 200 miles from Hillsborough County the impacts were severe. High velocity winds, substantial rainfall, and a consequential storm surge, leading to widespread housing and infrastructure damage were hallmarks of Helene. Areas not known to previously flood found themselves inundated, isolated and under threat from rising waters.



*Figure 2 - September 26, 2024, 11:25 PM (EDT) – Hurricane Helene Makes Landfall in Florida*  
Source: NOAA, National Environmental Satellite, Data, and Information Service

Coastal regions experienced significant impact due to the storm surge, resulting in the inundation of residential and commercial properties. Properties that had never flooded were impacted by a storm surge of 7.18 feet in Tampa and an estimated 15 feet in the Big Bend area, displacing residents previously considered “safe” from storms. Wider than 90% of Gulf of America hurricanes in the past 20 years with wind speeds reaching 140 mph at landfall, electric infrastructure was battered, with 10% of Hillsborough County customers offline.



*Figure 3 – Radar image of Helene northward off Florida, September 26*  
Source: NOAA, National Weather Service



Post-impact, Hillsborough County and State of Florida authorities declared a state of emergency, initiating a coordinated response for recovery and restoration. On September 28, 2024, Public advisories were issued to minimize civilian exposure to hazardous conditions, including debris and residual flooding. A boil water advisory was issued to mitigate potential waterborne health risks. Humanitarian aid organizations established temporary shelters to accommodate displaced individuals. Local, state, federal and volunteer resources mobilized quickly to address the needs of the community.

### **Act 2 – Hurricane Milton**

Late on October 9th, 2024, Hurricane Milton, classified as a Category 3 storm, made landfall at Siesta Key, adjacent to Hillsborough County, Florida. This event resulted in a severe confluence of heavy precipitation, high-velocity winds, and a substantial storm surge. The storm's landfall with 120 mph winds effectively limited access to critical services, housing and infrastructure within the County, causing widespread devastation and leaving a significant portion of the population without essential utilities. Only two weeks after being battered by Helene, storm surge predictions for the Tampa area were between 10 and 15 feet. Due to the lopsided shape of the storm, water levels at the top of the bay dropped by about five feet, sparing the area from further surge damage.



Figure 4 - Hurricane Milton Storm Surge Forecast, October 07, 2024  
Source: FOXweather

The severity of Milton's impact was particularly evident in the wind speeds, which ashore reached 100 mph with higher gusts. These forceful winds caused extensive damage, including the uprooting of trees, disruption of power infrastructure, and scattering of debris. As of the afternoon of October 10, more than 3.4 million homes and businesses in the state of Florida were without power.



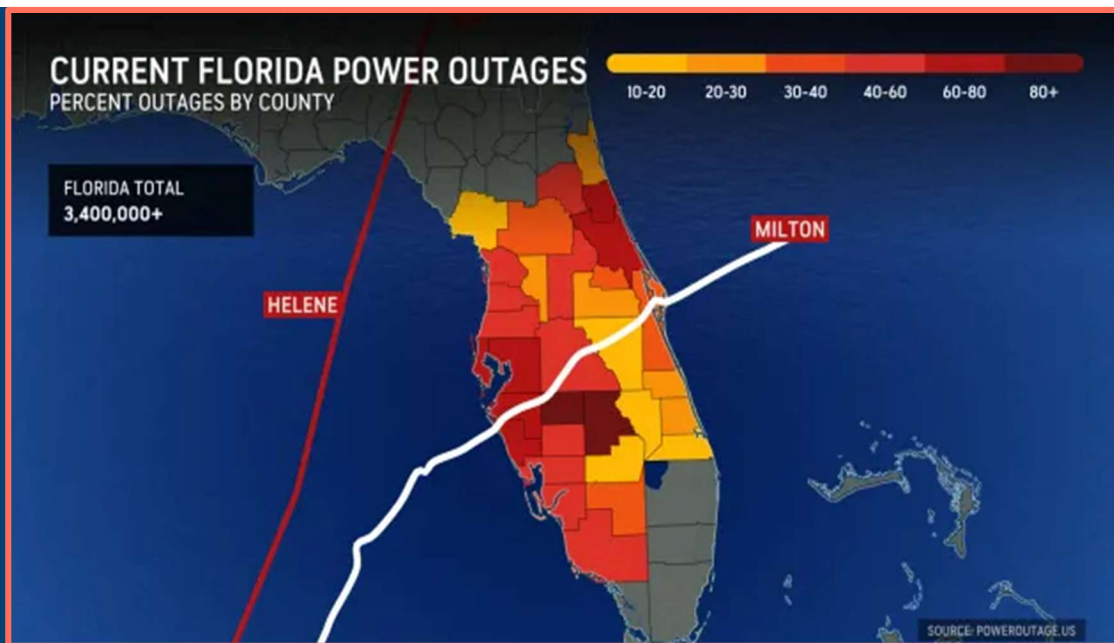


Figure 5 - Power outages across Florida as of October 10, 2024, at 4:00 PM EDT  
Source: POWEROUTAGE.US

Residential and commercial properties sustained considerable damage, including structural compromise and broken windows. Across Florida, 126 tornado warnings were issued in one day, with 46 tornadoes confirmed - both records. Areas of Hillsborough County received more than thirteen inches of rain, with the Hillsborough River cresting two feet above the previous record.

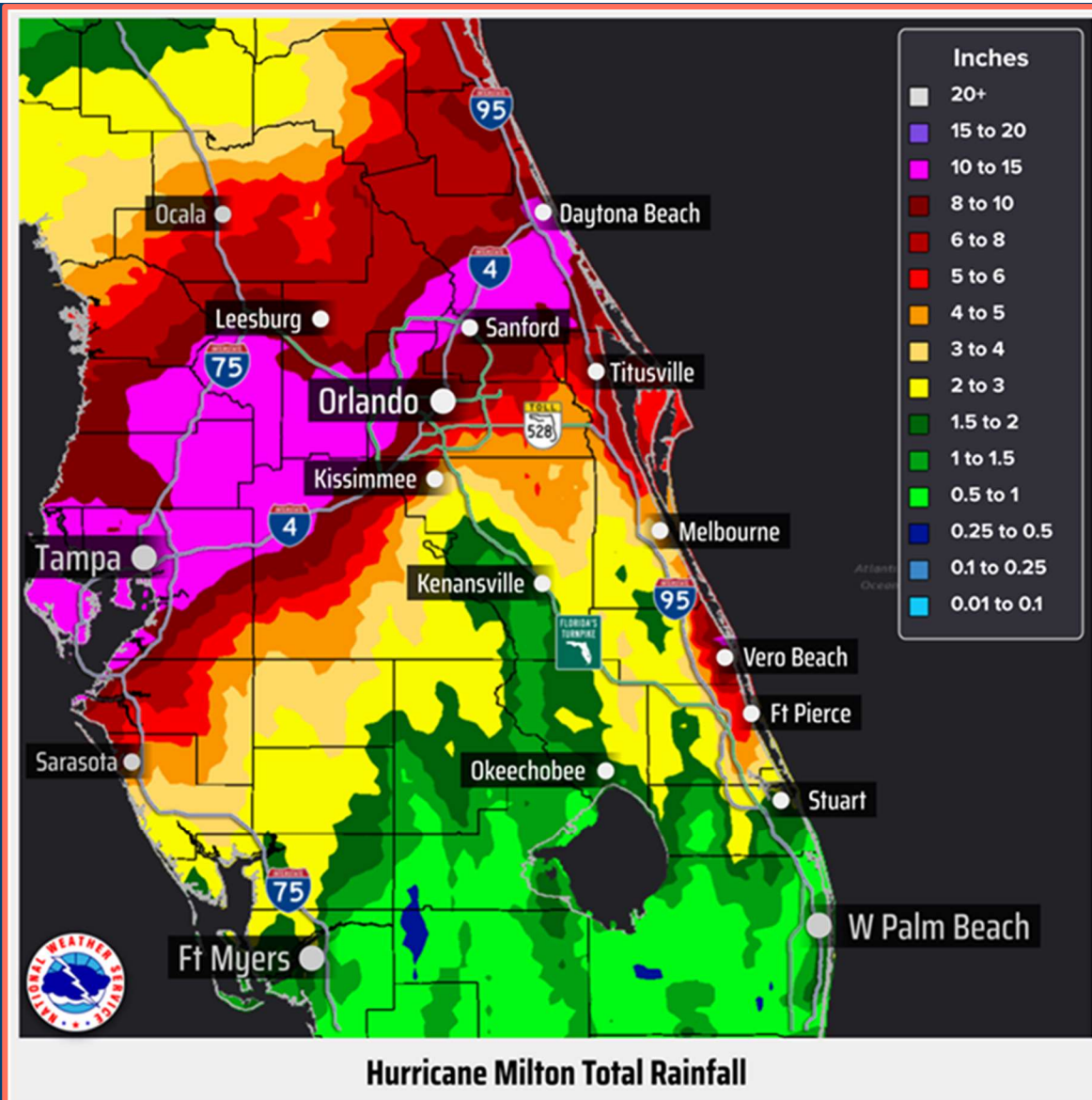


Figure 6 - Estimated Hurricane Milton total rainfall amounts, observed from 0800 October 09 to 0800 October 11, 2024  
Source: NOAA National Weather Service

### 3.1 Overview

The U.S. Department of Housing and Urban Development (HUD) announced that Hillsborough County, Florida will receive \$709,324,000 in funding to support long-term recovery efforts following Hurricane Helene (DR-4828-FL) and Hurricane Milton (DR-4834-FL) through the Hillsborough County Office of Equity and Community Impact. Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be used to address remaining unmet needs in Hillsborough County.

To meet disaster recovery needs, the statutes 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. HUD has allocated \$709,324,000 in CDBG-DR funds to Hillsborough County in response to Hurricane Helene (DR-4828-FL) and Hurricane Milton (DR-4834-

FL), through the publication of the Federal Register 90 FR 4759. This allocation was made available through the American Relief Act of 2025.

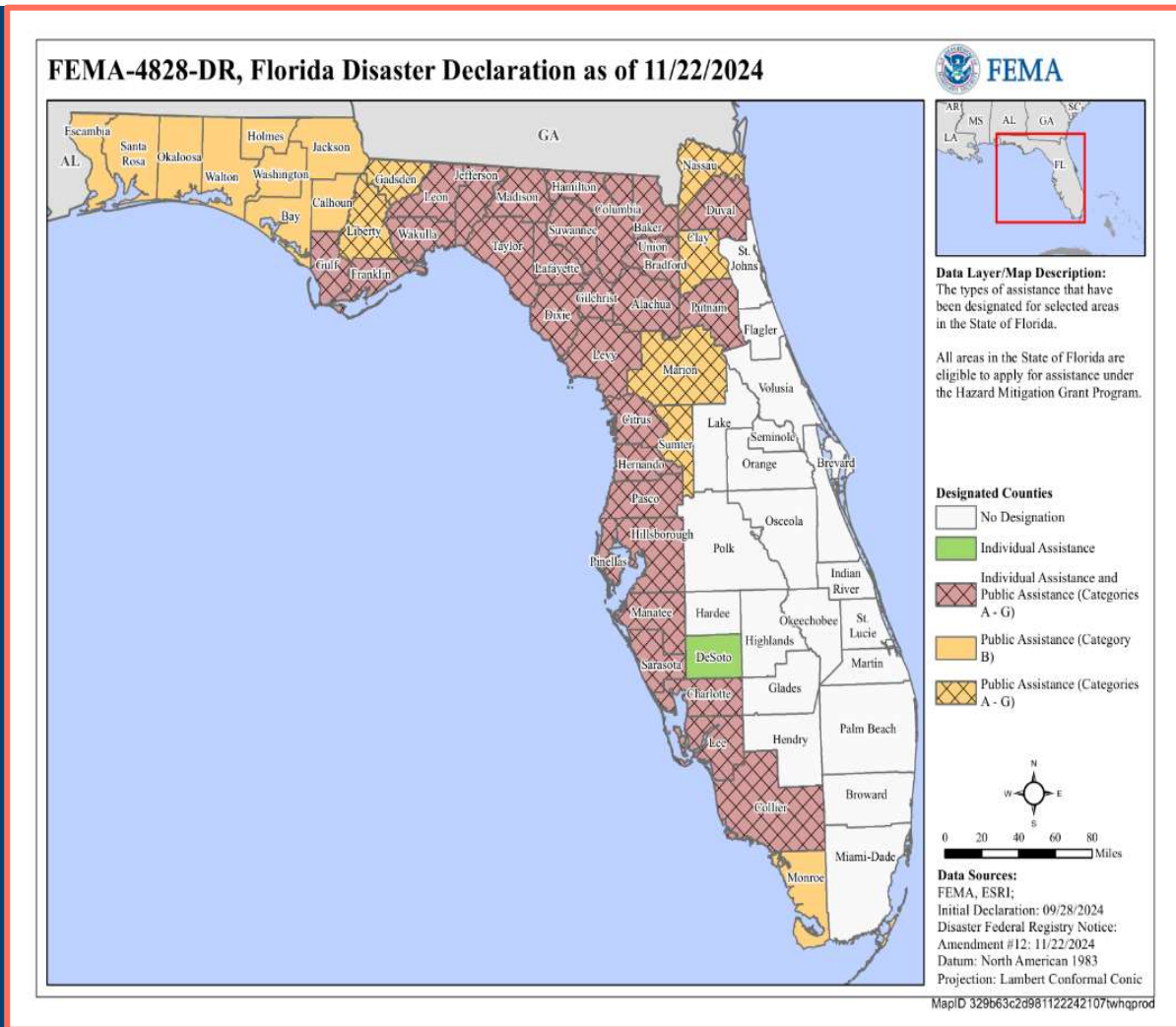


Figure 7 - Presidentially Declared Hurricane Helene Counties in Florida, including Hillsborough County  
(Source: <https://www.fema.gov/disaster/4829/designated-areas>)



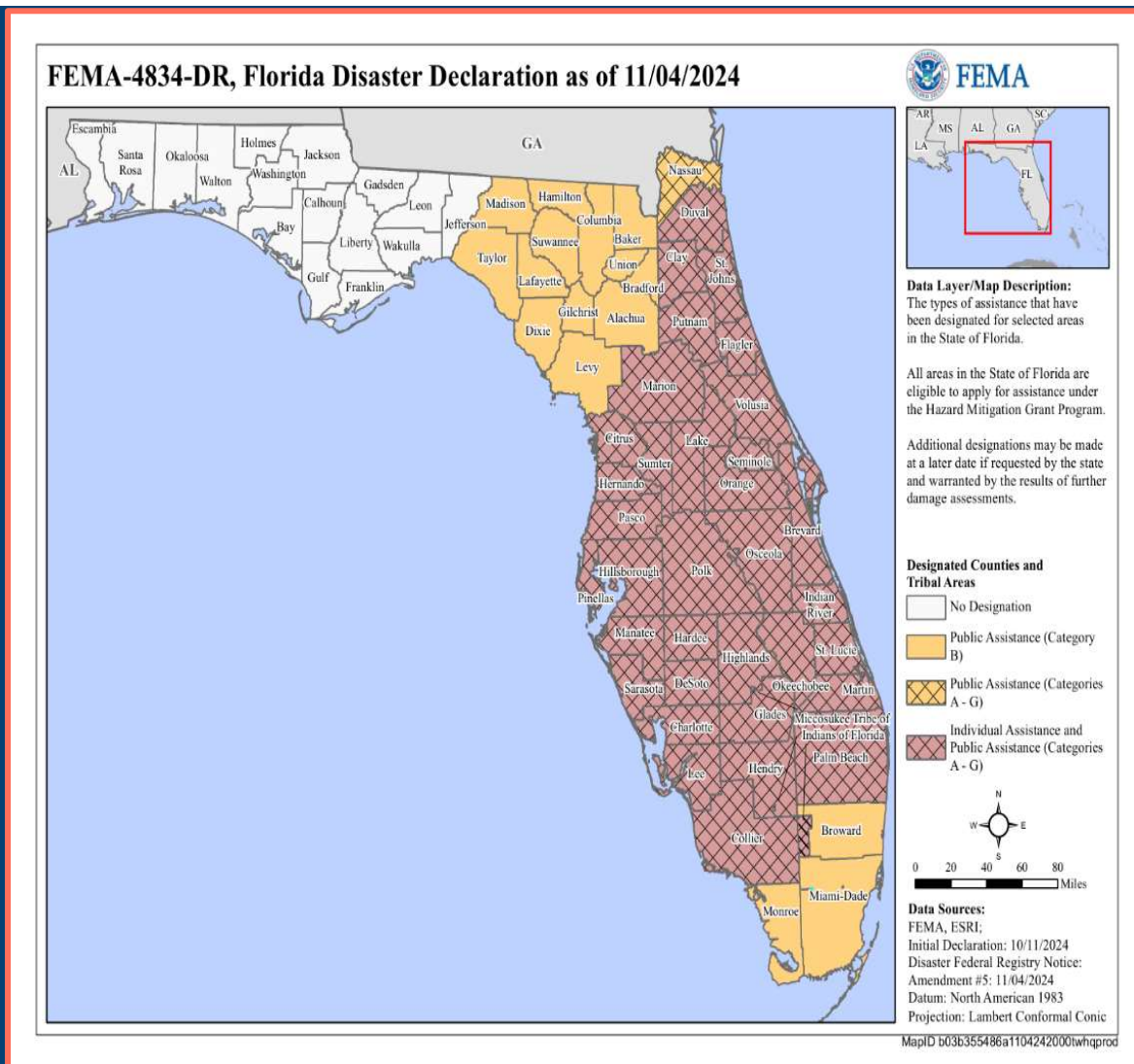


Figure 8 - Presidentially Declared Hurricane Milton Counties in Florida, including Hillsborough County  
(Source: <https://www.fema.gov/disaster/4829/designated-areas>)

## 3.2 Most Impacted and Distressed Areas

### HUD identified MID Areas

The HUD Office of Policy Development and Research and HUD Office of Disaster Recovery are responsible for establishing the extent of HUD-identified Most Impacted and Distressed (MID) Areas. Those defined areas refer to geographic areas that have experienced the most concentrated damage to housing, infrastructure or other community assets due to the Presidentially declared disaster. In the case of this specific allocation to Hillsborough County, the entire county is included as a MID area. This means that all geographic areas, including incorporated municipalities and unincorporated county areas, are deemed eligible MID areas. All CDBG-DR grant expenditures will occur in the County, thus meeting the HUD MID requirement.



### 3.3 Overview of the Impacts of the Qualifying Disaster

FEMA's OPEN data provides a broad summary of disaster survivors, damage, and funding at the zip code level to help illustrate the impacts of Hurricanes Helene and Milton on Hillsborough County. Aggregating individual applicant information to the zip code level enables a visual depiction of damage from various impacts, including total Real Property FEMA Verified Loss (RPFVL), average loss, and counts of FEMA applicants with any RPFVL. These three distinct perspectives on the same dataset can help identify not only where disaster survivors were impacted but also provide a measure of intensity and magnitude of Helene and Milton impacts across the region.

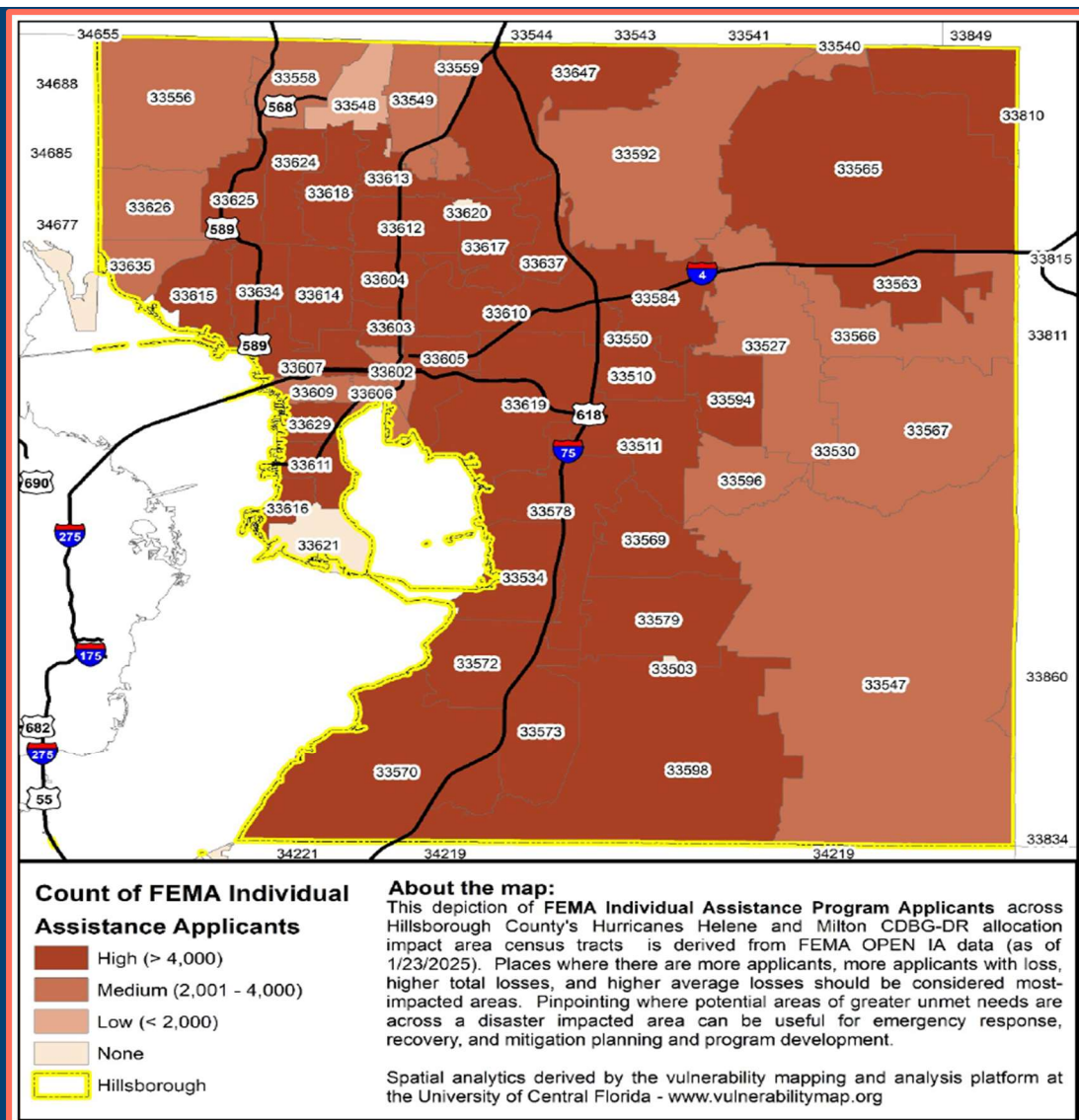


Figure 9 - FEMA Individual Assistance Applicants by Zip Code



*Table 2 - FEMA Individual Assistance Summary*

Category	# of Applicants	# of Inspections	# Inspected with Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Owners	159,556	31,010	16,860	8,241	\$159,746,015	\$9,475
Renters	164,777	37,706	16,341	8,537	\$25,007,633	\$1,530
Total	324,333	68,716	33,201	16,778	\$184,753,648	\$5,565



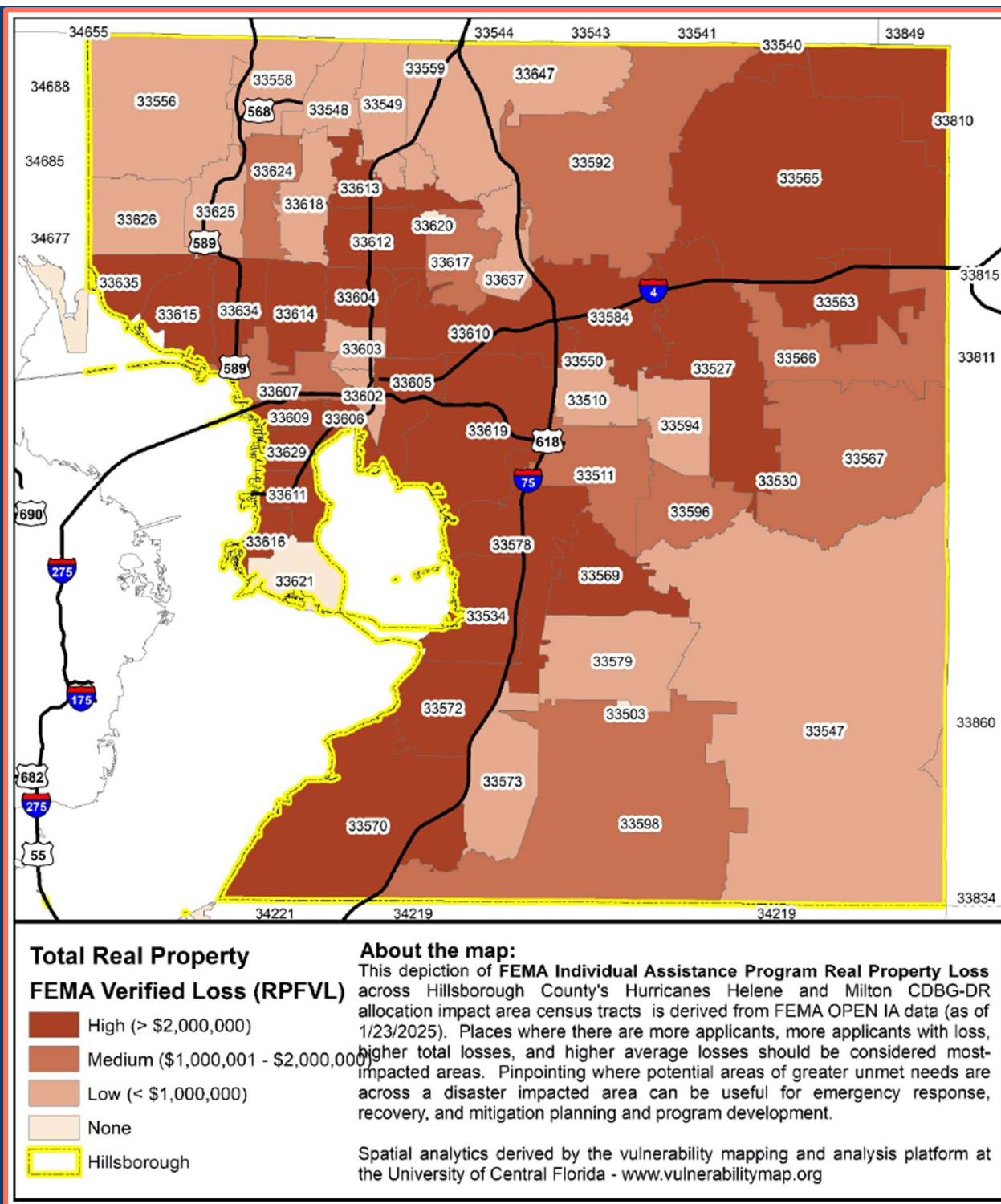


Figure 10 - Total Real Property Loss for FEMA Individual Assistance Applicants with Real Property Loss by Zip Code



An assessment of total damage shows an equalized distribution of major damage across the metro area of Tampa extending eastward to Plant City and south along Hillsborough Bay. There are areas of medium and low damage within Tampa, but, in general, high total real property FEMA verified loss is found where major population centers are located throughout the County.

Total losses clearly depict where the greatest amount of damage occurred across the County but may not provide a complete picture of the impacts in terms of the number of damaged structures and the relative intensity of damage. To pinpoint where higher relative damage occurred and identify those areas with more damaged housing requires an assessment of the RPFVL data in two additional ways, namely: damage assessed through averages and damage assessed through counts of applicants impacted. Here, mapping places by average RPFVL highlights more precisely where greater impacts were found. These include the unincorporated community of Town 'N' Country in the west, Gibsonton extending down to Ruskin in the south, and the Bloomingdale community and incorporated Plant City.

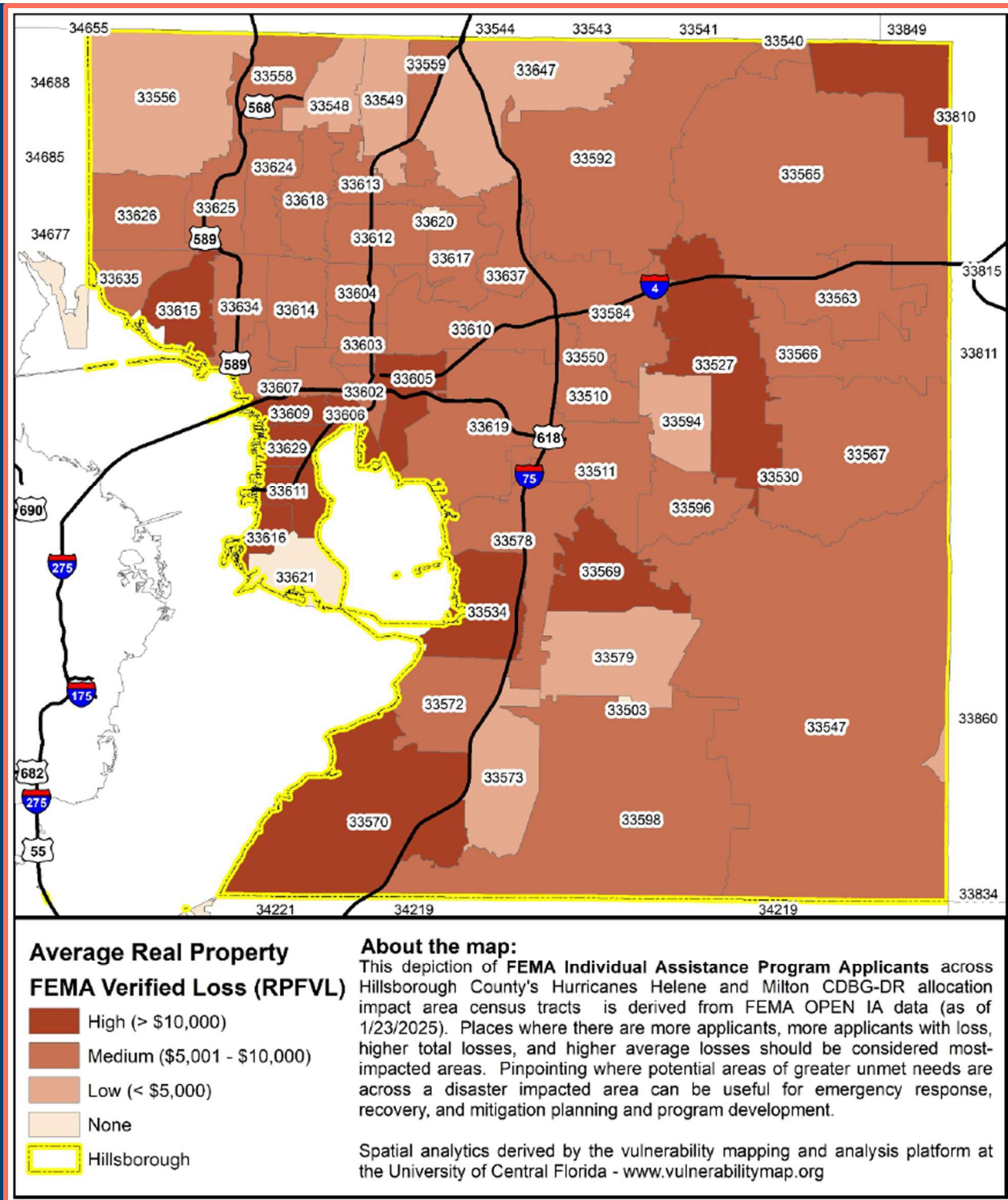


Figure 11 - Average Real Property Loss for FEMA Individual Assistance Applicants with Real Property Loss by Zip Code

However, average real property losses do not provide a complete picture of the most-impacted survivors. Zip codes with higher average damage can be the result of a few high-dollar losses rather than areas where many residences suffered moderate losses. In other cases, high averages may reflect





widespread, mid-level damage across a community. Forming a more comprehensive understanding of Hurricane Helene and Milton's impacts and pinpointing the most-impacted areas requires the addition of a different perspective on the same FEMA dataset – namely, the count of applicants with RPFVL.

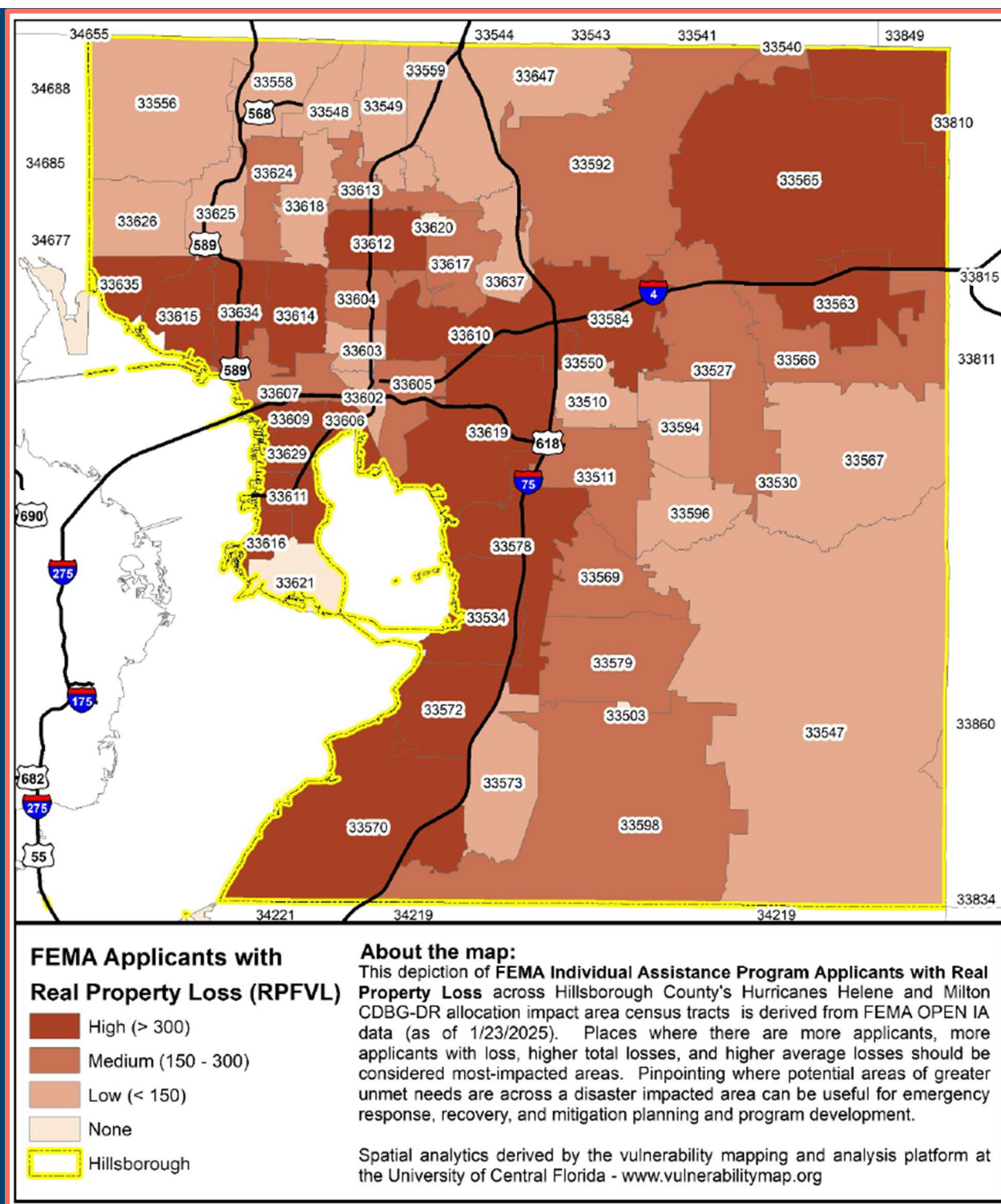


Figure 12 - FEMA Individual Assistance Applicants with Real Property Loss by Zip Code



Mapping counts of applicants with RPFVL provides a slightly different distribution of impact across the County. Here, the emphasis of activity appears to surround southwestern Tampa Bay and extend north-easterly to the edge of the County.

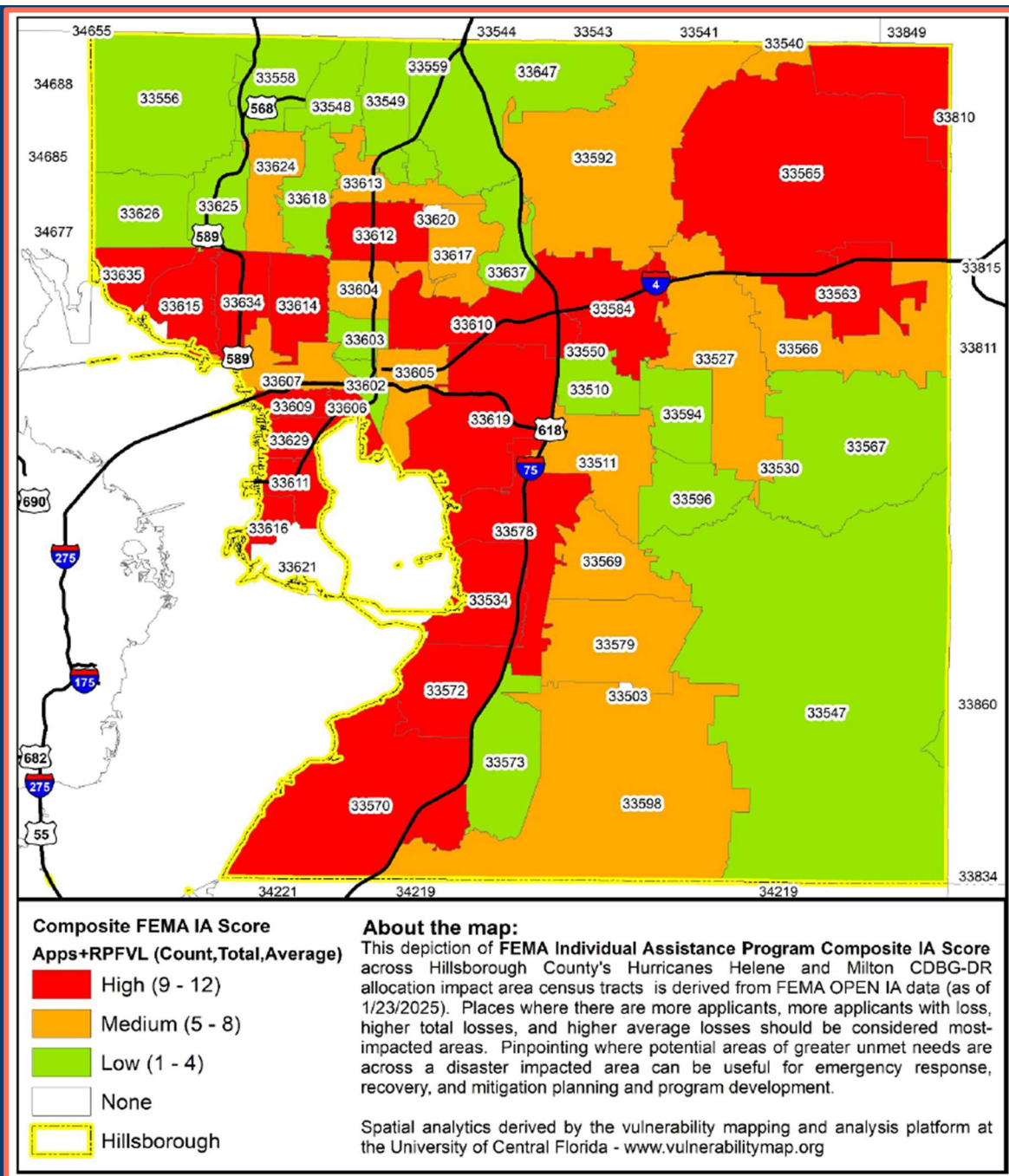


Figure 13 - Composite FEMA Individual Assistance Applicant Score (Applicants + RPFVL Applicants + RPFVL Total + RPFVL Average)



Combining these four perspectives of the Helene and Milton impacts provides perhaps the clearest representation of where more people applied for assistance, experienced damage, where that damage was higher (on average), and where there were more damaged housing units. Creating a composite RPFVL score by combining the scores from these four perspectives provides a range from 1 – 12 clearly indicating the relative impacts surrounding the bay and extending to the northeast. These places contain disaster survivors who had higher damages in greater numbers than the remainder of the County.

HUD requires grantees to expend, at minimum, 70% of their allocation to the benefit of low-to-moderate income (LMI) individuals or communities. Low-to-moderate income is defined as a household income that is at or below 80% of the area median income for the geographic boundary. In this case that geographic boundary is Hillsborough County. Understanding the LMI population for the County geographically can help to target outreach efforts for housing programs and identify potential infrastructure investments for an areawide LMI benefit.

---

*Table 3 - Low, Low-Moderate, and Low, Moderate and Middle Income (LMMI) – Hillsborough County*

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County	Total Population	Total LMI (80% AMI) Persons	Percentage LMI (80% AMI) Persons
Hillsborough	1,430,135	598,560	42%

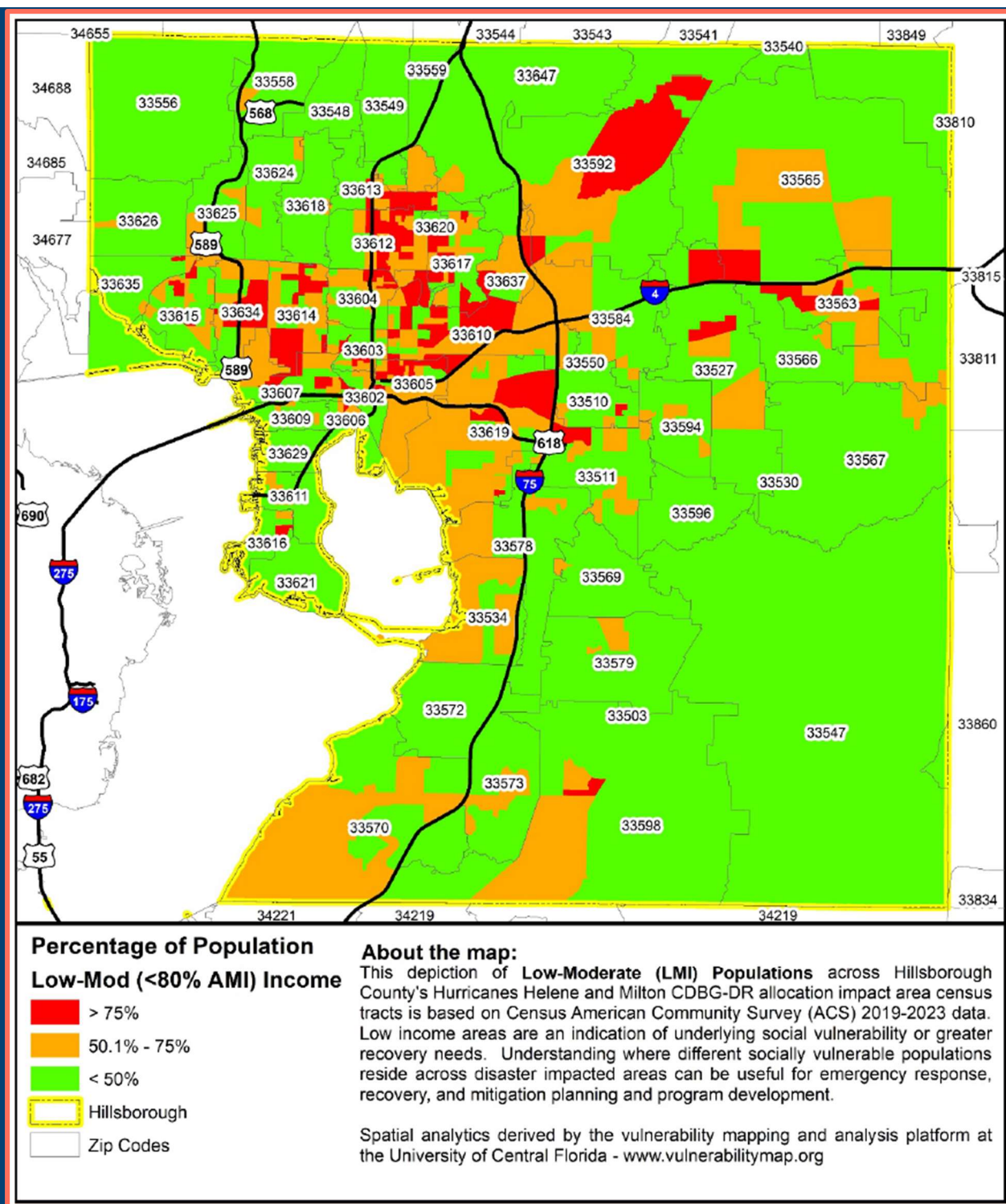


Figure 14 - Low-Moderate Income (<80% AMI) by Block Group across Hillsborough County

By focusing infrastructure investments in the orange and red portions of the map, projects will generate an area benefit to the LMI community, helping Hillsborough County achieve the goal of expending 70% of the funds for the benefit of the LMI community.



Targeting outreach for housing repair efforts to these areas will assist efforts to meet the goal as well since most households within the orange and red areas should be LMI.

---

*Table 4 - LMI Breakdown for FEMA Applicants*

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Type	Total Population	Total LMI Disaster Applicant Household Composition	LMI Percentage	Potential Additional LMI Populations	Potential Additional LMI Percentage
Owner Occupied Units	930,990	72,938	8%	49,164	5%
Renter Occupied Units	530,815	113,586	21%	39,364	7%



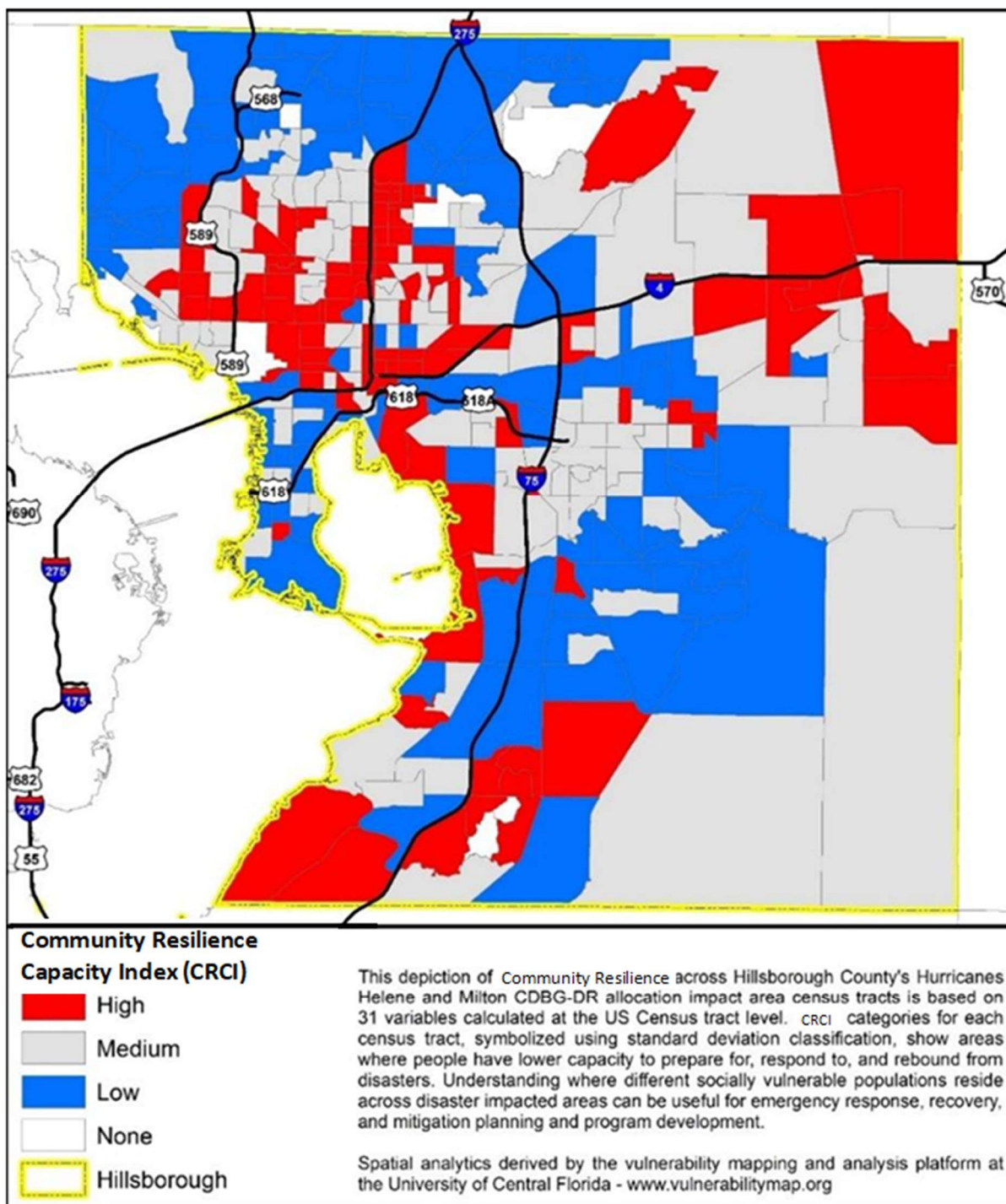


Figure 15 - Assessment of social and demographic characteristics to help identify communities that may need support in preparing for hazards or recovering from disasters by Census Tract across Hillsborough County.

The Community Resilience Capacity Index is a tool used by emergency responders, local planners, and officials to identify and quantify communities that may be disproportionately impacted by disasters or other hazards, based on factors like socioeconomic status, household characteristics, racial and ethnic



minority status, housing status and access to transportation networks. Utilizing an analysis of social and demographic characteristics can help to inform the unmet needs assessment by empirically delineating the census tracts within the County least likely to be able to self-recover.

Residents in high vulnerability areas generally have a lower ability to adequately prepare for, respond to, and rebound from environmental impacts (such as floods and other natural disasters), shocks and stresses. Vulnerable populations will often require additional resources and support to bounce back. Failure to support vulnerable populations during disaster recovery may ultimately lead to additional impacts and resource needs weeks, months and years later.

Utilizing community resilience capacity information in concert with FEMA damage data provides a standardized, replicable and pragmatic process for understanding where scarce resources would be most helpful in driving successful disaster recovery. This procedure results in a visualization of loss/vulnerability for the County where highly populated places such as the City of Tampa are characterized by a general attenuation of impacts due to lower levels of community resilience capacity. Conversely, populations residing in the eastern parts of the County (which tends to be more rural), although much less heavily populated, are characterized by generally higher levels of community resilience capacity.

Targeting housing assistance resources to these most heavily impacted and vulnerable areas will yield the most effective benefit because these areas will be much less able to bounce back without outside assistance.

Hillsborough County obtained from FEMA a list of Individual Assistance (IA) applicants and identified those applicants with a FEMA verified real property (housing) loss. Combining FEMA damage data at the zip code level – the finest level available from this set of FEMA data - provides a more nuanced view of damages across applicant addresses (points via latitude and longitude). FEMA verified losses were overlaid with community resilience capacity information to identify areas that were both heavily impacted and had a lower capacity to absorb such losses.

Combining all the associated factors can help to pinpoint where resources should be prioritized to obtain the maximum impact for the most vulnerable, most impacted residents of Hillsborough County. This tool can be used to target both housing recovery resources and protective infrastructure projects to get the greatest return on investment at a neighborhood level throughout the County. Targeting support to these areas in the immediate and long-term recovery phases of the disasters will yield the best outcomes for those with the highest need.

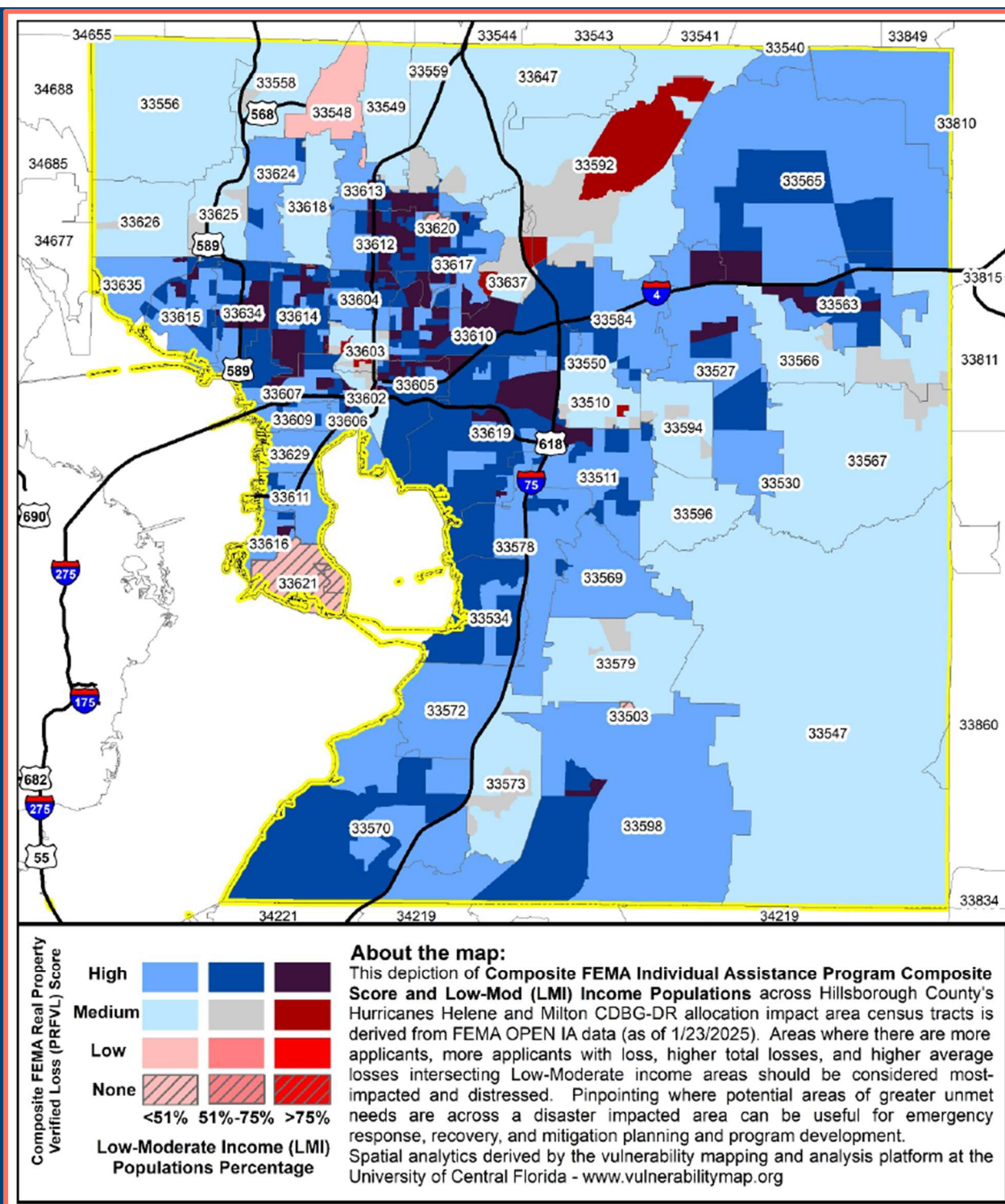


Figure 16 - Bivariate Composite FEMA Individual Assistance Applicant Score (Applicants + RPFVL Applicants + RPFVL Total + RPFVL Average) and LMI



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*Table 5 - Disaster Overview*

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Disaster Summary	
Qualifying Disaster:	FEMA-4828-DR and FEMA-4834-DR
HUD-identified MID Areas:	All of Hillsborough County
Grantee-Identified MID Areas:	Not applicable

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*Table 6 - CDBG-DR Allocation Overview*

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CDBG-DR Allocation Overview:	
CDBG-DR Allocation:	\$616,803,000
CDBG-DR Mitigation Set Aside:	\$92,521,000
Total Allocation:	<b>\$709,324,000</b>

## 4.0 Unmet Needs Assessment

### 4.1 Evaluate the Impacts of the Three Core Sectors of Recovery

Hillsborough County evaluated the impacts of Hurricanes Helene and Milton and the financial support to combat these impacts across the three major sectors as required by the Department of Housing and Urban Development: housing, infrastructure, and the economy. The unmet needs assessment has identified housing unmet needs of \$1,030,203,537 (56%), infrastructure unmet needs of \$284,811,777 (16%), and economic unmet needs of \$515,124,555 (28%). The total unmet needs identified from the impacts of Hurricane Milton on Hillsborough County is estimated to be \$1,830,139,869 after factoring in a 30% increase for resiliency (cost of compliance) in construction methods.





Table 7 - Summary Impact and Unmet Needs by Sector

Summary of Impacts/Support	Housing	Infrastructure	Economy	Total
Amount of Estimated Impact	\$2,059,490,996	\$305,392,106	\$1,039,509,703	\$3,404,392,805
Amount of Funds Available	\$1,029,287,459	\$20,580,329	\$524,385,148	\$1,574,252,936
Unmet Needs (impact-Available Funds) + Resiliency Costs	\$1,030,203,537	\$284,811,777	\$515,124,555	\$1,830,139,869
Percent of Total Unmet Needs	56%	16%	28%	100%

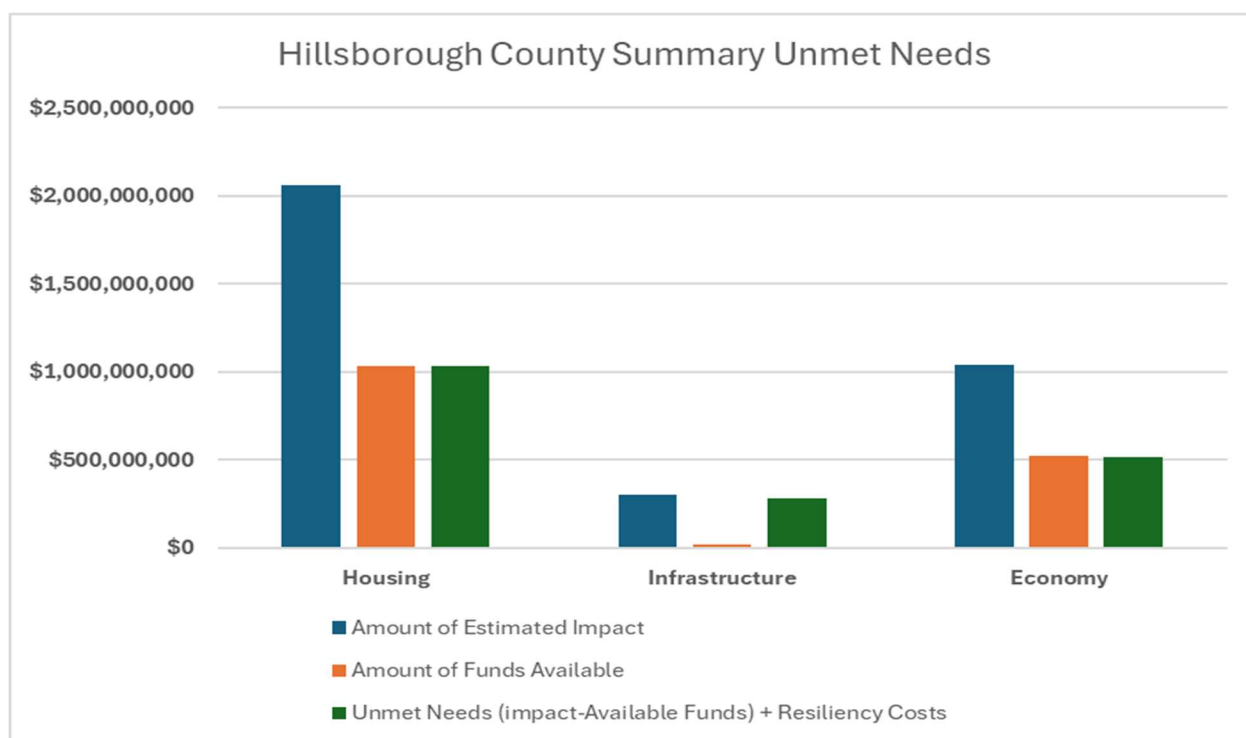


Figure 17 - Summary Impact and Unmet Needs by Sector



## 4.2 Summary Impact and Unmet Needs

### 4.2.1 Housing

The following summary provides a breakdown of the Housing analysis of the unmet needs assessment. To derive the final unmet needs estimate for housing, the data for 324,333 FEMA registrants was analyzed, representing both owners and renters that applied for FEMA Individual Assistance.

*Table 8 - FEMA Individual Assistance Summary*

Category	# of Applicants	# of Inspections	# Inspected with Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Owners	159,556	31,010	16,860	8,241	\$159,746,015	\$9,475
Renters	164,777	37,706	16,341	8,537	\$25,007,633	\$1,530
<b>Total</b>	<b>324,333</b>	<b>68,716</b>	<b>33,201</b>	<b>16,778</b>	<b>\$184,753,648</b>	<b>\$5,565</b>

Housing unmet needs was calculated using the HUD methodology of evaluating FEMA Individual Assistance information broken into five categories. The categories are:

- 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 of FEMA-inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor

Through this lens, the impacts were analyzed to account for an estimated total loss by damage category and home types (mobile homes, single family homes, condos, townhomes, etc.) to arrive at the total housing impact estimate from Hurricanes Helene and Milton using the HUD multiplier. This data was filtered to emphasize those homes that were significantly impacted (Major-High and Severe) versus those with lesser impacts (Minor-Low, Minor-High, and Major-Low) that included water intrusion into the home. This analysis helps to identify where infrastructure solutions could prevent repetitive flooding more cost effectively than elevations and acquisitions in the impacted areas. To identify the other variable in the equation, known sources of support were identified to include FEMA payments, SBA loans, property insurance payments, NFIP payments, and other sources of known funding.

Subtracting the sources of housing support from the estimated impacts led to the identified unmet housing need of \$1,030,203,537.

Table 9 - Housing Unmet Needs Summary

Housing Unmet Needs Summary	
Total Housing Impacts	\$2,059,490,996
Total Housing Support	\$1,029,287,459
Unmet Housing Need (Including Resilience Factors)	\$1,030,203,537

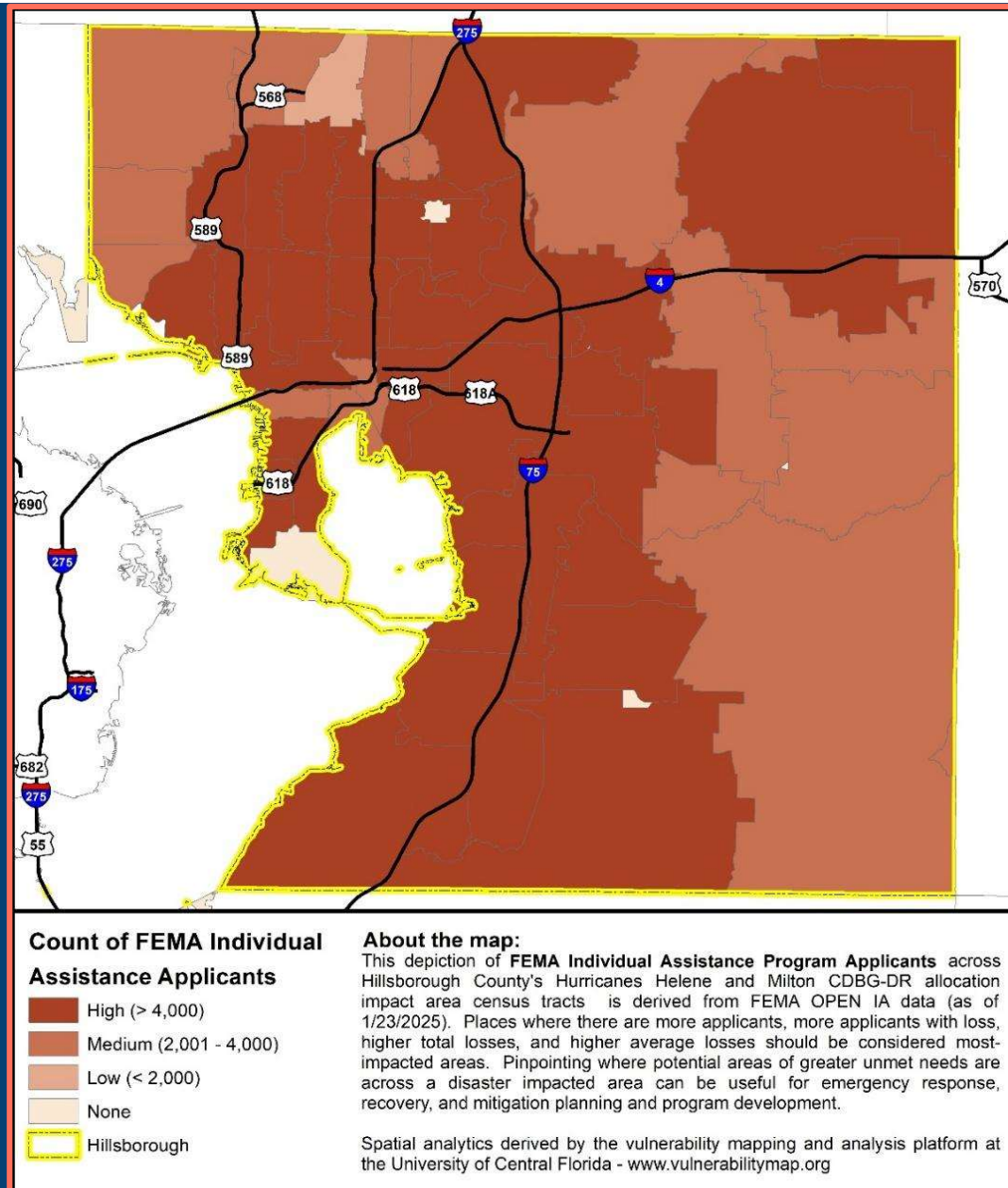


Figure 18 - FEMA Individual Assistance Applicants by Area



The map indicates that FEMA applications were submitted at a high level throughout the major population centers of the County, with the majority of zip codes having more than 4,000 applicants, and the less populated areas to the southeast having between 2,000 and 4,000 applicants. Only one zip code in the northern part of the County had fewer than 2,000 applicants.

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*Table 10 - FEMA Individual Assistance by HUD Damage Category*

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Category	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
Owners	9,393	3,513	6,042	3,229	420
Renters	8,443	3,378	2,199	1,999	410

Across the five damage categories, 39,026 applications received a damage categorization. Of those, 24,727 (63%) were split between the minor-low and minor-high category, indicating that they had a minor level of damage with no water intrusion into the structure. This group is indicative of those homes that could likely be repaired without the requirement for major mitigation efforts and action required for floodplain compliance. These applicants were nearly evenly split between owners at a count of 12,906 (52%) and renters at a count of 11,821 (48%).

Units with more severe damage and/or some level of water intrusion into the home had a total count of 14,299 (37% of applicants). These units had a tenancy split of 9,691 owners (68%) and 4,608 renters (32%). These units represent those that would likely require substantial improvement up to a full reconstruction. Given that many had water within the home, these units would have additional costs associated with elevating the existing or new structures. This universe of applicants would likely benefit from strategic infrastructure investment to limit the impacts of future flood events.





*Table 11 - Summary Housing Impacts and Unmet Needs*

Total Derived Impacts and Unmet Needs for Housing				
Data	Count	Total FEMA or SBA Estimated Property Loss	Average Real Property Loss	Estimated Total Loss (HUD Multiplier)
Minor-Low Damage to FEMA IA Applicants (Mobile Homes)	840	\$1,544,429	\$1,839	\$14,101,640
Minor-Low Damage to FEMA IA Applicants (All Other Home Types)	2,959	\$5,894,820	\$1,992	\$86,323,893
Minor-High Damage to FEMA IA Applicants (Mobile Homes)	719	\$13,121,863	\$18,250	\$32,840,804
Minor-High Damage to FEMA IA Applicants (All Other Home Types)	2,070	\$12,325,979	\$5,955	\$69,861,120
Major-Low Damage to FEMA IA Applicants (Mobile Homes)	907	\$10,007,326	\$11,033	\$69,891,606
Major-Low Damage to FEMA IA Applicants (Houses)	4664	\$50,134,043	\$10,749	\$171,635,200
Major-Low Damage to FEMA IA Applicants (Condos/Apartments/Townhomes)	322	\$2,857,517	\$8,874	\$11,849,600
Major-Low Damage to FEMA IA Applicants (All Other Home Types)	67	\$348,742	\$5,205	\$2,465,600
Major-High Damage to FEMA IA Applicants (Mobile Homes)	1428	\$8,451,420	\$5,918	\$140,605,164
Major-High Damage to FEMA IA Applicants (Houses)	2395	\$40,622,928	\$16,962	\$110,055,040
Major-High Damage to FEMA IA Applicants (Condos/Apartments/Townhomes)	77	\$1,022,607	\$13,281	\$3,538,304
Major-High Damage to FEMA IA Applicants (All Other Types)	22	\$155,515	\$7,069	\$1,010,944
Severe Damage to FEMA IA Applicants (Mobile Homes)	840	\$1,544,429	\$1,839	\$113,260,560
Severe Damage to FEMA IA Applicants (Houses)	284	\$6,840,632	\$24,087	\$13,050,368
Severe Damage to FEMA IA Applicants (Condos/Apartments/Townhomes)	4	\$54,815	\$13,704	\$183,808



Total Derived Impacts and Unmet Needs for Housing				
Data	Count	Total FEMA or SBA Estimated Property Loss	Average Real Property Loss	Estimated Total Loss (HUD Multiplier)
Severe Damage to FEMA IA Applicants (All Other Types)	25	\$859,236	\$34,369	\$1,148,800
Category 1 SBA Derived Damage to Rental Dwellings (Landlords)	3	\$9,628	\$3,209	\$50,363
Category 2 SBA Derived Damage to Rental Dwellings (Landlords)	4	\$96,152	\$24,038	\$182,703
Category 3 SBA Derived Damage to Rental Dwellings (Landlords)	11	\$513,898	\$46,718	\$847,638
Category 4 SBA Derived Damage to Rental Dwellings (Landlords)	14	\$1,498,403	\$107,029	\$1,378,482
Category 5 SBA Derived Damage to Rental Dwellings (Landlords)	10	\$32,022,604	\$3,202,260	\$1,348,340
Real Property Insurance Paid Claims	31,064	\$449,923,536	\$14,484	\$449,923,536
NFIP Identified Damages (Unincorporated Hillsborough)	9,224	\$510,248,489	\$55,317	\$510,248,489
Damage to Public Housing				
Total Housing Loss	57,953	\$1,150,099,015	\$19,845	\$1,805,802,003
Accounting for an additional 30% in funding to support rebuilding to higher standards (resilience) (est. total loss excld, RPIPC and NFIP damage)				\$2,059,490,996
FEMA payments to repair/replace homes	8,245		\$8,303	\$68,455,591
SBA Loan Support to Rental Properties (Landlords)	16		\$41,240	\$659,843
Real Property Insurance Payments	31,064	\$449,923,536	\$14,484	\$449,923,536
NFIP Building Payments (Unincorporated Hillsborough)	9,224	\$510,248,489	\$55,317	\$510,248,489
Total Support				\$1,029,287,459
Initial Unmet Needs				\$776,514,543
Total Unmet Housing Need (Accounting for an additional 30% in funding needed to support rebuilding to higher standards (resilience))				\$1,030,203,537



*Table 12 - Remaining Unmet Needs for FEMA Individual Assistance Applicants and LMI Applicants*

Category	Owners	Renters	Total Damage (Real and Personal Property)	Total Repair/Replace Support	Total Personal Property Support	Remaining FEMA Estimated Unmet Needs
All FEMA Applicants	159,556	164,777	\$218,369,222	\$68,455,591	\$33,935,839	\$115,977,793
Applicants in Mobile Homes	15,622	8,992	\$45,953,108	\$25,111,373	\$5,120,993	\$15,720,742
Applicants in Houses	120,690	55,171	\$152,021,934	\$39,948,139	\$18,891,632	\$93,182,162
All LMI Applicants	72,938	113,586	\$118,693,890	\$46,027,528	\$22,901,191	\$49,765,170
LMI Applicants Mobile Homes	11,333	7,322	\$35,333,004	\$19,448,571	\$4,087,400	\$11,797,032
LMI Applicants in Houses	51,290	38,215	\$70,350,286	\$24,549,301	\$12,005,915	\$33,795,070

What is not clear from the summary housing impact assessment of losses across building types are the water related impacts. Pinpointing where these losses occurred can help build a picture of those places where improvements in infrastructure must be made hand-in-hand with rebuilding or replacing residential structures. There were more than 12,000 applicants (nearly 8,500 LMI) with water related impacts who did not have flood insurance.



*Table 13 - Remaining Unmet Needs for FEMA Individual Assistance Applicants and LMI Applicants with Flood Damage and no Flood Insurance*

County	Owners	Renters	Total Damage (Real and Personal Property)	Total Repair/Replace Support	Total Personal Property Support	Remaining FEMA Estimated Unmet Needs
All FEMA Applicants	5,664	6,488	\$91,042,067	\$45,286,847	\$27,283,864	\$18,471,356
Applicants in Mobile Homes	1,544	464	\$23,846,355	\$13,898,638	\$3,356,076	\$6,591,640
Applicants in Houses	3,595	2,822	\$54,375,469	\$28,827,631	\$15,820,497	\$9,727,341
All LMI Applicants	3,643	4,726	\$59,191,331	\$28,234,778	\$17,808,826	\$13,147,726
LMI Applicants Mobile Homes	1,161	381	\$18,219,704	\$10,339,466	\$2,617,639	\$5,262,599
LMI Applicants in Houses	2,166	2,116	\$32,833,909	\$16,527,235	\$9,902,876	\$6,403,797

#### 4.2.1.1 Housing Analysis by Type and Tenancy

##### 4.2.1.1.1 Emergency Shelters, Interim, and Permanent Housing

Tampa Hillsborough Homeless Initiative (THHI), as the Lead Agency for the Tampa/Hillsborough County Continuum of Care (CoC), has primary responsibility for assessing the needs and coordinating the community's response to homelessness. The THHI CoC conducts a homeless count annually known as the Point in Time (PIT) Count. The PIT count is completed through a collaborative effort between CoC members, law enforcement, social service providers, city and county staff, the VA, business and community members. Hundreds of volunteers canvass the streets, alleys, and wooded areas to locate, count, and survey individuals and families experiencing homelessness. To abide by HUD's definition of homelessness, the count included only those that are living in emergency shelters, places not meant for human habitation, transitional/bridge housing, and inadequate dwellings without proper utilities for drinking water, heat, using the restroom and bathing. The 2024 PIT count estimated that 1,893 individuals are experiencing homelessness at any given time. This count provides critical data needed to appropriately address the needs of homeless individuals and families.





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*Table 14 - Continuum of Care Summary*

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CoC Number	CoC Entity	Impacted County	Homeless Count
FL-501	Tampa/Hillsborough County CoC	Hillsborough	1,893

Hillsborough County launched the community's 560 in 560 Strategic Plan, which addresses the issues of unsheltered homelessness and some of the top causes leading to homelessness. The goal of the 560 In 560 Plan was to provide housing opportunities to 560 people in 560 days. The program had served approximately 3,387 residents since the conception of the program. Services provided through this plan include Hillsborough County Expungement Clinic, Job Fairs, Hot Spot Mobile Outreach, Speed Leasing, Shared Housing, and Rapid Exit from shelters. Hillsborough County has committed financial resources to help implement this plan and is leveraging the County's commitment to garner support from other local governments as well as private sector partners.

Ongoing street outreach efforts are conducted through the CoC Outreach Committee, consisting of volunteers from non-profits, faith-based organizations, health centers, Tampa Police Department, Hillsborough County Sheriff's Office, Tampa Housing Authority and Hillsborough County Homeless Services Department. The CoC Outreach Committee conducts monthly outreach to engage with persons living on the streets, assess their vulnerability using the Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT), address their immediate and basic needs, and facilitate their transition from the streets into temporary/bridge and permanent housing as quickly as possible. The VI-SPDAT is a tool to match persons to the most appropriate housing based on the vulnerability of the person. Additionally, large outreach events are conducted quarterly to provide direct services such as showers, haircuts, vaccinations, Identification assistance, and assistance applying for benefits; provide essential items such as clothing and hygiene products; hold raffles for bikes and other essentials; and serve hot meals. Hillsborough County has dedicated staff members to participate in this committee and volunteer at outreach events.

*Table 15 - Unhoused Population Summary*

Scale of Data	Total Known Homeless (2023)	Emergency Shelter (2024)	Transitional Housing (2024)	Safe Haven Sheltered (2024)	Unsheltered Homeless (2024)	Total Known Homeless (2024)
Statewide	30,756	10,229	4,155	110	16,868	31,362
Hillsborough County	2,040	828	43	0	1,022	1,893

#### 4.2.1.1.2 Rental and Owner-Occupied Single Family and Multifamily Housing

*Table 16 - FEMA Individual Assistance Applicants by Housing Type*

Residence Type	# of Applicants	% Owner Occupied	% Tenants	% Unknown	% Type
Apartment	77,379	0.03%	99.95%	0.03%	23.84%
Assisted Living Facility	259	0.39%	99.23%	0.39%	0.08%
Boat	54	79.63%	20.37%	0.00%	0.02%
College Dorm	61	0.00%	100.00%	0.00%	0.02%
Condo	7,576	48.98%	51.02%	0.00%	2.33%
Correctional Facility	12	8.33%	91.67%	0.00%	0.00%
House/Duplex	175,963	68.59%	31.35%	0.06%	54.22%
Military Housing	219	0.00%	100.00%	0.00%	0.07%
Mobile Home	24,641	63.40%	36.49%	0.11%	7.59%
Other	18,604	48.02%	51.83%	0.15%	5.73%
Townhouse	17,722	52.62%	47.36%	0.02%	5.46%
Travel Trailer	2,027	59.55%	40.36%	0.10%	0.62%
Unknown	1	100.00%	0.00%	0.00%	0.00%
<b>Total</b>	<b>324,518</b>	<b>49.17%</b>	<b>50.78%</b>	<b>0.06%</b>	<b>100.00%</b>

In total, 324,518 FEMA Individual Assistance applicants in Hillsborough County were reported, with 49.17% of the housing units being owner occupied and 50.78% being rented. This comprehensive data spans a variety of housing types and shows the County's diverse residential profile.



Houses and duplexes dominate the application numbers, with 175,963 accounts representing 54.22% of the total. Among these, a robust 68.59% are owner occupied, indicating that most that sought FEMA assistance were homeowners, while 31.35% are tenants, reflecting a significant mix in residential occupancy.

Apartments represent the second largest housing category, accounting for 77,379 applicants (23.84% of the total). Nearly all of these are occupied by tenants (99.95%), suggesting that multi-family rental units are a critical segment within the County's housing stock when it comes to FEMA Individual Assistance applications.

Condos, townhouses, and properties classified as "Other" account for smaller portions of the total—with 7,576 condo applicants (2.33%), 17,722 townhouses (5.46%), and 18,604 in the "Other" category (5.73%). Ownership percentages in these categories are more balanced, generally ranging from around 48% to 53% owner occupied, reflecting a mixed residential profile.

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*Table 17 - Calculation of Impact and Support by Owners vs. Renters*

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	FEMA Damage Estimate (Impact)	FEMA Payment to Repair/Replace (Support)	% Impact	% Support
Owners	\$193,135,903	\$83,674,642	88%	82%
Renters	\$25,233,319	\$18,698,653	12%	18%

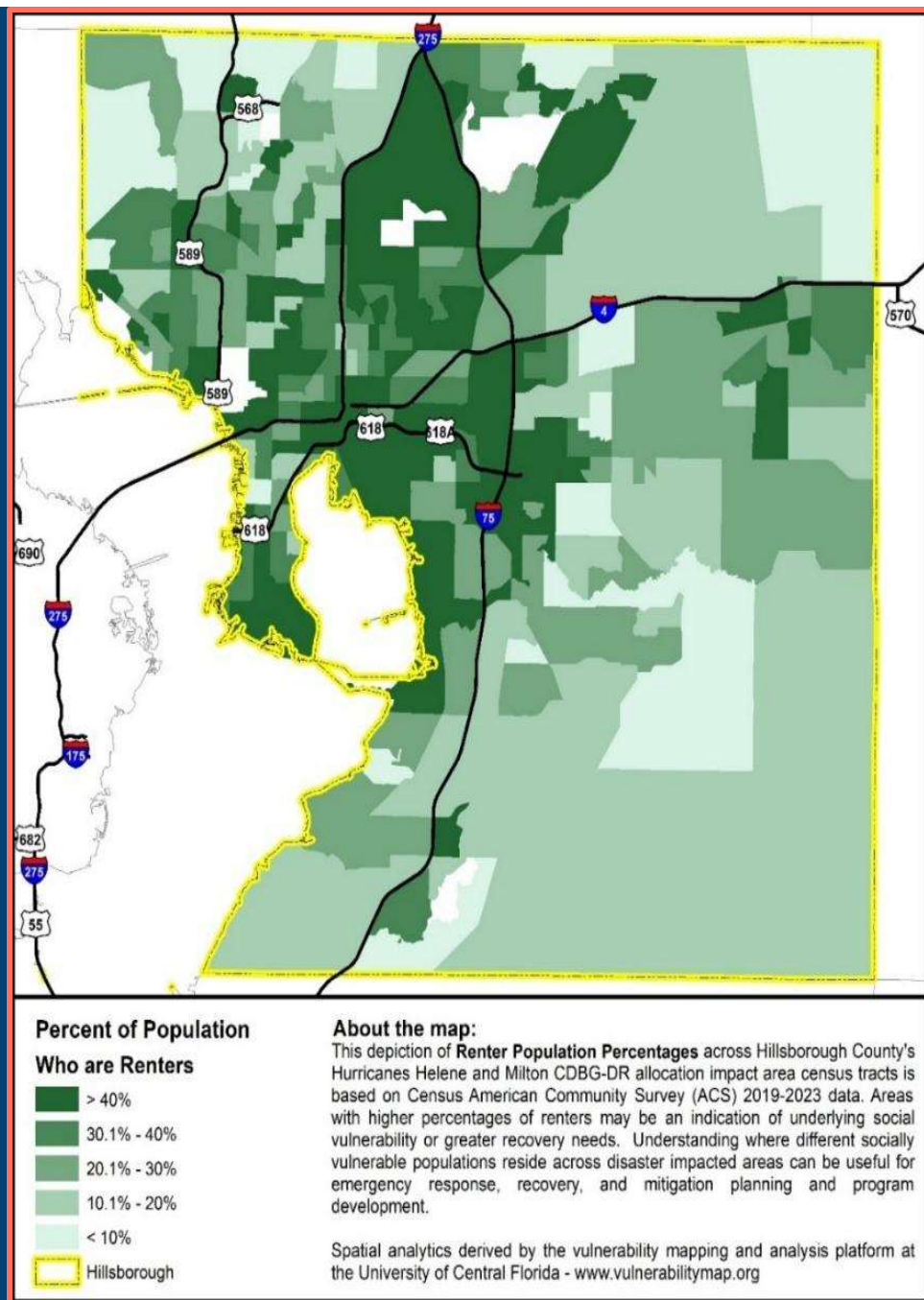


Figure 19 - Renter populations by Census Tract across Hillsborough County.





#### 4.2.1.1.3 Mobile Homes

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*Table 18 - Mobile Homes Impacted*

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Total Number of Mobile Housing Units	Number of Units Impacted	% of Total Impacted Units
40,160	24,641	61%

Mobile homes constitute a notable share of the FEMA Individual Assistance applicants, with 24,641 applicants (7.59% of the total applicant pool). In this category, 63.40% are owner-occupied and 36.49% are rental, highlighting a relatively high rate of home ownership. Mobile home percentages are higher in the more rural southeast and northeast portions of the County and in the many retirement communities in the Gibsonton, Riverview, and Ruskin areas on Tampa Bay's eastern shore.

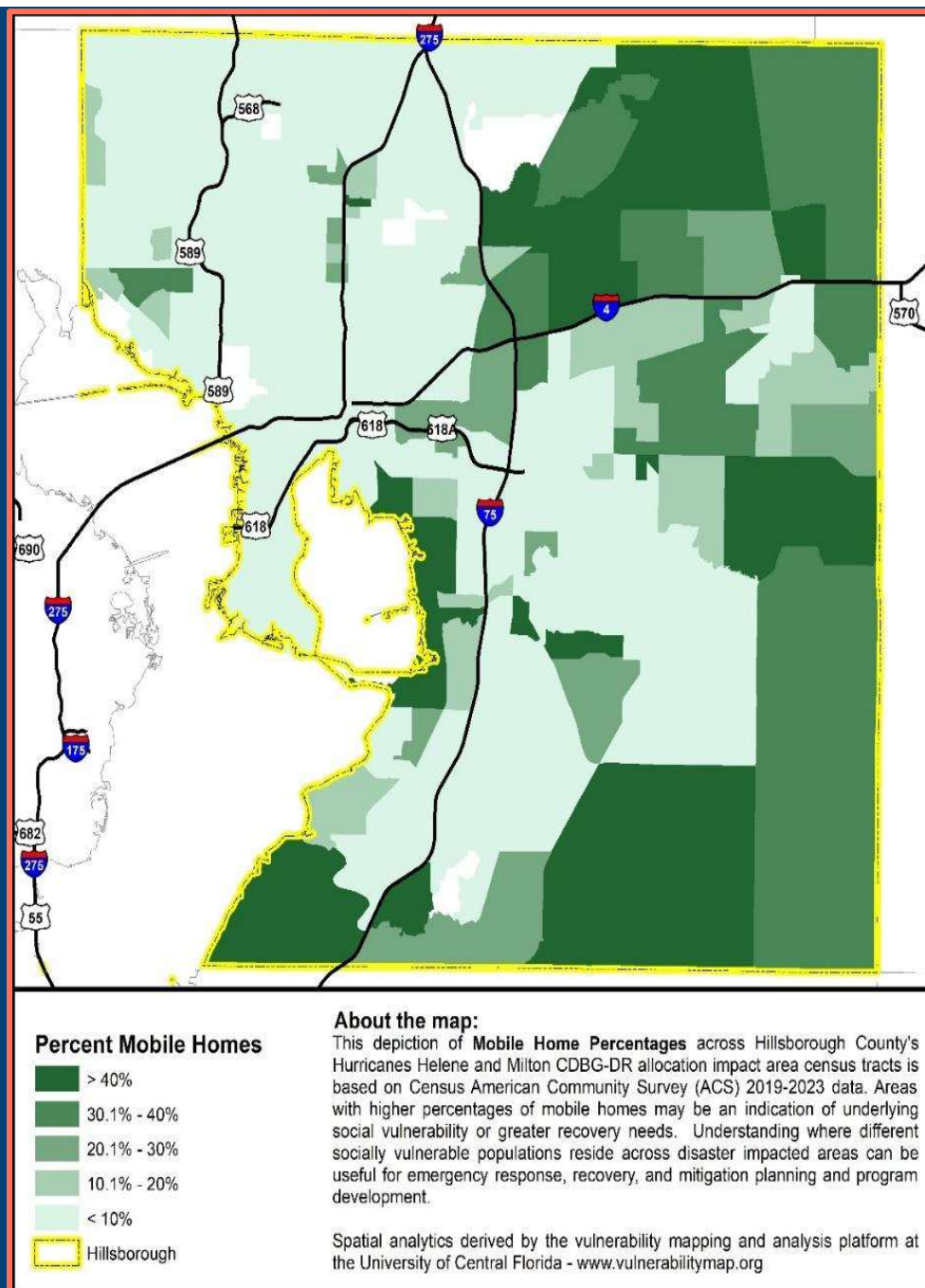


Figure 20 - Mobile Home Percentages by Census Tract

#### 4.2.2 Median Home Values

As of February 2025, the median home value for homes sold in Hillsborough County was \$390,000. This equates to an approximate price per square foot of \$232. This data comes from the sales of 1,422 homes over 2024, with the sold price being about 1.3% lower than the year prior. Given the back-to-back impacts of Helene and Milton, this figure will likely see a dramatic decrease in value when next the

data is consolidated. The map identifies the median home values throughout the County with major pockets of the County having a median home value more than \$400,000 and the major population centers with median home values typically falling between \$200,000 and \$400,000.

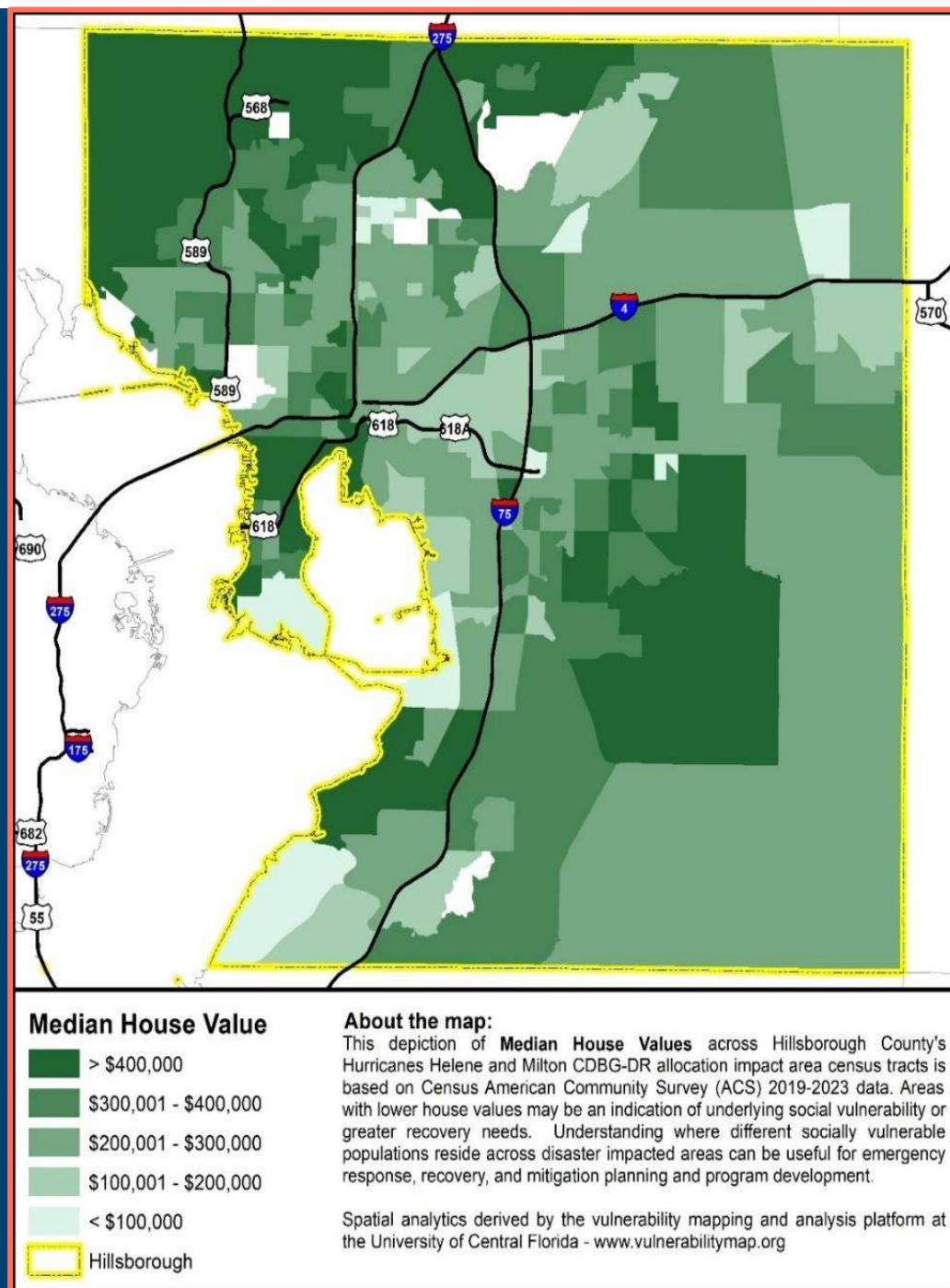


Figure 21 - Median House Value by Census Tract across Hillsborough County.



#### 4.2.3 Public Housing (Including HUD-assisted Housing) and Other Affordable Housing

Hillsborough County has two public housing authorities, the Tampa Housing Authority and the Plant City Housing Authority. The housing authorities own and operate public housing units and manage housing choice vouchers. The Tampa Housing Authority provides housing opportunities to more than 21,000 residents in the Tampa Bay area and currently administers 367 public housing units and 12,398 Housing Choice Vouchers. The Plant City Housing Authority has 200 units under management and 187 voucher assisted units throughout Hillsborough County.

The impact to public housing facilities was highly varied. Some facilities fared well, with little or no damage. Others lost entire ground floors to surface flooding, had extensive roof damage from wind and falling debris and electric and other systems failures. In addition to the immediate need to repair and return these units to service, the storms highlighted the need for mitigation and resiliency investments in the housing authority portfolio. The damage caused by Hurricanes Helene and Milton highlighted the need for improved stormwater management, more resilient building systems, and other infrastructure upgrades to strengthen the affected facilities.

In addition to public housing authority managed units, there was a substantial impact on other affordable housing in Hillsborough County, though the impacts are more anecdotal in nature and difficult to quantify. Understanding the impact is based more on discussions with affordable housing practitioners in the community. As individuals and families were displaced from their normal homes, both rented and owned, across the entire spectrum of affordability, they immediately occupied the few vacancies that existed in an already extremely tight rental market. As a result, affordable units were effectively lost from the market, and the overall market fell to an effective zero-percent vacancy rate and displaced people filled any available unit.

#### 4.2.4 Homeless Facilities and Services

Both facilities and services that support homeless individuals in Hillsborough County were disrupted by hurricanes Helene and Milton. With facilities distributed throughout the County, impacts were varied, but were significant, nonetheless. Eleven different providers were able to provide information regarding physical damage to their locations. The damages ranged from blocked access due to flooding, downed power lines and trees to roof and building damages from flooding, heavy rainfall and flying debris. The cost of damages ranges from relatively minor to hundreds of thousands of dollars.

Operationally, all the organizations saw a tremendous impact from the storms. Most operated over-capacity for an extended period out of necessity. All saw a rapid depletion of supplies with no predictable way to replenish them. Increased demand for temporary lodging assistance, financial assistance and emergency food supplies was a common concern among providers. All these on-site pressures were amplified by staffing challenges brought about by employees who were dealing with their own crises at home and who were also struggling to even find safe transportation to work.

#### 4.2.5 Infrastructure

The following summary provides a breakdown of the infrastructure analysis of the unmet needs assessment. To derive the final unmet needs estimate for infrastructure, the data for FEMA Public Assistance (PA) across all categories was analyzed to determine the overall immediate infrastructure impact following Hurricanes Helene and Milton. An analysis was conducted to identify all local capital





improvement projects that were potentially impacted by the hurricanes as submitted by the County and all municipal organizations within its jurisdiction.

The analysis of impacts was compared against the resources made available, primarily the federal cost share for all FEMA Public Assistance projects. The federal cost share for categories A and B, debris removal and emergency services, are covered by the federal government at 100%. Categories C-G of FEMA Public Assistance have an assumed 25% local match requirement which is considered an unmet needs. Resilience factors and increased costs of building supplies were then added to this figure, as indicated in the supporting data.

The value of all identified, impacted capital improvement infrastructure projects was analyzed to determine an unmet needs for that category of infrastructure work. These projects were split into two major categories based on estimated cost: those that are \$10M and over, and those that are under \$10M. It is assumed that those projects that are greater than \$10M will require some cost share arrangement with federal or state resources to fund the project. Due to this, only 25% of the value of the projects is included as unmet needs. For those projects under \$10M, the full value is included as an unmet needs. This capital improvement data is then added to the unmet needs amount prior to a resiliency factor and increased costs for building supplies being incorporated to account for building back in a more resilient manner.

Finally, identified support for federal portions of Public Assistance was included as an appropriate offset. Impacts minus known support led to the infrastructure unmet needs amount of \$284,811,777, equating to approximately 16% of the total unmet needs in response to Hurricanes Helene and Milton (not including unmet housing and economic revitalization infrastructure, which is subsumed in each of those categories).

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*Table 19 - Infrastructure Unmet Needs Summary*

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Infrastructure Unmet Needs Summary	
Total Infrastructure Impacts	\$305,392,106
Total Infrastructure Support	\$20,580,329
Unmet Infrastructure Need (Including Resilience Factors)	\$284,811,777



#### 4.2.6 Public Assistance Data

*Table 20 - Damages to Public Infrastructure*

Public Assistance Category	Damaged Sites	Approx. Cost	Federal Share	Non-Federal Share
A - Debris	24	\$223,996,434	\$223,996,434	\$0
B - Emergency Measures	66	\$35,507,369	\$35,507,369	\$0
C - Roads and Bridges	6	\$2,337,398	\$1,753,049	\$584,350
D - Water Control Facilities	3	\$1,577,200	\$1,182,900	\$394,300
E - Building and Equipment	49	\$28,938,574	\$21,703,931	\$7,234,644
F - Utilities	20	\$2,128,230	\$1,596,173	\$532,058
G - Other	17	\$10,906,901	\$8,180,176	\$2,726,725
<b>All Categories</b>	<b>185</b>	<b>\$305,392,106</b>	<b>\$293,920,030</b>	<b>\$11,472,076</b>

The above table summarizes the FEMA Public Assistance data for Hurricanes Helene and Milton for Hillsborough County. The federal government covers 100% of the cost for categories A and B (debris removal and emergency measures) and provides 75% of the cost for categories C-G. The local government is responsible for the remaining cost of the non-federal share.



*Table 21 - Damages to Public Infrastructure Accounting for Resilience (Increased Cost of Compliance), Increased Cost of Building Materials (32%) and Estimated Local Match (Unmet Needs)*

Public Assistance Category	Estimated PA Cost	30% Resiliency	32% Increased Cost of Building Materials	Total PA Unmet Needs
A - Debris	\$223,996,434	0	0	0
B - Emergency Measures	\$35,507,369	0	0	0
C - Roads and Bridges	\$2,337,398	\$701,219	\$972,358	\$1,002,744
D - Water Control Facilities	\$1,577,200	\$473,160	\$656,115	\$676,619
E - Building and Equipment	\$28,938,574	\$8,681,572	\$12,038,447	\$12,414,648
F - Utilities	\$2,128,230	\$638,469	\$885,344	\$913,011
G - Other	\$10,906,901	\$3,272,070	\$4,537,271	\$4,679,060
<b>Total</b>	<b>\$305,392,106</b>	<b>\$13,766,491</b>	<b>\$19,089,534</b>	<b>\$19,686,082</b>

#### 4.2.7 Impacted Capital Improvement Projects Data

In addition to these FEMA PA supported impacts to infrastructure slowly making their way through the federal system, Hillsborough County has long recognized the growing deficits in critical stormwater infrastructure that are linked with the extreme losses to housing and business content losses discussed in the next section. What follows is related to the impacts of Hurricanes Helene and Milton which should be included in the unmet needs evaluation for infrastructure within the County.

The stormwater infrastructure projects identified in the Local Mitigation Strategy include 77 total projects with a total estimated project cost of \$696,759,695. Hillsborough County submitted 24 projects totaling \$312,959,462. Plant City included one project at an estimated cost of \$5,000,000. Temple Terrace included two projects at an estimated cost of \$1,270,000. The City of Tampa included 50 projects at an estimated cost of \$377,759,695.

There were 21 of the projects submitted that had a value of \$10M or greater. Assuming a minimum 25% cost share match for the total value of those projects provides an estimated unmet needs for these projects amounting to \$143,878,000.

There were 51 projects with a total value of less than \$10M. These projects had a total value of \$121,247,695 which is also considered as unmet needs. The combined unmet needs for the planned capital improvement projects based on this methodology is \$265,125,695. These figures are then added to the remaining unmet needs (after accounting for additional resiliency and increased building costs) for Public Assistance projects (\$19,686,082). This results in an infrastructure unmet need of \$284,811,777.



#### 4.2.8 Economic Revitalization

This section summarized the economic sector analysis of the unmet needs assessment. To derive the final unmet needs estimate for the economy, data on business disaster impacts was analyzed based on SBA disaster loans to businesses using the HUD-approved approach of calculating the median real estate and content loss by the categories in (Table 22).

Here, total and median losses for all businesses with an SBA verified loss to contents/property were derived from SBA business loan reports. However, more than 1,200 businesses were denied an SBA loan before they could be inspected. For these businesses, the HUD-approved methodology supports estimating the number of businesses by category and multiplying the median loss for that category by the estimated number of businesses (as defined above).

Total economic impact is calculated by adding those businesses that had documented damages from SBA and those businesses who did not receive an inspection from SBA. This led to a total estimated impact of \$950,325,688.

After impacts are estimated, support is calculated by identifying SBA total loans issued and SBA loans rejected by businesses. This led to a known support figure of \$524,385,148.

Impacts minus support lead to the unmet economic revitalization need of \$515,124,555 (24% of the total unmet need).

*Table 22 - Median Inspected Loss by Category*

HUD Business Category	# Applicants without insurance, Approved or Declined with Losses Determined	% of All Businesses with Losses Determined	Total Loss	Median Inspected Loss	# Declined Businesses without Insurance and without an Inspected Loss
Category 1 (<\$12K)	3	1%	\$141	\$46	9
Category 2 (\$12K - \$29K)	9	2%	\$209,168	\$24,428	27
Category 3 (\$30K - \$64-999)	38	9%	\$1,639,991	\$44,509	112
Category 4 (\$65K - \$149,999)	86	20%	\$6,364,998	\$77,472	255
Category 5 (> \$150K)	286	68%	\$185,406,517	\$172,145	846
<b>Total</b>	<b>422</b>	<b>100%</b>	<b>\$193,620,814</b>	<b>\$318,600</b>	<b>1,249</b>





First, the median inspected loss by category must be calculated to assign that value to the estimated count of declined businesses which did not receive an inspection. After analyzing the loss data by category for those businesses without insurance with a loss identified by the Small Business Administration (SBA), the median losses by category were determined to be Category 1 - \$46, Category 2 - \$24,428, Category 3 - \$44,509, Category 4 - \$77,472, and Category 5 - \$172,145. These calculations were then multiplied by the appropriate corresponding businesses, which did not receive a loss estimate from SBA because their loan applications were denied due to insufficient credit or income (a total count of 1,249 businesses across the 5 categories). This resulted in an estimated impact across these businesses of \$171,093,639.

This data is then added to the HUD assessed impact estimates for the universe of applicants who were approved for loans and those who were declined a loan. This data is captured in the summary chart below.

*Table 23 - Summary Economic Impacts and Unmet Needs*

Category	Count	HUD Assessed (Estimated) Impact
SBA approved applicants with a verified HUD Category 1 Losses	13	\$49,412
SBA approved applicants with a verified HUD Category 2 Losses	22	\$453,117
SBA approved applicants with a verified HUD Category 3 Losses	74	\$3,574,867
SBA approved applicants with a verified HUD Category 4 Losses	211	\$21,993,554
SBA approved applicants with a verified HUD Category 5 Losses	306	\$498,314,198
SBA declined applicants with a verified HUD Category 1 Losses	24	\$22,608
SBA declined applicants with a verified HUD Category 2 Losses	8	\$178,516
SBA declined applicants with a verified HUD Category 3 Losses	31	\$1,530,363
SBA declined applicants with a verified HUD Category 4 Losses	79	\$8,175,959
SBA declined applicants with a verified HUD Category 5 Losses	119	\$249,395,164
<b>Total Estimated Property Losses</b>	<b>255</b>	<b>\$126,186,413</b>
<b>Total Estimated Content Losses</b>	<b>806</b>	<b>\$653,045,635</b>
Estimated additional businesses with impacts and unmet needs (Category 1 Losses)	9	\$406
Estimated additional businesses with impacts and unmet needs (Category 2 Losses)	27	\$650,705
Estimated additional businesses with impacts and unmet needs (Category 3 Losses)	112	\$5,005,898
Estimated additional businesses with impacts and unmet needs (Category 4 Losses)	255	\$19,719,314
Estimated additional businesses with impacts and unmet needs (Category 5 Losses)	846	\$145,717,316
<b>Total verified loss for all businesses (Estimate)</b>		<b>\$950,325,688</b>
<b>Accounting for an additional 30% in funding needed to support rebuilding to higher standards (resilience)</b>		<b>\$1,039,509,703</b>
SBA Current Support Accepted	348	\$8,481,964
Estimated SBA Support Not Accepted	278	\$515,903,184
<b>Total Benefit</b>		<b>\$524,385,148</b>
<b>Total Unmet Business Needs Estimate</b>		<b>\$425,940,540</b>
<b>Accounting for 30% resilience addition</b>		<b>\$515,124,555</b>

One item of note is the contents loss calculation for SBA applicants. 806 applicants had a combined content loss of \$653,045,635. This significant figure can be inferred to be related to loss resulting from floodwater entering businesses and destroying business equipment and property. Based on this assumption and given the fact that HUD funds are not best used replacing business content loss considering the tremendous housing loss in Hillsborough County, these content losses could be mitigated in the future by deploying strategic infrastructure investments in areas that would benefit the residential and business community.



#### 4.2.9 Public Service

Public service activities are critical in the aftermath of a hurricane, providing essential support to affected communities. These response activities range from immediate relief efforts to long-term recovery projects. In the initial phases, emergency services, including firefighters, police, and medical personnel, work tirelessly to rescue those stranded, provide medical care, and ensure public safety. Simultaneously, volunteers and non-governmental organizations (NGOs) often step in to distribute food, water, and other necessities, and to establish temporary shelters for those displaced from their homes.

As the immediate crisis subsides, the focus shifts towards recovery and rebuilding. Public service activities at this stage include debris removal, infrastructure repair, and immediate housing assistance. Government agencies work to restore essential services like electricity and water, while community organizations and volunteers help residents navigate insurance claims and access initial financial aid. Additionally, mental health support becomes a critical component of public service, helping individuals and families cope with the trauma and loss experienced during the hurricane.

Long-term recovery involves rebuilding not just physical structures, but also the social fabric of the community. Hillsborough County believes that addressing unmet recovery needs is not only a local priority, but a national priority. Public service activities in this phase may include organizing community meetings, providing job training and economic development programs, and supporting schools and healthcare facilities. These efforts aim to foster resilience and ensure that the community is better prepared for future disasters. Collaboration between government agencies, NGOs, volunteers, and residents is vital for the successful recovery and revitalization of hurricane-affected areas.

As the long-term recovery of Hillsborough County shifts to the resources of the CDBG-DR program, the three primary sectors of housing, economic revitalization and infrastructure take center stage. Knitted in among all three, however, are threads of public services meeting widely varied community needs. These needs will range from the very personal, such as mental health counseling, to the needs of the community at-large in the form of job training and skill development. The importance of the non-profit community cannot be understated throughout this process, as a critical infrastructure component of the County. While there have been only limited specific needs identified at this juncture, enough flexibility is being designed into the program to accommodate activities that are complementary and aligned with the three primary sectors.



## 5.0 Mitigation Needs Assessment

Mitigation activities are defined as those activities that increase resilience 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.

As part of the development of this Action Plan, the County conducted an analysis of the County's Multi-Jurisdictional Local Mitigation Strategy as required under federal guidelines. In January of 2020, Hillsborough County updated the Multi-Jurisdictional Local Mitigation Strategy (LMS) as required by FEMA (<https://bit.ly/430VRRN>). This update built on a plan first developed for the County in 1998 and subsequently updated every five years as required by Code of Federal Regulations, 44 CFR §201.6 - Local Mitigation Plans (eCFR.gov, 2014).

The goal of the Hillsborough County LMS is to establish and maintain an ongoing process that continually assesses potential disasters, develops corresponding mitigation techniques and incorporates preparedness and response into the consciousness of the entire community. To date Hillsborough County's LMS process has produced the assessed vulnerabilities of the community to a variety of hazards, identified a comprehensive list of plans, programs and projects to decrease the magnitude of those vulnerabilities and prioritized the implementation of respective initiatives. This all-hazards LMS is referenced through the Comprehensive Emergency Management Plan, the local Comprehensive Plan, the Hillsborough County Land Development Code, the Floodplain Management Plan, the Hillsborough County Construction Code (Ord.13-31) and the unified Post-Disaster Redevelopment Plan.

As part of updating the 2020 plan, the LMS group further refined the goals of the LMS to focus on four major areas:

1. Improved Human Environment – with directives focusing on community resilience capacity, public education, collaboration with community networks, warning and evacuation procedures, improving resilience of businesses, and public health;
2. Improved Built Environment – focusing on resilient structures and sustainable infrastructure, watershed management, and flood reduction techniques;
3. Improved Natural Environment – which emphasizes protection of natural habitats, management of the natural floodplain, and natural infrastructure solutions
4. Resiliently Designed Environments – includes directives that promote countywide consistency for higher standards, consideration of higher risk thresholds for hazard assessments, and education of residents and businesses on impacts from climate variability.

The LMS is due for an update in 2025, and the development of this action plan considered and incorporated the planning process for the required revisions to the plan. Close coordination with parties involved in its revision had an opportunity for feedback and recommendations during the action plan development process. As required by Florida Administrative Code (FAC) 27P-22.004 (4)(e), the Local Mitigation Strategy Working Group meets at least three times a year to review the Local Mitigation Strategy and submit annual updates to the Florida Division of Emergency Management no later than the last work day of January. In January of 2025, county officials worked with the LMS Working Group to





update potential and planned mitigation projects for unincorporated Hillsborough County, the City of Tampa, Plant City, and the City of Temple Terrace.

### 5.1 FEMA National Risk Index Analysis for Hillsborough County

The FEMA National Risk Index (NRI) (source: Zuzak, C., E. Goodenough, C. Stanton, M. Mowrer, A. Sheehan, B. Roberts, P. McGuire, and J. Rozelle. 2023. *National Risk Index Technical Documentation*. Federal Emergency Management Agency, Washington, DC.) is an online mapping tool that identifies communities most at risk to 18 natural hazards, providing a holistic view of community risk based on expected annual loss and community resilience. Risk Index scores are calculated using an equation that combines scores for Expected Annual Loss due to natural hazards, and Community Resilience Capacity.

**Risk Index = Expected Annual Loss x Community Risk Factor**

**Where Community Risk Factor =  $f \left( \frac{\text{Resilience Capacity}}{\text{Community Resilience}} \right)$**

Figure 22 - Risk Index Equation

Risk Index values are calculated using an equation that combines values for Expected Annual Loss (EAL) due to natural hazards, with the Community Risk Factor (CRF), which is a function of Community Resilience Capacity.

Values for Risk and Expected Annual Loss (EAL) are in units of dollars, representing the community's average economic loss from natural hazards each year. For Community Resilience Capacity, values are the index values for the community provided by the source data sets. Scores represent the national percentile ranking of the community's component value compared to all other communities at the same level (county-level for Hillsborough).

Ratings are provided for each hazard risk as a component of the NRI. Ratings refer to the qualitative terms that describe the relative risk of an area within the same geographic level. These rating categories range from "Very Low" to "Very High". Ratings for Community Resilience Capacity are based on quintiles of those components' scores, while Risk and EAL ratings are based on more advanced statistical calculations on values. As a result, there is no fixed range of scores or values that correspond to the rating categories.

Hillsborough County has an overall risk index score of 99.6 out of 100 which is designated as very high. Contributing to the high score are the components for expected annual loss, community resilience capacity, and community resilience. The County has a very high score for EAL (99.6) indicating that the risks to the County ultimately result in tremendous fiscal consequences. The community resilience capacity score is relatively high as well (79.1) indicating that residents of the County are less likely to bounce back to a sense of normalcy in the aftermath of major disasters. Community resilience is

considered moderately low (40.9 out of 100) indicating that there is more work to do to develop a culture of risk reduction throughout the County.

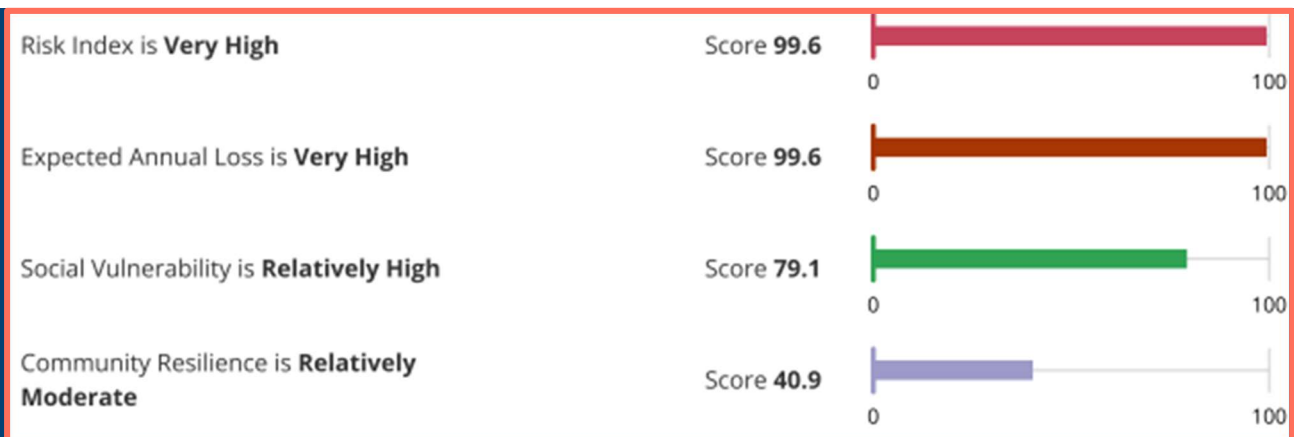


Figure 23 - Hillsborough County National Risk Index Summary

Data for the 18 hazards contemplated by the NRI within Hillsborough County is found in Figure 24 below. Six of the hazards had insufficient data (tsunami), no rating (heat wave and winter weather), or were considered not applicable (avalanche, ice storm, and volcanic activity). Hurricanes, lightning, and tornados all had a ranking very high for the risk index. Cold waves, drought, and wildfires all had a relatively high risk. Landslides and riverine flooding were considered moderate risks. The risks identified in the FEMA National Risk Index as relatively low include earthquakes, hail, and, most surprisingly (given the high risk of hurricanes), strong winds, and coastal flooding.




Hazard Type	Risk Index Rating	Risk Index Score	National Percentile
<b>Avalanche</b>	Not Applicable	--	
<b>Coastal Flooding</b>	Relatively Low	69.2	0  100
<b>Cold Wave</b>	Relatively High	92.8	0  100
<b>Drought</b>	Relatively High	98.6	0  100
<b>Earthquake</b>	Relatively Low	76.4	0  100
<b>Hail</b>	Relatively Low	69.7	0  100
<b>Heat Wave</b>	No Rating	0	0  100
<b>Hurricane</b>	Very High	99.8	0  100
<b>Ice Storm</b>	Not Applicable	--	
<b>Landslide</b>	Relatively Moderate	86.9	0  100
<b>Lightning</b>	Very High	99.9	0  100
<b>Riverine Flooding</b>	Relatively Moderate	77.2	0  100
<b>Strong Wind</b>	Relatively Low	58.6	0  100
<b>Tornado</b>	Very High	99.7	0  100
<b>Tsunami</b>	Insufficient Data	--	
<b>Volcanic Activity</b>	Not Applicable	--	
<b>Wildfire</b>	Relatively High	97.2	0  100
<b>Winter Weather</b>	No Rating	0	0  100

Figure 24 - Hillsborough County Hazard Type Risk Index



### 5.1.1 Historical Record of Known Events in Hillsborough County

*Table 24 - Hillsborough County Annualized Frequency Values by Hazard Type with Known Data*

Hazard Type	Annualized Frequency	Events on Record
Coastal Flooding	3.7 events per year	74
Cold Wave	0.2 events per year	3
Drought	14.2 events per year	413
Earthquake	0.012% chance per year	1
Hail	2 events per year	56
Heat Wave	0 events per year	0
Hurricane	0.3 events per year	50
Landslide	0 events per year	0
Lightning	217 events per year	3,853
Riverine Flooding	2.3 events per year	55
Strong Wind	1 event per year	27
Tornado	1.1 events per year	83
Wildfire	0.335% chance per year	15
Winter Weather	0 events per year	0

The NRI includes the frequency of known events based on recorded data from a variety of sources. Based on this analysis, lightning, drought, riverine flooding, tornados, hurricanes, strong winds, and hail are actual recorded events causing disruption in Hillsborough County. The mitigation focus of the CDBG-DR funds should prioritize these known, recorded hazard events to fund projects that mitigate the reality of Hillsborough catastrophe as practical.



## 5.2 Connection of Proposed Programs and Projects to Unmet Needs and Mitigation Needs

Hillsborough County's CDBG-DR Action Plan has been developed with three key tenets in mind:

1. Address long term recovery needs of those in our community least likely to be able to self-recover;
2. Identify areas of the community that are at greater risk to future storm events and make investments in mitigation and resilience to reduce that risk; and
3. Make data-supported program funding allocation decisions to best address identified unmet needs across the community.

As such, Hillsborough County is planning on the following distribution of funds across its primary sectors:

*Table 25 - Funds Distribution in Relation to Unmet Needs*

	CDBG-DR	MIT	Total	PCT	Unmet Needs Assessment Target
Housing	\$370,873,393	\$43,947,475	\$414,820,868	63%	56%
Infrastructure	\$95,267,081	\$43,947,475	\$139,214,556	21%	16%
Economic Revitalization	\$99,822,376	\$ -	\$99,822,376	15%	28%
Excluding Admin, Planning, and Public Service			<b>\$653,857,800</b>		N/A

Of this distribution that tracks the data-supported unmet needs analysis, 100% of funds will be expended within the Most Impacted and Distressed (MID) area, as the area is coterminous with the County boundary. Additionally, it is projected that at least 70% of funds will be expended to the direct benefit of Low and Moderate Income (LMI) persons.

As specific activities are proposed and implemented within each of the program categories, they will continue to be informed by the currently in-force 2020 multi-jurisdictional Local Mitigation Strategy (LMS) as well as its 2025 update that is under development. That strategy is expected to inform and support projects such as (*provided for example only*):

- Upgrading stormwater systems to improve floodwater management capacity;
- Expanding infrastructure resiliency (e.g., wetlands, bioswales, permeable pavement) to reduce stormwater runoff and enhance natural water absorption;
- Upgrading bridges and key roadways to withstand recurrent flooding;
- Revitalizing flood-affected economic corridors through land-use planning, infrastructure modernization, and economic development policies that prioritize investments for commercial areas;
- Conducting flood resilience upgrades for multifamily housing in high-risk flood zones.





*Table 26 - CDBG-DR Mitigation Set-Aside Needs Assessment*

CDBG-DR Mitigation Set-Aside			
	Percentage of Overall Unmet Needs	MIT Set-Aside Allocation	Percentage of MIT Set-Aside (1)
Housing	56.29%	\$43,947,475	47.50%
Infrastructure	15.56%	\$43,947,475	47.50%
Economic Revitalization	28.15%	\$ -	0%
<b>Total</b>	<b>100.00%</b>	<b>\$87,894,950</b>	<b>95%</b>
<i>(1) totals less than 100% due to an additional \$4,626,050 being allocated to Administration of CDBG-DR Mitigation Set-Aside</i>			

The County plans to minimize displacement of persons or entities and assist persons or entities displaced as a result of implementing a project with CDBG-DR funds. This is not intended to limit the ability of the County to conduct buyouts or acquisitions for destroyed and extensively damaged units or units in a floodplain. Any Hillsborough County Buyout Program is voluntary and Hillsborough County will not utilize the power of eminent domain because Hillsborough County has no direct authority to perform eminent domain utilizing CDBG-DR funds. Hillsborough County will follow the criteria required of agencies that do not have eminent domain under 49 CFR 24.101(b) when presenting a buyout as an option for Buyout Program applicants as follows:

- Prior to making an offer for the property, clearly advise the owner that it is unable to acquire the property if negotiations fail to result in an agreement; and
- Inform the owner in writing of what it believes to be the market value of the property.

The County will ensure that the assistance and protections afforded to persons or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), and Section 104(d) of the Housing and Community Development Act of 1974 are available. The URA provides that a displaced person is eligible to receive a rental assistance payment that covers a period of 42 months. The County accepts the HUD waiver of the Section 104(d) requirements which assures uniform treatment by setting the URA and its implementing regulations as the sole standard for relocation assistance under FR-6182-N-01. The County will designate a URA specialist to ensure compliance with the Uniform Relocation Act (URA), where applicable.

Table 27, below, is a HUD-required element of the Action Plan. It combines several different data elements. First, the table looks to establish the distribution of unmet needs among three different categories as determined by the Unmet Needs Analysis – Housing, Infrastructure and Economic Revitalization. Those dollar amounts are then expressed as a percentage of the overall unmet needs.

Next, to remain in compliance with the regulatory requirements of the CDBG-DR program, grantees are asked to identify what percentage of their grant funds will be expended in the HUD-identified “Most



Impacted and Distressed Areas” (MID). In the case of Hillsborough County, 100% of those funds will meet the requirement, as the entire county was designated as a MID.

Finally, those values are aligned with the allocations from the Hillsborough County CDBG-DR grant, not including the mitigation (MIT) set-aside. What HUD is looking for is a general correlation between the data-established unmet-need and the grant allocations. Hillsborough County’s allocation achieve that.

*Table 27 - CDBG-DR Program Allocation and Funding Thresholds*

Eligible Cost Category	Unmet needs based on Unmet Needs Analysis	% of Unmet Needs based on Unmet Needs Analysis	% of Funding to be Expended in HUD Identified MID	CDBG-DR Allocation Amount (not inc. MIT 15%)	% of CDBG-DR Allocation (Excluding the 15% MIT Set-Aside)
<b>Administration (5% cap)</b>	N/A	N/A	100%	\$ 30,840,150	5.00%
<b>Planning (15% cap)</b>	N/A	N/A	100%	\$ 5,000,000	0.81%
<b>Housing</b>	\$ 1,030,203,537	56.29%	100%	\$ 370,873,393	60.13%
<b>Infrastructure</b>	\$ 284,811,777	15.56%	100%	\$ 95,267,081	15.45%
<b>Economic Revitalization</b>	\$ 515,124,555	28.15%	100%	\$ 99,822,376	16.18%
<b>Public service (15% cap)</b>	N/A	N/A	100%	\$ 15,000,000	2.43%
<b>Total</b>	\$ 1,830,139,869	100.00%	100%	\$ 616,803,000	100.00%
<b>Funds that have not been allocated</b>				\$ -	



## 6.0 Allocation and Award Caps

### 6.1 Funding Criteria

The following sections identify how Hillsborough County will distribute its grant funds across the following program categories:

- Housing Programs
- Infrastructure
- Economic Revitalization
- Planning
- Public Services
- Administration

Additionally, the sections will address how mitigation and resilience activities will be emphasized, program eligibility, who may be an eligible partner to work with the County in running the programs and the statutory and regulatory eligibility criteria for activities for each program.

### 6.2 Administration

The Hillsborough County Board of County Commissioners approved an Administration-Only Action Plan on March 05, 2025 for the purposes of being able to access admin funds from the awarded CDBG-DR grant. That approved plan is attached hereto as Appendix A. No changes to that plan are proposed.

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*Table 28 - Grantee Administration Activity Overview*

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Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration Total:	\$35,466,200	5.00%
Total:	\$709,324,000	100%

### 6.3 Planning

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*Table 29 - Grantee Planning Activity Overview*

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Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Planning Activities	\$5,000,000	0.70%
Total	\$709,324,000	100%

Hillsborough County anticipates investing CDBG-DR funds in a range of Planning activities to both guide current recovery activities as well as to better inform resilience and mitigation activities for the future.



Planning activities may include, but are not limited to:

- Infrastructure Recovery Plans
- 2025 Updated Local Mitigation Strategy
- Long-Term Recovery Plans
- Economic Recovery and Resiliency Plans
- Community Resiliency Planning
- Multi-modal Transportation Plans
- Updated Affordable Housing Plans
- Updated Building Codes

## 6.4 Housing Programs

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*Table 30 - Housing Allocation in Relation to Unmet Needs*

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Housing	
Unmet Needs Percentage	56%
Programmed Allocation Percentage	56.4% (1)
(1) Excluding Admin, Planning and Public Service	

Housing is the single largest category of identified unmet need in Hillsborough County resulting from hurricanes Helene and Milton. Within that classification are a spectrum of needs, from single-family to multi-family and from special populations to infrastructure specifically in support of housing. A summary of the planned investment of CDBG funds in housing needs is as follows:

Table 31 - Housing Activities

Housing Activities Allocation			
PROGRAM	CDBG-DR	MIT	TOTAL
Single Family Repair	\$186,339,196	-	\$186,339,196
Single Family Replacement	\$25,000,000	-	\$25,000,000
Multifamily Repair	\$10,000,000	-	\$10,000,000
Multifamily Replacement	\$50,000,000	-	\$50,000,000
Special Population Housing	\$20,000,000	-	\$20,000,000
Housing Infrastructure	\$79,534,197	\$43,947,475	\$123,481,672
Total	\$370,873,393	\$43,947,475	\$414,820,868

Each of the specific housing programs is further outlined below. In addition to that detail, specific overarching program components will apply to all housing programs and will be outlined in the final operating policies and procedures that govern the day-to-day operations of the program as a whole. It is also essential to capture those in this Action Plan, as follows:

- All housing activities, with the exception of MIT-specifically funded activities, will demonstrate that damage to the home can be tied back to damage from Hurricanes Helene or Milton;
- Beneficiaries of the housing programs will be at or below 80% of Area Median Income (AMI), with the exception of Area Benefit National Objective criteria for eligible infrastructure projects;
- Damaged manufactured housing units eligible under the Housing Program will not be repaired. Instead any eligible units will be replaced with a new unit;
- Existing homes eligible under the Housing Program that may require elevation to remove them from hazard areas will not be elevated. They will instead be replaced with a new reconstructed home at the required higher elevation;
- Voluntary Buyouts, per Section III.D.5.i. of the Universal Notice, as amended, are specifically authorized and contemplated by this Action Plan. These strictly voluntary buyouts will not utilize eminent domain acquisition authorities, nor is the program authorized to do so. The intent of these buyouts is specifically and exclusively to remove qualified beneficiaries from harm's way and repetitive loss properties and relocate them to suitable safe, sanitary, and secure homes;
- Single-family programs, both repair and replacement, are limited to owner-occupied homes;
- Per Section III.D.1. of the Universal Notice, *"...each activity must: (1) **address a direct or indirect impact from the disaster...**; (2) **be a CDBG-eligible activity...** and (3) **meet a national objective.** This is true for all activities except for mitigation activities funded by an additional mitigation set-aside in the appropriations acts that do not require a connection to the qualifying major disaster...."* [emphasis added]





- Funds specifically noted as those being part of the 15% Mitigation Set-Aside are subject to separate requirements that are more fully detailed in the Universal Notice, as amended, in section III.D.4. In summary, those specific funds must:
  - meet the definition of mitigation activities;
  - address the current and future risks as identified in the grantee's mitigation needs assessment in the MID areas;
  - be CDBG-eligible activities under title I of the HCDA or otherwise eligible pursuant to a waiver or alternative requirement; and
  - meet a national objective.
- Applicants to any program will be required to provide information about all assistance received for recovery purposes, as required by Section 312 of the Stafford Act. Any funds found to be duplicative will be deducted from the CDBG-DR award prior to the disbursement of the award amount. A review of potential duplication of benefits (DOB) is necessary for all CDBG-DR funded activities as this assistance is intended to supplement—not replace—other public, private, and non-profit sector resources that have already been provided for the same need or loss and are legally required to constitute a duplicative source of financial assistance.
- Consistent with the HCDA, 24 CFR 570.484 and 24 CFR 570.200(a)(3), the Universal Notice, as amended, requires grantees to comply with the overall benefit requirement that 70 percent of funds be used for activities that benefit LMI persons. Sections III.B.1. and III.B.1.a. of the Universal Notice, as amended, do address alternative requirements and the opportunity to apply for waivers to that threshold, but it remains Hillsborough County's intent to comply with the 70% threshold. As such, the 80% and below AMI qualification for housing program eligibility will remain in force, and if necessary to improve overall program percentage ratios to stay above the 70% threshold, Hillsborough County reserves the right to prioritize certain beneficiary groups.
- Hillsborough County is aware of private not-for-profit entities that leverage private sector resources to work with impacted homeowners and provide short-term bridge loans to repair damage to impacted homes. These organizations are familiar with CDBG-DR regulations and cross-cutting requirements (such as duplication of benefits and environmental regulations) and can provide assistance to help homeowners remain in their home and complete repairs quickly. Homeowners who choose to work with these entities may be eligible for reimbursement of their short-term bridge loans through the Single Family Repair and Replacement Program.
- Grant funds allocated to each program through this action plan are subject to amendment over the lifespan of the grant. This does not, however, obligate Hillsborough County in any manner to add funds to any budget line.
- Requirements for continued ownership and residency of assisted properties will mirror those for the HOME Investment Partnerships Program.
- Properties that did not serve as a primary residence or were acquired after the dates of the declared disaster events are not eligible for assistance.
- All construction will comply with, at a minimum, the adopted building and development codes of the cognizant jurisdiction at the time of construction. New construction will comply with HUD



green building requirements or other such standards to comply with section III.D.5.b.  
(i). of the Universal Notice as amended;

- The funds awarded under the housing programs may not be used for the following actions:
  - Forced mortgage payoffs
  - Compensation payments
  - Reconstruction of housing units in a designated floodway.
- Hillsborough County reserves the right to add or delete such policies, procedures and criteria as Hillsborough County, as the Grantee, or the U.S. Department of Housing and Urban Development, as Grantor, deem necessary and appropriate.
- This CDBG-DR Action Plan may, at the sole discretion of Hillsborough County, be amended at any time. The process and criteria for amendments are explained later in this document in the sections titled “Modifications to the Action Plan” and “Nonsubstantial Amendment”.

To restate, Hillsborough County will issue detailed operating policies and procedures for all CDBG-DR funded programs which will both provide greater definition on points highlighted herein and serve as working guidance for the implementation of the program.

#### 6.4.1 Housing Program Method of Delivery

The Hillsborough County CDBG-DR program anticipates utilizing three delivery models for its housing program – internally self-administered, administered through sub-recipient partners and delivered via competitive proposals.

For the single family, owner-occupied programs, application-level assessments will be at an individual property basis. The detailed qualifications for inclusion into the program will be built into the application intake process, to be defined and established in policies and procedures that are yet to be developed.

*Table 32 - Single Family Repair*

Program	Single Family Repair
<b>CDBG-DR Budget Allocations</b>	<b>Single Family Repair: \$186,339,196</b>
Program Description	Program designed specifically for the repair and rehabilitation of owner-occupied, single-family homes meeting all program requirements of income eligibility, duplication of benefits, connection to the storm, primary dwelling, occupancy, and others to be outlined in the operating policies and procedures.
National Objectives  24 CFR 570, Subpart I	<ul style="list-style-type: none"> <li>• LMI Benefit</li> <li>• Urgent Need</li> <li>• Elimination of Slum and Blight Conditions</li> </ul>
Eligible Area	All of Hillsborough County (MID-Area)
Eligible Activities: <ul style="list-style-type: none"> <li>• Referenced to Title I of Housing and Community Development Act of 1974</li> <li>• 42 USC 5305(a)</li> <li>• HUD Revised Universal Notice</li> </ul>	<ul style="list-style-type: none"> <li>• §5305(a)(1) – Acquisition</li> <li>• §5305(a)(3) – Code Enforcement</li> <li>• §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing</li> <li>• §5305(a)(5) – Removal of Architectural Barriers</li> <li>• §5305(a)(7) – Disposition</li> <li>• §5305(a)(8) – Public Services</li> <li>• §5305(a)(11) – Relocation Payments</li> <li>• §5305(a)(13) – Administrative Costs</li> <li>• §5305(a)(14) – Assistance to Non-Profit Entities</li> <li>• §5305(a)(15) – Assistance to Neighborhood-Based Organizations</li> <li>• §5305(a)(20) – Housing Services</li> <li>• §5305(a)(24) – Direct Assistance for Homeownership Activities</li> <li>• §5305(a)(25) – Tornado Shelters</li> <li>• §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction</li> <li>• FR Notice – Housing activities and standards - Section III.D.5.</li> <li>• FR Notice – Mitigation activities – Section III.D.4.</li> <li>• FR Notice – Buyouts – Section III.D.5.i.</li> </ul>
Maximum Income of Beneficiary	80% LMI
Beneficiary Minimum / Maximum Project or Sub-Award Size	There is no minimum value for repair. Maximum repair award is \$350,000.
Distribution Process	Funds will be directly administered by the grantee and also distributed to eligible subrecipients and applicants through a competitive application process.



Program	Single Family Repair
Lead Agency Designation	As grantee, Hillsborough County will retain Lead Agency status per 24 CFR 58.4.
Mitigation Measures / Elements	None explicitly required, as no MIT-set-aside funding included. All programs and activities are, however, expected to contribute to the overall resiliency of the community in decisions, policies and the built environment that impacts the ability of Hillsborough County to withstand and recover from future severe weather events.
Reducing Barriers	Hillsborough County, its subgrantees and contractors will all strive to identify individuals and populations who may face specific or generalized barriers to assistance from CDBG-DR funded recovery programs, including protected classes, vulnerable populations and other communities with specialized needs. Upon identification of those persons or populations, efforts will be tailored to address those needs to ensure equal access to the CDBG-DR funded recovery programs.
Other Eligibility Criteria	Eligible applicants include private multifamily property owners, local governments, public or non-profit organizations, Community Housing Development Organizations (CHDOs) and Community-Based Development Organizations (CBDOs). Manufactured Housing Units (MHUs) will not be repaired – they will only be replaced. In instances where elevation is appropriate, existing structures will not be elevated. They will be replaced with a new elevated structure.

*Table 33 - Single Family Replacement*

Program	Single Family Replacement
<b>CDBG-DR Budget Allocations</b>	<b>Single Family Replacement: \$25,000,000</b>
Program Description	Where homes are damaged beyond a point of cost effective repair, or are candidates for elevation to remain in place but are not in a floodway or 100 year floodplain, the Single Family Replacement program is intended to completely reconstruct a new home. Activities subject to all program requirements of income eligibility, duplication of benefits connection to the storm, occupancy, primary dwelling and others to be outlined in the operating policies and procedures.
National Objectives 24 CFR 570, Subpart I	<ul style="list-style-type: none"> <li>• LMI Benefit</li> <li>• Urgent Need</li> <li>• Elimination of Slum and Blight Conditions</li> </ul>
Eligible Area	All of Hillsborough County (MID-Area)
Eligible Activities: <ul style="list-style-type: none"> <li>• Referenced to Title I of Housing and Community Development Act of 1974</li> <li>• 42 USC 5305(a)</li> <li>• HUD Revised Universal Notice</li> </ul>	<ul style="list-style-type: none"> <li>• §5305(a)(1) – Acquisition</li> <li>• §5305(a)(3) – Code Enforcement</li> <li>• §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing</li> <li>• §5305(a)(5) – Removal of Architectural Barriers</li> <li>• §5305(a)(7) – Disposition</li> <li>• §5305(a)(8) – Public Services</li> <li>• §5305(a)(11) – Relocation Payments</li> <li>• §5305(a)(13) – Administrative Costs</li> <li>• §5305(a)(14) – Assistance to Non-Profit Entities</li> <li>• §5305(a)(15) – Assistance to Neighborhood-Based Organizations</li> <li>• §5305(a)(20) – Housing Services</li> <li>• §5305(a)(24) – Direct Assistance for Homeownership Activities</li> <li>• §5305(a)(25) – Tornado Shelters</li> <li>• §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction</li> <li>• FR Notice – Housing activities and standards - Section III.D.5.</li> <li>• FR Notice – Mitigation activities – Section III.D.4.</li> <li>• FR Notice – Buyouts – Section III.D.5.i.</li> </ul>
Maximum Income of Beneficiary	80% LMI
Beneficiary Minimum / Maximum Project or Sub-Award Size	There is no minimum value for replacement. Maximum replacement award is \$350,000.





Program	Single Family Replacement
Distribution Process	Funds will be directly administered by the grantee and also distributed to eligible subrecipients through a competitive application process.
Lead Agency Designation	As grantee, Hillsborough County will retain Lead Agency status per 24 CFR 58.4.
Mitigation Measures / Elements	None explicitly required, as no MIT-set-aside funding included. All programs and activities are, however, expected to contribute to the overall resiliency of the community in decisions, policies and the built environment that impacts the ability of Hillsborough County to withstand and recover from future severe weather events.
Reducing Barriers	Hillsborough County, its subgrantees and contractors will all strive to identify individuals and populations who may face specific or generalized barriers to assistance from CDBG-DR funded recovery programs, including protected classes, vulnerable populations and other communities with specialized needs. Upon identification of those persons or populations, efforts will be tailored to address those needs to ensure equal access to the CDBG-DR funded recovery programs.
Other Eligibility Criteria	Eligible subrecipients include private developers, local governments, public or non-profit organizations, CHDOs/CBDOs.

*Table 34 - Multifamily Repair and Replacement*

Program	Multifamily Repair
<b>CDBG-DR Budget Allocations</b>	<b>MF Repair: \$10,000,000</b>
Program Description	Multi-family repair activities are intended to address storm-damaged repair needs of affordable multi-family rental units in Hillsborough County. Activities subject to all program requirements of income eligibility, duplication of benefits, connection to the storm, long term affordability and others to be outlined in the operating policies and procedures.
National Objectives 24 CFR 570, Subpart I	<ul style="list-style-type: none"> <li>• LMI Benefit</li> <li>• Urgent Need</li> <li>• Elimination of Slum and Blight Conditions</li> </ul>
Eligible Area	All of Hillsborough County (MID-Area)
Eligible Activities: <ul style="list-style-type: none"> <li>• Referenced to Title I of Housing and Community Development Act of 1974</li> <li>• 42 USC 5305(a)</li> <li>• HUD Revised Universal Notice</li> </ul>	<ul style="list-style-type: none"> <li>• §5305(a)(1) – Acquisition</li> <li>• §5305(a)(3) – Code Enforcement</li> <li>• §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing</li> <li>• §5305(a)(5) – Removal of Architectural Barriers</li> <li>• §5305(a)(7) – Disposition</li> <li>• §5305(a)(8) – Public Services</li> <li>• §5305(a)(11) – Relocation Payments</li> <li>• §5305(a)(13) – Administrative Costs</li> <li>• §5305(a)(14) – Assistance to Non-Profit Entities</li> <li>• §5305(a)(15) – Assistance to Neighborhood-Based Organizations</li> <li>• §5305(a)(20) – Housing Services</li> <li>• §5305(a)(24) – Direct Assistance for Homeownership Activities</li> <li>• §5305(a)(25) – Tornado Shelters</li> <li>• §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction</li> <li>• FR Notice – Housing activities and standards - Section III.D.5.</li> <li>• FR Notice – Mitigation activities – Section III.D.4.</li> </ul>
Maximum Income of Beneficiary	80% LMI
Minimum / Maximum Project or Sub-Award Size	Unit count: 10 minimum, 300 maximum. Project or sub-award value: \$100,000 minimum, \$250,000 <u>per unit</u> .
Distribution Process	Funds will be distributed to eligible subrecipients and applicants through a competitive application process.
Lead Agency Designation	As grantee, Hillsborough County will retain Lead Agency status per 24 CFR 58.4.



Program	Multifamily Repair
Mitigation Measures / Elements	None explicitly required, as no MIT-set-aside funding included. All programs and activities are, however, expected to contribute to the overall resiliency of the community in decisions, policies and the built environment that impacts the ability of Hillsborough County to withstand and recover from future severe weather events.
Reducing Barriers	Hillsborough County, its subgrantees and contractors will all strive to identify individuals and populations who may face specific or generalized barriers to assistance from CDBG-DR funded recovery programs, including protected classes, vulnerable populations and other communities with specialized needs. Upon identification of those persons or populations, efforts will be tailored to address those needs to ensure equal access to the CDBG-DR funded recovery programs.
Other Eligibility Criteria	Eligible applicants include private multifamily property owners, local governments, public or non-profit organizations, CHDOs/CBDOs.

*Table 35 - Multifamily Replacement*

Program	Multifamily Replacement
<b>CDBG-DR Budget Allocations</b>	<b>MF Replacement: \$50,000,000</b>
Program Description	Where affordable multi-family units are damaged beyond a point of cost effective repair, this program is intended to replace those units on a one-for-one basis. Activities subject to all program requirements of income eligibility, duplication of benefits, connection to the storm, long term affordability and others to be outlined in the operating policies and procedures.
National Objectives 24 CFR 570, Subpart I	<ul style="list-style-type: none"> <li>• LMI Benefit</li> <li>• Urgent Need</li> <li>• Elimination of Slum and Blight Conditions</li> </ul>
Eligible Area	All of Hillsborough County (MID-Area)
Eligible Activities: <ul style="list-style-type: none"> <li>• Referenced to Title I of Housing and Community Development Act of 1974</li> <li>• 42 USC 5305(a)</li> <li>• HUD Revised Universal Notice</li> </ul>	<ul style="list-style-type: none"> <li>• §5305(a)(1) – Acquisition</li> <li>• §5305(a)(3) – Code Enforcement</li> <li>• §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing</li> <li>• §5305(a)(5) – Removal of Architectural Barriers</li> <li>• §5305(a)(7) – Disposition</li> <li>• §5305(a)(8) – Public Services</li> <li>• §5305(a)(11) – Relocation Payments</li> <li>• §5305(a)(13) – Administrative Costs</li> <li>• §5305(a)(14) – Assistance to Non-Profit Entities</li> <li>• §5305(a)(15) – Assistance to Neighborhood-Based Organizations</li> <li>• §5305(a)(20) – Housing Services</li> <li>• §5305(a)(24) – Direct Assistance for Homeownership Activities</li> <li>• §5305(a)(25) – Tornado Shelters</li> <li>• §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction</li> <li>• FR Notice – Housing activities and standards - Section III.D.5.</li> <li>• FR Notice – Mitigation activities – Section III.D.4.</li> </ul>
Maximum Income of Beneficiary	80% LMI



Program	Multifamily Replacement
Minimum / Maximum Project or Sub-Award Size	The minimum project size under the Multifamily Replacement program is 20 units and the maximum is 300 units. The maximum allowable per-unit subsidy is limited to the maximum per-unit subsidy allowable by the HUD HOME Investment Partnerships Program for the specific activity location applicable at the time of funding application. The maximum allowable award for a single project is \$30,000,000.
Distribution Process	Funds will be directly administered by the grantee and also distributed to eligible subrecipients and applicants through a competitive application process.
Lead Agency Designation	As grantee, Hillsborough County will retain Lead Agency status per 24 CFR 58.4.
Mitigation Measures / Elements	None explicitly required, as no MIT-set-aside funding included. All programs and activities are, however, expected to contribute to the overall resiliency of the community in decisions, policies and the built environment that impacts the ability of Hillsborough County to withstand and recover from future severe weather events.
Reducing Barriers	Hillsborough County, its subgrantees and contractors will all strive to identify individuals and populations who may face specific or generalized barriers to assistance from CDBG-DR funded recovery programs, including protected classes, vulnerable populations and other communities with specialized needs. Upon identification of those persons or populations, efforts will be tailored to address those needs to ensure equal access to the CDBG-DR funded recovery programs.
Other Eligibility Criteria	Eligible applicants include private multifamily property owners, local governments, public or non-profit organizations, CHDOs/CBDOs.



*Table 36 - Special Population Housing*

Program	Special Population Housing
<b>CDBG-DR Budget Allocations</b>	<b>Special Population Housing: \$20,000,000</b>
Program Description	Activities under the category of Special Population Housing are expected to address the unique needs of persons in non-traditional households, such as care facilities and the homeless. Activities can address both storm impacts as well as mitigation and resilience needs to better withstand future events. Activities subject to all program requirements of income eligibility, duplication of benefits, connection to the storm, long term affordability and others to be outlined in the operating policies and procedures.
National Objectives 24 CFR 570, Subpart I	<ul style="list-style-type: none"> <li>• LMI Benefit</li> <li>• Urgent Need</li> <li>• Elimination of Slum and Blight Conditions</li> </ul>
Eligible Area	All of Hillsborough County (MID-Area)
Eligible Activities: <ul style="list-style-type: none"> <li>• Referenced to Title I of Housing and Community Development Act of 1974</li> <li>• 42 USC 5305(a)</li> <li>• HUD Revised Universal Notice</li> </ul>	<ul style="list-style-type: none"> <li>• §5305(a)(1) – Acquisition</li> <li>• §5305(a)(3) – Code Enforcement</li> <li>• §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing</li> <li>• §5305(a)(5) – Removal of Architectural Barriers</li> <li>• §5305(a)(7) – Disposition</li> <li>• §5305(a)(8) – Public Services</li> <li>• §5305(a)(11) – Relocation Payments</li> <li>• §5305(a)(13) – Administrative Costs</li> <li>• §5305(a)(14) – Assistance to Non-Profit Entities</li> <li>• §5305(a)(15) – Assistance to Neighborhood-Based Organizations</li> <li>• §5305(a)(20) – Housing Services</li> <li>• §5305(a)(25) – Tornado Shelters</li> <li>• §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction</li> <li>• FR Notice – Housing activities and standards - Section III.D.5.</li> <li>• FR Notice – Mitigation activities – Section III.D.4.</li> </ul>
Maximum Income of Beneficiary	80% LMI
Minimum / Maximum Project or Sub-Award Size	Minimum: \$1,000,000 Maximum: \$15,000,000
Distribution Process	Funds will be distributed to eligible subrecipients and applicants through a competitive application process.
Lead Agency Designation	As grantee, Hillsborough County will retain Lead Agency status per 24 CFR 58.4.



Program	Special Population Housing
Mitigation Measures / Elements	While MIT funds are not specifically allocated for this activity, it is acknowledged that damage incurred by special population housing facilities could, in many instances, be mitigated in the future by the incorporation of hardening and resilience measures into repairs addressing the impacts of the two storms. Simply bringing facilities up to the most current building codes and standards will improve their resiliency and will be an ancillary goal of the program.
Reducing Barriers	Hillsborough County, its subgrantees and contractors will all strive to identify individuals and populations who may face specific or generalized barriers to assistance from CDBG-DR funded recovery programs, including protected classes, vulnerable populations and other communities with specialized needs. Upon identification of those persons or populations, efforts will be tailored to address those needs to ensure equal access to the CDBG-DR funded recovery programs.
Other Eligibility Criteria	Eligible applicants include governments, public or non-profit organizations, CHDOs/CBDOs.

*Table 37 - Infrastructure in Support of Housing*

Program	Infrastructure In Support of Housing
<b>CDBG-DR Budget Allocations</b>	<b>Infrastructure in Support of Housing: \$123,481,672</b> <b>Infrastructure in Support of Housing CDBG-DR: \$79,534,197</b> <b>MIT: \$43,947,475</b>
Program Description	<p>This activity is specifically to make investments in infrastructure to address (1) known infrastructure deficiencies as they impact existing housing, and (2) mitigation and resilience measures to better protect housing from increased frequency and severity of storm events. Activities subject to all program requirements of area benefit/income eligibility, duplication of benefits, connection to the storm, mitigation and resilience value and others to be outlined in the operating policies and procedures.</p>
National Objectives 24 CFR 570, Subpart I	<ul style="list-style-type: none"> <li>• LMI Benefit via Area Benefit - 24 CFR 570.483(b)(1)</li> <li>• Urgent Need - 24 CFR 570.483(d)</li> <li>• Low- and Moderate-Income Benefit – Housing Activities 24 CFR 570.483(b)(3)</li> <li>• Activities which aid in the prevention or elimination of slums or blight – area basis - 24 CFR 570.483(c)(1)</li> </ul>
Eligible Area	All of Hillsborough County (MID-Area)
Eligible Activities: <ul style="list-style-type: none"> <li>• Referenced to Title I of Housing and Community Development Act of 1974</li> <li>• 42 USC 5305(a)</li> <li>• HUD Revised Universal Notice</li> </ul>	<ul style="list-style-type: none"> <li>• §5305(a)(1) – Acquisition</li> <li>• §5305(a)(2) – Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements</li> <li>• §5305(a)(3) – Code Enforcement</li> <li>• §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing</li> <li>• §5305(a)(5) – Removal of Architectural Barriers</li> <li>• §5305(a)(7) – Disposition</li> <li>• §5305(a)(9) – Non-Federal Match</li> <li>• §5305(a)(11) – Relocation Payments</li> <li>• §5305(a)(13) – Administrative Costs</li> <li>• §5305(a)(14) – Assistance to Non-Profit Entities</li> <li>• §5305(a)(15) – Assistance to Neighborhood-Based Organizations</li> <li>• §5305(a)(16) – Energy Use Strategies</li> <li>• §5305(a)(25) – Tornado Shelters</li> <li>• §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction</li> <li>• FR Notice – Infrastructure</li> <li>• FR Notice – Mitigation FR Notice – Mitigation activities – Section III.D.4.</li> </ul>



Program	Infrastructure In Support of Housing
	<ul style="list-style-type: none"> <li>FR Notice – Buyouts – Section III.D.5.i.</li> </ul>
Maximum Income of Beneficiary	80% LMI
Minimum / Maximum Project or Sub-Award Size	Minimum: \$250,000 Maximum: \$20,000,000
Distribution Process	Funds will be directly administered by the grantee.
Lead Agency Designation	As grantee, Hillsborough County will retain Lead Agency status per 24 CFR 58.4.
Mitigation Measures / Elements	Of the \$123,481,672 in funding, \$43,947,475 is from the MIT set-aside. As such, projects that address risks identified in the MNA will be prioritized for, at a minimum, this portion of the funding. Overall, The County will evaluate each project for mitigation opportunities that improve long-term community resilience. Specific mitigation measures will vary by project, but may include the integration of resilient materials, flood-resistant designs, components that reduce flooding and other measures to reduce risk.
Reducing Barriers	Hillsborough County, its subgrantees and contractors will all strive to identify individuals and populations who may face specific or generalized barriers to assistance from CDBG-DR funded recovery programs, including protected classes, vulnerable populations and other communities with specialized needs. Upon identification of those persons or populations, efforts will be tailored to address those needs to ensure equal access to the CDBG-DR funded recovery programs.
Other Eligibility Criteria	Eligible applicants include governments, public or non-profit organizations, CHDOs/CBDOs.



## 6.5 Infrastructure

### 6.5.1 Infrastructure Programs Overview

*Table 38 - Infrastructure Allocation in Relation to Unmet Needs*

Infrastructure	
Unmet Needs Percentage	16%
Programmed Allocation Percentage	21%
(Excluding Admin, Planning and Public Service)	

Hillsborough County infrastructure needs are woven throughout this recovery and mitigation program. This stand-alone Infrastructure section of the Action Plan therefore is anything but stand-alone. Rather, it is complementary and supportive of housing, of economic revitalization and of long term recovery and resilience of the community as a whole.

Three general infrastructure areas are planned for investing the combined CDBG-DR and MIT set-aside funds. The first is *Infrastructure Restoration* to address those critical needs of systems and infrastructure components that were physically damaged or degraded by the back-to-back storms. The second is Flood Mitigation which will address areas that witnessed flooding conditions from hurricanes Helene and Milton. The third prong is investment in Resilience and Adaptation, which involves protecting life and property through investments that mitigate against more intense weather patterns and storms. To achieve maximum program flexibility, all three are aggregated under the single category of *Infrastructure Investment*.

*Table 39 - Grantee Infrastructure Programs Overview*

Eligible Cost Category	CDBG-DR Allocation Amount	MIT Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Infrastructure Restoration	\$95,267,081	\$43,947,475	70%
Infrastructure Program Total	\$139,214,556		70%





*Table 40 - Infrastructure Investment + Infrastructure Investment – MIT*

Program	Infrastructure Investment
<b>CDBG-DR and MIT Budget Allocations</b>	<b>Infrastructure Investment: \$139,214,556</b> <b>Infrastructure CDBG-DR: \$95,267,081</b> <b>MIT: \$43,947,475</b>
Program Description	<p>This activity is intended to make investments in infrastructure to address (1) known infrastructure deficiencies, (2) localized and area-wide flooding, (3) forecasted deficiencies in infrastructure systems based on projected future storm event and growth pressures, and (4) mitigation and resilience measures to better protect the community from increased frequency and severity of storm events. Activities subject to all program requirements of area benefit/income eligibility, duplication of benefits, connection to the storm, mitigation and resilience value and others to be outlined in the operating policies and procedures.</p>
National Objectives 24 CFR 570, Subpart I	<ul style="list-style-type: none"> <li>• LMI Benefit via Area Benefit - 24 CFR 570.483(b)(1)</li> <li>• Urgent Need - 24 CFR 570.483(d)</li> <li>• Activities which aid in the prevention or elimination of slums or blight – area basis - 24 CFR 570.483(c)(1)</li> </ul>
Eligible Area	All of Hillsborough County (MID-Area)



Program	Infrastructure Investment
Eligible Activities: <ul style="list-style-type: none"><li>• Referenced to Title I of Housing and Community Development Act of 1974</li><li>• 42 USC 5305(a)</li><li>• HUD Revised Universal Notice</li></ul>	<ul style="list-style-type: none"><li>• §5305(a)(1) – Acquisition</li><li>• §5305(a)(2) – Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements</li><li>• §5305(a)(3) – Code Enforcement</li><li>• §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing</li><li>• §5305(a)(5) – Removal of Architectural Barriers</li><li>• §5305(a)(7) – Disposition</li><li>• §5305(a)(9) – Non-Federal Match</li><li>• §5305(a)(11) – Relocation Payments</li><li>• §5305(a)(13) – Administrative Costs</li><li>• §5305(a)(14) – Assistance to Non-Profit Entities</li><li>• §5305(a)(15) – Assistance to Neighborhood-Based Organizations</li><li>• §5305(a)(16) – Energy Use Strategies</li><li>• §5305(a)(25) – Tornado Shelters</li><li>• §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction</li><li>• FR Notice – Infrastructure</li><li>• FR Notice – Mitigation FR Notice – Mitigation activities – Section III.D.4.</li><li>• FR Notice – Buyouts – Section III.D.5.i.</li></ul>
Maximum Income of Beneficiary	CDBG-DR allocation: 75% LMI; MIT allocation: 80% LMI
Minimum / Maximum Project or Sub-Award Size	Minimum: \$250,000 Maximum: \$30,000,000
Distribution Process	Funds will be directly administered by the grantee and may also distributed to eligible subrecipients through a competitive application process.
Lead Agency Designation	As grantee, Hillsborough County will retain Lead Agency status per 24 CFR 58.4.



Program	Infrastructure Investment
Mitigation Measures / Elements	Of the total \$139,214,556 in funding, \$43,947,475 is from the MIT set-aside. As such, projects that address risks identified in the MNA will be prioritized for, at a minimum, this portion of the funding. Overall, The County will evaluate each project for mitigation opportunities that improve long-term community resilience. Specific mitigation measures will vary by project, but may include the integration of resilient materials, flood-resistant designs, components that reduce flooding and other measures to reduce risk.
Reducing Barriers	Hillsborough County, its subgrantees and contractors will all strive to identify individuals and populations who may face specific or generalized barriers to assistance from CDBG-DR funded recovery programs, including protected classes, vulnerable populations and other communities with specialized needs. Upon identification of those persons or populations, efforts will be tailored to address those needs to ensure equal access to the CDBG-DR funded recovery programs.
Other Eligibility Criteria	Eligible applicants include governments, quasi-governmental entities, public or non-profit organizations, CHDOs/CBDOs.



## 6.6 Economic Revitalization

### 6.6.1 Economic Revitalization Programs Overview

*Table 41 - Economic Revitalization Allocation in Relation to Unmet Needs*

Economic Revitalization	
Unmet Needs Percentage	28%
Programmed Allocation Percentage	15%
(Excluding Admin, Planning and Public Service)	

In the broad category of Economic Revitalization, Hillsborough County is allocating 87% of its category investment to Business Infrastructure for one basic reason. There have been identified hundreds of millions of dollars of capital projects that businesses in and of themselves cannot afford to fund, like the replacement of functionally and physically obsolete bridges and signalization of intersections to make them more resilient to future weather events. This is further compounded by the fact that from these two storm events alone, 806 SBA applicants suffered over \$650 million in content losses that can be inferred to have been primarily resulting from floodwaters entering businesses. Had there been more modern and more aggressive mitigation and resilience measures in place, these losses would have been minimized. Therefore, it is the judgement of Hillsborough County that the most prudent economic revitalization investments are made in protecting and preserving its economic future.

Of additional note is the category of Workforce Development, investment in which is spread between multiple programs. In addition to this program, Workforce Development is also contemplated as an eligible activity in the category of Public Services, addressed later in this Action Plan.

*Table 42 - Grantee Economic Revitalization Programs Overview*

Eligible Cost Category	CDBG-DR Allocation Amount	MIT Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Workforce Development	\$2,500,000	\$ -	70%
Business Infrastructure	\$92,322,376	\$ -	70%
Technical Assistance	\$5,000,000	\$ -	70%
<b>TOTAL</b>		<b>\$99,822,376</b>	<b>70%</b>

*Table 43 - Workforce Development*

Program	Workforce Development
<b>CDBG-DR Budget Allocations</b>	<b>Workforce Development: \$2,500,000</b>
Program Description	The Training Program is designed to upskill and reskill underemployed and unemployed LMI individuals to support their economic mobility. The Program focuses on industries and skills that are essential to disaster recovery, such as general construction and other critical skill sectors in the Hillsborough County economy.
National Objectives 24 CFR 570, Subpart I	<ul style="list-style-type: none"> <li>• LMI Benefit via Area Benefit - 24 CFR 570.483(b)(1)</li> <li>• Urgent Need - 24 CFR 570.483(d)</li> <li>• Activities which aid in the prevention or elimination of slums or blight – area basis - 24 CFR 570.483(c)(1)</li> </ul>
Eligible Area	All of Hillsborough County (MID-Area)
Eligible Activities: <ul style="list-style-type: none"> <li>• Referenced to Title I of Housing and Community Development Act of 1974</li> <li>• 42 USC 5305(a)</li> <li>• HUD Revised Universal Notice</li> </ul>	<ul style="list-style-type: none"> <li>• §5305(a)(1) – Acquisition</li> <li>• §5305(a)(2) – Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements</li> <li>• §5305(a)(3) – Code Enforcement</li> <li>• §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing</li> <li>• §5305(a)(5) – Removal of Architectural Barriers</li> <li>• §5305(a)(7) – Disposition</li> <li>• §5305(a)(9) – Non-Federal Match</li> <li>• §5305(a)(11) – Relocation Payments</li> <li>• §5305(a)(13) – Administrative Costs</li> <li>• §5305(a)(14) – Assistance to Non-Profit Entities</li> <li>• §5305(a)(15) – Assistance to Neighborhood-Based Organizations</li> <li>• §5305(a)(16) – Energy Use Strategies</li> <li>• §5305(a)(25) – Tornado Shelters</li> <li>• §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction</li> <li>• FR Notice – Infrastructure</li> <li>• FR Notice – Mitigation FR Notice – Mitigation activities – Section III.D.4.</li> <li>• FR Notice – Buyouts – Section III.D.5.i.</li> </ul>





Program	Workforce Development
	<ul style="list-style-type: none"> <li>Assistance to Institutions of Higher Education - HCDA Section 105(a)(21)</li> <li>Provision of Public Services (Workforce Development) - 24 CFR 570.201(e), 24 CFR 570.482(c)(2)</li> </ul>
Maximum Income of Beneficiary	80% LMI
Minimum / Maximum Project or Sub-Award Size	Minimum: \$100,000 Maximum: \$3,000,000
Distribution Process	Funds will be administered to eligible subrecipients through a competitive proposal and application process.
Lead Agency Designation	As grantee, Hillsborough County will retain Lead Agency status per 24 CFR 58.4.
Mitigation Measures / Elements	None explicitly required, as no MIT-set-aside funding included. All programs and activities are, however, expected to contribute to the overall resiliency of the community in decisions, policies and the built environment that impacts the ability of Hillsborough County to withstand and recover from future severe weather events.
Reducing Barriers	Hillsborough County, its subgrantees and contractors will all strive to identify individuals and populations who may face specific or generalized barriers to assistance from CDBG-DR funded recovery programs, including protected classes, vulnerable populations and other communities with specialized needs. Upon identification of those persons or populations, efforts will be tailored to address those needs to ensure equal access to the CDBG-DR funded recovery programs.
Other Eligibility Criteria	Eligible applicants include governments, public or non-profit organizations, CHDOs/CBDOs, Educational Institutions.

*Table 44 - Business Infrastructure*

Program	Business Infrastructure
<b>CDBG-DR Budget Allocations</b>	<b>Business Infrastructure: \$92,322,376</b>
Program Description	This activity is specifically to make investments in infrastructure in support of the business and industrial community to address (1) damage incurred as a result of the two subject storm events, (2) infrastructure deficiencies highlighted and exacerbated by the storms and (3) such mitigation and resilience measures that can be directly tied to (1) and (2). Activities subject to all program requirements of area benefit/income eligibility, duplication of benefits, connections to the storm(s) and others to be outlined in the operating policies and procedures.
National Objectives 24 CFR 570, Subpart I	<ul style="list-style-type: none"> <li>• LMI Benefit via Area Benefit - 24 CFR 570.483(b)(1)</li> <li>• Urgent Need - 24 CFR 570.483(d)</li> <li>• Activities which aid in the prevention or elimination of slums or blight – area basis - 24 CFR 570.483(c)(1)</li> </ul>
Eligible Area	All of Hillsborough County (MID-Area)
Eligible Activities: <ul style="list-style-type: none"> <li>• Title I of Housing and Community Development Act of 1974</li> <li>• 42 USC 5305(a)</li> <li>• HUD Revised Universal Notice</li> </ul>	<ul style="list-style-type: none"> <li>• §5305(a)(1) – Acquisition</li> <li>• §5305(a)(2) – Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements</li> <li>• §5305(a)(3) – Code Enforcement</li> <li>• §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing</li> <li>• §5305(a)(5) – Removal of Architectural Barriers</li> <li>• §5305(a)(7) – Disposition</li> <li>• §5305(a)(9) – Non-Federal Match</li> <li>• §5305(a)(11) – Relocation Payments</li> <li>• §5305(a)(13) – Administrative Costs</li> <li>• §5305(a)(14) – Assistance to Non-Profit Entities</li> <li>• §5305(a)(15) – Assistance to Neighborhood-Based Organizations</li> <li>• §5305(a)(16) – Energy Use Strategies</li> <li>• §5305(a)(25) – Tornado Shelters</li> <li>• §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction</li> <li>• FR Notice – Infrastructure</li> </ul>



Program	Business Infrastructure
	<ul style="list-style-type: none"> <li>FR Notice – Mitigation FR Notice – Mitigation activities – Section III.D.4.</li> <li>FR Notice – Buyouts – Section III.D.5.i.</li> </ul>
Maximum Income of Beneficiary	80% LMI
Minimum / Maximum Project or Sub-Award Size	Minimum: \$100,000 Maximum: \$30,000,000
Distribution Process	Funds will be directly administered by the grantee and also distributed to eligible subrecipients through a competitive application process.
Lead Agency Designation	As grantee, Hillsborough County will retain Lead Agency status per 24 CFR 58.4.
Mitigation Measures / Elements	None explicitly required, as no MIT-set-aside funding included. All programs and activities are, however, expected to contribute to the overall resiliency of the community in decisions, policies and the built environment that impacts the ability of Hillsborough County to withstand and recover from future severe weather events.
Reducing Barriers	Hillsborough County, its subgrantees and contractors will all strive to identify individuals and populations who may face specific or generalized barriers to assistance from CDBG-DR funded recovery programs, including protected classes, vulnerable populations and other communities with specialized needs. Upon identification of those persons or populations, efforts will be tailored to address those needs to ensure equal access to the CDBG-DR funded recovery programs.
Other Eligibility Criteria	Eligible applicants include governments, public or non-profit organizations, CHDOs/CBDOs.

*Table 45 - Technical Assistance*

Program	Technical Assistance
<b>CDBG-DR Budget Allocations</b>	<b>Technical Assistance: \$5,000,000</b>
Program Description	This activity is specifically to make planning and technical investment in the long term recovery and resiliency of the Hillsborough County economy. By investing in data-driven strategies for infrastructure investment, human-capital investment and technology investment, individual businesses and the County as a whole will realize a leveraged benefit from the additional bricks-and-mortar CDBG-DR investments integral to this program.
National Objectives  24 CFR 570, Subpart I  Title I of Housing and Community Development Act of 1974	<ul style="list-style-type: none"> <li>• LMI Benefit via Area Benefit - 24 CFR 570.483(b)(1)</li> <li>• Urgent Need - 24 CFR 570.483(d)</li> <li>• Low- and Moderate-Income Benefit – Housing Activities 24 CFR 570.483(b)(3)</li> <li>• Activities which aid in the prevention or elimination of slums or blight – area basis - 24 CFR 570.483(c)(1)</li> <li>• Assistance to Non-Profit Development Organization for an Economic Development Activity - 24 CFR 570.204(a)(2)</li> <li>• Public Facilities and Improvements - 24 CFR 570.201(c)</li> <li>• Assistance to Institutions of Higher Education - HCDA Section 105(a)(21)</li> <li>• Provision of Public Services (Workforce Development) - 24 CFR 570.201(e), 24 CFR 570.482(c)(2)</li> </ul>
Eligible Area	All of Hillsborough County (MID-Area)
Eligible Activities: <ul style="list-style-type: none"> <li>• Referenced to Title I of Housing and Community Development Act of 1974</li> <li>• 42 USC 5305(a)</li> <li>• HUD Revised Universal Notice</li> </ul>	<ul style="list-style-type: none"> <li>• §5305(a)(3) – Code Enforcement</li> <li>• §5305(a)(5) – Removal of Architectural Barriers</li> <li>• §5305(a)(7) – Disposition</li> <li>• §5305(a)(9) – Non-Federal Match</li> <li>• §5305(a)(13) – Administrative Costs</li> <li>• §5305(a)(14) – Assistance to Non-Profit Entities</li> <li>• §5305(a)(15) – Assistance to Neighborhood-Based Organizations</li> <li>• §5305(a)(16) – Energy Use Strategies</li> <li>• §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction</li> <li>• FR Notice – Infrastructure</li> <li>• FR Notice – Mitigation FR Notice – Mitigation activities – Section III.D.4.</li> </ul>



Program	Technical Assistance
Maximum Income of Beneficiary	80% LMI
Minimum / Maximum Project or Sub-Award Size	Minimum: \$100,000 Maximum: \$5,000,000
Distribution Process	Funds will be directly administered by the grantee and also distributed to eligible subrecipients through a competitive application process.
Lead Agency Designation	As grantee, Hillsborough County will retain Lead Agency status per 24 CFR 58.4.
Mitigation Measures / Elements	None explicitly required, as no MIT-set-aside funding included. All programs and activities are, however, expected to contribute to the overall resiliency of the community in decisions, policies and the built environment that impacts the ability of Hillsborough County to withstand and recover from future severe weather events.
Reducing Barriers	Hillsborough County, its subgrantees and contractors will all strive to identify individuals and populations who may face specific or generalized barriers to assistance from CDBG-DR funded recovery programs, including protected classes, vulnerable populations and other communities with specialized needs. Upon identification of those persons or populations, efforts will be tailored to address those needs to ensure equal access to the CDBG-DR funded recovery programs.
Other Eligibility Criteria	Eligible applicants include governments, public or non-profit organizations, CHDOs/CBDOs, educational institutions.





## 6.7 Public Services

### 6.7.1 Public Services Programs Overview

The total funding allocation for Public Services activities is \$15,000,000, or 2.11% as opposed to the total allowable 15%. All of the activity funding is being drawn from the CDBG-DR award, with none drawn from the MIT set-aside. Public Service activities are being funded to address a wide range of needs in Hillsborough County that span housing, economic recovery and individual support. The types of services anticipated include, but are not limited to:

- Job Training
- Child Care
- Health Services
- Housing Counseling
- Education Programs
- Energy Conservation
- Homeless Services
- Senior Citizens Programs
- Business Counseling
- Legal Assistance

*Table 46 - Grantee Public Services Programs Overview*

Eligible Cost Category	CDBG-DR Allocation Amount	MIT Allocation Amount	% of Allocation for LMI Benefit	Exempt from 15% Public Service Cap?
Public Service Activities	\$15,000,000	\$ -	70%	No
Public Services Program Total	\$15,000,000		70%	



*Table 47 - Public Service*

Program	Public Service
<b>CDBG-DR Budget Allocations</b>	<b>Public Service: \$15,000,000</b>
Program Description	The primary objective of the Public Services Program is to enhance community resiliency and economic stability by providing new or expanded access to public services that ensure housing permanency, increase disaster preparedness and recovery, promote economic self-sufficiency, and improve access to health and mental health services for individuals and households impacted by Hurricanes Helene and Milton.
National Objectives 24 CFR 570, Subpart I	<ul style="list-style-type: none"> <li>• LMI Benefit</li> <li>• Urgent Need</li> <li>• Elimination of Slum and Blight Conditions</li> </ul>
Eligible Area	All of Hillsborough County (MID-Area)
Eligible Activities: <ul style="list-style-type: none"> <li>• Title I of Housing and Community Development Act of 1974</li> <li>• 42 USC 5305(a)</li> <li>• HUD Revised Universal Notice</li> </ul>	<ul style="list-style-type: none"> <li>• §5305(a)(1) – Acquisition</li> <li>• §5305(a)(3) – Code Enforcement</li> <li>• §5305(a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing</li> <li>• §5305(a)(5) – Removal of Architectural Barriers</li> <li>• §5305(a)(7) – Disposition</li> <li>• §5305(a)(8) – Public Services</li> <li>• §5305(a)(11) – Relocation Payments</li> <li>• §5305(a)(13) – Administrative Costs</li> <li>• §5305(a)(14) – Assistance to Non-Profit Entities</li> <li>• §5305(a)(15) – Assistance to Neighborhood-Based Organizations</li> <li>• §5305(a)(20) – Housing Services</li> <li>• §5305(a)(25) – Tornado Shelters</li> <li>• §5305(a)(26) – Lead-Based Paint Hazard Evaluation and Reduction</li> <li>• FR Notice – Housing activities and standards - Section III.D.5.</li> <li>• FR Notice – Mitigation activities – Section III.D.4.</li> <li>• Assistance to Institutions of Higher Education - HCDA Section 105(a)(21)</li> <li>• Provision of Public Services (Workforce Development) - 24 CFR 570.201(e), 24 CFR 570.482(c)(2)</li> </ul>



Program	Public Service
Maximum Income of Beneficiary	80% LMI
Minimum / Maximum Project or Sub-Award Size	Minimum: \$500,000 Maximum: \$2,500,000
Distribution Process	Funds will be distributed to eligible subrecipients and applicants through a competitive application process.
Lead Agency Designation	As grantee, Hillsborough County will retain Lead Agency status per 24 CFR 58.4.
Mitigation Measures / Elements	None explicitly required, as no MIT-set-aside funding included. All programs and activities are, however, expected to contribute to the overall resiliency of the community in decisions, policies and the built environment that impacts the ability of Hillsborough County to withstand and recover from future severe weather events.
Reducing Barriers	Hillsborough County, its subgrantees and contractors will all strive to identify individuals and populations who may face specific or generalized barriers to assistance from CDBG-DR funded recovery programs, including protected classes, vulnerable populations and other communities with specialized needs. Upon identification of those persons or populations, efforts will be tailored to address those needs to ensure equal access to the CDBG-DR funded recovery programs.
Other Eligibility Criteria	Eligible applicants include governments, public or non-profit organizations, educational institutions and CHDOs/CBDOs.



# 7.0 CDBG-DR Mitigation Set-Aside

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

### 7.1.1 Mitigation Program Descriptions

Each of the Mitigation Set-Aside funded programs are co-mingled with CDBG-DR programs, with the expressed intent of achieving mitigation and resiliency benefits across the entire portfolio. Please refer to the overall program descriptions for additional detail on each.

Table 48 - CDBG-DR Mitigation Set-Aside Allocation Summary

Eligible Cost Category	Unmet Needs	% of Unmet Needs	% of Funding Spent in HUD MID	MIT Allocation Amount	% of MIT Total (excluding Admin)
Planning (15% cap)			100%	\$ -	0%
Housing	\$1,030,203,537	56%	100%	\$43,947,475	50%
Infrastructure	\$284,811,777	16%	100%	\$43,947,475	50%
Economic Revitalization	\$515,124,555	28%	100%	\$ -	0%
Total	\$1,830,139,869	100%	100%	\$87,894,950	100%



*Table 49 - Grantee CDBG-DR Mitigation Set-Aside Programs Overview*

Eligible Cost Category	CDBG-DR Mitigation Set-Aside Allocation	% of MIT Allocation for LMI Benefit	Does the Program have tie-back to the disasters?
Housing	\$ 43,947,475	47.50%	N/A
Infrastructure	\$ 43,947,475	47.50%	N/A
Administration	\$ 4,626,050	5.00%	N/A
<b>Total MIT Set Aside</b>	<b>\$ 92,521,000</b>	<b>100.00%</b>	

#### 7.1.2 General Exception Criteria

Hillsborough County reserves the right to make exceptions to award caps as necessary to comply with federal accessibility standards or to reasonably accommodate a person with disabilities. The County will incorporate program-specific guidelines in its Policies and Procedures including any RFP-specific requirements. Each project will be evaluated both during the evaluation and underwriting phases, including a plan and cost review, to ensure that any proposed exceptions to the award caps are reasonable and appropriate.

Amendments to this Action Plan, both substantial and non-substantial, are addressed separately in this document.

#### 7.1.3 Cross-Cutting Compliance

Hillsborough County will use all CDBG-DR funds in a manner that complies with applicable statutes, which include:

- Section 109 of the Housing Community Development Act (HCDA), 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;
- Section 504 and 508 of the Rehabilitation Act of 1973, 29 U.S.C. 794;
- The Americans with Disabilities Act (ADA) of 1990, 42 U.S.C. 12131 et seq.; and
- Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193) (PRWORA).





## 8.0 General Information

### 8.1 Competitive Project Solicitations

Hillsborough County, as the responsible entity and signatory of the grant agreement with the U.S. Department of Housing and Urban Development (HUD), maintains all fiduciary responsibility for the administration of CDBG-DR funds under this program, including any program income that may be generated in the future. As such, the County is bound to comply with the Financial Certifications that it makes to HUD in advance of the grant agreement execution. Those certifications will be made available for inspection and posted on the County's official CDBG-DR website once the grant agreement is final.

One component of those certifications is compliance with 2 CFR Part 200 Procurement Standards, upholding the principles and practice of fair and open competition to all parties who may propose projects in response to formal solicitations issued by Hillsborough County. In each of those formal solicitations, the County will publish specific response requirements as well as review criteria against which proposals will be measured. Given that each solicitation will have different needs and criteria, it is anticipated that review criteria will correspondingly vary. Each solicitation will address disaster and mitigation needs in the identified MID area, which is co-terminus with the boundary of the whole of Hillsborough County. The following is provided as a generalized example of what the range of criteria and weighting may be, but in no manner is a limit to what may be included or excluded in the Criteria final scoring for any given solicitation:

Criteria	Weight
Applicant Capacity	15
LMI Population Served	15
Project Schedule	15
Funding Leverage	10
Environmental Quality	10
Linkage to other Capital Investments	15
Conformity with Land Use Plans	10
Resilient Design	10
Total	100

Figure 25 - Sample Scoring Distribution

### 8.2 Citizen and Stakeholder Engagement

Hillsborough County has committed to encouraging and maintaining active community participation in the long term recovery from hurricanes Helene and Milton for the lifespan of the CDBG-DR program and beyond. Through active engagement with incorporated municipalities, other jurisdictions within the County, stakeholders, partners and most of all citizens, we will rebuild our community together into a stronger, more resilient Hillsborough.

From the outset, this plan has been developed through stakeholder engagement, open public comment periods, multiple public hearings and open communication. This open transparency will continue with the expansion of the County's CDBG-DR program website and dashboard as the program unfolds, including individual applicant tracking and updates. Citizen communications will continue to be channeled through all available means,



including electronic mailings, press releases, media advertisements, social media, public service announcements and engagement with community organizations.

For additional detail, please refer to the Hillsborough County Citizen Participation Plan, version 1.2 dated 5/21/2025 (draft published) attached as Appendix B.

### 8.3 Consultation of Developing the Action Plan

*Table 50 - Summary of Stakeholder Partners*

Partners Consulted	Describe Engagement
Federal Partners (FEMA, SBA)	Hillsborough County collaborated closely with FEMA and SBA to support rapid disaster response and recovery efforts. This included setting up Disaster Recovery Centers, coordinating field assessments, and coordinating the delivery of Individual Assistance and Small Business loans through the State of Florida consultants for impacted residents and business owners.
Local/State Government	The County coordinated with municipal government the City of Tampa, Plant City, and Temple Terrace to align disaster recovery priorities, share needs housing and infrastructure damage, in an effort to create a methodology to address the most impacted and vulnerable residents.
Indian Tribes	The County extended outreach to tribal leadership to ensure awareness of recovery resources and gather feedback on unmet needs. Tribal representatives were invited to participate in local emergency coordination briefings and resource planning.
Nongovernmental organizations	The County partnered with established NGOs such as the Red Cross, Metropolitan Ministries, St. Vincent DePaul, Grace Point MHC, and numerous local faith-based organizations to support sheltering, food distribution, case management, and rebuilding assistance for vulnerable populations.
State and local emergency management agencies that have primary responsibility for the administration of FEMA funds	The County worked in tandem with the Florida Division of Emergency Management (FDEM) and its own Office of Emergency Management to ensure compliance with FEMA guidelines and to prioritize funding for recovery efforts.
Agencies that manage local Continuum of Care	Coordination with the Tampa Hillsborough Homeless Initiative and its associate agencies was essential to identify displaced and at-risk individuals, facilitate rapid rehousing, and incorporate disaster recovery funding into ongoing homelessness prevention strategies.



Partners Consulted	Describe Engagement
Public Housing Agencies	The County engaged with local PHAs to assess the condition of public housing stock, support temporary relocation efforts, and apply for HUD waivers and supplemental funding to expedite repairs and rehousing.
HUD-approved housing counseling agencies	
State Housing Finance Agencies	Hillsborough County consulted with the Florida Housing Finance Corporation to explore the availability of disaster recovery funding. We have also consulted with the Hillsborough Housing Finance Authority to explore available tax credits, and technical assistance for long-term housing rehabilitation and development.
Other Stakeholders	Additional outreach was conducted with community leaders, neighborhood associations, advocacy agencies, and planning organizations to ensure an inclusive recovery process that addressed the diverse needs of the population.
Additional Stakeholder Engagement	<p>Centre for Women</p> <p>East Tampa Business and Civic Association</p> <p>Rebuilding Together Tampa Bay</p> <p>Florida Home Partnership</p> <p>Housing Finance Authority</p> <p>Catholic Charities Diocese of St. Petersburg</p> <p>Friends of Joshua House</p> <p>Seniors in Service of Tampa Bay</p> <p>Community Developer Corporation of Tampa Bay</p> <p>Habitat for Humanity</p> <p>Dawning Family Services</p> <p>A Kids Place</p> <p>Childrens Home Network</p> <p>University Area Community Development Corporation</p> <p>Housing Education Alliance</p> <p>Macdonald Training Center</p> <p>Metropolitan Ministries</p> <p>New Life Village</p> <p>Tampa Lighthouse for the Blind</p>

## 8.4 Public Hearings

Because Hillsborough County's CDBG-DR grant exceeds \$500 million, a minimum of three public hearings are required per the Universal Notice, as revised, at I.C.2.b. *Public comment period and minimum public hearing requirement.* A total of four (4) public information sessions and five (5) public hearings were conducted as follows:

*Table 51 - Public Hearings & Information Sessions*

DATE, TIME	Location	Details
Thursday June 5, 2025 6pm-8pm	C. Blythe Andrews Jr. Library 2607 E. Dr. Martin Luther King Jr. Blvd. Tampa, FL 33610 (District 3)	Educational Meeting
Monday June 9, 2025 6pm-8pm	Jan Kaminis Platt Regional Library 3910 S. Manhattan Ave., Tampa, FL 33611 (District 1)	Educational Meeting
Tuesday June 17, 2025 6pm-8pm	Roy Haynes Park & Recreation Center 1902 S. Village Ave., Tampa, FL 33612 (District 2)	Educational Meeting
Monday June 23, 2025 6pm-8pm	Victor Crist Community Center Complex 14013 N. 22nd St., Tampa, FL 33613 (District 3)	Educational Meeting

DATE, TIME	Location	Details
Wednesday June 4, 2025 6pm-8pm	Pierce Middle School - 5511 N. Hesperides St. Tampa 33614 (District 1)	Public Comment Hearing
Tuesday June 10, 2025 6pm-8pm	Emanuel P. Johnson, Recreation Center 5855 S. 78th St., Tampa, FL 33619, (District 3)	Public Comment Hearing
Thursday June 12, 2025 6pm-8pm	Maureen B. Gauzza Public Library, 11211 Countryway Blvd., Tampa, FL 33626, (District 2)	Public Comment Hearing
Friday June 13, 2025 6pm-8pm	Lennard High School 2342 E. Shell Point Rd., Ruskin, FL 33570 (District 4)	Public Comment Hearing
Wednesday June 18, 2025 6pm-8pm	Sayde Gibbs Martin Community Center 302 S. Maryland Ave., Plant City, FL 33563 (District 4)	Public Comment Hearing



Hillsborough County hosted the five in-person public hearings at different locations within the HUD-identified MID area in an effort to promote geographic balance and maximize accessibility for all community stakeholders and disaster-impacted individuals. All in-person hearings took place in ADA-compliant facilities, ensuring access for people with disabilities. The County selected hearing times and locations to be convenient for potential and actual beneficiaries, and conducted outreach through social media, newspaper and other media notices, e-mail distribution, and community networks.

## 8.5 Public Comment

Per the requirements established in the Universal Notice, as amended, at I.C.2.b., a formal Public Comment period for the review of this Action Plan was opened on June 4, 2025 and closed on July 7, 2025. During that time, the draft Action Plan was published on the Hillsborough County CDBG-DR website at <https://hcflgov-stage.netlify.app/residents/stay-safe/storm-recovery-resources/disaster-recovery-grant> with paper copies available for review in the Office of Community Impact, CDBG-DR Program, 23rd Floor, 601 E. Kennedy Blvd., Tampa, FL 33602.

### 8.5.1 Consideration of Public Comments

A record of all received Action Plan comments and responses is included in Appendix C to this Action Plan.

## 8.6 Citizen Complaints

Hillsborough County is committed to maintaining a transparent and accessible process for addressing citizen complaints related to the CDBG-DR Action Plan, program and associated recovery activities. Residents and stakeholders may submit complaints to express concerns or provide feedback on the CDBG-DR process. Complaints may be emailed to: [HillsboroughCDBG-DR@HCFL.GOV](mailto:HillsboroughCDBG-DR@HCFL.GOV) or may be delivered in person or by mail to:

Office of Community Impact, CDBG-DR Program  
23rd Floor, 601 E. Kennedy Blvd.  
Tampa, FL 33602

To align with Hillsborough County's Citizen Participation Plan, the County will make every effort to respond to citizen complaints within 10 working days. Written responses will be mailed within 15 working days of receiving a written complaint or grievance. Each complaint will be thoroughly reviewed, and responses will be tailored to the nature and complexity of the issue. Complaints related to noncompliance with HUD regulations, or the Revised UN requirements will be escalated for appropriate resolution in consultation with relevant agencies.

To promote transparency, the County will document all complaints, responses, and resolutions. The County may conduct regular evaluations of the complaint process to ensure it aligns with community needs and HUD's Citizen Participation Requirements.

Complaints regarding fraud, waste, or abuse of government funds should be forwarded to:

HUD Office of Inspector General Fraud Hotline  
phone: 1-800-347-3735  
email: [hotline@hudoig.gov](mailto:hotline@hudoig.gov)



## 8.7 Modifications to the Action Plan

### 8.7.1 Substantial Amendment

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

- A change in program benefit or eligibility criteria (including the expansion of eligible beneficiaries);
- The addition or deletion of an activity;
- A proposed reduction in the overall benefit requirement (as described in section III.B.1. of the Universal Notice as revised);
- The allocation or reallocation of more than \$35,000,000, or 4.93%, of the total grant award.;
- An update to the submitted initial Action Plan if the original submission was incomplete.

Pursuant to sections I.C.1.f. and I.C.6.a of the Revised Universal Notice, Hillsborough County will make substantial amendments available for public comment for no less than 30 days. Amendments will be posted online at <https://hcfl.gov/residents/stay-safe/storm-recovery-resources>. Following the public comment period, Hillsborough County will address comments received and then submit the substantial amendment for HUD's review and approval. Hillsborough 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 its official website (<https://hcfl.gov/residents/stay-safe/storm-recovery-resources>), and consolidated into the Action Plan.

### 9.7.2 Nonsubstantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the threshold for substantial amendment thresholds noted above and does not require posting for public comment. Hillsborough County will notify HUD of nonsubstantial amendments five business days before a 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.

## 8.8 Performance Reports

In accordance with HUD requirements, Hillsborough County will submit a Quarterly Performance Report (QPR) through the HUD Disaster Recovery Grant Reporting (DRGR) system no later than 30 days following the end of each calendar quarter. Within three days of submission to HUD, Hillsborough County will post each QPR on its official website (<https://hcfl.gov/residents/stay-safe/storm-recovery-resources>). Program QPR's will be posted on a quarterly basis until all funds have been expended and all expenditures have been reported.





## Appendix A - Administration-Only Action Plan



OFFICE OF COMMUNITY PLANNING  
AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-7000

Cheryl Howell  
Assistant County Administrator  
Hillsborough County  
601 E. Kennedy Blvd  
Tampa, FL 33602

Dear Ms. Howell:

The Department of Housing and Urban Development (HUD) is pleased to advise you that it approves the Hillsborough County's Action Plan for program administrative costs for Community Development Block Grant Disaster Recovery (CDBG-DR) funds appropriated by Disaster Relief Supplemental Appropriations Act, 2025 Public Law 118-158. On December 21, 2024, the Department allocated \$709,324,000 to Hillsborough County for the purpose of assisting in long-term recovery from major disasters that occurred in 2023 and 2024. This letter transmits the enclosed CDBG-DR grant agreement in the amount of \$35,466,200 to be used for program administrative costs.

Following the execution of the initial grant agreement to obligate funds to be used for program administrative costs, HUD will execute an amended grant agreement with Hillsborough County to allow access to the remaining grant funds. Prior to obligating the remaining funds, HUD must review and approve the Hillsborough County's Action Plan, and the Secretary must certify the proficiency of the grantee's financial controls and procurement processes and procedures for proper grant management.

The county must execute the grant agreement to oblige the CDBG-DR funds. Please electronically sign and return for HUD's signature by email to [Disaster\\_Recovery@hud.gov](mailto:Disaster_Recovery@hud.gov). The date of HUD's signature on the grant agreement is the date the funds are obligated. All funds obligated for this grant must be expended within the six years of this grant agreement's execution date.

The Department remains committed to assisting Hillsborough County in its efforts to address recovery needs and looks forward to working with you and your staff to achieve this goal. If you have any questions, please contact Jill Smolen, Assistant Director, Grants Management Division, Office of Disaster Recovery at 305-520-5023, or by email at [Jill.C.Smolen@hud.gov](mailto:Jill.C.Smolen@hud.gov).

Sincerely,

**WILLIAM  
BEDFORD**

William Bedford, Director  
Grants Management Division  
Office of Disaster Recovery

 Digitally signed by WILLIAM  
BEDFORD  
Date: 2025.04.01 19:28:47 -04'00'

[www.hud.gov](http://www.hud.gov)

[espanol.hud.gov](http://espanol.hud.gov)



**COMMUNITY DEVELOPMENT BLOCK GRANT DISASTER RECOVERY (CDBG-DR)  
GRANT AGREEMENT**

**Grantee's Name:** Hillsborough County

**Tax ID Number:** 59-6000661

**Grantee's unique entity identifier [UEI]:** PGWKT576NH472

**Unique Federal Award Identification Number (FAIN):** B-25-UU-12-002

**Appropriation Account:** 86X0162

**Program Accounting Code:** MAU

**Federal Award Date:**

**Period of Performance and Budget Period Start Date:**

**Period of Performance and Budget Period End Date:**

**Date Use of Funds May Begin:** 10/03/2024

**Amount of Federal Funds Obligated by this Action:** \$35,466,200

**Amount of Federal Funds Previously Obligated:** 0

**Dates of Prior Obligation (if applicable):** N/A

**Total Amount of the Federal Award:** \$709,324,000

**Federal awarding agency:** Department of Housing and Urban Development

**Contact information for HUD:** Tennille S. Parker, Director, Office of Disaster Recovery,  
Community Planning and Development, U.S. Department of Housing and Urban Development,  
451 7th Street, S.W., Room 7282, Washington, DC 20410

**Assistance Listing:** 14.218 Community Development Block Grants/Entitlement program

**Indirect Cost Rate for the Grant:** See Attachment 1

**Check One:** ☒Original Funding Approval or ☐Amendment: Click or tap here to enter text.



## I. Recitals

The Disaster Relief Supplemental Appropriations Act, 2025 (Pub. L. 118-158, Division B) (“the Appropriations Act”) approved on December 21, 2024, makes available \$12,070,701,000 in CDBG-DR funds. These CDBG-DR funds are for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) (HCDA) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the “most impacted and distressed” (MID) areas resulting from a qualifying major disaster that occurred in 2023 or 2024. The Appropriations Act provides that \$78,850,000 of these amounts will be available for these specific purposes: \$45,000,000 for salaries and expenses of the Office of Community Planning and Development, \$1,850,000 for HUD’s disaster recovery portal, \$7,000,000 for the Office of Inspector General, and \$25,000,000 for capacity building and technical assistance, leaving the remaining \$11,991,851,000 available for allocations to CDBG-DR grantees.

Of the \$11,991,851,000 made available, the United States Department of Housing and Urban Development (the “Department” or “HUD”) allocated \$11,889,437,000 in CDBG-DR funds from the Appropriations Act to assist in long term recovery from disasters that occurred in 2023 and 2024. HUD will allocate the remaining \$102,414,000 of available funds under a separate Allocation Announcement Notice that provides plus-up funding for disasters that occurred in January 2023 for which HUD previously allocated funding in a *Federal Register* notice published on November 27, 2023, at 88 FR 82982. As required by the Appropriations Act, HUD’s final allocations for the total estimate of unmet needs included an additional amount of 15 percent of that estimate for mitigation activities that reduce risk in the MID areas.

HUD notified the public of the allocations in a press release and in a *Federal Register* notice, *Allocations for Community Development Block Grant Disaster Recovery and Implementation of the CDBG-DR Consolidated Waivers and Alternative Requirements Notice* (UN AAN), which was published at 90 FR 4759 on January 16, 2025, the “Allocation Announcement Notice”). The Allocation Announcement Notice and the CDBG-DR Universal Notice, which was published on January 8, 2025, at 90 FR 1754 and made applicable to these CDBG-DR funds through the Allocation Announcement Notice, contain requirements that are incorporated into this Agreement and are included for reference in Attachment 2.

This agreement between the Grantee identified on page one (“Grantee”) and HUD governs grant amounts identified on page one that are allocated and obligated to the Grantee based on HUD’s review of the impacts and estimates of unmet need for major disasters identified in the Allocation Announcement Notice. The Allocation Announcement Notice identifies the total amount allocated to the Grantee, and the amount of the total allocation that must be used for mitigation activities that reduce risk in the MID areas (referred to as the “CDBG-DR mitigation set aside” in Table 1 of the Allocation Announcement Notice). Page one of this agreement identifies the portion of that allocation that HUD has obligated to the Grantee.

The *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (2 CFR part 200) require HUD to have in place a framework for evaluating the risks posed by applicants before they receive Federal awards. HUD may establish specific criteria





and conditions for this grant as provided for in section III.F.2.b. of the CDBG-DR Universal Notice at 90 FR 1788 and at 2 CFR 200.206 and 200.208.

Now, therefore, under the authority of the Appropriations Act, the Grantee and HUD agree to the terms of this COMMUNITY DEVELOPMENT BLOCK GRANT DISASTER RECOVERY (CDBG-DR) GRANT AGREEMENT, including but not limited to the General Terms and Conditions and Specific Conditions set forth in sections II. and III. and Attachment(s) (the "Agreement").

## **II. General Terms and Conditions**

1. This Agreement is a federal award (grant). The grant is subject to all requirements in the Agreement, including the requirement that the Grantee agrees to use the grant funds in accordance with the Agreement, as may be amended from time to time. If the amendment box on page one is checked, the amended agreement governs the grant from the date the amendment is signed by HUD.
2. The following requirements, as now in effect and as these requirements may be amended from time to time, are incorporated into the Agreement: requirements of the Appropriations Act, and requirements of title I of the Housing and Community Development Act of 1974 (HCDA or HCD Act) (42 USC 5301 et seq.) and implementing regulations at 24 CFR part 570, as modified by waivers, alternative requirements, and other requirements published in the Allocation Announcement Notice and other applicable *Federal Register* notices or on HUD's website.
3. The period of performance/budget period for this agreement is specified on page one. The Grantee shall not incur any obligations to be paid from funds made available by this award after the last day of the period of performance. Pre-award costs and pre-agreement costs are allowable to the extent permitted by the Allocation Announcement Notice and other applicable waivers, alternative requirements, or other requirements published in the *Federal Register* or on HUD's website.
4. The Grantee must comply with the applicable requirements at 2 CFR part 200, as may be amended from time to time, to the extent that part 200 is incorporated into and made applicable by 24 CFR part 570, or applicable waivers, alternative requirements, or other requirements that govern this grant and are published in the *Federal Register* or on HUD's website. Recent amendments to 2 CFR part 200 were effective on August 13, 2020, November 12, 2020, February 22, 2021, and October 1, 2024. Where any previous or future amendments to 2 CFR part 200 replace or renumber sections of part 200 that are cited specifically in applicable *Federal Register* notices, in applicable requirements published on HUD's website, in the Agreement (as may be amended), or in program regulations, activities carried out under the grant after the effective date of the part 200 amendments will be governed by the part 200 requirements as replaced or renumbered by the part 200 amendments. The Grantee must comply with other requirements established by the Office of Management and Budget (OMB), as amended, regarding the System for Award Management (SAM.gov) and the Federal Funding Accountability and Transparency Act as provided in 2 CFR part 25 and 2 CFR part 170.



5. A metropolitan city, urban county, unit of general local government, or insular area that directly or indirectly receives funds obligated by this agreement may not sell, trade, or otherwise transfer all or any such portion of such funds to another such entity in exchange for any other funds, credits, or non-Federal considerations, but must use such funds for eligible activities.
6. Activities undertaken with funds obligated by this Agreement shall be governed by the specific conditions in section III of this Agreement until the specific conditions are modified or removed in writing by HUD (changes may be made unilaterally by HUD in accordance with 2 CFR 200.208). If the "Amendment" box on page one is checked, the following requirement applies as of the date HUD signs the amendment, specific conditions in section III. of the amendment shall supersede all specific conditions previously imposed. Activities undertaken after HUD signs the amendment shall be governed by the specific conditions in the amendment until modified or removed by HUD in writing.
7. The attached indirect cost rate(s) are incorporated into and made part of this Agreement, provided that each rate identified meets the applicable requirements under 2 CFR part 200 (including appendices). The Grantee must notify HUD upon any change in the Grantee's indirect cost rate(s), so that HUD can amend the Grant Agreement, if necessary, to reflect the change.
8. HUD and the Grantee agree that this Agreement shall be electronically signed, and that any electronic signatures appearing on this Agreement are the same as handwritten signatures for the purposes of validity, enforceability, and admissibility. The Grantee shall maintain this Agreement, including any amendments, in its files.
9. Data Sharing Agreements and Computer Matching Agreements between HUD and the Grantee (which may include the Federal Emergency Management Agency as a signatory) for the purpose of sharing Federal Emergency Management Agency data pertaining to major disasters assisted by this grant, when signed (including data sharing and computer matching agreements signed or modified after this Agreement is signed), are and shall be wholly incorporated into and made a part of this Agreement. Grant requirements enforceable under the terms of 24 CFR part 570, subpart O or I include the Grantee's duties and responsibilities under such Data Sharing Agreements and Computer Matching Agreements.
10. Waste, Fraud, Abuse, and Whistleblower Protections. In accordance with 2 CFR 200.113, grantees and subrecipients of CDBG-DR must promptly inform in writing the OIG and HUD when it has credible evidence of violations of Federal criminal law involving fraud, bribery, or gratuities or a violation of the civil False Claims Act that could potentially affect the Federal award at <https://www.hudoig.gov/hotline/report-fraud> (a subrecipient of CDBG-DR must also inform the CDBG-DR grantee that awarded it funding). All other instances of fraud, waste, and abuse should be referred to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: [hotline@hudoig.gov](mailto:hotline@hudoig.gov)). You must comply with 41 U.S.C. § 4712, which includes informing your employees in writing of their rights and remedies, in the predominant native language of the workforce. Under 41 U.S.C. § 4712,





employees of a government contractor, subcontractor, grantee, and subgrantee—as well as a personal services contractor—who make a protected disclosure about a Federal grant or contract cannot be discharged, demoted, or otherwise discriminated against as long as they reasonably believe the information they disclose is evidence of: 1. Gross mismanagement of a Federal contract or grant; 2. Waste of Federal funds; 3. Abuse of authority relating to a Federal contract or grant; 4. Substantial and specific danger to public health and safety; or 5. Violations of law, rule, or regulation related to a Federal contract or grant.

11. The Grantee may use up to five percent of its allocation under the Appropriations Act for program administrative costs related to the use of funds for this grant and program administrative costs of other CDBG-DR, CDBG-Mitigation (MIT), and CDBG-National Disaster Resilience (NDR) grants without regard to a particular disaster. The Grantee must track and document payments of program administrative costs so that HUD may distinguish which program administrative costs are charged to this Federal award (grant) and which program administrative costs were paid for by grant funds obligated under prior or future CDBG-DR, CDBG-MIT, and CDBG-NDR grants. The Grantee must comply with requirements published in the *Federal Register* or on HUD's website for the use of funds for administrative costs across multiple grants, including the requirements in section III.B.3.a. of the Universal Notice at 90 FR 1770, as may be modified from time to time, which requires (as of the date of this Agreement) that if the Grantee "chooses to exercise this authority, the grantee must (i) have appropriate financial controls to comply with the requirement that the amount of grant administration expenditures for each CDBG-DR or CDBG-MIT grant will not exceed five percent of the total grant award for each grant (plus five percent of program income generated by the grant); (ii) review and modify its financial management policies and procedures regarding the tracking and accounting of administration costs, as necessary; and (iii) address the adoption of this treatment of administrative costs in the applicable portions of its Financial Management and Grant Compliance submissions as referenced in sections II.A."
12. In accordance with the authority provided in the Appropriations Act, the first Agreement signed by HUD obligates funds that can be used for program administrative costs prior to the Secretary's certification of financial controls and procurement processes, and adequate procedures for proper grant management. The Grantee prepared an action plan describing its use of funds for program administrative costs, subject to the five percent cap on the use of grant funds for such costs. HUD approved the action plan that describes the Grantee's use of grant funds for program administrative costs. Unless and until this Agreement is amended to allow the use of grant funds for other eligible activities, the requirements in a. through c. apply:
  - a. The Grantee shall only use grant funds obligated by this Agreement for program administrative costs. This includes any funds used interchangeably under paragraph II.11 of this grant agreement.
  - b. The Grantee's use of grant funds must adhere to the criteria for eligibility and the amount to be budgeted for any program administrative cost activities described in its action plan.







- c. To access funds for program administrative costs, the Grantee must enter the activities from its approved action plan into the DRGR system if it has not previously done so and submitted its DRGR action plan to HUD (funds can be drawn from the line of credit only for activities that are established in the DRGR system).

To receive grant funds for activities other than administrative costs, the Grantee shall submit an Action Plan as required by the Allocation Announcement Notice at 90 FR 4762 (including the CDBG-DR Universal Notice). Once HUD approves the Action Plan, the use of all grant funds must be consistent with the Action Plan. After the date that HUD signs a separate agreement obligating grant funds that can be used for activities other than administrative costs, the action plan for administrative costs shall only be relevant to program administrative costs charged to the grant before the date of approval of the Action Plan.

The requirements a. and b. above continue to apply to program administrative costs charged to the grant before HUD signs a separate agreement that obligates grant funds that can be used for activities other than administrative costs.

### **III. Specific Conditions**

The following specific conditions correspond to the degree of risk assessed by HUD. These specific conditions may be adjusted post-award in accordance with paragraph II.6 of this grant agreement when merited by a re-evaluation of risk factors identified in 2 CFR 200.206 and 200.208. The specific conditions will be removed once the conditions that prompted them have been satisfied.

N/A

[rest of page intentionally left blank]



THE UNDERSIGNED, as authorized officials on behalf of the Grantee and the Secretary, hereby enter this **COMMUNITY DEVELOPMENT BLOCK GRANT DISASTER RECOVERY (CDBG-DR) GRANT AGREEMENT**, which shall be effective as of the date it is signed by the Secretary.

Hillsborough County

GRANTEE

BY:

Ken Hagan  
(Signature)

APPROVED AS TO FORM AND LEGAL SUFFICIENCY

Nancy Y. Takemori

Digitally signed by Nancy Y.  
Takemori  
Date: 2025.04.21 09:44:06 -04'00'

Nancy Takemori, Senior Assistant County Attorney

Ken Hagan

(Name)

Chair, Board of County Commissioners

(Title)

04/25/2025

(Date)

HOUSING AND URBAN DEVELOPMENT

BY:

(Signature)

(Name)

(Title)

(Date)



**Attachment 1****Grantee Indirect Cost Rate(s)**

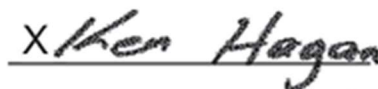
As the duly authorized representative of the Grantee, I certify that the Grantee:

- ☒ Will not use an indirect cost rate to calculate and charge indirect costs under the grant.
- ☐ Will calculate and charge indirect costs under the grant by applying a *de minimis* rate as provided by 2 CFR 200.414(f), as may be amended from time to time.
- ☐ Will calculate and charge indirect costs under the grant using the indirect cost rate(s) listed below, and each rate listed is included in an indirect cost rate proposal developed in accordance with the applicable appendix to 2 CFR part 200 and, *if required*, was approved by the cognizant agency for indirect costs.

Agency/department/major function	Indirect cost rate	Type of Direct Cost Base
	%	
	%	
	%	

**Name of Authorized Official:**

Ken Hagan

**Signature:****Date (mm/dd/yyyy):**

04/25/2025

**Title:**

Chair, Board of County Commissioners

**Name/Title:** Nancy Takemori, Senior Assistant County Attorney**Signature:**Nancy Y.  
TakemoriDigitally signed by Nancy Y.  
Takemori  
Date: 2025.04.21 09:44:38 -0400**Instructions for the Grantee's Authorized Representative:**

You must mark the one (and only one) checkbox above that best reflects how the Grantee's indirect costs will be calculated and charged under the grant. Do not include indirect cost rate information for subrecipients.

The table following the third box must be completed only if that box is checked. When listing a rate in the table, enter both the percentage amount (e.g., 10%) and the type of direct cost base to be used. For example, if the direct cost base used for calculating indirect costs is Modified Total Direct Costs, then enter "MTDC" in the "Type of Direct Cost Base" column.

If using the Simplified Allocation Method for indirect costs, enter the applicable indirect cost rate and type of direct cost base in the first row of the table.

If using the Multiple Allocation Base Method, enter each major function of the organization for which a rate was developed and will be used under the grant, the indirect cost rate applicable to that major function, and the type of direct cost base to which the rate will be applied.

If the Grantee is a government and more than one agency or department will carry out activities under the grant, enter each agency or department that will carry out activities under the grant, the indirect cost rate(s) for that agency or department, and the type of direct cost base to which each rate will be applied.

To learn more about the indirect cost requirements, see 2 CFR part 200, subpart E; and Appendix VII to Part 200 (for state and local governments).



## **Attachment 2**

Attachment 2 is the *Federal Register* notice, *Allocations for Community Development Block Grant Disaster Recovery and Implementation of the CDBG-DR Consolidated Waivers and Alternative Requirements Notice (UN AAN)*, which was published at 90 FR 4759 on January 16, 2025, referred to as the Allocation Announcement Notice in this Agreement. Additional or amended grant requirements published in the *Federal Register* or on HUD's website apply and are incorporated into this grant agreement even if this grant agreement (including this Attachment 2) is not updated.





### **Attachment 3**

Attachment 3 is the *Federal Register* notice, *Common Application, Waivers, and Alternative Requirements for Community Development Block Grant Disaster Recovery Grantees: The Universal Notice*, which was published at 90 FR 1754 on January 8, 2025, referred to as the Universal Notice in this Agreement. Additional or amended grant requirements published in the *Federal Register* or on HUD's website apply and are incorporated into this grant agreement even if this grant agreement (including this Attachment 3) is not updated.





## 2024 Community Development Block Grant Disaster Recovery (CDBG-DR) Grants Action Plan

## Hillsborough County Admin Action Plan

The purpose of the Program Administrative Costs (PACs) Action Plan for the 2024 Community Development Block Grant – Disaster Recovery (CDBG-DR) is to begin using funds for allowable administrative activities prior to the submission of the full program Action Plan at a later date. This will allow Hillsborough County as the administering agency to initiate planning activities, coordinate with eligible units of local government, procure, and utilize consulting assistance for the creation of the CDBG-DR Action Plan, and general administrative assistance for the program.

### I. General Information for Admin Action Plan Submission

<b>Grantee Name:</b>	Hillsborough County BOCC
<b>Date Plan Submitted:</b>	March 5, 2025
<b>Total Grant Amount:</b>	\$709,324,000
<b>Total Amount of PACs Budgeted:</b>	\$35,466,200
<b>Grantee Contact (Name):</b>	Cheryl Howell
<b>Grantee Contact (Email/Phone):</b>	813.274.6673 <a href="mailto:howellch@hcfi.gov">howellch@hcfi.gov</a>
<b>HUD Contact (Name):</b>	Sherry Copeland
<b>HUD Contact (Email/Phone):</b>	<a href="mailto:sherry.l.copeland@hud.gov">sherry.l.copeland@hud.gov</a>

### II. Proposed Allocation of Funds

**Instructions:**

The Disaster Relief Supplemental Appropriations Act 2025 (Public Law 118-158) approved on December 21, 2024, allocated \$709,324,000 of CDBG-DR funds to Hillsborough County. Up to 5% (\$35,466,200) of the total allocation may be used for the administration of the program. Administration costs are necessary to support expenses related to administrative activities and include Action Plan development, community engagement, overall grant management, compliance and monitoring, and other costs specified as eligible administrative expenses in 24 CFR 570.206. Under the PACs Action Plan Hillsborough County is proposing to receive access to the full 5% or \$35,466,200 for the following allowable administrative activities:



## 2024 Community Development Block Grant Disaster Recovery (CDBG-DR) Grants Action Plan

Program Administration Activity/Activities	Criteria for Eligibility (e.g., 24 CFR 570.206(a))	Budget/Allocation
Total (Amount up to 5% of grant total) <ul style="list-style-type: none"><li>• Staff time, administrative costs, and consulting fees associated with the development, oversight and management of the Action Plan and general CDBG-DR grant set-up including financial certifications, capacity assessment and implementation plan, including any indirect cost associated with the administering of funds.</li><li>• Staff time, administrative costs, and other expenses associated with the development of the request for proposal (RFP) documentation to procure qualified third-party vendors to assist with the development of the Action Plan and the administration of the grant program. Advertising and publication costs associated with the solicitation may be included.</li><li>• Staff time, administrative costs and other expenses associated with activities and services for Action Plan drafting, public engagement, and all associated technical assistance support.</li><li>• Staff time, administrative costs, and other expenses associated with the design, development, review and implementation of resilience, mitigation, and all eligible recovery programs and activities.</li></ul>		\$35,466,200

### III. Publication of the Admin Action Plan

**Instructions:**

Normally, a grantee must publish any proposed action plan and substantial amendments to the plan for public comment. However, because the Admin Action Plan will only include PAC's, and to allow for a more streamlined process and timely awarding of grants, no public comment period is required.



## 2024 Community Development Block Grant Disaster Recovery (CDBG-DR) Grants Action Plan

Grantees must publish the Admin Action Plan online when the plan is submitted to HUD. The manner of publication of the Admin Action Plan must include prominent posting on the Grantee's official Disaster Recovery website and includes any substantial amendments to the Admin Action Plan.

And su

Provide link to website with Admin Action Plan prominently posted and/or other evidence.

### IV. Standard Form 424 (SF-424)

**Instructions:**

When the grantee submits its Admin Action Plan or substantial amendment to the plan to HUD for approval, it must include the Standard Form 424 (SF-424).

Completed SF-424 attached	X
---------------------------	---

### V. Certifications

**Instructions:**

Each grantee receiving an allocation subject to the Universal Notice and choosing to submit an Admin Action Plan must complete the following certifications in Appendix A of the Universal Notice and submit them with the Admin Action Plan to HUD.

**Certification in Appendix A of the Universal Notice include the following:**

- a. **Compliance with Anti-discrimination Laws:** The grantee certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.
- b. **Affirmatively Further Fair Housing:** The grantee certifies that it will affirmatively further fair housing.
- c. **Anti-Lobbying:** The grantee certifies its compliance with restrictions on lobbying required by 24 CFR 87, together with disclosure forms, if required by part 87.
- d. **Authority of Grantee:** The grantee certifies that the Admin Action Plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- e. **Consistency with the Action Plan:** The grantee certifies that activities to be undertaken with CDBG-DR funds are consistent with its Admin Action Plan.





## 2024 Community Development Block Grant Disaster Recovery (CDBG-DR) Grants Action Plan

- f. **Citizen Participation:** The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in 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).
- g. **Use of Funds:** The grantee certifies that it is complying with each of the following criteria:
- (1) Purpose of the Funds. 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 Admin 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 grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) the 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).
- h. **Excessive Force:** The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, state grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing:
- (1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and



## 2024 Community Development Block Grant Disaster Recovery (CDBG-DR) Grants Action Plan

(2) A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

- i. **Grant Timeliness:** The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.
- j. **Environmental Requirements:** The grantee certifies that it will comply with environmental requirements at 24 CFR 55 (as applicable) and 24 CFR 58.
- k. **Compliance with Laws:** The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

Completed certifications attached	X
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*Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001, and 31 U.S.C. 3729.*

Ken Hagan March 13, 2025  
Signature of Certifying Official (Date)

Ken Hagan March 13, 2025  
Printed Name of Certifying Official (Date)





Application for Federal Assistance SF-424	
<b>*1. Type of Submission:</b> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	
<b>*2. Type of Application</b> <b>* If Revision, select appropriate letter(s):</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <b>* Other (Specify)</b> <input type="checkbox"/> Revision	
<b>*3. Date Received:</b> 01/21/2025 <b>4. Applicant Identifier:</b>	
<b>5a. Federal Entity Identifier:</b> <b>*5b. Federal Award Identifier:</b>	
<b>State Use Only:</b>	
<b>6. Date Received by State:</b> <b>7. State Application Identifier:</b>	
<b>8. APPLICANT INFORMATION:</b>	
<b>*a. Legal Name:</b> Hillsborough County	
<b>*b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 59-6000661 <b>*c. UEI:</b> PGWKT576NH472	
<b>d. Address:</b>	
<b>*Street 1:</b> 601 E. Kennedy Blvd <b>Street 2:</b> <b>*City:</b> Tampa <b>County/Parish:</b> <b>*State:</b> FL <b>*Province:</b> <b>*Country:</b> USA: United States <b>*Zip / Postal Code:</b> 33602-4932	
<b>e. Organizational Unit:</b>	
<b>Department Name:</b> Community Impact <b>Division Name:</b>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>	
<b>Prefix:</b> Ms. <b>*First Name:</b> Cheryl <b>Middle Name:</b> <b>*Last Name:</b> Howell <b>Suffix:</b>	
<b>Title:</b> Assistant County Administrator	
<b>Organizational Affiliation:</b>	
<b>*Telephone Number:</b> 813-274-6673 <b>Fax Number:</b>	
<b>*Email:</b> howellch@hcfi.gov	



**Application for Federal Assistance SF-424**

**\*9. Type of Applicant 1: Select Applicant Type:**

B: County Government

**Type of Applicant 2: Select Applicant Type:**

Pick an applicant type

**Type of Applicant 3: Select Applicant Type:**

Pick an applicant type

\*Other (Specify)

**\*10. Name of Federal Agency:**

Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.218

CFDA Title:

CDBG-DR

**\*12. Funding Opportunity Number:**

N/A

\*Title:

N/A

**13. Competition Identification Number:**

N/A

Title:

N/A

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

N/A

**\*15. Descriptive Title of Applicant's Project:**

Community Development Block Grant - Disaster Recovery (CDBG-DR) These CDBG-DR funds are for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the "most impacted and distressed" areas resulting from a qualifying major disaster that occurred in 2023 or 2024.

Attach supporting documents as specified in agency instructions.



<b>Application for Federal Assistance SF-424</b>	
<b>16. Congressional Districts Of:</b>	
*a. Applicant: SF-012	*b. Program/Project: SF-012
Attach an additional list of Program/Project Congressional Districts if needed.	
<b>17. Proposed Project:</b>	
*a. Start Date: 01/21/2025	*b. End Date: 01/21/2031
<b>18. Estimated Funding (\$):</b>	
*a. Federal	\$ 709,324,000
*b. Applicant	\$ 0
*c. State	\$ 0
*d. Local	\$ 0
*e. Other	\$ 0
*f. Program Income	\$ 0
*g. TOTAL	\$ 709,324,000
<b>*19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b>	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on _____ <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>*20. Is the Applicant Delinquent On Any Federal Debt?</b>	
Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
If "Yes", explain:	
<p>21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)</p> <p><input checked="" type="checkbox"/> ** I AGREE</p> <p>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</p>	
<b>Authorized Representative:</b>	
Prefix: Mr.	*First Name: Ken
Middle Name:	
*Last Name: Hagan	
Suffix:	
*Title: Chair, Board of County Commissioners	
*Telephone Number: 813-272-5720	Fax Number: 813-2727048
* Email: Hagank@hcf.gov	
*Signature of Authorized Representative: <i>Ken Hagan</i>	*Date Signed: 3/13/2025

Nancy Takemori, Senior Assistant County Attorney



## Appendix B - Citizen Participation Plan

Hillsborough County

# Citizen Participation Plan

Date	Changes
6/2/21	Original
8/14/21	To include Coronavirus Funds
5/10/24	Added Emergency State of Emergency Access to documents on the website of Affordable Housing.
10/8/24	Waivers for public review and comment period added.
2/20/25	<ol style="list-style-type: none"> <li>1. Modified existing plan to comply with all current Disaster recovery activities.</li> <li>2. Maintain a comprehensive website for CDBG AND CDBG-DR-DR. This site can be found at <a href="#">CDBG AND CDBG-DR DR Hillsborough</a></li> <li>3. Updated “Public Notice and Public comment Period” with additional information on efforts to notify citizens and stakeholders of Action Plan Amendments, public comment periods, and public hearings. Update “Public Comment” section for clarity and consistency with other Citizen Participation Plans. Updated “Accessibility” section by separating information into an LEP plan for individuals with Limited English Proficiency and individuals with disabilities. The LEP plan is bounded in as a part of the Citizen Participation Plan. Added information on efforts Hillsborough County makes to ensure meaningful access to LEP and disabled individuals in compliance with the requirements at 24 CFR 91.115.</li> <li>4. The County will create an online survey to engage citizens.</li> <li>5. The plan was updated to include the geographical area of the City of Tampa.</li> <li>6. The County will publish all meetings on this website</li> <li>7. The County will provide a list of Frequently Asked Questions on its website to offer insight to some of the most common questions.</li> <li>8. The County will provide written feedback to written responses, complaints, or inquiries within a 7 day period.</li> <li>9. This document will be updated as needed to incorporate changes based on information obtained from attending CDBG AND CDBG-DR-DR and program-related training workshops, seminars, webinars, and other resources, including changes in federal and state laws, rules, regulations and program policies and procedures. In addition, information obtained at the training sessions and an overview of the training sessions will be provided to all core staff supporting program operations. Updated guidelines specific to each program will also be posted on the CDBG AND CDBG-DR DR Hillsborough webpage.</li> </ol>





# Citizen Participation

## Introduction

Federal regulations require that Hillsborough County develop a system through which the community can participate in the planning, implementation, and evaluation of housing and community development programs. These regulations, which are found under 24 CFR § 91.105, provide opportunities for the general public, elected officials, and community stakeholders to actively plan and assess certain federally funded programs that have a direct impact on Hillsborough County's citizens.

The Citizen Participation Plan provides the County with vital guidance on development of the plans for Consolidated Plan, Action Plans, Substantial Amendments, and the Consolidated Annual Evaluation and Performance Report (CAPER). The County uses the Citizen Participation Plan on a regular basis throughout the year--it is a working document. Hillsborough County's Citizen Participation Plan was developed in accordance with federal regulations set forth in the Housing and Community Development Act of 1974, as amended, and Part 91 of Title 24 (Housing and Urban Development) of the Code of Federal Regulations (24 CFR 91), in particular §91.100 and §91.105 and 24 CFR 5.158.

The Citizen Participation Plan brings together the planning, application, reporting and citizen participation components for all HUD funded programs. This narrative will explain the Citizen Participation Plan and its applicability to the applicable programs and the ongoing role of citizen involvement. Hillsborough County Affordable Housing Services (AHS) is responsible for administering the Citizen Participation Plan.

## Purpose of the Citizen Participation Plan

Hillsborough County is required to adopt a Citizen Participation Plan that explains the County's policies and procedures for citizen participation in the Five-Year Consolidated Plan, any subsequent amendments, the Assessment of Fair Housing, the Action Plans, and the Consolidated Annual Performance and Evaluation Reports (CAPER). [24 CFR 91 §91.105(a)(1)]

Although the Citizen Participation Plan is a Federal requirement, Hillsborough County is equally committed to ensure that the citizens of the County, particularly persons who may be under-represented in the public process, as well as other interested parties and stakeholders, are provided opportunities to participate in the planning and preparation of the Consolidated Plan, subsequent amendments, the Assessment of Fair Housing, the Action Plans, and the CAPER. The main goal of this plan is to increase citizen participation, promote community partnerships, and receive input





from residents regarding the projects and activities funded through the CDBG AND CDBG-DR, HOME and ESG Programs as well as actions taken to affirmatively further fair housing.

In particular, citizen participation is encouraged from persons with low and moderate incomes, persons living in slum and blighted areas and in areas where CDBG AND CDBG-DR funds are proposed to be used, residents of predominantly low and moderate income neighborhoods, as well as persons with special needs, residents of public housing, persons who are homeless, members of minority groups, non-English speaking persons, and persons with disabilities. The County provides outreach to these residents by contacting groups and agencies that represent or serve these populations.

Hillsborough County will also consult with public and private agencies addressing economic issues, housing, infrastructure, health, social services, victim services, employment or education needs of low-income individuals and families as well as homeless individuals and homeless families and other individuals with special needs. Additionally, Hillsborough County shall consult with local and regional institutions, Continuums of Care, and other organizations in the process of developing and implementing the AFH and the Consolidated Plan. [24 CFR 91§91.100(a)(2)(ii)]

**Relevant Areas and Programs:** The Hillsborough County 2021-2025 Consolidated Plan and Assessment of Fair Housing covers the geographic area within the County limits of Hillsborough County, Florida. Specifically, the exact relevant geographic area includes the unincorporated County and the Cities of Temple Terrace, City of Tampa, and Plant City. The County is entitled to receive CDBG AND CDBG-DR, HOME and ESG program funding from HUD during the program years within the five year time period covered by the plan. Hillsborough County does not have officially designated areas of blight or Community Redevelopment Areas within its jurisdiction.

## Regular Public Hearings

The County will conduct at least two public hearings every year, as follows:

1. One public hearing will be associated with the development and review of the Consolidated Plan and the Annual Action Plans. The purpose will be to obtain citizen views on housing and community development issues, steps taken to affirmatively further fair housing, and to provide comments on proposed projects. [24 CFR 91 §91.105(e)(ii)]
2. The second public hearing will be held in association with the CAPER to obtain citizen views on program performance, as well as housing and community development issues.

**Applicability and Adoption:** This Citizen Participation plan sets forth the policies and procedures that Hillsborough County shall follow to encourage citizen participation in the above-mentioned federally funded programs and shall be used during the development and adoption of the County's Consolidated Plan, subsequent amendments, the Assessment of Fair Housing, the Action Plans, and CAPER. Hillsborough County shall follow this Citizen Participation Plan throughout all stages of the 2021-2025 Consolidated Planning process and for subsequent Assessments of Fair Housing. [24 CFR 91 §91.105(k)].



This Citizen Participation Plan was initially approved and adopted by the Hillsborough County Board of County Commissioners on August 14, 2021, but has been modified to include disaster recovery efforts, changes to reflect online survey, changes with Limited English Proficiency, dedicated website, and response times.

**HUD Regulations:** Hillsborough County's Citizen Participation Plan was developed in accordance with federal regulations as set forth in the Housing and Community Development Act of 1974, as amended, and Part 91 of Title 24 (Housing and Urban Development) of the Code of Federal Regulations (24 CFR 91), in particular §91.100 and §91.105 and 24 CFR 5.158.

## Consolidated Plan and Assessment of Fair Housing Process

The Development of the Consolidated Plan and the Assessment of Fair Housing and housing resiliency and mitigation requires the most citizen participation of any activity undertaken by AHS. Prior to adopting a Consolidated Plan or an Assessment of Fair Housing, Hillsborough County shall make available to citizens, public agencies, Continuums of Care and other interested parties information which includes the amount of assistance the County expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount of funding that will benefit persons of low and moderate income. The County shall also make available to the public, public agencies, and other interested parties at the start of its citizen participation process or as soon as possible thereafter, all data related to its Assessment of Fair Housing. The data will be made available on the AHS website by cross-referencing HUD data, maps, and other supplemental data to be used in the Assessment of Fair Housing. [24 CFR 91§91.105(b)(1)]

### Public Meeting During the Development of the Consolidated Plan and Assessment of Fair Housing

Before the Consolidated Plan and Assessment of Fair Housing is developed, public meetings shall be held to determine the priorities and needs of the community and to solicit public input regarding the housing and community development needs including priority non-housing Community development needs, as well as on fair housing issues in the region. The meetings may be held anywhere within the County but should be concentrated in areas that may receive benefit from the programs described in the Consolidated Plan and actions prescribed in the Assessment of Fair Housing, as well as in blighted or areas designated for revitalization.



## Reasonable and Timely Access

Hillsborough County shall provide its citizens with reasonable and timely access to all local and county-wide meetings regarding the Consolidated Plan and the Assessment of Fair Housing. [24 CFR 91.105(f)]

## Location and Accessibility

The locations of these meetings shall be accessible to persons with disabilities. Special accommodations shall be arranged upon request with two business days advance notice. In addition to assessing the likelihood of attendance of non-English speaking persons at each public meeting location by reviewing census demographic characteristics and providing translation services at meetings deemed likely to require such services, translation services shall also be provided upon request with two business days advance notice. [24 CFR 91 §91.105(a)(4)]

Meetings will be held, to the greatest extent possible, in the geographic areas of the County most likely to receive benefit from the programs described in the Consolidated Plan and/or the Assessment of Fair Housing. Although it is not possible to meet in every low income area in Hillsborough County, every effort will be made to hold meetings in the major regions of the County. The meetings will be held in convenient and accessible facilities. The time and location of the meetings will be published in the local newspaper(s) of county-wide circulation and will also be advertised on the County's website.

## Encouragement of Citizen Participation

All citizens of Hillsborough County are encouraged to participate in the development of the Consolidated Plan and the Assessment of Fair Housing. [24 CFR 91 §91.105(a)(2)(i)] It is the policy and past practice of Hillsborough County to identify and offer various opportunities for citizens to participate in the Consolidated Planning and Assessment of Fair Housing processes.

The County shall undertake whatever actions are appropriate to encourage the participation of all its citizens, particularly persons with low and moderate incomes, persons living in slum and blighted areas and in areas where CDBG AND CDBG-DR funds are proposed to be used, residents of predominantly low and moderate income neighborhoods, as well as persons with special needs, residents of public housing, persons who are homeless, members of minority groups, non-English speaking persons, and persons with disabilities by contacting groups and agencies that represent or serve these populations.

[24 CFR 91§91.105(a)(2)(i)] Note: For the purposes of this Citizen Participation Plan, the definition of residents of predominately low- and moderate-income neighborhoods are those residents of low- and moderate-income census tracts as identified within the current Consolidated Plan.



The County shall also encourage participation of local and regional institutions, Continuums of Care, and other organizations such as businesses, developers, nonprofit and philanthropic organizations, faith-based organizations and other community-based organizations in the process of developing and implementing the Assessment of Fair Housing and the Consolidated Plan.

[24 CFR 91 §91.105(a)(2)(ii)]

**Public Housing Residents:** Hillsborough County encourages, in conjunction with and in consultation with public housing authorities, the participation of residents of public and assisted housing developments, in the process of developing and implementing the Consolidated Plan and the Assessment of Fair Housing, along with other low-income residents of targeted revitalization areas in which developments are located. Hillsborough County shall make an effort to provide information to the local public housing authorities regarding fair housing and Consolidated Plan activities related to its developments and surrounding communities so that said housing authorities can make this information available at the annual public hearing required under their respective Comprehensive Grant programs. [24 CFR 91 §91.105(a)(2)(iii)]

**Jurisdiction Responsibility:** The requirements for citizen participation do not restrict the responsibility or authority of the County for the development and execution of its Consolidated Plan or its Assessment of Fair Housing. [24 CFR 91 §91.105(l)]

## Consultations with Other Agencies

### General

During development of the Consolidated Plan, the Assessment of Fair Housing and the Action Plans, Hillsborough County shall consult with public and private agencies that provide assisted housing, health services and social services, community-based and regionally based organizations that represent protected class members, and organizations that enforce fair housing laws. [24 CFR§91.100(a)(1)]

Consultation shall include individual and group meetings, and requests for data related to housing, health services, social services, children, HIV/AIDS, the elderly and persons with disabilities and their families, non-English speaking persons and homeless persons. [24 CFR 91.100(a)]

When preparing portions of the Consolidated Plan describing the County's homeless strategy and the resources available to address the needs of homeless persons, Hillsborough County will consult with the following individuals and agencies: the local Continuum of Care, public and private agencies that address housing, health, social services, victim services, employment, or education needs of homeless individuals and families, publicly funded institutions and systems of care that may discharge persons into homelessness and business or civic leaders. [24 CFR §91.100(a)(2)]





Hillsborough County shall consult also with adjacent municipalities and government agencies, including local government agencies with metropolitan-wide planning responsibilities where they exist, particularly for problems and solutions that extend beyond a single jurisdiction. [24 CFR 91 §91.100(a)(4)]

## Mailing List

Hillsborough County shall develop and maintain a “Notify Me” mailing list to communicate with interested parties regarding the Consolidated Plan, subsequent amendments, the Assessment of Fair Housing, the Action Plans, and the CAPER.

The Mailing List shall be maintained as an open list. Private citizens, as well as public and private agencies representing Hillsborough County citizens, shall be added to or removed from the mailing list upon request.

The Mailing List shall include but not be limited to representatives of the State of Florida agencies (as may be relevant to the planning process), Hillsborough County, City of Tampa, City of Temple Terrace, and the City of Plant City. The list shall also include members of the Hillsborough County Affordable Housing Advisory Board (AHAB), the Hillsborough County City-County Planning Commission, and the Public Housing Authorities within the County. Representatives from public housing resident councils, neighborhood associations representing low- and moderate-income neighborhoods, and public and private agencies that provide assisted housing, health services and social services (including those focusing on services to children, elderly people, people with disabilities, homeless people and people with HIV/AIDS and their families) shall also be included on the list.

Any person or entity may request to be added or removed from the “Notify Me” emailing list by calling 813- 612-5397. The Department will request an individual's name, title, company/agency name, address, phone, and email address.

## Public Housing

Hillsborough County staff shall consult with the Tampa Housing Authority and the Plant City Housing Authority (local public housing agencies participating in approved Comprehensive Grant programs) concerning public housing needs and planned Comprehensive Grant program activities to ensure that CDBG AND CDBG-DR activities are coordinated to help achieve comprehensive community development goals.

Additionally, in accordance with Assessment of Fair Housing requirements, Hillsborough County staff shall consult with the Tampa Housing Authority and the Plant City Housing Authority to solicit input on fair housing issues in the region, including the use of the Housing Choice Voucher program. [24CFR 91 §91.100(c)(1)]

This consultation will also help ensure that activities with regard to local drug elimination, neighborhood improvement programs, and resident programs and services, funded under the public



housing program and those funded under a program covered by the Consolidated Plan or actions prescribed to affirmatively further fair housing in the County's Assessment of Fair Housing, are fully coordinated to achieve comprehensive community development goals. [24CFR91 §91.100(c)(2)] Hillsborough County shall make every effort to cooperate in providing activities with regard to local drug elimination, neighborhood improvement programs, and resident programs and services.

## Continuum of Care

Hillsborough County shall consult with the local Continuum of Care to determine how to allocate its Emergency Solutions Grant (ESG) for eligible activities as well as to consult with the development of performance standards and outcomes for projects and activities assisted with ESG funds. Hillsborough County will also consult with the Continuum of Care to develop funding, policies and procedures for the operation and administration of the HMIS. [24 CFR§91.100(d)] Affirmatively Furthering Fair Housing.

Hillsborough County staff shall consult with community-based and regionally based organizations that represent protected class members, and organizations that enforce fair housing laws, including local fair housing enforcement agencies. The goal is for this consultation to inform the County's Assessment of Fair Housing, its certification to affirmatively further fair housing and inform the County's Consolidated Plan. [24 CFR 91§91.100(e)(1)]

The organizations consulted with shall have relevant knowledge or data to inform the Assessment of Fair Housing and represent an independent opinion for development of the Consolidated Plan, Assessment of Fair Housing and implementation of these plans. [24 CFR 91§91.100(e)(2)]

The organizations described above shall, at a minimum, be consulted with during the development of the County's Assessment of Fair Housing and its Consolidated Plan, but the County shall, at its discretion, consult with these organizations beyond the minimum as described in this paragraph. [24 CFR 91 §91.100(e)(3)]

## Priority Non-Housing Community Development Needs

Hillsborough County staff shall consult with adjacent municipalities, internal departments and government agencies concerning any non-housing needs identified during the development of the Five-Year Consolidated Plan and the Action Plans. Such adjacent municipalities and government agencies shall include but shall not be limited to the City of Tampa, City of Temple Terrace, and Plant City. [24CFR 91 §91.100 (a)(4)]

## Lead-Based Paint

Hillsborough County staff shall consult with local and State health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings, including health



department data on the addresses of housing units in which children have been identified as lead poisoned. [24 CFR 91 §91.100(a)(3)]

## **Public Review and Comment Period**

A public review and comment period of not less than 30 days shall be established for the receipt of comments from citizens on the proposed Consolidated Plan and the Assessment of Fair Housing. [24 CFR 91 §91.105(b)(4)]

## **Copies of Proposed Consolidated Plan and Assessment of Fair Housing**

Copies of the entire proposed Consolidated Plan and Assessment of Fair Housing shall be available on the internet, on the County's website, at libraries, government offices, public places and other locations throughout the County for examination by the general public. Upon request, the County shall also make free copies of the proposed Consolidated Plan and Assessment of Fair Housing available to citizens and groups. [24 CFR 91 §91.105(b)(2)] In the event of a Local State of Emergency, the proposed Consolidated Plan and Assessment of Fair Housing will be available on Affordable Housing Services webpage.

## **Publication of Proposed Consolidated Plan Summary and Assessment of Fair Housing Summary**

A summary of the proposed Consolidated Plan and Assessment of Fair Housing shall be published in the County's newspapers of general circulation. The published summary shall describe the contents and purpose of the Consolidated Plan and Assessment of Fair Housing and include locations where copies of the entire proposed Consolidated Plan/Assessment of Fair Housing may be examined by the public. [24 CFR 91 §91.105(b)(2)]

The summary shall encourage citizens, public agencies, and other interested parties to examine the contents of the proposed Consolidated Plan and Assessment of Fair Housing and to submit comments. If available, the summary or a notice announcing the availability of the proposed documents shall be published in a bi-lingual or multi-lingual newspaper to provide non- English-speaking persons the opportunity of notice.



## Public Hearing for Consolidated Plan and Assessment of Fair Housing

Hillsborough County shall hold at least one public hearing every Consolidated Program year to obtain citizens' views and to respond to proposals and questions regarding the Consolidated Plan, to review actions undertaken to affirmatively further fair housing consistent with the County's Assessment of Fair Housing, and activities set forth within the Consolidated Plan. The County may hold additional public hearings as needed. [24 CFR 91 §91.105(e)(1)(i)]

Hillsborough County shall also hold at least one public hearing before the finalization of its Assessment of Fair Housing. The purpose of this meeting is to obtain the views of the community on the proposed Assessment of Fair Housing, publish and make available data related to the assessment, and publicize proposed actions to affirmatively further fair housing. [24 CFR 91 §91.105(e)(1)(iii)]

## Notice of Public Hearing

Notice of public hearings for both the Consolidated Plan and the Assessment of Fair Housing shall be published at least 14 days in advance of the hearings in the County's newspapers of general circulation, the County website, and minority and non-English language newspapers, where available. Notice of the public hearing shall include the time, date, place and procedures of these hearings as well as topics to be considered. Said notices shall encourage all interested parties to participate and solicit their comments and input on the proposed Consolidated Plan and Assessment of Fair Housing. [24 CFR 91 §91.105(e)(2)]

Copies of the public hearing notices shall be posted at County government offices and public places throughout the County. Said notices shall also be forwarded to those persons and agencies on the Consolidated Plan Mailing List and other mailing lists developed to solicit input regarding fair housing issues in the region. [24 CFR 91 §91.105(e)(2)]

Reasonable efforts shall be made in the form of press releases and possibly flyers to inform residents of these public hearings including the time, date, place and procedures of these hearings as well as topics to be considered. [24 CFR 91 §91.105(e)(2)]

## Time and Location of Meetings

The public hearing shall be held at a time and location convenient to potential and actual beneficiaries. [24 CFR 91 §91.105(e)(3)] In the event of a Local State of Emergency, public hearings will be held virtually or in a hybrid (virtual and in person) format.



## Special Accommodations for Persons with Disabilities

Should the need present itself, Hillsborough County staff make special arrangements for the attendance of persons with disabilities who notify the County at least two business days prior to the meeting or Public Hearing and request special accommodation. [24 CFR 91 §91.105(e)(3)]

## Non-English-Speaking Persons

Should the need present itself, a qualified translator shall be made available at all County meetings where a significant number of non-English speaking persons or interest groups notify the staff at least two business days prior to the meeting or Public Hearing and request said translation services. [24 CFR 91 §91.105(e)(4)]

# Availability to the Public

The Consolidated Plan, consolidated plan substantial amendments, Assessment of Fair Housing, revisions to the AFH, and the CAPER shall be made available and accessible to the public. Public access includes the availability of materials in a form accessible to persons with disabilities, upon request. In addition, English Spanish bilingual staff shall be available to assist non-English speaking residents in assessing this information. [24 CFR 91 §91.105(g)]

Copies of the Consolidated Plan and Assessment of Fair Housing shall be made available for public inspection and review during regular business hours at the Hillsborough County AHS office located at 601 E. Kennedy Boulevard, Tampa, Florida 33602.

# Public Comments on the Proposed Consolidated Plan and Assessment of Fair Housing

In preparing the final Consolidated Plan and Assessment of Fair Housing, Hillsborough County shall consider any comments or views of citizens received in writing or orally at the public hearings. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons, therefore, shall be attached to the final Consolidated Plan and Assessment of Fair Housing. [24 CFR 91 §91.105(b)(5)]





# Amendment Process

## Substantial Amendment and Amendments to the Action Plan, the Consolidated Plan and Assessment of Fair Housing

### Substantial Amendment Process for Consolidated Plan and Action Plan

Hillsborough County shall consider the following changes to be Substantial Amendments to the Consolidated Plan and Action Plan subject to a citizen participation process, in accordance with this Citizen Participation Plan: [24 CFR 91 §91.105(c) (1) and §91.505(b)]. A substantial change is defined as:

1. A change in the use of any CPD program funding from one eligible activity to another. [24 CFR 91§91.105(c)(1)]
2. When any change exceeds 15 percent of the annual grant awarded to the County.
3. A change in the project location beyond a five mile radius of the original project location.
4. Changes to Priority Need Levels as identified in the Strategic Plan Priority Needs Summary Table.
5. An administrative decision to reallocate all funds allocated to an eligible activity in the Action Plan or other eligible activities or equal or lesser priority need level, unless the decision is a result of any of the following:
  - A. A federal government reduction of appropriated funds, or appropriations are so much less than anticipated that the County makes an administrative decision not to fund one or more activities.
  - B. The governor declares a state of emergency in the County and the County reallocates federal funds to address the emergency.
  - C. A unique affordable housing opportunity arises where the County administration asks that Federal grants be used to take advantage of the opportunity with the prior approval of HUD.

Changes in the use of CPD Program funds that do not meet the definition of a substantial change as defined above will be added to subsequent Substantial Amendments for the purpose of memorialization.

All other changes will be considered revisions (non-substantial) and will be accomplished administratively by HCAHS.

In order to streamline local citizen participation processes during a federal or state disaster, the Participating Jurisdiction will make disaster response and recovery a priority in its current Consolidated Plan and Action Plans. In addition, it will ensure that these plans are aligned with this Citizen Participation Plan. In this way Hillsborough County will be able to charge pre-award costs under 24 CFR 570.200(h), 24 CFR 92.212 and 2 CFR 200.458 for the response and recovery activities not covered in an approved action plan [CPD-17-06].



## Criteria for Determining Revision Requirements to the Assessment of Fair Housing

Hillsborough County shall consider the following criteria when determining the need for revisions to its Assessment of Fair Housing: [24 CFR 91 §91.105(c)(ii)]

1. A material change in circumstances in the County that affects the information on which the Assessment of Fair Housing is based. [24 CFR §5.164]
2. A written notice from HUD specifying a material change that requires a revision.

## Availability of the Substantial Amendment and Revision to the Assessment of Fair Housing – Public Notice

A notice advertising the availability of the proposed Substantial Amendment or Assessment of Fair Housing Revisions shall be published in the County's newspapers of general circulation and on the County's website, and shall establish a 30-day public review and comment period [24CFR 91 §91.105(c)(2)]

See below for greater detail, and the alternate conditions occurring during the Coronavirus Aid, Relief and Economic Security Act (CARES Act) (Public Law 116-136) related waiver for public comment period.

The notice shall encourage all interested parties to participate and solicit their comments and input on the proposed Substantial Amendment and Revisions to the Assessment of Fair Housing. The notice shall also include locations where copies of the entire proposed Substantial Amendment or Revisions to the Assessment of Fair Housing may be examined by the public. Upon request, the County shall also make free copies of the proposed Substantial Amendment and Revisions to the Assessment of Fair Housing available to citizens and groups.

## Publication of Substantial Amendment Summary

A summary of the proposed Substantial Amendment and Assessment of Fair Housing Revisions shall be published in the County's newspapers of general circulation and on the County's website. The published summary shall describe the contents and purpose of the Substantial Amendment and Assessment of Fair Housing Revisions and include locations where copies of the entire proposed Substantial Amendment and Assessment of Fair Housing Revisions may be examined by the public.

The summary shall encourage citizens, public agencies, and other interested parties to examine the contents of the proposed Substantial Amendment and Assessment of Fair Housing Revisions and to submit comments. If available, the summary or a notice announcing the availability of the proposed Substantial Amendment and Assessment of Fair Housing Revisions shall be published in a bi-lingual or multi-lingual newspaper to provide non-English speaking persons the opportunity of notice.



## Public Review and Comment Period

A public review and comment period of not less than 30 days shall be established for the receipt of comments from citizens and all interested parties on the proposed Substantial Amendment to the Annual Action and Consolidated Plan and Assessment of Fair Housing Revisions. [24CFR 91 §91.105(c)(2)]

## Publication and Public Hearing Notice for the Substantial Amendment

Hillsborough County shall conduct a public hearing to consider the proposed Substantial Amendment and Assessment of Fair Housing Revisions. This hearing shall follow the public review and comment period, noted above. Notice of this public hearing shall be published at least 14 days in advance of the hearing. If available, the notice shall be published in a bi-lingual or multi-lingual newspaper to afford non-English speaking persons the opportunity of notice.

Notice of these public hearings shall include the time, date, place and procedures of these hearings as well as topics to be considered. Said notice shall encourage all interested parties to participate and solicit their comments and input on the proposed Substantial Amendment and Assessment of Fair Housing Revisions.

## Availability to the Public

The Substantial Amendment and Assessment of Fair Housing Revisions shall be made available and accessible to the public. Public access includes the availability of materials in a form accessible to persons with disabilities, upon request. In addition, English Spanish bilingual staff shall be available to assist non- English-speaking residents in accessing this information.

The Substantial Amendment and Assessment of Fair Housing Revisions shall be made available for public inspection and review during regular business hours at Hillsborough County AHS office located at 601 E. Kennedy Boulevard, Tampa, Florida 33602. In the event of a Local State of Emergency, the proposed Substantial Amendment and Assessment of Fair Housing Revisions shall be available on Affordable Housing Services webpage.

## Public Comments on the Substantial Amendment and Assessment of Fair Housing Revisions

Hillsborough County shall consider any comments or views of citizens received in writing, electronically, or orally at the public hearings, in preparing the final Substantial Amendment and



Assessment of Fair Housing Revisions. Questions (including requests to review supporting documentation) or written comments regarding the proposed Amendment and Revision shall be directed to Hillsborough County AHS. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons, therefore, shall be attached to the Substantial Amendment and the Assessment of Fair Housing Revisions. [24CFR 91 §91.105(c) (3)]

## Changes in Federal Funding Level

A change in federal funding levels after the expiration of the Consolidated Plan's draft comment period and the resulting effect on the distribution of funds shall not be considered an Amendment or a Substantial Amendment.

# Action Plan Process

Each year, Hillsborough County shall reassess the housing and community development needs in order to review and develop proposed activities for the upcoming program year through an Action Plan.

## Consultations with Other Agencies and the Public

### General

During development of the Action Plans, Hillsborough County shall consult with citizens, public and private agencies that provide assisted housing, health services and social services, as may be required.

Consultation shall include individual and group meetings, as needed, and requests for data related to housing, health services, social services, children, HIV/AIDS, the elderly and person with disabilities and their families, and homeless persons.

Hillsborough County shall consult, as needed, with adjacent municipalities and government agencies, including local government agencies with metropolitan-wide planning responsibilities where they exist, particularly for problems and solutions that extend beyond a single jurisdiction.



# Availability of the Action Plan, and Environmental Reviews of Activities Listed in the Action Plan – Public Notice

A notice advertising the availability of the Action Plan shall be published in the County's newspapers of general circulation and the County's website and shall establish a 30 public review and comment period (see below). The Notice shall encourage all interested parties to participate and solicit their comments and input on the Action Plan. The notice shall also include locations where copies of the entire proposed Action Plan may be examined by the public. Upon request, the County shall also make free copies of the proposed Action Plan available to citizens and groups.

Environmental Reviews, conducted for activities listed in the Action Plan, will be made available for public review by the following means: Floodplain Notices following the 8 Step process will be published in the local newspaper specifying comment procedures. Notice of Request for Release of Funds and Finding of No Significant Impact (FONSI) will be posted at the County library located near the project area, at the project location by way of free standing or existing signage, and at the office of grant recipient, if feasible; posting will provide scope of work and comment procedure.

Notice of Environmental Reviews will also be made available on Affordable Housing Services (AHS) website and a hard copy will be available at the AHS Departmental office.

## Availability to the Public

The Action Plan shall be made available and accessible to the public. Public access includes the availability of materials in a form accessible to persons with disabilities, upon request. In addition, English Spanish bilingual staff shall be available to assist non-English speaking residents in accessing this information.

The Action Plan shall be made available for public inspection and review on the County's website and can be found during regular business hours at Hillsborough County AHS office located at 601 E. Kennedy Boulevard, Tampa, Florida 33602.

## Public Review and Comment Period

A public review and comment period of not less than 30 days shall be established for the receipt of comments from citizens and all interested parties on the proposed Action Plan.





## Publication and Public Hearing for the Action Plan

Hillsborough County shall conduct a public hearing to consider the proposed Action Plan. This hearing shall follow the public review and comment period noted above. Notice of this public hearing shall be published at least 14 days in advance of the hearing. If available, the notice shall be published in a bi-lingual or multi-lingual newspaper to afford non-English speaking persons the opportunity of notice.

## Public Comments on the Proposed Action Plan

Hillsborough County shall consider any comments or views of citizens received in writing or orally at the public hearing, in preparing the final Action Plan. A summary of these comments or views, and responses shall be attached to the final Action Plan.

# Consolidated Annual Performance Evaluation Report (CAPER) Process

Each year, Hillsborough County shall review and report, in a form prescribed by HUD, on the progress it has made in carrying out its Strategic Plan and Action Plan. This Consolidated Annual Performance and Evaluation Report (CAPER) must include a description of the resources made available, the investment of available resources, the geographic distribution and location of investments, the families and persons assisted (including the racial and ethnic status of persons assisted), actions taken to affirmatively further fair housing, and other actions indicated in the Strategic Plan and the Action Plan.

This CAPER report shall be submitted to HUD within 90 days after the close of the County's program year. [24CFR 91 §91.520(a)]

## Availability of the CAPER – Public Notice

A notice advertising the availability of the CAPER shall be published in the County's newspapers of general circulation, and the county's website, and shall establish a 15-day public review and comment period (see below). The Notice shall encourage all interested parties to participate and solicit their comments and input on the CAPER. The notice shall also include locations where copies of the entire proposed CAPER may be examined by the public. Upon request, the County shall also make free copies of the proposed CAPER available to citizens and groups. [24CFR 91§91.105(d)(1)].



In the event of a Local State of Emergency, the proposed CAPER shall be posted to the Affordable Housing Services webpage.

## Public Review and Comment Period

A public review and comment period of not less than 15 days shall be established for the receipt of comments from citizens and all interested parties on the proposed CAPER. [24CFR 1§91.105(d)(1)]

## Public Hearing

At least one public hearing will be held to facilitate public comment on the CAPER.

## Public Comments on the Proposed CAPER

Hillsborough County shall consider any comments or views of citizens received in writing in preparing the annual CAPER. A summary of these comments or views shall be attached to the annual CAPER. [24CFR 91 §91.105(d)(2)]

## Availability to the Public

The CAPER shall be made available and accessible to the public. Public access includes the availability of materials in a form accessible to persons with disabilities, upon request. In addition, English Spanish bilingual staff shall be available to assist non-English speaking residents in accessing this information. [24CFR 91 §91.105(g)].

The CAPER shall be made available for public inspection and review during regular business hours at Hillsborough County AHS office located at 601 E. Kennedy Boulevard, Tampa, Florida 33602.

# Access to Records and Information

Hillsborough County shall provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to this Citizen Participation Plan, the Consolidated Plan, the AFH, and the County's use of assistance under all programs covered by the Consolidated Plan during the preceding five years. The public shall be provided with reasonable access to housing assistance records, subject to all local, state and Federal laws regarding privacy and obligations of confidentiality, during the public comment periods. [24CFR 91 §91.105(h)]



Citizens, public and private agencies, and other interested parties, including those most affected, shall have the opportunity to receive information, review and submit comments on any proposed submission concerning the amount of funds available, including the estimated amount proposed to benefit low, very low- and moderate-income level residents.

The Consolidated Plan, any amendment thereto, the AFH, revisions to the AFH, the Action Plans and the CAPER shall be made available for public inspection and review during regular business hours at Hillsborough County AHS office located at 601 E. Kennedy Boulevard, Tampa, Florida, 33602. In the event of a Local State of Emergency, the Proposed Consolidated Plan, any amendment thereto, the AFH, revisions to the AFH, the Action Plans and the CAPER shall be made available on the Affordable Housing Services webpage.

## Technical Assistance and Application for Funds Process

Many organizations seek funding from CDBG AND CDBG-DR, HOME and ESG programs through AHS. Hillsborough County shall continue its policy of providing planning and technical assistance, prior to the release of a request for a proposal (RFP), to groups representing persons of low and moderate income such as lower income neighborhoods and neighborhood organizations, including resource deprived organizations, in developing proposals for funding assistance under any of the programs or actions covered by the Consolidated Plan and Assessment of Fair Housing. Hillsborough County staff shall provide technical assistance, to the greatest extent feasible, to all applicants or potential applicants and their constituents, provision of funds. [24CFR 91 §91.105(i)]

Such technical assistance shall include helping individuals or groups understand the program requirements, determination of eligible/ineligible activities and providing suggestions on structuring new programs. Technical assistance may include the authorization of studies and formal research to identify and develop fund matching opportunities to make the most of existing funding. Assistance with completion of grant request applications and grant writing assistance in preparing proposals for the CDBG AND CDBG-DR.

Technical assistance is available by contacting:

Hillsborough County Affordable Housing Services  
(813) 612-5397



# Comments and Complaints Process

## Comments

Hillsborough County shall consider any comments or views of citizens received in writing, or orally at public hearings, in preparing the final Consolidated Plan, an amended Consolidated Plan, AFH, AFH revisions, the Action Plan or the CAPER.

## Complaints and Grievance

Hillsborough County shall provide a timely, substantive written response to all written complaints received concerning the Consolidated Plan, any amendment thereto, the AFH, AFH revisions, the Action Plan, or the CAPER within 15 working days, where practicable. [24CFR 91§91.105(j)]

Comments or complaints regarding the Consolidated Plan process, an amended Consolidated Plan, the AFH, AFH revisions, the Action Plan or the CAPER must include:

1. A description of the objection with supporting facts and data
2. Name, address, telephone number and the date of the complaint

To facilitate a timely response, comments or complaints should be addressed and directed as follows:

Consolidated Plan – Commentary  
Department of Affordable Housing Services Hillsborough County  
601 E. Kennedy Boulevard Tampa, Florida 33602

## Complaint Review and Appeals Process

If unsatisfied with the County's response, a Complainant may request that a review of their complaint be conducted by the Complaint Review Committee.

The County shall set up a four-member Complaint Review Committee consisting of:

1. A staff member from the Department of Affordable Housing Services.
2. A member appointed by the Hillsborough County Administrator.
3. A member of the Board of County Commissioners – Affordable Housing Advisory Board (AHAB).
4. A member of the Hillsborough County Equal Opportunity Office.

After deliberations, the Complaint Review Committee shall submit a report upon its review of the complaint to the Complainant and the Director of AHS for resolution. Said report may include a validation of research and related data, a recommendation for funding during a current or future funding cycle, or a recommendation for non-funding and the reasons, therefore.



If still unsatisfied with the Department of AHS' complaint resolution process, the Complainant may further appeal to the Hillsborough County Administrator at 601 E. Kennedy Blvd., Tampa, Florida 33602 or to the U. S. Department of Housing and Urban Development – CPD, Jacksonville Field Office, Charles Bennett Federal Building, 400 West Bay Street, Suite 1015, Jacksonville, FL 32202-4410.

## Comments and Availability of Citizen Participation Plan

Hillsborough County shall provide citizens with a reasonable opportunity to comment on this Citizen Participation Plan and on any substantial amendments thereto. This Citizen Participation Plan and any amendments thereto, shall be public documents and available to any member of the public. This Citizen Participation Plan shall be made available in a format accessible to persons with disabilities and non- English-speaking persons, upon request. [24CFR 91 §91.105(a)(3)]

To solicit review and input on the proposed Citizen Participation Plan, prior to its adoption, Hillsborough County shall distribute the proposed Citizen Participation Plan, or any proposed subsequent amendments thereto, to various social service providers and groups that represent or serve persons with low and moderate incomes, persons living in slum and blighted areas and in areas where CDBG AND CDBG-DR funds are proposed to be used, persons with special needs, residents of public housing, persons who are homeless, members of minority groups, non- English speaking persons, and persons with disabilities. This review process may occur as part of the public comment period for the Consolidated Plan and the Assessment of Fair Housing.

Copies of this Citizen Participation Plan shall be kept on file at the offices of Hillsborough County AHS located at 601 E. Kennedy Boulevard, Tampa, Florida 33602, and shall be made available for public inspection and review during regular business hours. An electronic version will be made available on the official website.

Hillsborough County is a recipient of a Community Development Block Grant-Disaster Recovery (CDBG-DR) funds to support long-term recovery efforts following Hurricanes that occurred in 2023 or 2024. The Disaster Relief Supplemental Appropriations Act, 2025 (Public Law 118-158) approved on December 21, 2024, makes available an allocation of CDBG-DR funds for applicable jurisdictions.

## Hillsborough County Citizen Participation Plan

Updated February 2025, Page 22 requirements for CDBG-DR is the adoption of citizen participation standards to ensure all citizens of Hillsborough County are provided an opportunity to participate in the planning, implementation, and assessment of the CDBG-DR recovery program. This portion of the County's Citizen Participation Plan governs participation requirements specifically implemented for the County's CDBG-DR program. Unless otherwise specified, other components of the Citizen Participation Plan (e.g., provision of technical assistance; complaint and grievance procedures, etc.) apply to the CDBG-DR program as well as the County's Consolidated Plan programs.





#### A. CDBG-DR Action Planning Process

Hillsborough County is required to complete and submit an action plan detailing how the County will use all available CDBG-DR funding to support unmet needs. The CDBG-DR Action Plan lays out program details for each area of assistance along with projected timelines, performance metrics, and an expenditure schedule. As further described within this component of the Citizen Participation Plan, the CDBG-DR Action Plan will be made accessible to persons with disabilities and those with Limited English Proficiency (LEP). Before adopting the CDBG-DR Action Plan, the County will consult with a specified group of stakeholders and seek public input on CDBG-DR activities. The draft CDBG-DR Action Plan will be presented to the community for feedback through a public hearing, a public comment period, and other methods as described in this CPP.

#### B. Stakeholder Consultation

- Hillsborough County will consult via meeting, telephone, or email, with the following entities during the preparation of the CDBG-DR Action Plan:
  - Affected municipalities within the County;
  - Indian Tribes and any state offices with an interest in projects being carried out with CDBG-DR funds;
  - Non-governmental organizations
  - Public Housing Authorities;
  - Local government and non-profit organizations that administer programs and projects funded through HUD (e.g., Continuum of Care, CDBG, HOME, ESG, etc.);
  - Organizations that advocate on behalf of members of protected classes, vulnerable populations, and limited-resource communities impacted by the disaster, and State and local emergency management agencies have primary responsibility for the administration of FEMA funds.

To the extent possible, Hillsborough County will also solicit input from residents of the affected areas. Such input can be collected by various means, which might include the following: community meetings, a public survey, comments cards, etc. Consultations will include a brief overview of CDBG-DR funding and planning processes and will attempt to gather input from stakeholders regarding key issues of local importance that may impact the County's planning and funding allocations for CDBG-DR funds.

#### C. Draft CDBG-DR Action Plan and Public Comments

Before the CDBG-DR Action Plan is considered for approval by the Board of County Commissioners and prior to submission to HUD, Hillsborough County will ensure that citizens, public agencies, and other interested parties are provided with a reasonable opportunity to examine the contents of the draft CDBG-DR Action Plan and to submit comments during the public comment period. The duration of this public comment period must not be less than thirty days. Hillsborough County will take reasonable actions to ensure that affected citizens, especially those who are members of protected classes, vulnerable populations, and individuals from limited-resource communities, are notified of CDBG-DR public hearings and public comment periods. Reasonable actions include, but may not be limited to the following:



- A public notice in a newspaper(s) of general circulation;
- Email distribution;
- Press releases;
- Statements by public officials;
- Media advertisements;
- Public service announcements; and/or
- Contacts with neighborhood organizations.

The County's CDBG-DR website will be used as the primary source of information related to CDBG-DR, public hearings, and public comment periods. A full copy of the proposed CDBG-DR Action Plan will be posted to the County's CDBG-DR website and physical copies will be made available for review at the Hillsborough County Public Library, and at the offices of the Hillsborough County Affordable Housing Services open to the public. Upon request, the County will also make a reasonable number of copies of the CDBG-DR Action Plan available to citizens and groups that request it, including copies to persons who are homebound. Locations and addresses of locations where the plan will be available are as follows:

*[Hillsborough County CDBG-DR Website](#)*

*[CDBG-DR DR Hillsborough](#)*

Hillsborough County Affordable Housing Services 601 E. Kennedy Blvd., Tampa, FL 33602

Hillsborough County Community Impact 601 E. Kennedy Blvd., Tampa, FL 33602 Hillsborough County Libraries

Any updates or changes made to the CDBG-DR Action Plan in response to public comments, to include oral and written comments, will be clearly identified in the CDBG-DR Action Plan. A summary of comments on the plan, and the County's response to each comment addressing the substance of the comment, must be included in the final version of the CDBG-DR Action Plan that is uploaded in DRGR.

*D. CDBG-DR Public Hearings*

Hillsborough County will hold at least three public hearing and a minimum of three community outreach meetings to gather input regarding the CDBG-DR Action Plan. The CDBG-DR public hearings must be held after the County's proposed CDBG-DR Action Plan has been published on its website for public comment and before submittal of the CDBG-DR Action Plan to HUD. If the County

chooses to hold multiple CDBG-DR public hearings, they will be convened in different locations within Hillsborough County to ensure maximum accessibility for impacted citizens and affected local governments. Hearings will be held at times and locations convenient to potential and actual beneficiaries. All efforts will be made to accommodate participation for those who with disabilities and/or LEP with appropriate auxiliary aids and services offered to ensure effective communication.



Limited English Proficient (LEP) Persons: Hillsborough County will make a translator available at public hearings where LEP persons or interest groups contact County staff at least two (2) business days prior to the public hearing and request appropriate translation services.

- Accommodations for Persons with Disabilities: Hillsborough County staff will make accommodations for the attendance of persons with disabilities who notify the County at least two(2) business days prior to the public meeting, and identify the accommodations needed, hearing, visual, or other. Arrangements for these services can be made by contacting the respective Department conducting the public meeting, and in the case of Community Impact's public meetings at 813 -675-3260.
- Other Accessibility Accommodations: Requests for additional accommodations should be made no less than two days prior to the public meeting. Upon receipt of the request, the County will make an effort to provide the following services: an interpreter and audio equipment for the hearing impaired; a reader to review printed materials with the sight impaired; and a foreign language interpreter for non-English speaking residents.
- Arrangements for language assistance and translation services can also be made in advance by contacting the respective Division conducting the public meeting, and in the case of Community Impact's Department public meetings at 813.675.3260.
- The County may hold CDBG-DR public hearings in-person or virtually. In-person public hearings will be held in facilities that are physically accessible to persons with disabilities. If held virtually, the public hearing format must allow questions in real time, with answers from County staff and/or representatives provided to all hearing attendees. In public hearings, the County will provide the opportunity for citizens to submit comments orally or in writing. The County treats written and oral comments equally and incorporates both in the response document submitted to HUD with the CDBG-DR Action Plan and any substantial amendments. Materials presented at the CDBG-DR public hearings will be made available on the County's CDBG-DR website in the form of meeting minutes.
- A recording of public hearings may be made available upon an advance request by sending an email to [HillsboroughCDBG-DR@HCFL.Gov](mailto:HillsboroughCDBG-DR@HCFL.Gov). Questions received and answers provided will be made available on the CDBG-DR website within a reasonable timeframe following the conclusion of the public hearings.

Below is the list of all CDBG-DR Public Comment Hearings:

*District 1 – Cohen*

Pierce Middle School - 5511 N. Hesperides St. Tampa 33614– June 4th, 2025, 6pm -8pm

*District 2 – Hagan*

Maureen B. Gauzza Library – 1121 Countryway Blvd Tampa 33626 - June 12th, 2025, 6pm-8pm

*District 3 – Myers*

Emanuel P. Johnson– 5855 S. 78<sup>th</sup> St. Tampa 33619 - June 10th, 2025, 6pm-8pm.

*District 4 – Miller*

Southshore Regional Library – 15816 Beth Shields Wy. Ruskin 33573 – June 13, 2025, 6pm-8pm



**The Public Comment period ends on July 7<sup>th</sup>, 2025.**

**E. Comprehensive CDBG-DR Website**

Hillsborough County maintains a dedicated CDBG-DR content area within the County's existing public website, which may be found at [CDBG DR](#). This CDBG-DR website permits individuals and entities awaiting disaster recovery assistance, and the general public, to see how all CDBG-DR funds are being used and administered. At a minimum, the website provides residents, affected local governments, and other interested parties the opportunity to review the following documents:

- CDBG-DR Action Plan created using the DRGR system;
- Any amendments to the CDBG-DR Action Plan;
- Citizen Participation Plan;
- Procurement policies and procedures;
- Vital documents that are critical for ensuring meaningful access by beneficiaries or potential beneficiaries generally and LEP persons specifically;
- All executed contracts, including subrecipient contracts, that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.1, are not required to be posted to the County's website;
- Summary description and the procurement status of all services or goods being procured by Hillsborough County and its subrecipients using CDBG-DR funds;
- and within three days of submission to HUD, a version of the performance report that omits personally identifiable information.

At all times, the County's CDBG-DR website will be navigable by all interested parties from Hillsborough County's homepage and the County's homepage will link to the CDBG-DR website. The CDBG-DR website will be updated at least quarterly.

**F. Amendments to the CDBG-DR Action Plan**

As programs and activities develop over time, Hillsborough County will amend its CDBG-DR Action Plan as often as necessary to best address our long-term recovery needs and goals. An amendment may not be triggered if the program or activity is consistent with the descriptions provided in the CDBG-DR Plan. All amendments, substantial or non-substantial amendments, will be noted in the Action Plan by an Amendment chart in the document and will be posted to Hillsborough County's CDBG-DR website.

A substantial amendment to the CDBG-DR Action Plan is defined as one of the following occurrences:

- A change in program benefit or eligibility criteria;
- The addition or deletion of an activity;
- A proposed reduction in the overall benefit requirement; or
- The allocation or re-allocation of more than 25 percent of the total allocation from HUD.



A non-substantial amendment or amendment to the CDBG-DR Action Plan is defined as follows:

- Technical corrections or clarifications;
- Budgetary changes that do not meet the monetary threshold for substantial amendments to the Action Plan.

Substantial amendments are subject to the citizen participation process and all citizen participation elements specified in this CPP for the original CDBG-DR Action Plan must be followed for a substantial amendment except for stakeholder consultation and public hearings. Therefore, a public notice of the proposed substantial amendment will be issued and will allow for a thirty (30)- day public comment period. Notice of the amendments will be posted on the Hillsborough County CDBG-DR website and communicated through other means as described under the “Draft CDBG-DR Action Plan and Public Comments” heading above. Comments or views received orally or in writing will be considered in preparing the substantial amendment. A summary of the comments or views and Hillsborough County’s responses will be included with the Final substantial amendment to the CDBG-DR Action Plan submitted in the DRGR system. For amendments considered to be non-substantial, the County will notify HUD but public comment is not required. Every amendment, substantial or not, will be numbered sequentially, and the amendment chart will be posted on the CDG-DR website.

#### G. Anti-Displacement and Relocation

In implementing its Consolidated Plan and CDBG-DR activities, Hillsborough County will make every effort possible to avoid or minimize the effects of displacement of persons affected by any CDBG, HOME, ESG, and CDBG-DR funded activities. If an involuntary displacement should occur, the County will provide housing referral assistance and, if required, make relocation payments in accordance with local, state and federal law within the required timeframe.

#### H. Access to Documents, Records, And Information

Hillsborough County will provide citizens, public agencies or other interested parties, with a reasonable opportunity to comment on any of the consolidated planning documents produced by the Division, to include the Consolidated Plan, any amendments thereto, annual Action Plans, CAPERs, Citizen Participation Plan, and CDBG-DR Action Plan. These documents will be made available and accessible to the public, including various social service providers and groups that represent or serve persons with low and moderate-incomes, persons living in slum and blighted areas and in areas where CDBG funds are proposed to be used, persons with special needs, residents of public housing, persons who are homeless, members of minority groups, LEP persons, and persons with disabilities.

As provided in the text of this CPP and in the County’s Language Access Plan, Hillsborough County is committed to taking reasonable steps to provide language assistance to ensure meaningful access to participation by non-English-speaking residents of the County. English-





Spanish bilingual Division staff will be available to assist non-English speaking residents in accessing documents, records and other program information associated with Consolidated Plan programs and/or CDBG- DR.

The documents will also be made available for public inspection and review during regular business hours at the Hillsborough County Community Impact, located at 601 E. Kennedy Blvd., Tampa, FL and on the Hillsborough County's CDBG DR referrals made, and the final disposition. This record will be included with the final document submitted to HUD. Comments and/or complaints should be submitted to Hillsborough County Community Impact which administers federal funding from HUD for the CDBG, HOME, and ESG programs, or other programs that may be administered on behalf of HUD from time to time as deemed necessary.

The applicable public comment periods for each of the documents and ways to provide comments to the Department staff will be advertised in the Tampa Bay Times or other newspaper of general circulation.

Hillsborough County will consider any comments or views of citizens received orally or in writing. A summary of these comments or views will be attached to the applicable document and submitted to HUD.

It should be noted that comments that are not related to the documents being reviewed, or comments that contain derogatory and prejudicial language, might not be included in the final documents. However, those comments will be made available to HUD and to the public, upon request.

#### I. Additional Public Participation Tools

In addition to the strategies proposed in this document, Hillsborough County will continue implementing other outreach tools to improve citizen participation. Concerning Public Notices, documents submitted for review may be summarized in the form of flyers or brochures and placed in public libraries and/or community centers in low-income areas for easy accessibility; these summaries will also be published on the County's website. Public Notices may be provided in languages other than English and Spanish, upon request. Furthermore, advertisement will also be done through Spanish radio channels, when necessary, to reach larger audiences and improve access to information for LEP populations. Email announcements will be shared with agencies and community leaders when documents become available for public review.

Hillsborough County will continue consultations with other local governments and jurisdictions in the region to discuss issues of regional importance, such as affordable housing and homelessness. In an effort to reach out to various groups within the County and to ensure these public participation tools are put into place, Hillsborough County staff will host topic-oriented stakeholder sessions and continue to participate in local housing and community events. To reduce language barriers and allow for better communication, staff who are Spanish speaking, or who speak other languages, such as Haitian Creole, may be available to assist the public upon request. Hillsborough County is committed to ensuring that all people, including those who



speak a language other than English, have full and equal access to the County's programs and services.

As of the date of this plan. Finally, some of the Community Impact staff are fluent in Spanish often attends meetings of local Hispanic groups and make appearances at the radio and TV shows, as well as social media outlets catering to Spanish-speaking residents of Hillsborough County, to provide information about the programs and activities administered by the County, as well as the consolidated planning process.

#### J. Complaints and Grievance Procedures

Hillsborough County will provide a substantive written response to all complaints received in writing or orally at public hearings, if any, related to projects or activities proposed or implemented by the Consolidated Plan, the Annual Action Plan, any amendment to these plans, the CAPER, or the CDBG-DR Action Plan. Responses will be provided via email within fifteen (15) working days, where practicable. A record of complaints received will include the nature of the complaint, Comments and/or complaints should be submitted in writing, by mail, or fax to:

Wesley Hughes, Office of Community Impact,  
23rd Floor 601 E. Kennedy Blvd. Phone: 813.675.3260  
Fax: 813-301-7250 c/o OCI Staff

Complaints regarding fraud, waste, or abuse of government funds should be forwarded to the HUD Office of Inspector General Fraud Hotline (phone: 1-800-347-3735 or email: [hotline@hudoig.gov](mailto:hotline@hudoig.gov)).

To maintain accountability for the use of public funds, the Hillsborough County has established the County Audit Office (County Audit) to review allegations of fraud, waste, and abuse of County property and resources. Hillsborough County's citizens or County employees may contact the County Audit Division's Fraud Hotline in instances where fraud, waste, or abuse of County assets or resources are suspected. Individuals are not required to provide their name. Hillsborough County Fraud Hotline: (813) 635-8316.

Hillsborough County provides funding or assistance to all subrecipients and program beneficiaries following applicable federal, state and local regulations, in addition to the guidelines governing each program. All subrecipients and program beneficiaries must meet the established eligibility criteria to access funds or benefits. Subrecipients or individuals who are denied funds or benefits will be notified in writing and will be provided technical assistance upon request. When there is evidence or suspicion of fraud by a subrecipient or a program beneficiary, the Division sends a letter to the subrecipient or program beneficiary explaining the reason for the termination of a contract or denial of benefits. A subrecipient or a program beneficiary that has been terminated or denied benefits due to fraud, will not be allowed to participate in the Community Impact's Department federal, state or local funded programs.



Program beneficiaries are entitled to request an informal termination hearing to dispute the alleged fraud. A decision to reinstate the client or withhold the termination of benefits is made by a committee or a designated hearing officer. Additionally, Hillsborough County has Consumer Protection Office under the Veteran's Service Department to assist residents who are victims of fraudulent or unfair business practices. A Consumer Protection Investigator is available to assist residents subject to fraudulent transactions by contractors.

The Contact information for the Consumer Protection Office is:

Hillsborough County Consumer Protection 3602 US-301, Tampa, FL 33619

Email: [consumers@hcfl.gov](mailto:consumers@hcfl.gov) Phone: (813) 635-8316

#### K. Citizen Participation Plan Contact

For more information about Hillsborough County's citizen participation efforts regarding Hillsborough County's Action Planning process for CDBG-DR, please contact us at 813.675.3260 or [HillsboroughCDBG-DR@HCFL.GOV](mailto:HillsboroughCDBG-DR@HCFL.GOV)



## Appendix C - Public Comments

### Public Comments Draft Action Plan

Hillsborough County public comment period on the draft action plan for the Community Development Block Grant – Disaster Recovery (CDBG-DR) took place from June 4, 2025 and closed on July 7, 2025. A total of 256 comments were received during this time.

Comments could be submitted using the following formats:

- Using an online form at the webpage, <https://hcflgov-stage.netlify.app/residents/stay-safe/storm-recovery-resources/disaster-recovery-grant>
- Emailing [HillsboroughCDBG-DR@HCFL.GOV](mailto:HillsboroughCDBG-DR@HCFL.GOV)
- Attending the public hearing and providing comments either in writing or orally
- Mailing a letter to: Office of Community Impact, CDBG-DR Program 23rd Floor, 601 E. Kennedy Blvd. Tampa, FL 33602

The table below provides a summary of the comments received and the County's response:



Topic	# of Comments	Summary of Comments Received	County Response
Flooding & Drainage Infrastructure	174	<p>Community members overwhelmingly cited inadequate and outdated drainage systems as a primary cause of repeated flooding in residential neighborhoods. During public comments, residents described how even moderate rainfall events often result in standing water, property damage, and hazardous conditions due to the failure of local drainage systems to effectively manage stormwater. Concerns included clogged ditches, broken or undersized culverts, neglected canals, and stormwater runoff from overdevelopment. Many comments called for comprehensive infrastructure upgrades, routine maintenance, and improved coordination among agencies to address flood-prone areas before future storms. Many residents noted that increased impervious surface coverage from new construction such as parking lots, roads, and housing developments has significantly worsened flooding in older neighborhoods that were not originally designed to accommodate such levels of runoff. Residents stressed that without substantial and proactive investment in stormwater infrastructure, these issues will continue to threaten homes, displace families, and strain local emergency resources.</p>	<p>The widespread flooding from recent storms underscores the urgent need for a coordinated, well-funded, and forward-looking recovery strategy. Table 40 (page 75) outlines proposed activities and funding distribution to address unmet needs. Additional details on drainage and infrastructure improvements can be found under mitigation measures (page 87), which may include resilient materials, flood-resistant designs, and other risk-reduction features tailored to each project.</p>





Topic	# of Comments	Summary of Comments Received	County Response
Affordable Housing & Housing Rehab	82	Significant emphasis was placed on prioritizing the allocation of funds toward affordable housing initiatives that integrate renewable energy, energy efficiency measures, and sustainable development principles. Comments highlighted an urgent need for both repairs to existing homes damaged by storms and new affordable housing. Speakers advocated for roof and electrical repairs, disaster-resilient building materials, and protections against displacement, especially for seniors, veterans, and low-income households. Community members and advocates emphasized that many households—particularly those occupied by seniors, veterans, and low-income families—remain in unsafe or uninhabitable conditions due to deteriorating roofs, outdated or hazardous electrical systems, and general disrepair.	Hillsborough County’s Housing program (Section 6.4, page 58) is intended to repair, rehabilitate and replace single-family and multifamily homes that meet specific eligibility criteria, including income limits, storm-related damage, primary residence status, and other requirements. Each housing program is described in detail, with overarching components that apply to all programs. These will be outlined in the final operating policies and procedures that guide daily operations. Program activities are summarized in Table 31: Housing Activities Allocation Chart on page 59.
Community Engagement & Equity	63	Participants expressed frustration over a lack of community involvement in recovery planning and urged more inclusive, transparent engagement strategies. Several emphasized the importance of prioritizing underserved neighborhoods, BIPOC communities, and those historically left out of government decision-making processes. Comments called for equity in funding, program access, and representation. Equity emerged as a central theme across public input, with participants calling for fair and targeted distribution of recovery funds, improved access to programs and services, and diverse representation in decision-making bodies. There was a clear demand that recovery efforts not only address immediate needs but also work to correct systemic disparities that have contributed to unequal vulnerability and access over time.	To support a full recovery, Hillsborough County is taking a comprehensive approach that focuses on ensuring citizen participation in the development of Hillsborough County’s Action Plan which includes housing, mitigation, and long-term resilience in the most affected areas. This effort includes community, citizen and stakeholder engagement, interagency coordination, and strategic investments to build a stronger, more disaster-ready county (page 90). Individual programs will outline how mitigation and resilience efforts will be prioritized, define program eligibility, identify eligible partners to assist the County, and detail the statutory and regulatory criteria for each program’s activities. Throughout this process Hillsborough County will encourage citizen participation through its citizen participation plan (page 115).



Topic	# of Comments	Summary of Comments Received	County Response
Energy Efficiency & Climate Resilience	43	<p>Many commenters expressed strong support for the integration of solar energy, battery storage systems, and sustainable building materials in both residential housing and community infrastructure. The installation of solar panels on homes, community centers, and other critical facilities was highlighted as a key strategy for enhancing energy resilience, particularly in the face of power outages caused by hurricanes and other extreme weather events.</p> <p>Solar panels for homes and community centers were emphasized as essential for grid resilience, lower utility costs, and reduced dependence on fossil fuels, particularly during outages caused by hurricanes.</p>	Resiliently Designed Environments (Mitigation Needs Assessment, page 49 promotes countywide consistency in adopting higher design standards, assessing higher-risk hazard thresholds, and educating residents and businesses on the impacts of climate variability. Hillsborough County's housing activities as outlined in the plan anticipate compliance with HUD's green building standards.
Emergency Response & Immediate Needs	55	<p>Speakers shared frustrations with delayed or absent disaster response and unmet basic needs following recent storms highlighting widespread unmet needs across impacted communities. Requests included generators, temporary housing support, faster response times, and more clarity on FEMA eligibility. A recurring theme was the need for clearer communication around eligibility for federal assistance, particularly FEMA programs. Residents reported confusion about the application process, documentation requirements, and the status of their claims, which often delayed or entirely blocked access to critical resources. There were widespread calls for the County and its partners to offer more accessible guidance and direct assistance in navigating recovery programs. Several comments emphasized support for those without insurance or denied claims, especially seniors and medically vulnerable residents.</p>	Hillsborough County acknowledges concerns regarding emergency response, recovery delays, and challenges navigating FEMA and other assistance programs. The County is committed to working with federal and state partners to improve communication and outreach around disaster recovery resources, including eligibility requirements and application processes. The Action Plan prioritizes investments in public services and planning activities that support long-term recovery and resilience (see Section 6.7, page 85, and Table 47, page 86). These investments may help address some of the barriers residents have faced by enhancing local capacity to deliver recovery information, coordinate available resources, and strengthen preparedness efforts for future events.



Topic	# of Comments	Summary of Comments Received	County Response
Government Accountability & Transparency	59	<p>A significant number of commenters questioned how CDBG-DR funds are being allocated and monitored. Concerns included lack of clarity around spending, perceived favoritism toward developers, limited access to detailed plans, and skepticism about consultant fees. Residents urged the County to publish progress reports, commit to transparency, and ensure funds directly benefit the public. Overall, the community emphasized the necessity of ensuring that CDBG-DR funds are managed responsibly and equitably, with a clear commitment that these resources directly support disaster recovery efforts and tangible improvements for residents, particularly those most impacted by recent crises.</p>	<p>Hillsborough County established the County Audit Office to ensure accountability in the use of public funds by investigating fraud, waste, and abuse of County resources. Citizens and employees can report suspected misuse anonymously through the County Audit Division's Fraud Hotline at (813) 635-8316.</p> <p>The Section 9.2 Citizen and Stakeholder Engagement (Page 90) plan was developed with stakeholder input, public comment, and open communication. Transparency will continue through the expanded CDBG-DR program website and dashboard, including applicant tracking and updates. Citizen engagement will be maintained via email, media, social media, public announcements, and collaboration with community organizations. To promote transparency, the County will record all complaints, responses, and resolutions. It may also conduct regular evaluations of the complaint process to ensure it meets community needs and complies with HUD's Citizen Participation Requirements.</p>



Topic	# of Comments	Summary of Comments Received	County Response
Disaster Preparedness & Resilience Hubs	36	<p>Residents emphasized the critical importance of proactive, community-level investments in disaster preparedness to build resilience ahead of future storms and emergencies. Rather than relying solely on reactive responses, speakers advocated for strategic planning and infrastructure improvements that would enable neighborhoods particularly the most vulnerable to better withstand and recover from disasters.</p> <p>A range of suggestions were offered to strengthen local preparedness efforts. These included the establishment of both mobile and permanent resilience hubs that could serve as central points for coordination, communication, shelter, and resource distribution during and after emergencies. Participants also recommended the pre-positioning of essential equipment and supplies such as generators, in high-risk areas to ensure timely access when disasters strike.</p> <p>A strong emphasis was placed on integrating renewable energy solutions into emergency infrastructure. Speakers proposed the installation of backup systems to maintain critical services during power outages. These systems were viewed as essential for enhancing the self-sufficiency and reliability of disaster response operations.</p> <p>Senior communities, as well as neighborhoods with elevated storm vulnerability due to geography, housing conditions, or socioeconomic factors, were repeatedly identified as priorities for targeted support. Residents urged that these areas receive tailored preparedness resources and services both before and after disasters recognizing that limited mobility, health concerns, and income constraints can significantly impact residents' ability to respond and recover without assistance.</p> <p>Overall, the public called for a shift toward long-term resilience planning, with equity, accessibility, and sustainability at the core of all preparedness initiatives.</p>	<p>Severe flooding from recent storms highlights the need for a coordinated, well-funded recovery plan focused on long-term resilience. Key priorities include building stronger housing, upgrading drainage and flood-resistant infrastructure, and enhancing disaster preparedness. The Hillsborough County LMS aims to maintain an ongoing process that assesses risks, develops mitigation strategies, and promotes community-wide readiness. Mitigation Needs Assessment (Page 49) The Public Services Program aims to strengthen community resilience and economic stability by offering new or expanded public services that support housing permanency and improve disaster preparedness and recovery. Table 47- Public Services (Page 86)</p> <p>The County is dedicated to a comprehensive recovery strategy that integrates housing, mitigation, and long-term resilience in heavily impacted areas. This approach emphasizes community engagement, agency coordination, and targeted investments to strengthen future disaster preparedness.</p>



Topic	# of Comments	Summary of Comments Received	County Response
Infrastructure Repairs & Public Safety	37	<p>Comments called attention to deteriorating infrastructure such as sidewalks, roadways, power systems, and unsafe vegetation. Specific concerns included broken sidewalks, overgrown trees blocking signage, failing electrical grids in mobile home communities, and delayed repair timelines. Residents requested more timely and visible County maintenance efforts.</p> <p>Many also voiced frustration with delays in repair and maintenance timelines, emphasizing that prolonged inaction exacerbates risks to public safety and quality of life. In response, community members called for more proactive, timely, and visible maintenance efforts by the County to address these issues promptly and prevent further deterioration</p>	<p>Hillsborough County’s Action Plan provides for the both investment in critical infrastructure and public services. Infrastructure and mitigation investments described in the Action Plan (Section 6.5, page 74) will be used to assess opportunities for improving critical infrastructure, including stormwater capacity and reducing flood risks.</p> <p>Public service activities are vital after a hurricane, supporting communities through immediate relief and long-term recovery. Early efforts focus on emergency services—firefighters, police, and medical teams—who ensure public safety, provide care, and assist with rescues. During the recovery stage, public service activities focus on essential tasks such as infrastructure repair, and immediate housing assistance. These efforts help stabilize affected communities and lay the groundwork for long-term recovery. Section 4.2.9 Public Service (Page 48)</p>





Topic	# of Comments	Summary of Comments Received	County Response
Workforce Development & Economic Revitalization	25	<p>Speakers strongly advocated for the strategic use of disaster recovery funds to generate good-paying, sustainable local employment opportunities, emphasizing the importance of workforce development as a critical component of community resilience. Many urged the prioritization of union apprenticeships and comprehensive training programs designed to equip residents with marketable skills in construction and related trades. These programs were seen not only to facilitate immediate rebuilding efforts but also as pathways to long-term career advancement and economic stability for workers.</p> <p>A key recommendation involved prioritizing employment opportunities for Tampa-area residents, particularly those from historically marginalized communities, including BIPOC (Black, Indigenous, and People of Color) contractors and workers. Participants highlighted that disaster recovery efforts present a unique opportunity to address systemic employment disparities by actively supporting minority-owned businesses and ensuring equitable access to contracting and labor positions. Speakers also emphasized the importance of linking recovery initiatives with emerging sectors such as green construction and renewable energy. By incorporating specialized training in energy-efficient building practices, solar panel installation, and sustainable materials, workforce development programs could not only support immediate reconstruction needs but also position local workers at the forefront of the growing clean energy economy. This approach was viewed as a forward-looking strategy that would contribute to environmental sustainability while creating durable economic benefits.</p> <p>Overall, there was a clear call for recovery funding to be leveraged in ways that strengthen the local labor market, promote inclusive economic growth, and empower communities most impacted by</p>	<p>Workforce Development investments in Hillsborough County are strategically allocated across several targeted programs, including initiatives categorized under Public Services. A central component of these investments is the Training Program, which is specifically designed to support low-to-moderate income (LMI) individuals. The program's primary goal is to enhance economic mobility by providing participants with opportunities to upskill and reskill, preparing them for meaningful employment in sectors that are both high-demand and essential to the county's long-term resilience.</p> <p>The Training Program places a particular emphasis on industries that are critical to disaster recovery and economic stability, such as general construction, skilled trades, logistics, and other essential sectors. By aligning training opportunities with these priority areas, the county is ensuring that its workforce is equipped to respond to future emergencies while also addressing persistent gaps in the labor market. These program details are further outlined in Table 43 – Workforce Development (Page 79. Importantly, the County also recognizes the valuable role of local non-profit organizations in advancing community-based economic development. Opportunities will be made available for these organizations to participate in the implementation of workforce and economic revitalization initiatives, particularly those that support LMI populations and promote growth. Their involvement is expected to</p>



Workforce Development & Economic Revitalization		<p>recent disasters. Such investments were described as essential to fostering resilient neighborhoods and ensuring that the benefits of rebuilding efforts are broadly shared.</p>	<p>enhance program outreach, provide culturally relevant services, and ensure that investments are responsive to community-specific needs. In the Economic Revitalization category, Hillsborough County is dedicating a large portion of its investment to Business Infrastructure, signaling a strong commitment to building a resilient economic foundation. This includes site development, broadband access, and other infrastructure enhancements that foster business growth and recovery. The county's prioritization and justification for these investments are outlined in Table 41, page 78, which addresses unmet needs, and Table 42, which presents an overview of Economic Revitalization strategies (Page 78. Together, these efforts demonstrate Hillsborough County's comprehensive and inclusive approach to recovery—investing in people, strengthening systems, and empowering local organizations to play a direct role in shaping a more resilient and vibrant economic future.</p>
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Topic	# of Comments	Summary of Comments Received	County Response
Consumer Protection & Fraud Prevention	8	Speakers voiced concerns about out-of-state contractors exploiting disaster victims, especially regarding roof repairs. They urged the County to take proactive measures to protect residents from fraud and exploitation. Recommendations included the promotion of vetted, trusted local contractors and the development of a publicly accessible directory of certified service providers. Several speakers emphasized the importance of reinvesting recovery funds in the local economy by prioritizing small and minority-owned businesses with established ties to the community.	Program beneficiaries can request an informal termination hearing to challenge alleged fraud, with decisions made by a committee or hearing officer. Hillsborough County also offers support through its Consumer Protection Office, part of the Veteran's Service Department, which assists residents facing fraudulent or unfair business practices. A Consumer Protection Investigator helps those affected by contractor fraud. The office can be contacted at 3602 US-301, Tampa, FL 33619, by email at <a href="mailto:consumers@hcfl.gov">consumers@hcfl.gov</a> , or by phone at (813) 635-8316. (Page 143). Individuals are not required to provide their name.
Grant Access & Application Process	20	Community members expressed interest in understanding how to access available grant funding, including questions about eligibility, timelines, application processes, and how to stay informed. One comment requested access to planning documents that informed the proposed budget, while another asked when they could submit their action plan.	<p>Hillsborough County appreciates the community's interest in learning more about accessing CDBG-DR funding, including eligibility criteria, application timelines, and program processes. Program eligibility requirements and application details will be finalized in the program's policies and procedures and made available before funding opportunities open.</p> <p>Planning documents and program descriptions are included throughout the Action Plan (for example, Section 6.0 Allocation and Award Caps, page 57, and Table 27 on page 56). Additional information and updates will be published on the County's CDBG-DR program webpage, and announcements will be shared through email, public notices, and community partners to keep residents informed.</p>



Topic	# of Comments	Summary of Comments Received	County Response
FEMA & Recovery Program Gaps	18	Speakers expressed frustration with being denied assistance from FEMA or county-administered mitigation programs, despite ongoing damage to their homes following hurricanes. They questioned whether CDBG-DR funds would be more accessible and helpful than prior programs.	<p>Hillsborough County acknowledges the challenges faced by residents who were denied assistance through FEMA or other mitigation programs, despite ongoing recovery needs. CDBG-DR funds are intended to address unmet needs after other sources of assistance have been exhausted. Program eligibility criteria will be detailed in the final policies and procedures prior to implementation, with the goal of making funding as accessible and evenly distributed as possible for eligible applicants.</p> <p>Additional information on program activities and funding priorities is provided in Section 6.0 Allocation and Award Caps (page 57) and throughout the housing and infrastructure program descriptions in Sections 6.4 and 6.5. The County will continue to coordinate closely with FEMA and other partners to ensure that residents are aware of all available resources and can navigate recovery programs effectively.</p>



Topic	# of Comments	Summary of Comments Received	County Response
Emotional Hardship & Access Barriers	19	Speakers conveyed emotional fatigue and discouragement after struggling to secure assistance to repair their home. They noted the difficulty of navigating aid systems and emphasized the human toll of prolonged disaster recovery.	Hillsborough County recognizes the emotional hardship and frustration experienced by residents navigating disaster recovery systems. The County is committed to supporting a long-term recovery process that is evenly distributed and community centered. Public Services activities described in Section 6.7 (page 85) and summarized in Table 47 (page 86) aim to stabilize households and support community resilience, including services that can help residents access recovery resources. Additionally, Hillsborough County will continue to engage with community partners to improve outreach and coordination efforts to better assist residents throughout the recovery process.
Nonprofit Eligibility Questions	6	Multiple representatives from nonprofit organizations inquired about eligibility to apply for CDBG-DR funding. Questions included whether nonprofit developers and small community-based 501(c)(3) organizations are eligible, and whether funding will be accessible to grassroots efforts. These comments highlight a need for clearer guidance on nonprofit eligibility and application processes.	The County will encourage participation from local and regional institutions, Continuums of Care, businesses, developers, nonprofits, faith-based groups, and other community organizations in developing and implementing the Assessment of Fair Housing and the Consolidated Plan. (page 119)
Innovative Construction & Resilience Technologies	11	Speakers advocated for the use of innovative, cost-effective construction techniques to support disaster recovery and affordable housing efforts. Suggestions included 3D-printed homes, panelized modular construction, and fire-resistant building materials. These approaches were framed as practical, scalable solutions to both housing shortages and long-term resilience challenges. Commenters emphasized that Hillsborough County should explore and invest in these technologies as part of its CDBG-DR strategy.	All construction will meet local building codes and HUD green building standards. Housing program funds cannot be used for forced mortgage payoffs, compensation payments, or rebuilding homes in designated floodways. (Page 61)



Topic	# of Comments	Summary of Comments Received	County Response
Insurance Affordability	6	Residents expressed deep concern over the growing unaffordability of homeowners' insurance following recent hurricanes. Some noted that deductibles had doubled or tripled, while others reported losing coverage entirely. These trends were described as major barriers to recovery and financial stability, particularly for fixed-income households—highlighting the need for CDBG-DR planning to account for underinsurance and insurance gaps in vulnerable communities.	Nearly 8,500 low-to-moderate income (LMI) individuals affected by water damage lacked flood insurance. In response, government agencies focused on restoring essential services, while community organizations and volunteers assisted residents with insurance claims and accessing initial financial aid. (Page 48)
Regency Cove	3	Senior community of over 400 residents facing severe power outages and damage, requesting grant funding for a \$4.6 million electrical system overhaul.	The Action Plan includes investments in housing rehabilitation and critical infrastructure repairs supporting housing (Sections 6.4, Page 58 and Table 37, Page 72) to improve disaster resilience and support recovery for residents, subject to program eligibility requirements and funding priorities. Electrical system upgrades may be considered if they address unmet needs resulting from storm-related damage and support household safety and habitability standards. Additional details will be provided in program guidelines before applications open.
Twin Branches Acres	2	Residents described historic flooding from upstream runoff worsened by new development, calling for regional water management studies and drainage updates.	The Action Plan addresses stormwater and drainage system improvements through infrastructure and mitigation investments described in Section 6.5.1 (page 74) and the Mitigation Needs Assessment (Section 5.0, page 49). Regional coordination with water management partners will be essential to address upstream runoff and drainage needs, and these efforts will be evaluated as part of project prioritization during program implementation.





Topic	# of Comments	Summary of Comments Received	County Response
Progress Village	7	Residents described repeated flooding, damage to older uninsured homes, and called for immediate relief, plus investment in economic revitalization. Asked for roadway and infrastructure evaluation and improvement, potentially a complete drainage system replacement along Progress Boulevard.	The Action Plan supports both infrastructure and economic revitalization activities (Section 6.5, page 74 and Section 6.6, page 78) to help address flooding impacts, roadway conditions, and overall neighborhood resilience. Mitigation projects will prioritize areas with severe and repeated storm damage, subject to funding eligibility and prioritization criteria, with details outlined in final program policies and procedures.
Sugar Creek/ Buffalo Estates	4	The Civic Association raised concerns about stormwater management and proposed partnerships to drain excess water into the Tampa Bay Bypass Canal.	Infrastructure and mitigation investments described in the Action Plan (Section 6.5, page 74) will be used to assess opportunities for improving stormwater capacity and reducing flood risks, including partnerships with other agencies to advance larger-scale drainage projects. Program eligibility and funding guidelines will be finalized before project selection begins.
Forest Hills Neighborhood	2	Residents described aging stormwater systems, pump failures, and the need for modernized flood control infrastructure.	Infrastructure repairs and flood control upgrades are included in the Action Plan (Section 6.5, page 77) to support neighborhoods with aging systems and repetitive stormwater impacts. Funding priorities will consider community risk, infrastructure condition, and the severity of unmet needs to guide future investment decisions during implementation.



Topic	# of Comments	Summary of Comments Received	County Response
Curiosity Creek	2	Reports of blocked or poorly maintained drainage, failing pumps, and calls for investments in waterway maintenance to prevent flooding.	The Action Plan's infrastructure and mitigation activities (Section 6.5, page 76 and Section 7.0 page 88), aim to improve drainage, maintain waterway systems, and address failing pump infrastructure in impacted neighborhoods. Additional coordination with local partners will help identify projects that strengthen long-term flood resilience and support safer living environments.
Bay Crest Park	53	<p>A number of residents from Baycrest submitted comments describing chronic and worsening flooding throughout the neighborhood. Many reported that even moderate rainfall overwhelms the current stormwater infrastructure, leading to yard and street flooding, pooling near homes, and in some cases, water intrusion into living spaces. Residents cited clogged ditches, collapsed or inadequate pipes, and the lack of a cohesive drainage system as persistent issues. Several expressed frustration over long-standing inaction by the County, noting that these problems have existed for decades without meaningful resolution. There were also reports of mold, cracked foundations, and rising insurance costs as secondary impacts of the flooding.</p> <p>Commenters requested a full drainage study and infrastructure redesign for the Baycrest area, not just patchwork maintenance. Many emphasized the need for regular ditch clearing, replacement of failing pipes, and improved coordination between agencies. Some requested that the County prioritize Baycrest for CDBG-DR infrastructure investments, warning that the neighborhood remains extremely vulnerable to future storms without intervention. There was also concern about being overlooked due to the community's location or demographics, with residents urging equity in disaster funding decisions.</p>	<p>The Action Plan outlines investments in stormwater and drainage upgrades under infrastructure and mitigation programs (Section 6.5, page 76 and Section 7.0 page 88), including potential replacement of aging systems and removal of barriers that prevent proper water flow. The Mitigation Needs Assessment (Section 5.0, page 49) further emphasizes the importance of addressing repetitive loss areas through improved capacity, resilience-focused design, and coordination with local partners.</p> <p>CDBG-DR infrastructure funds may support high-priority projects in flood-impacted neighborhoods like Bay Crest, subject to eligibility criteria and risk assessments. Final program guidelines will outline how areas with extensive damage, increased vulnerability, or systemic drainage issues—such as those described in Bay Crest—may be considered for drainage studies, system redesign, and capital improvements. The County remains committed to funding distribution that prioritizes limited-resource communities and neighborhoods with long-standing infrastructure gaps.</p>



Topic	# of Comments	Summary of Comments Received	County Response
Dana Shores	1	A commenter from Dana Shores noted that their neighborhood has experienced increased vulnerability to stormwater intrusion in recent years, particularly due to development and changing drainage patterns in nearby areas. The resident expressed concern that while Dana Shores sits adjacent to other flood-prone areas, it may be excluded from major infrastructure planning or drainage upgrades. They requested that the County include Dana Shores in any regional stormwater assessments or mitigation planning and ensure that upstream development does not worsen conditions for downstream residential neighborhoods.	<p>The Action Plan recognizes that changing development patterns and upstream runoff can intensify flooding in adjacent neighborhoods like Dana Shores. Infrastructure and mitigation investments described in Section 6.5 Infrastructure (page 74) aim to address regional drainage issues through interagency coordination, stormwater system improvements, and nature-based resilience strategies. The County is committed to ensuring that all affected neighborhoods—including those adjacent to high-risk zones—are considered in planning and prioritization processes.</p> <p>As part of implementation, regional stormwater assessments and infrastructure projects will account for cumulative impacts and strive to avoid downstream harm. Final funding decisions will be guided by program eligibility, unmet needs, and vulnerability data, with the goal of supporting flood-prone communities across the county in a fair and strategic manner.</p>



Topic	# of Comments	Summary of Comments Received	County Response
Florida Rising	7	<p>Residents recognize the Action Plan as an important opportunity to strengthen our county's long-term resilience. However, the current draft lacks a clear timeline and details on funding distribution, making accountability and effectiveness difficult to assess.</p> <p>Community feedback highlights that the plan does not address the root cause of repeated flooding and storm damage: environmental degradation from unchecked development. There is strong public support for nature-based solutions, such as:</p> <ul style="list-style-type: none"> <li>• <b>Wetland, mangrove, and oyster bed restoration</b> to buffer storm surge and flooding</li> <li>• <b>Tree planting and tree protection policies</b> in commercial development to reduce erosion</li> <li>• <b>Conservation of low-lying, flood-prone areas</b> to prevent further risk from new construction</li> </ul> <p>Residents also emphasized that recovery efforts must include deeper support for working families. Priorities include:</p> <ul style="list-style-type: none"> <li>• <b>Permanent affordable housing solutions</b>, not temporary fixes</li> <li>• <b>Solar energy investments</b>, including mobile hubs and permanent disaster relief centers</li> <li>• <b>Energy efficiency micro-grants</b> for residents and small businesses</li> </ul> <p>Community members are asking the County to revise the Action Plan to reflect these priorities—focusing on long-term environmental restoration, climate resilience, and equity for low-income households.</p>	<p>The Action Plan includes strategies to strengthen climate resilience and address long-standing vulnerabilities in limited-resource communities (Sections 5.0 page 49 and 7.0 page 88). Mitigation and resilience investments will prioritize reducing future disaster risks through improved infrastructure, nature-based solutions, and sustainable design practices. These efforts may include green infrastructure approaches, such as wetland restoration and tree canopy preservation, that align with community feedback on environmental protections. Housing programs will aim to support long-term affordability and stability for working families by addressing storm-related damage and improving housing conditions. Final program guidelines will further define eligible activities, funding allocations, and partnerships to ensure recovery and resilience outcomes for heavily impacted communities.</p>



Topic	# of Comments	Summary of Comments Received	County Response
GenCLEO at USF	3	<p>Members of GenCLEO, a youth-led climate advocacy group representing students from the University of South Florida, appreciate the opportunity to participate in the public comment process for the Hillsborough County Action Plan. They recognize the importance of this plan and offer constructive feedback focused on building a cleaner, safer, and more equitable county.</p> <p>Key concerns include:</p> <ul style="list-style-type: none"> <li>• <b>Lack of investment in solar microgrids:</b> Power outages during hurricanes pose serious risks, particularly for residents who rely on medical devices at home. GenCLEO members strongly urge the County to invest in <b>solar microgrid infrastructure</b> as a life-saving measure and a critical component of disaster preparedness.</li> <li>• <b>Insufficient focus on green infrastructure:</b> The plan currently lacks emphasis on nature-based flood mitigation strategies such as <b>mangrove restoration, tree canopy expansion,</b> and overall ecosystem protection. These measures are essential to reducing the impact of storm surge and flooding, which have already caused significant damage in Hillsborough County.</li> <li>• <b>Lack of detail and transparency:</b> Students raised concerns about the absence of a clear timeline and specific allocation of funds within the current draft of the plan. They emphasized that strategic investments must be guided by measurable goals and long-term impact.</li> </ul> <p>GenCLEO members advocate for:</p> <ul style="list-style-type: none"> <li>• Solar energy and battery storage programs</li> <li>• Rooftop solar incentives</li> <li>• Stronger commitments to environmental restoration and climate resilience</li> </ul> <p>They believe these priorities are essential not only for protecting residents but for ensuring a more sustainable and equitable future for Hillsborough County.</p>	<p>The Action Plan outlines a commitment to community resilience and sustainability through mitigation needs assessments (Section 5.0 page 49) and resilience-focused mitigation activities (Section 7.0 Page 88). Opportunities to integrate renewable energy, such as solar energy systems and battery storage, will be evaluated during program development and implementation, subject to federal guidelines and funding eligibility. In addition, nature-based flood mitigation and ecosystem restoration may be explored in coordination with partners to support long-term risk reduction. The County will continue to engage with community stakeholders, including youth-led and environmental organizations, to strengthen planning efforts and identify measurable goals that advance climate-resilient recovery strategies for all residents.</p>



## Appendix D - Data Sources and Resources

The following publicly available data sources were utilized and/or referenced to support disaster recovery planning, equity analysis, and community needs assessments:

Source Name	Description	Link
<b>OPEN FEMA Public Assistance (PA) Data</b>	Detailed records of funded PA projects including project costs, categories, and applicant types.	<a href="https://www.fema.gov/openfema-data-page/public-assistance-funded-projects-details-v1">https://www.fema.gov/openfema-data-page/public-assistance-funded-projects-details-v1</a>
<b>OPEN FEMA PA Applicant Data</b>	Information about applicants for FEMA's Public Assistance program.	<a href="https://www.fema.gov/openfema-data-page/public-assistance-applicants-v1">https://www.fema.gov/openfema-data-page/public-assistance-applicants-v1</a>
<b>OPEN FEMA Individual Assistance (IA) Applicant Data</b>	Records of validated registrations for the Individuals and Households Program.	<a href="https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1">https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1</a>
<b>OPEN FEMA Disaster Declarations Summary</b>	Summarized information about disaster declarations including type, incident period, and geography.	<a href="https://www.fema.gov/openfema-data-page/disaster-declarations-summaries-v2">https://www.fema.gov/openfema-data-page/disaster-declarations-summaries-v2</a>
<b>OPEN FEMA Hazard Mitigation Assistance Projects</b>	Data on funded projects under FEMA's Hazard Mitigation Assistance programs.	<a href="https://www.fema.gov/openfema-data-page/hazard-mitigation-assistance-projects-v3">https://www.fema.gov/openfema-data-page/hazard-mitigation-assistance-projects-v3</a>
<b>HUD Low- and Moderate-Income (LMI) Data</b>	Income data used to determine community eligibility for CDBG programs.	<a href="https://www.hudexchange.info/programs/cdbg/cdbg-low-moderate-income-data">https://www.hudexchange.info/programs/cdbg/cdbg-low-moderate-income-data</a>





Source Name	Description	Link
<b>HUD Continuum of Care (CoC) Data</b>	Data on homelessness including Point-in-Time (PIT) counts and Housing Inventory Counts (HIC).	<a href="https://www.hudexchange.info/programs/hdx/pit-hic">https://www.hudexchange.info/programs/hdx/pit-hic</a>
<b>HUD-Assisted Housing Inventory</b>	Inventory of affordable housing units supported by HUD funding in Florida.	<a href="http://flhousingdata.shimberg.ufl.edu/assisted-housing-inventory">http://flhousingdata.shimberg.ufl.edu/assisted-housing-inventory</a>
<b>SBA Disaster Loan Summary Data</b>	Data on approved SBA disaster loans for homeowners, renters, and businesses.	<a href="https://www.sba.gov/document/report-sba-disaster-loan-data">https://www.sba.gov/document/report-sba-disaster-loan-data</a>
<b>Census Mobile Home Units</b>	American Community Survey data on the number of mobile homes by county and state.	<a href="https://api.census.gov/data/2023/acs/acs5/profile?get=DP04_0014E&amp;for=county:xxx&amp;in=state:xx">https://api.census.gov/data/2023/acs/acs5/profile?get=DP04_0014E&amp;for=county:xxx&amp;in=state:xx</a>
<b>Census Rental Units by Affordability Tier</b>	ACS data on rental units categorized by rent ranges by county and state.	<a href="https://api.census.gov/data/2023/acs/acs5?get=B25127_001E,B25127_045E,B25127_046E,B25127_053E,B25127_060E,B25127_067E,B25127_074E,B25127_081E&amp;for=county:xxx&amp;in=state:xx">https://api.census.gov/data/2023/acs/acs5?get=B25127_001E,B25127_045E,B25127_046E,B25127_053E,B25127_060E,B25127_067E,B25127_074E,B25127_081E&amp;for=county:xxx&amp;in=state:xx</a>



## Appendix E – Action Plan Certification Statements

### Uniform Relocation Act and Residential Anti-displacement and Relocation Plan

The grantee certifies that it:

- (1) will comply with the acquisition and relocation requirements of the Uniform Act, and implementing regulations at 49 CFR 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 42, and 24 CFR 570, as amended by waivers and alternative requirements.*


### Order of Assistance

The grantee certifies that it will comply with the statutory order of assistance listed at 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.

### Additional Certifications

Further, as required by revisions to the Universal Notice issued on January 8, 2025, Hillsborough 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), (b)(6), (b)(7) and (b)(8).*

 <b>Hillsborough County Florida</b>	Document Type: Procedures	Effective:	Page
	Issuing Area: Affordable Housing Services	8/13/2025	1 of 9
Subject: Relocation Assistance and Displacement Mitigation			

## Purpose

As a Community Development Block Grant (“CDBG”), Community Development Block Grant-Disaster Recovery (“CDBG-DR”), HOME Investment Partnerships Program (“HOME”), and, Neighborhood Stabilization Programs (“NSP”) entitlement grantee, Hillsborough County must certify to the Department of Housing and Urban Development (“HUD”) that it has and is following a plan to minimize adverse impacts on persons of low-and-moderate income resulting from acquisition, rehabilitation and/ or demolition activities. The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (“URA”), Section 104(d) of the Housing and Community Development Act of 1974 (“HCDA”), as amended, (42 U.S.C. 5304(d)(4)) and Section 105(b)(16) of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12705(b)(16)), and implementing Federal Regulations at 49 CFR Part 24, 24 CFR Part 42, 24 CFR Part 570, specify that a grantee awarded the CDBG, CDBG-DR, HOME, NSP and other such grants as HUD may deem applicable which are administered within County limits, must certify that it has in effect and is following a “residential anti-displacement and relocation assistance plan” (the Plan). All projects with federal funding must be eligible activities and comply with national objectives including benefiting low and moderate income persons.


## Responsibility

The Affordable Housing Services Department is responsible for ensuring compliance with this policy. The AHS manager responsible for engaging in contracts will ensure policy implementation.

## Policy

Hillsborough County’s Plan seeks to minimize the displacement of persons and other entities that may be affected by HUD funded projects. The County will provide relocation assistance available to each targeted income household, business, farm or nonprofit organization displaced by the demolition or rehabilitation of housing or by the conversion of a targeted income group dwelling to another use as a direct result of assisted activities; and to each separate class of targeted income group persons temporarily relocated as a direct result of activities funded by HUD programs. The Plan as indicated herein includes several components as it relates to households, property owners, businesses, farms or nonprofit organizations namely 1) Proper Notice 2) One-for-One Replacement requirements for lower income housing units, 3) Relocation Assistance, 4) a guide to minimize displacement, 5) Real Property acquisition guidance.

- I. **One-for-One Replacement Units:** All occupied and vacant lower income dwelling units that are demolished or converted to a use other than lower income dwelling units in connection with an assisted activity must be replaced with comparable lower income units. Except that, current CDBG-DR requirements at section 104(d)(2)(A)(i) and (ii) and 104 (d)(3) of the HCDA and 24 CFR 42.375 waive the requirement to provide one-for-one replacement for owner-occupied lower income dwelling units that are damaged by disaster and not suitable for rehabilitation. Generally, a property “not suitable for rehabilitation” applies if it meets the requirements of 24 CFR 42.375 if any of the following conditions apply:
  - a. The housing unit has been demolished.


 <b>Hillsborough</b> <b>County Florida</b>	Document Type: Procedures	Effective:	Page
	Issuing Area: Affordable Housing Services	8/13/2025	2 of 9
Subject: Relocation Assistance and Displacement Mitigation			

- b. Structural assessment by licensed engineer deems the home not safe for rehabilitation.
- c. The housing unit is a construction on a slab on grade and requires elevation.

However, tenant occupied and vacant occupiable lower-income dwelling units demolished or converted to another use other than lower-income housing in connection with a CDBG-DR assisted activity are generally subject to one-for-one replacement requirements.

**II.** Replacement of lower income dwelling units may be provided by any government agency or private developer and must meet the following requirements:

- a. The units must be located within Hillsborough County (excluding the City of Tampa). To the extent feasible, the replacement units shall be located within the same neighborhood as the demolished units.
- b. The replacement units must be sufficient in number and size to house no fewer than the number of occupants who were housed in the units that are demolished or converted. The number of occupants who were housed in the units shall be in accordance with applicable local housing occupancy codes. The replacement units may not be smaller units than the original units, (e.g., a 2-bedroom unit with two 1-bedroom units), unless the County has provided information demonstrating that such a proposed replacement is consistent with the needs assessment contained in its HUD-approved CDBG-DR Action Plan and/or Consolidated Plan.
- c. All units must be in standard condition and must at a minimum meet local housing code standards. Replacement lower income units may include units brought from a substandard condition to standard condition if: 1) no person was displaced from the unit; and 2) the unit was vacant for at least three (3) months before execution of the agreement between the County and the property owner.
- d. The replacement/converted units must initially be made available for occupancy at any time during the period beginning one (1) year before the recipient makes public the information required in item F below and ending three (3) years after the commencement of the demolition or rehabilitation related to the conversion.
- e. The units must be designed to remain lower income units for at least 10 years from the date of initial occupancy.


 <b>Hillsborough County Florida</b>	Document Type: Procedures	Effective:	Page
	Issuing Area: Affordable Housing Services	8/13/2025	3 of 9
Subject: Relocation Assistance and Displacement Mitigation			

f. Before the County enters into a contract committing it to provide federal funds for any activity that will directly result in the demolition of lower income dwelling units or the conversion of lower income dwelling units to another use, the County must make public and submit in writing to HUD the following information:

1. A description of the proposed assisted activity;
2. The location on a map and number of dwelling units by size (number of bedrooms) that will be demolished or converted to a use other than for lower income dwelling units as a direct result of the assisted activity;
3. A time schedule for the commencement and completion of the demolition or conversion;
4. The location on a map and the number of dwelling units by size (number of bedrooms) that will be provided as replacement dwelling units. If such data is not available at the time of the submission to HUD, the submission shall identify the general location on an area map and the approximate number of dwelling units by size, and information identifying the specific location and number of dwellings units by size shall be submitted and disclosed to the public as soon as it is available;
5. The source of funding and time schedule for the provision of replacement dwelling units;
6. The basis for concluding that each replacement unit will remain a lower income dwelling unit for at least 10 years from the date of initial occupancy; and
7. Information that demonstrates any proposed replacement of dwelling units with smaller dwelling units is consistent with the needs assessment contained in the Hillsborough County Consolidated Plan or CDBG-DR Action Plan.

### **III. Relocation Assistance:**


Each lower income person who is displaced as a direct result of federally assisted demolition or conversion of a lower income dwelling shall be provided with relocation assistance. Relocation assistance includes advisory services and reimbursement for moving expenses, security deposits, credit checks, other moving expenses, including certain interim living costs, and certain replacement housing assistance.

 <b>Hillsborough</b> <b>County Florida</b>	Document Type: Procedures	Effective:	Page
	Issuing Area: Affordable Housing Services	8/13/2025	4 of 9
Subject: Relocation Assistance and Displacement Mitigation			

Displaced persons have the right to elect, as an alternative to the benefits described in this Plan, to receive benefits under the URA, if they determine that it is in their best interest to do so. The following relocation assistance shall be available to lower income displaced persons:

- a. Displaced lower income persons will receive the relocation assistance required under 49 CFR 24, Subpart C (General Relocation Requirements) and Subpart D (Payment for Moving and Related Expenses) whether the person elects to receive assistance under the URA or the assistance required by federal regulations. Relocation notices must be distributed to the affected persons in accordance with 49 CFR 24.203 of the URA.
- b. The reasonable and necessary cost of any security deposit and credit checks required to rent or purchase the replacement dwelling unit.
- c. Actual reasonable out-of-pocket costs incurred in connection with temporary relocation, including moving expenses and increased housing costs, if:
  1. The person must relocate temporarily because continued occupancy of the dwelling unit constitutes a substantial danger to the health or safety of the person or the public; or
  2. The person is displaced from a lower income dwelling unit, none of the comparable replacement units to which the person has been referred qualifies as a lower income dwelling unit, and a suitable lower income dwelling unit is scheduled to become available through one-for-one replacement requirements.
- d. Replacement Housing Assistance. Displaced persons are eligible to receive one of the following two forms of replacement housing assistance:
  1. Each person shall be offered rental assistance equal to 60 times the amount necessary to reduce the monthly rent and estimated average monthly cost of utilities for a replacement dwelling to the "Total Tenant Payment", as determined under 24 CFR 813.107. To the extent that cash assistance is provided, it will be provided in installments.



 <b>Hillsborough County Florida</b>	Document Type: Procedures	Effective:	Page
	Issuing Area: Affordable Housing Services	8/13/2025	5 of 9
Subject: Relocation Assistance and Displacement Mitigation			


2. In lieu of the housing voucher, certificate or cash assistance described above, the person may elect to receive a lump sum payment allowing them to secure participation in a housing cooperative or mutual housing association. This lump sum payment shall be equal to the capitalized value of 60 monthly installments of the amount that is obtained by subtracting the “Total Tenant Payment”, as determined under 24 CFR 813.107, from the monthly cost of rent and average monthly cost of utilities at a comparable replacement dwelling unit. To compute the capitalized value, the installments shall be discounted at the rate of interest paid on passbook savings in a federally insured financial institution conducting business within Hillsborough County.

Displaced lower income tenants shall be advised of their right to elect relocation assistance pursuant to the URA and the regulations at 49 CFR 24 as an alternative to the relocation assistance available under federal regulations.

#### **IV. Eligibility for Relocation Assistance**

A lower income person is eligible for relocation assistance if they are considered to be a “displaced person” as defined in 24 CFR 42.305. A displaced person means a lower income person who, in connection with an activity assisted under the respective program, permanently moves from real property or permanently moves personal property from real property as a direct result of demolition or conversion of a lower income dwelling. For purposes of this definition, a permanent move includes a move made permanently and:

- a. After notice by the owner to move from the property, if the move occurs on or after the date of the submission of a request to the Hillsborough County Affordable Housing Services Department for assistance that is later approved for the requested activity; or
- b. After notice by the owner to move from the property, if the move occurs on or after the date of the initial official submission to HUD of the consolidated plan under 24 CFR Part 91 describing the assisted activity; or
- c. Before the dates described in A & B above, if the County or HUD determines that the displacement was a direct result of conversion or demolition in connection with a federally assisted activity; or


 <b>Hillsborough</b> <b>County Florida</b>	Document Type: Procedures	Effective:	Page
	Issuing Area: Affordable Housing Services	8/13/2025	6 of 9
Subject: Relocation Assistance and Displacement Mitigation			

d. By a tenant-occupant of a dwelling unit, if any one of the following three situations occurs:

1. The tenant moves after execution of the agreement covering the acquisition, rehabilitation or demolition and the move occurs before the tenant is provided written notice offering the tenant the opportunity to lease and occupy a suitable, decent, safe and sanitary dwelling in the same building/complex upon completion of the project under reasonable terms and conditions, including a monthly rent and estimated average monthly utility costs that do not exceed the greater of the tenant's monthly rent before such agreement, or the total tenant payment as determined under 24 CFR 813.107 if the tenant is lower income, or 30 percent of gross household income if the tenant is not lower income.
2. The tenant is required to relocate temporarily, does not return to the building/complex, and either is not offered payment for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation, or other conditions of the temporary relocation are not reasonable.
3. The tenant is required to move to another dwelling unit in the same building/complex but is not offered reimbursement for all reasonable out-of-pocket expenses incurred in connection with the move, or other conditions of the move are not reasonable.

If the displacement occurs on or after the appropriate date described in a. & b. above, the lower income person is not eligible for relocation assistance if:

- a. The person is evicted for cause based upon a serious or repeated violation of the terms and conditions of the lease or occupancy agreement, violation of applicable federal, State or local law, or other good cause, and the County determines that the eviction was not undertaken for the purpose of evading the obligation to provide relocation assistance;
- b. The person moved into the property on or after the date described in A & B above after receiving written notice of the expected displacement; or
- c. The County determines that the displacement was not a direct result of the federally assisted activity, and the HUD office concurs with this determination.

 <b>Hillsborough</b> <b>County Florida</b>	Document Type: Procedures	Effective:	Page
	Issuing Area: Affordable Housing Services	8/13/2025	7 of 9
Subject: Relocation Assistance and Displacement Mitigation			

## **V. Minimizing Displacement:**

Federal regulations regarding the demolition or conversion of lower income dwelling units exist to ensure that adequate affordable replacement housing are provided to lower income persons. Naturally, involuntary displacement should be discouraged whenever a reasonable alternative exists. Involuntary displacement is extremely disruptive and disturbing, especially to lower income persons who do not have the means to locate alternative housing.

There are various ways that displacement can be minimized. The following are steps that will be taken to minimize the involuntary displacement of lower income persons when federal funds are involved:

### **A. Screening of Applications**


All applications will be reviewed to determine whether involuntary displacement is likely to occur. Those applications involving displacement will receive a lower priority recommendation for funding unless it can be shown that alternatives are not available.

### **B. Acquisition of Property**

Applicants who apply for federal funds to acquire property for the development of lower income housing will be encouraged to purchase vacant land. In the case of in-fill and other projects where this is not feasible and the project involves potential displacement; the applicant shall agree to allow the displaced lower income person(s) to occupy the new housing at an affordable rent. Applicants who utilize federal funds to rehabilitate or convert a lower income unit to a non-residential use will be required to supply replacement housing consistent with this policy, as well as relocation assistance to the displaced household.

### **C. Cost of Relocation Assistance**

The cost of any required relocation assistance and the provision of replacement housing will be borne by the applicant and may be paid for out of federal funds awarded to the project.

 <b>Hillsborough County Florida</b>	Document Type: Procedures	Effective:	Page
	Issuing Area: Affordable Housing Services	8/13/2025	8 of 9
Subject: Relocation Assistance and Displacement Mitigation			

## BUSINESS RELOCATION


- I. The County plan will ensure that businesses, including farms and nonprofit organizations, are treated fairly and compensated for their losses, provided advisory services, and relocation assistance to minimize the impacts from displacement in accordance with the URA and Section 104(d) of the HCDA.
  - a. Businesses must receive sufficient written notice, as required, before displacement and typically a minimum of 90 days;
  - b. Provide relocation advisory services;
  - c. Provide reimbursement for moving and reestablishment expenses;
  - d. Provide compensation for losses related to the displacement in accordance with the guidelines.
- II. Minimizing Displacement
  - a. The County will consider alternative project designs, phasing construction or other methods to allow businesses to remain in place as long as possible or provide assistances for businesses to relocated within the same area.
  - b. The County will work with the businesses to understand their needs and concerns and develop a relocaton plan that minimizes disruption and hardship.

## **Other Resources**

- A. Seek further guidance from HUD Handbook 1378 that provides HUD policy and guidance on implementing the URA and 49 CFR 24 for HUD funded programs and projects.
- B. Review 24 CFR Part 42, the federal regulation that implements section 104(d) of the Housing and Community Development Act.
- C. Review 49 CFR Part 24, the federal regulation that implements the URA.

## **Definitions**

- A. "Comparable replacement dwelling unit" means a dwelling unit that:

 <b>Hillsborough</b> <b>County Florida</b>	Document Type: Procedures	Effective:	Page
	Issuing Area: Affordable Housing Services	8/13/2025	9 of 9
Subject: Relocation Assistance and Displacement Mitigation			

1. Meets the criteria of 49 CFR 24.2(d)(1) through (6); and
  2. Is available at a monthly cost for rent plus estimated average monthly utility costs that does not exceed the “Total Tenant Payment” determined under 24 CFR 813.107 after taking into account any rental assistance the household would receive.
- B. “Lower income dwelling unit” means a dwelling unit with a market rental (including utility costs) that does not exceed the applicable Fair Market Rent (FMR) for existing housing and moderate rehabilitation established under 24 CFR Part 888.
- C. “Standard condition” means units that at a minimum meet the local housing code.
- D. “Substandard condition suitable for rehabilitation” means units with code violations that can be brought to local housing code standards within reasonable monetary amounts.
- E. “Vacant occupiable dwelling unit” means a dwelling unit that is in a standard condition; a vacant dwelling unit that is in substandard condition, but is suitable for rehabilitation; or a dwelling unit in any condition that has been occupied (except by a squatter) at any time within the period beginning three (3) months before the date of execution of the agreement by the County covering the rehabilitation or demolition.

## Approvals

Name	Title	Department	Date Approved
<b>Brenda Vallecilla</b>	Acting Director	Affordable Housing Services	 <small>Digitally signed by Brenda Vallecilla Date: 2025.08.13 10:21:50 +04'00'</small>

## Change Management

Name	Title	Department	Change	Date
<b>Brenda Vallecilla</b>	Acting Director	Affordable Housing	Evergreen Review	8/7/2025