

ORANGE COUNTY

Community Development Block Grant -

DISASTER RECOVERY

ACTION PLAN

FOR HURRICANE MILTON



COMMUNITY
DEVELOPMENT
BLOCK GRANT

**DISASTER
RECOVERY**





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Change Log

| Version (Date) | Summary of Changes Made |
|----------------------------|-------------------------|
| Version 1 (April 15, 2025) | Action Plan published. |
| Version 2 (June 18, 2025) | Action Plan sent to HUD |
| | |

Executive Summary

In October 2024, Hurricane Milton struck Central Florida with destructive force, leaving a trail of damage across Orange County and prompting a federal disaster declaration (DR-4834-FL). As a result of the widespread devastation—including housing loss, infrastructure damage, and economic disruption—Orange County was awarded \$33,357,000 in Community Development Block Grant–Disaster Recovery (CDBG-DR) funding from the U.S. Department of Housing and Urban Development (HUD). This allocation was made available through the American Relief Act of 2025 and is intended to support long-term recovery in communities that were most severely impacted and that face the greatest challenges to full recovery without additional assistance. This Action Plan outlines the County’s strategy for deploying these funds to address urgent unmet needs, promote an efficient recovery, and invest in community resilience.

Hurricane Milton followed a path similar to Hurricane Ian (2022), compounding existing vulnerabilities in housing, infrastructure, the economy and public services. With wind gusts reaching up to 87 mph and more than 10 inches of rainfall in some areas, the storm caused significant flooding, damage to thousands of homes, widespread power outages, and disruption to businesses and essential services. The County’s unmet needs assessment—based on Federal Emergency Management Agency (FEMA) and Small Business Administration (SBA) data, and local stakeholder input—identified over \$279 million in damages. After accounting for other funding sources, the total unmet recovery need remains at approximately \$196 million, the majority of which is concentrated in housing (77%), followed by economic recovery (19%), and infrastructure (4%). This assessment reflects both the severity of the disaster and the pre-existing affordability challenges faced by many Orange County residents, especially those in low- to moderate-income (LMI) households, who comprise nearly half the County’s population.

To address these needs, Orange County will invest in a range of targeted recovery programs designed to repair and replace damaged housing, restore essential public infrastructure, assist small businesses. The Action Plan prioritizes housing recovery through three core programs: Homeowner Rehabilitation, Rental Housing Rehabilitation, and New Affordable Housing Construction. These programs respond to both disaster-related damages and affordable housing challenges—including a shortfall in affordable rental units and high rates of cost burden among low-income renters and homeowners. Infrastructure funds will help address remaining gaps in utility systems, and public facilities in disaster-impacted areas. Economic revitalization funds will support small businesses that suffered property loss or operational disruption, with particular attention to those denied or unable to access SBA loans. These programs also incorporate workforce stabilization measures to prevent job loss and strengthen the local economy through the provision of public services.

In accordance with HUD’s requirements, 100% of the CDBG-DR allocation will be used within the HUD-designated Most Impacted and Distressed (MID) areas—which include all of Orange County—and a minimum of 70% of funds will benefit LMI individuals and households. The County also commits to using at least 15% of the total allocation on mitigation activities that reduce future risks and build long-term resilience. Mitigation needs were assessed using both the Florida State Hazard Mitigation Plan (SHMP) and Orange County’s Local Mitigation Strategy (LMS), which identify high-risk hazards such as hurricanes, flooding, sinkholes, and tornadoes. By incorporating mitigation into

housing and infrastructure recovery programs, the County aims to not only recover but to emerge stronger and more resilient.

The development of this Action Plan was guided by meaningful community engagement, including public meetings, consultation with local jurisdictions, nonprofits, housing authorities, and tribal entities, and the collection of public comments. Orange County remains committed to transparency, efficiency, and accountability throughout the implementation of its CDBG-DR programs. This Action Plan provides a clear and forward-thinking roadmap for recovery—one that addresses the deepest impacts of Hurricane Milton, addressing unmet needs, and positions Orange County for a more resilient future.

Overview

The U.S. Department of Housing and Urban Development (HUD) has allocated \$33,357,000 to Orange County, Florida to support long-term recovery efforts following Hurricane Milton (DR-4834-FL). Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that will not be met by other sources of assistance. This plan details how funds will be used to address the remaining unmet need in Orange County, Florida.

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. The \$33,357,000 in CDBG-DR funds allocated to Orange County were made available through the American Relief Act of 2025 (Public Law 118-158) and through publication in the Federal Register (90 FR 4759).

DISASTER-SPECIFIC OVERVIEW

In October of 2024, [Hurricane Milton \(DR-4834-FL\)](#) hit Orange County and led to presidential disaster declarations and the availability of FEMA Public Assistance and Individual Assistance in Orange County.

Hurricane Milton (DR-4834-FL)

At its strongest, only 24 hours after becoming a tropical storm, Milton was a Category 5 storm with winds up to 180 mph, extraordinarily low barometric pressure, and a ‘pinhole’ eye. This made Milton the fifth-strongest Atlantic hurricane before it made landfall as a Category 3 major hurricane near Siesta Key, FL, on October 9, 2024. Two years prior, the more destructive Hurricane Ian followed a similar path through Orange County. The President declared a major disaster for the State of Florida on October 11, 2024, as a result of Hurricane Milton, pursuant to his authority under the Stafford Act.

Though the most significant impacts were felt in west and southwest Orange County, the storm brought substantial impacts throughout the county, with powerful winds, heavy rainfall, and widespread power outages. The hurricane produced wind gusts reaching up to 87 mph in the county, causing damage to homes, businesses, and infrastructure, and downing trees and power lines. Additionally, parts of the county received more than 10 inches of rain, resulting in localized flooding and rises on areas rivers and creeks. Hurricane Milton's severity prompted more than 42 tornado warnings across Central Florida and knocked out power for more than 170,000 Duke and OUC customers.



Figure 1. Flooded Boathouses in Windermere Partially Submerged After Milton. Photo credit: West Orange Times Observer.

Overall, Hurricane Milton resulted in substantial damage with 35 fatalities reported throughout the state. It caused infrastructure damage and devastating flooding across numerous Florida counties, exacerbating the previously damaging effects of Ian and other storms. These storms led to evacuations, rescue operations, and ongoing recovery efforts across the affected region.

Most Impacted and Distressed (MID) Areas

Orange County and all the municipalities are the Most Impact and Distressed (MID) area. In the CDBG-DR Action Plan required by HUD, grantees must describe unmet needs in the HUD identified Most Impacted and Distressed (MID) areas; the allocations of funds are based on the unmet needs of these specific communities, which HUD has identified as the least likely to fully recover without additional assistance. Grantees are required to use at least 80% of the CDBG-DR award to benefit the HUD-identified MID areas, which is easily accomplished since the entire County is the MID area. In other disaster events, the MID area can be within a geographic area of the jurisdiction. Local government grantees whose HUD-identified MID areas include their entire jurisdiction must use 100% of the CDBG-DR award to benefit the HUD-identified MID area. Written descriptions of those needs and the use of maps are impactful ways to illustrate the recovery needs of the county to the public.

The Action Plan must also identify the use of all CDBG-DR funds – including criteria for eligibility and how users address long-term recovery needs, restoration of infrastructure and housing, economic revitalization, and mitigation in the MID areas.

Grantee-identified MID Areas

As required by the Federal Register notice, Orange County will spend 100% of its allocation in the HUD identified MID areas, which include all of Orange County. Additionally, no less than 70% of the total allocation will be expended to benefit Low- to Moderate-income (LMI) persons. All proposed CDBG-DR programs will include some disaster recovery related mitigation initiatives, as well as allowing for stand-alone mitigation activities to ensure that Orange County complies with the 15% mitigation expenditure requirement established by Congress for these funds.

The following map and tables show the distribution of Low to Moderate Income populations across Orange County and in comparison to the state. The first table presents data on low to moderate income (LMI) individuals in Florida, using Area Median Income (AMI) thresholds.

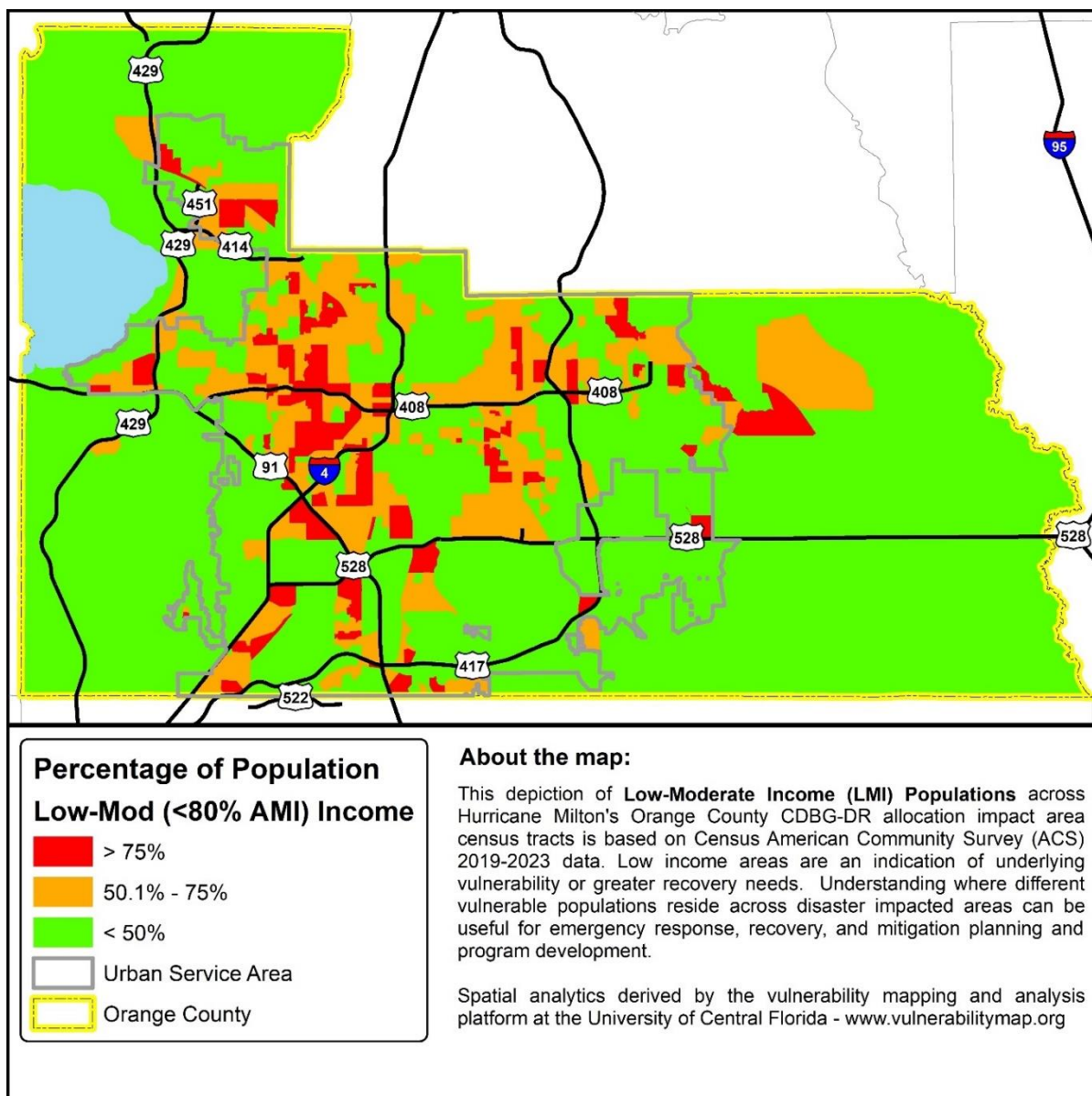


Figure 2. Low to Moderate Populations in Orange County. Map Credit: University of Central Florida.

| Category | Total Persons | Total Population | Percent LMI |
|-------------------|---------------|------------------|-------------|
| Low (<50% AMI) | 5,423,482 | 20,784,704 | 26% |
| Low Mod (80% AMI) | 9,330,950 | 20,784,704 | 45% |
| LMMI (< 120% AMI) | 13,381,125 | 20,784,704 | 64% |

Table 1: Low to Moderate Income Persons for Florida. Data Source: US Census, ACS 2019-2023.

| County | MID-Total Population | MID-Total LMI Persons | MID% LMI |
|--------|----------------------|-----------------------|----------|
| Orange | 1,342,545 | 629,355 | 47% |

Table 2. Declared Area Low to Moderate Income Persons. Data Source: US Census, ACS 2019-2023.

Out of Florida’s total population of 20,784,704, approximately 26% (5.42 million people) fall below 50% of AMI, classifying them as low income. Expanding the threshold to include those below 80% of AMI raises the LMI population to 45% (9.33 million people), and further expanding the threshold to include those under 120% of AMI – classified as low-moderate-middle income (LMMI) – raises the population to 64% (13.38 million people) of the state.

The second table focuses on Orange County, one of the HUD-designated Most Impacted and Distressed (MID) areas. Out of a total MID population of 1,342,545, approximately 629,355 residents are considered LMI, representing 47% of the county’s population. This indicates that nearly half of Orange County’s population may qualify for programs or resources targeting LMI households, highlighting a significant area of need within the disaster recovery context.

Overview of the Impacts of the Qualifying Disaster

The qualifying disaster, Hurricane Milton (DR-4834-FL), caused widespread devastation in Orange County, affecting residential areas with severe flooding, structural damage to homes, and significant infrastructure disruption, leaving a lasting impact on the community. The most pressing current unmet needs are long-term housing repairs, critical infrastructure restoration, and economic revitalization, particularly in the hardest-hit neighborhoods around west and southwest Orange County. Much of the observed impacts exacerbated impacts from previous storms, including Hurricane Ian. With an estimated \$243,520,269 in damages overall, hundreds of homes in Orange County sustained damage such as roof breaches, flood intrusion and compromised walls, rendering many housing units uninhabitable due to heavy rainfall, flooding, and hurricane force winds.

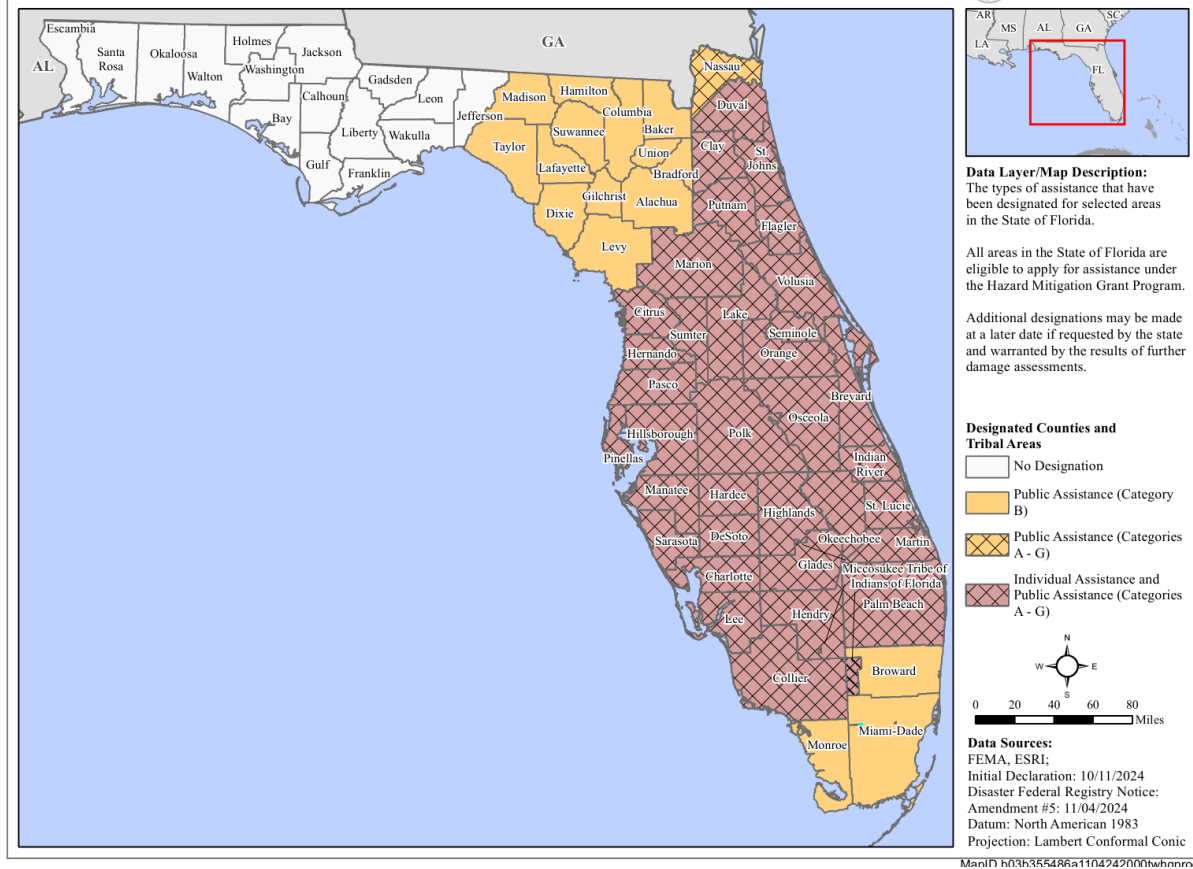
FEMA-4834-DR, Florida Disaster Declaration as of 11/04/2024

Figure 3. Hurricane Milton (DR-4834-FL) Disaster Declaration Map as of 11/04/2024. Image Source: FEMA.

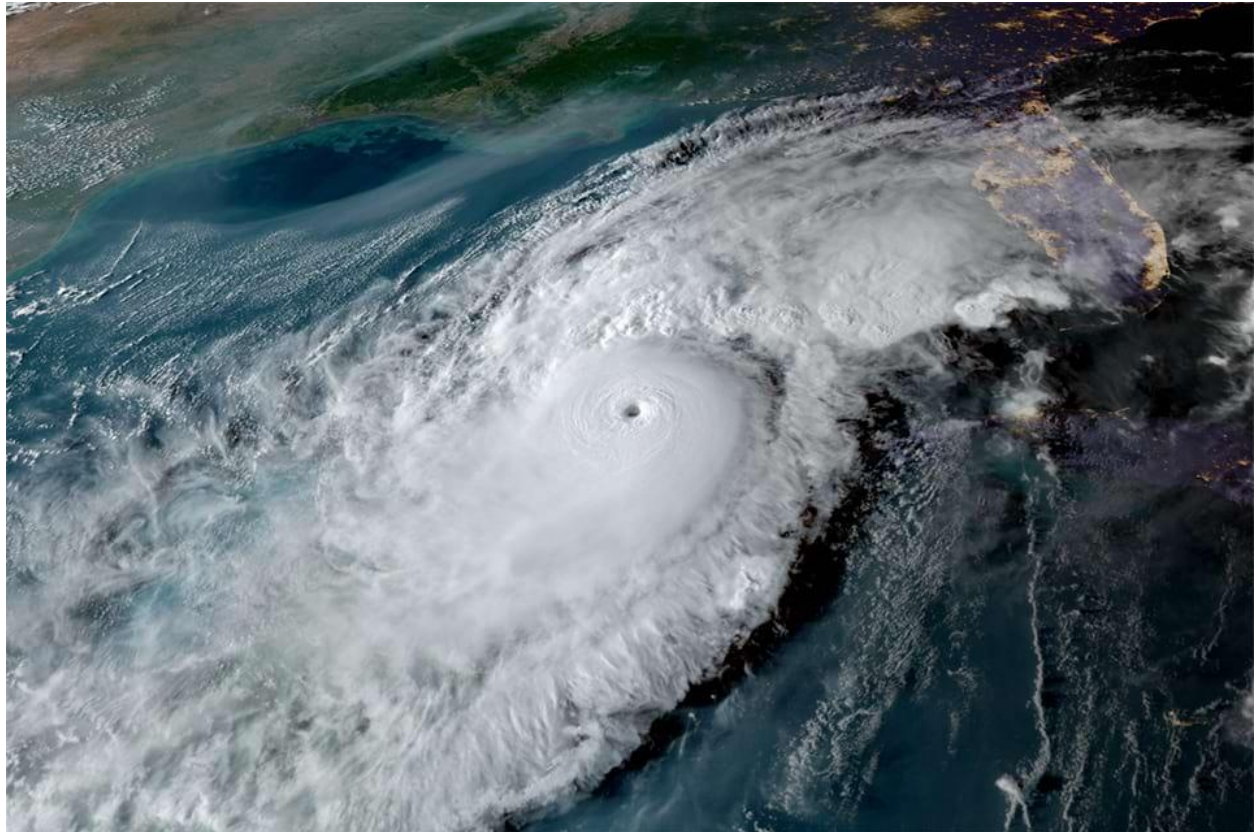


Figure 4: Satellite Image of Hurricane Milton on Oct. 8, 2024, as it approaches Florida. Image Credit Milton Storm Imagery, NOAA.

| Qualifying Disaster: | Hurricane Milton with FEMA Disaster (DR-4834-FL) |
|-------------------------------------|--|
| HUD-identified MID Areas: | Orange County |
| Grantee-Identified MID Areas | Orange County |

Table 3: Disaster Overview.

| CDBG-DR Allocation: | \$29,006,000 |
|--------------------------------------|--------------|
| CDBG-DR Mitigation Set Aside: | \$4,351,000 |
| Total Allocation: | \$33,357,000 |

Table 4: CDBG-DR Allocation Overview.

Unmet Needs Assessment

UNMET NEEDS ASSESSMENT AND ALLOCATION

Orange County has completed this assessment to identify community needs across the county by assessing the remaining effects of the qualifying disaster as they relate to housing, infrastructure, and the economy utilizing the quantifiable and verifiable data as of February 26, 2025. Specifically, as required by HUD, this assessment evaluates housing needs across four major areas: (1) emergency shelters; (2) interim and permanent housing; (3) rental and owner-occupied single family and multifamily housing; (4) public housing (including HUD-assisted housing) and other types of affordable housing.

The following table summarizes the losses and unmet needs related to Hurricane Milton's impact on Orange County. The unmet needs analysis identified a total unmet recovery need of \$196,195,089¹.

| Summary of Impacts/Support | Housing | Infrastructure | Economy | Total |
|--|---------------|----------------|---------------|----------------|
| Amount of Estimated Impact | \$157,123,775 | \$ 36,551,008 | \$ 85,545,954 | \$ 279,220,737 |
| Amount of Funds Available | \$ 5,228,919 | \$ 29,257,637 | \$ 48,539,092 | \$ 83,025,648 |
| Unmet Needs (impact-Available Funds) + Resiliency Costs | \$151,894,856 | \$ 7,293,371 | \$ 37,006,862 | \$ 196,195,089 |
| % of Total Unmet Needs | 77% | 4% | 19% | 100% |

Table 5: Summary of Unmet Needs and Proposed Funding Allocations.

Hurricane Milton's total estimated impact in Orange County across housing, infrastructure, and the economy amounts to \$279,220,737. Housing accounts for the largest portion of the damage at \$151,894,856 (and 77% of the total remaining unmet needs), followed by the economy at \$37,006,862 (19%), and infrastructure at \$7,293,371 (4%). Available funds are significantly lower, with a total availability of \$83,025,648 for recovery efforts. This significant funding gap, particularly in housing and economic recovery efforts, requires additional financial support to ensure a comprehensive recovery. The analysis shows that housing constitutes the greatest remaining need for CDBG-DR funds not addressed by other sources of funds, followed by economic revitalization and then infrastructure.

¹ The datasets used for the analyses for unmet needs include OPEN FEMA Public Assistance (PA) Data and Applicant Data, Individual Assistance (IA) Applicant Data; OPEN FEMA Disaster Declarations; HUD LMI Data and Continuum of Care; SBA Home and Business Report Data; US Census Data.



Housing Impacts and Unmet Needs

The following section describes the losses and unmet needs related to Hurricane Milton's impact on the housing stock in Orange County. The unmet needs analysis identified a total housing unmet recovery need, including resilience costs, of \$151,894,856.

Housing Affordability in Orange County

Florida faces a significant shortage of rental housing that is both affordable and accessible to extremely low-income households — households defined as those earning at or below 30% of the area median income (AMI) or the federal poverty level. A large portion of these households face severe cost burdens, with more than half of their income going toward housing expenses. As a result, they are at higher risk of financial strain, often having to forgo essential needs such as nutritious food and healthcare to afford rent. This financial instability also increases their likelihood of experiencing housing insecurity, including the threat of eviction. According to the National Low Income Housing Coalition's 2024 Florida housing Profile, 583,625 (20%) of renter households have extremely low incomes.² There is a shortage of 435,879 rental homes that are considered affordable and available for extremely low-income renters. In 2024, the average income limit for a 4-person extremely low-income household is \$27,790, while the annual household income needed to afford a two-bedroom rental home at HUD's Fair Market Rent is \$73,308. For the state, 82% of extremely low-income renter households are severely cost burdened. Renter households spending more than 30% of their income on housing costs and utilities are cost burdened; those spending more than half of their income are severely cost burdened.

²Source: National Low Income Housing Coalition GAP Report 2024, found at https://nlihc.org/sites/default/files/gap/2024/Gap-Report_2024.pdf ; Data also at NLIHC <https://nlihc.org/housing-needs-by-state/florida>. They reference 2023 ACS data, which indicates conditions pre-Hurricane Milton.

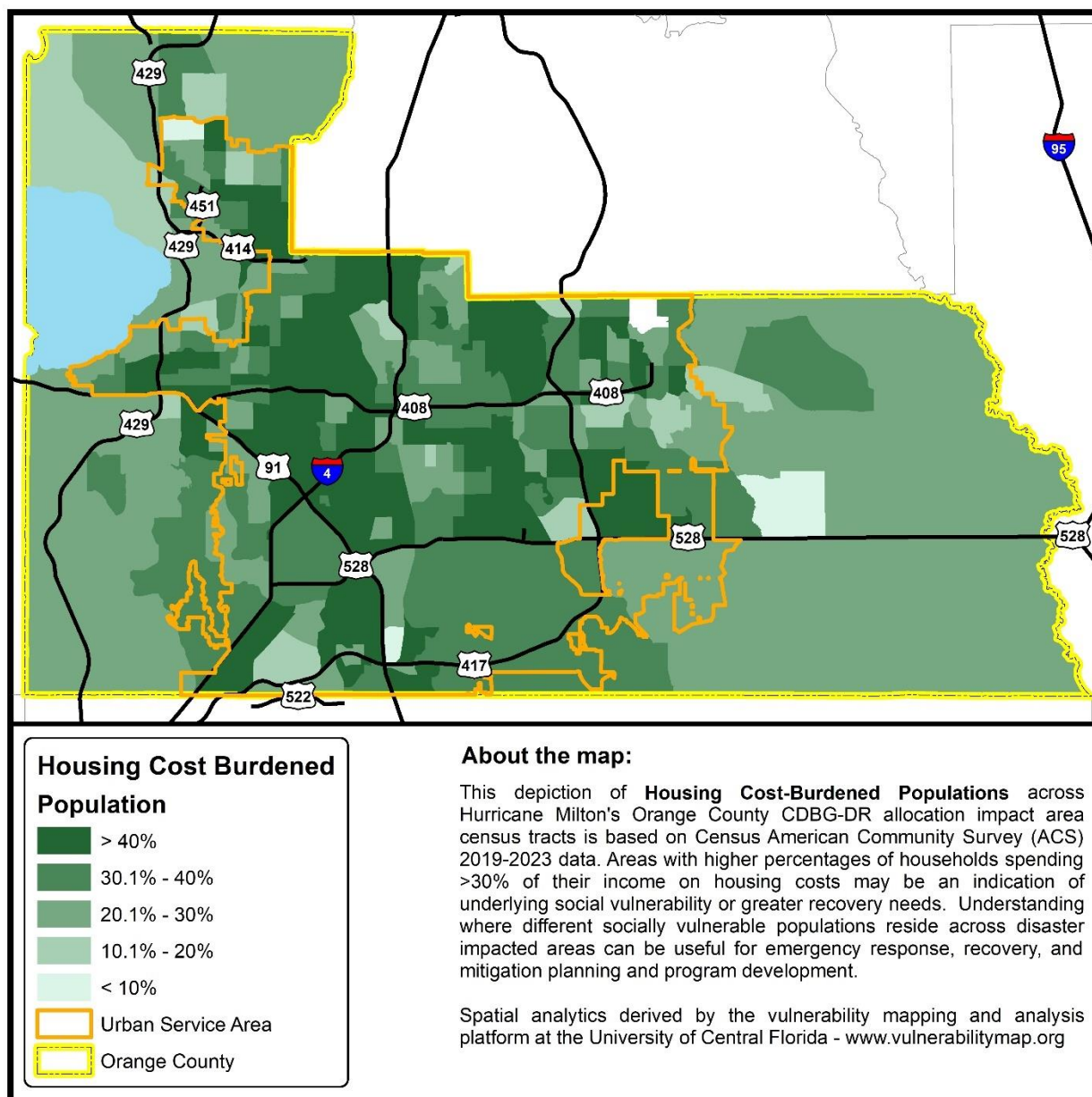


Figure 5: Housing Cost Burdened Population for Orange County. Map Credit: University of Central Florida.

The map above presents the distribution of housing costs burden throughout the county. According to the 2022-2026 Consolidated Plan and 2022-2023 Annual Action Plans for Orange County, the primary housing challenge in Orange County is unaffordable housing costs. Approximately 31% of households face cost burdens, with low- to moderate-income households making up 69% of those affected. Severe cost burdens disproportionately impact lower-income residents, as nearly 97% of affected households fall into this category. Among households earning less than 30% of Housing Area Medium Family Income (HAMFI), 65% experience severe cost burdens. While affordability is the most significant issue, about 3% of households also struggle with overcrowding and substandard living conditions.

Another critical element in housing affordability and understanding community needs is understanding the affordable housing stock in the county. Below is a table that describes the distribution of renter-occupied units by year built for Orange County compared to the state.

| Year Built | Statewide | | | Orange County | | |
|----------------------------|---------------------------------|----------------------------|-------------------------|---------------------------------|----------------------------|-------------------------|
| | Number of Renter Occupied Units | Percentage of Rental Units | Percentage of All Units | Number of Renter Occupied Units | Percentage of Rental Units | Percentage of All Units |
| 2020 or later | 41,928 | 2% | 0.49% | 3,403 | 0% | 0.09% |
| 2000 to 2019 | 332,736 | 14% | 3.89% | 37,098 | 4% | 1.00% |
| 1980 to 1999 | 933,077 | 40% | 10.91% | 76,513 | 9% | 2.06% |
| 1960 to 1979 | 742,648 | 31% | 8.69% | 41,806 | 5% | 1.13% |
| 1940 to 1959 | 241,513 | 10% | 2.82% | 12,264 | 1% | 0.33% |
| 1939 or earlier | 69,479 | 3% | 0.81% | 3,969 | 0% | 0.11% |
| Total Rental Units | 2,361,381 | 100% | 27.62% | 175,053 | 20% | 4.72% |
| Total Housing Units | 8,550,911 | | 100.00% | 508,907 | | 13.72% |

Table 6: Summary of Evolution of Renter-Occupied Units by Year Built in Florida and Orange County.

Statewide, renter-occupied units comprise 27.62% of total housing, with the highest concentration (40%) built between 1980-1999. In Orange County, renter-occupied units comprise 4.72% of total housing, with 9% built between 1980-1999. According to the data, a substantial portion of rental housing stock is aging, which may impact resilience and maintenance needs. The relatively low percentage of new renter occupied housing (0.09% built in 2020 or later) highlights a lack of recent development to meet increasing demand for housing.

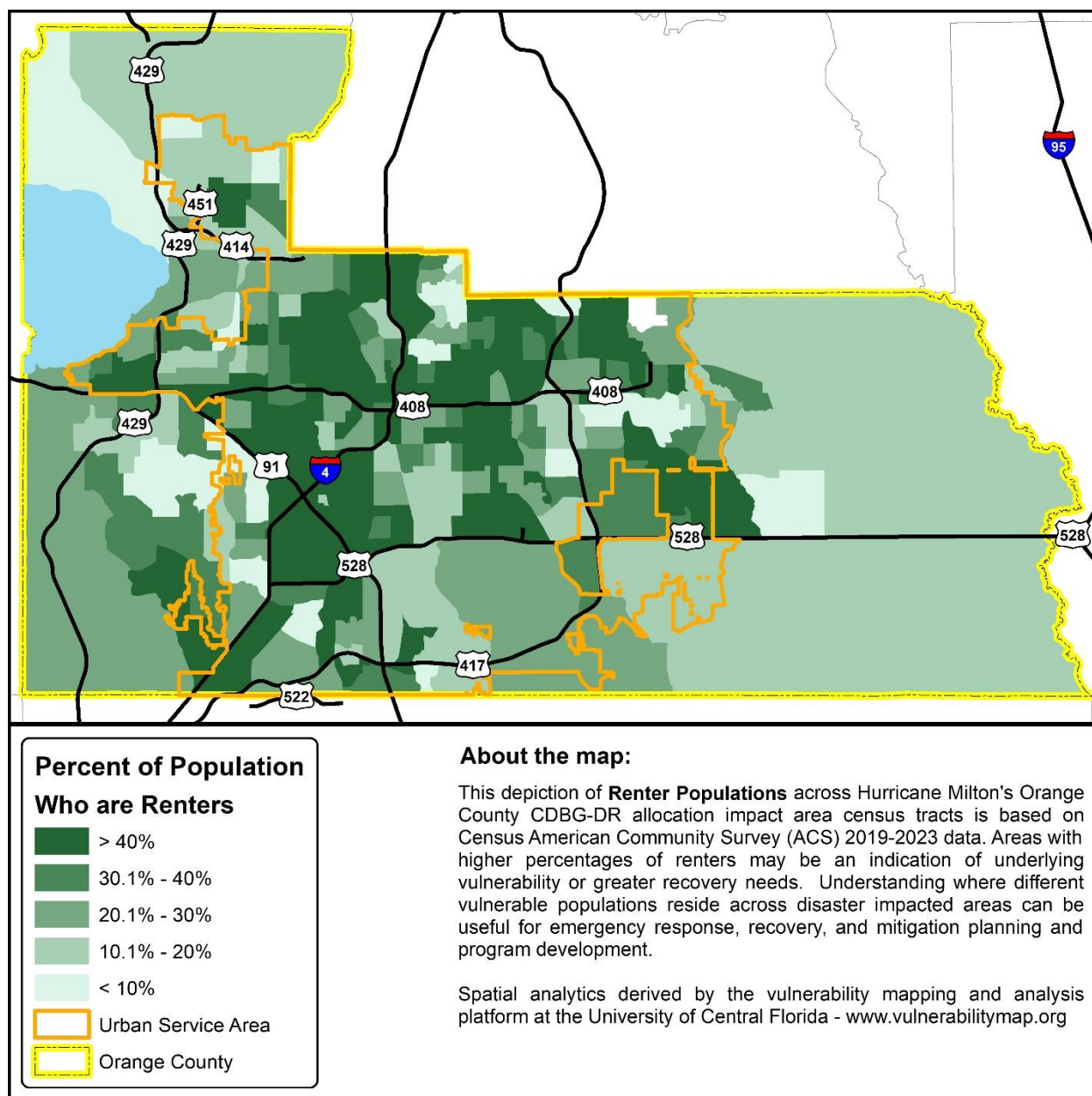


Figure 6: Percent of Population Who Are Renters in Orange County Census Tracts. Map Credit: University of Central Florida.

The most recent American Census Survey (ACS) 2019-2023 renter population data is mapped in the above graphic, showing the spatial distribution of renters in Orange County.

Emergency Shelters, Interim, and Permanent Housing

The following table outlines homelessness data for a specific geographic area in the aftermath of Hurricane Milton. It provides a point-in-time snapshot of individuals experiencing homelessness, including those in emergency shelters, transitional housing, and those without shelter. Additionally, it details the total number of homeless individuals in Orange County, the designated MID area. The data collection process involves identifying values from various geographic levels — such as area-

wide, FEMA-declared regions, and the MID area — and categorizing them accordingly. This information is crucial for evaluating the storm’s immediate impact on homelessness and helping stakeholders gauge the scale of the issue and develop targeted response strategies. Given the widespread severity of the storm, it is likely that unhoused individuals in Orange County faced significant increased hardships as a result.

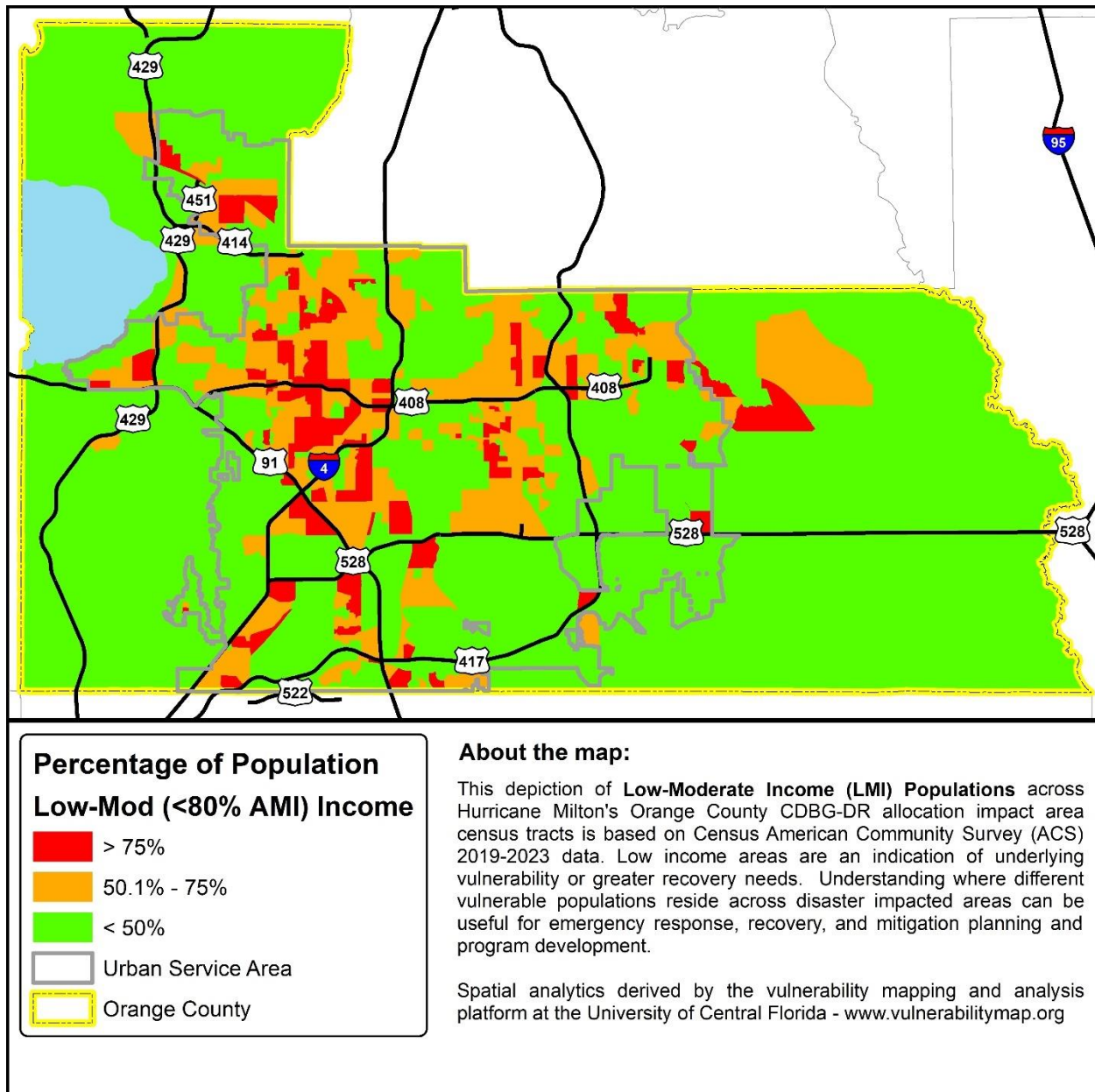


Figure7: Percentage of Low- to Moderate-Income Population for Orange County. Map Credit: University of Central Florida.

Homelessness data further highlights the affordability crisis. The Point-in-Time (PIT) count identified 2,258 individuals experiencing homelessness in Orange County, with 25.9% unsheltered. The first table provides data on the homeless population within the Orlando/Orange, Osceola, and Seminole Counties Continuum of Care (CoC), identifying a total of 2,258 individuals experiencing homelessness.

| CoC Number | CoC Entity | Impacted County | Homeless Count |
|------------|--|---------------------------|----------------|
| FL-507 | Orlando/Orange, Osceola, Seminole Counties CoC | Osceola, Orange, Seminole | 2,258 |

Table 7: Osceola, Orange, Seminole CoC for Hurricane Milton.

| Scale of Data | Total Known Homeless (2022) | Emergency Shelter (2023) | Transitional Housing (2023) | Unsheltered Homeless (2023) | Safe Haven Sheltered Homeless (2023) | Total Known Homeless (2023) |
|----------------------|-----------------------------|--------------------------|-----------------------------|-----------------------------|--------------------------------------|-----------------------------|
| Statewide | 25,959 | 10,843 | 4,289 | 15,482 | 142 | 30,756 |
| FEMA Declared | 25,232 | 10,660 | 4,034 | 14,740 | 142 | 29,576 |
| Orlando COC | 2,151 | 1,127 | 544 | 587 | 0 | 2,258 |

Table 8: Orlando's COC for Hurricane Milton.

In 2023, Orlando's CoC recorded 2,258 homeless individuals, with 1,127 in emergency shelters, 544 in transitional housing, and 587 unsheltered. Statewide, the total homeless population reached 30,756, with FEMA-declared disaster areas accounting for 29,576 of that population. The data highlights the ongoing need for emergency and transitional housing solutions, particularly in disaster-affected regions like Orlando, where a substantial portion of individuals remain unsheltered.

Rental and Owner-Occupied Single Family and Multifamily Housing

The following tables provide insight into impacts from Hurricane Milton by renters and owners. The table below shows the FEMA IA applications submitted by the type of residence and tenure status of the applicant after Hurricane Milton.



| Residence Type | # of Applicants | % Owner Occupied | % Tenants | % Unknown | % Type |
|--------------------------|-----------------|------------------|------------|--------------|-------------|
| Apartment | 15,445 | 0.01% | 27.69% | 0.00% | 27.69% |
| Assisted Living Facility | 47 | 0.00% | 0.08% | 0.00% | 0.08% |
| Boat | 7 | 0.01% | 0.01% | 0.00% | 0.01% |
| College Dorm | 10 | 0.00% | 0.02% | 0.00% | 0.02% |
| Condo | 1,363 | 0.87% | 1.58% | 0.00% | 2.44% |
| Correctional Facility | 5 | 0.00% | 0.01% | 0.00% | 0.01% |
| House/Duplex | 29,395 | 31.72% | 20.96% | 0.02% | 52.71% |
| Military Housing | 10 | 0.00% | 0.02% | 0.00% | 0.02% |
| Mobile Home | 2,995 | 3.69% | 1.67% | 0.01% | 5.37% |
| Other | 4,292 | 3.17% | 4.52% | 0.01% | 7.70% |
| Townhouse | 2,027 | 1.48% | 2.15% | 0.00% | 3.63% |
| Travel Trailer | 174 | 0.16% | 0.15% | 0.00% | 0.31% |
| Total | 55,770 | 41% | 59% | 0.04% | 100% |

Table 9: FEMA IA Housing Applications by Housing Residence Type for Orange County

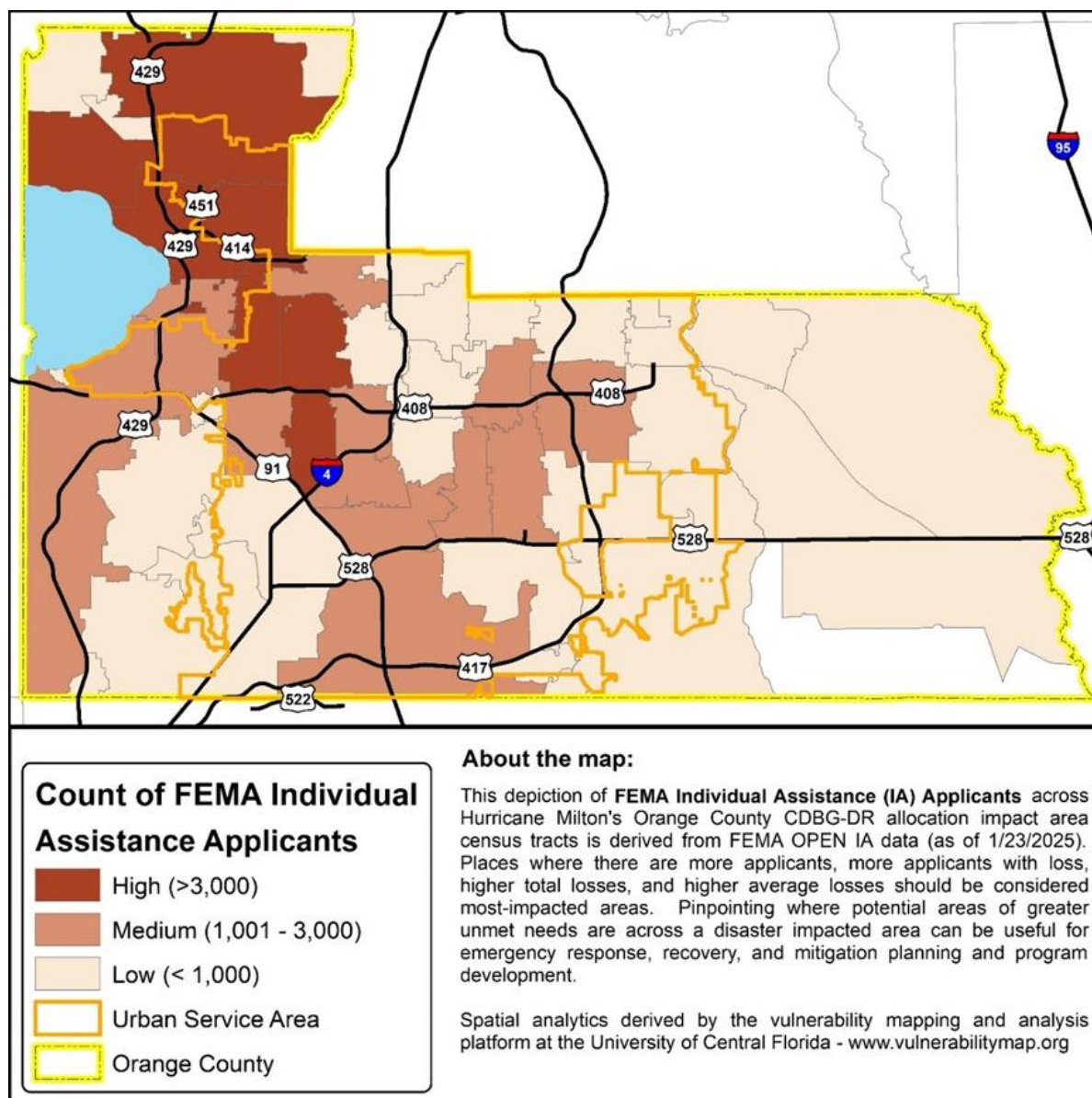


Figure 8: FEMA Individual Assistance (IA) Applications. Map Credit: University of Central Florida.

The map above shows the distribution of IA applicants across the county, indicating the higher number of applicants in the west and southwest portions of the county more impacted by the storm. House/duplex residences dominate with 52.71% of applicants affected, followed by apartments at 27.69%. Mobile homes, while comprising a smaller share (5.37%), still represent a critical housing component. The prevalence of house/duplex units suggests that single-family housing bears a significant portion of the disaster's impact, requiring targeted recovery strategies. The following tables and maps provide more insight into the property damage assessed with assistance received and verified loss amounts for owners and renters.



| County | # of Applicants | # of Inspections | # Inspected with Damage | # Received Assistance | Total FEMA Verified Loss | Average FEMA Verified Loss |
|--------|-----------------|------------------|-------------------------|-----------------------|--------------------------|----------------------------|
| Orange | 22,932 | 2,874 | 1,287 | 806 | \$8,989,289 | \$6,985 |

Table 10: FEMA IA Owner Applicant Breakdown

| County | # of Applicants | # of Inspections | # Inspected with Damage | #Received Assistance | Total FEMA Verified Loss | Average FEMA Verified Loss |
|--------|-----------------|------------------|-------------------------|----------------------|--------------------------|----------------------------|
| Orange | 32,817 | 5,811 | 1,861 | 835 | \$1,537,555 | \$826 |

Table 11: FEMA IA Renter Applicant Breakdown

| County | Units with Minor-Low | Units with Minor-High | Units with Major-Low | Units with Major-High | Units with Severe |
|--------|----------------------|-----------------------|----------------------|-----------------------|-------------------|
| Orange | 914 | 521 | 298 | 56 | 15 |

Table 12: FEMA Real Property Damage to Owners (as specified by HUD method)

| County | Units with Minor-Low | Units with Minor-High | Units with Major-Low | Units with Major-High | Units with Severe |
|--------|----------------------|-----------------------|----------------------|-----------------------|-------------------|
| Orange | 1,215 | 489 | 103 | 40 | 14 |

Table 13: FEMA Personal Property Damage to Renters (as specified by HUD method)

When considering the locations and concentrations of applicants with losses, impacted areas, and average losses, the highest impacts as indicated in the map below resonates with the other data, field observations, and public comments describing the same areas as the worst impacted.

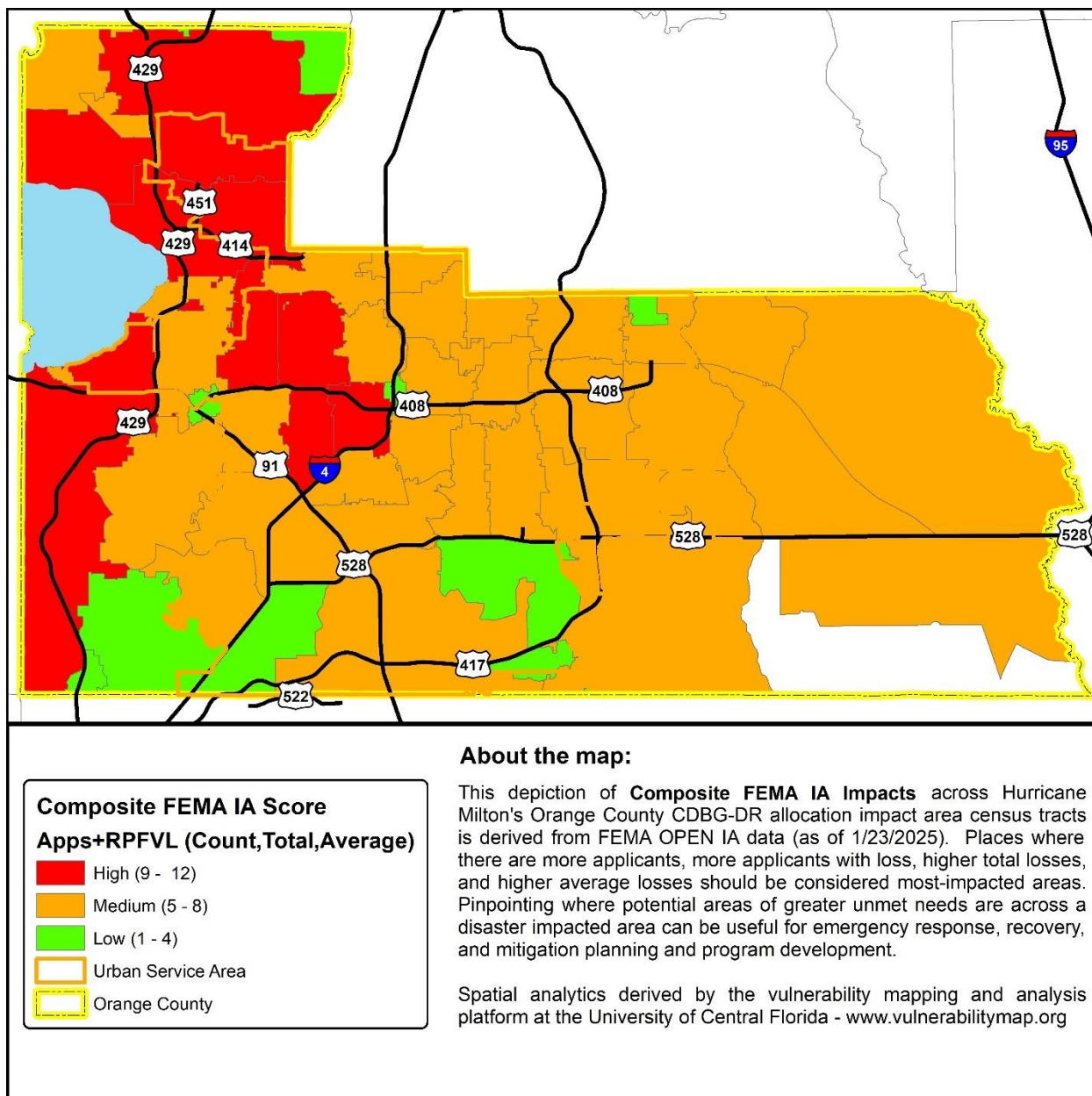


Figure 9: Composite FEMA IA Impacts across Orange County. Map Credit: University of Central Florida.

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

The following table further details impacts and unmet housing needs for Orange County. These include property losses, the adjustments made using the HUD multiplier, and other data points of interest such as insurance, public housing, and other affordable housing information that better substantiate the total housing unmet need for Orange County. Of note is that the Public Housing Authorities (PHAs) did not report significant damage from Hurricane Milton.

| Total Derived Impacts and Unmet Needs for Housing | | | | |
|--|-------|------------------------------------|----------------------------|---------------------------------------|
| Data | Count | Total FEMA Estimated Property Loss | Average Real Property Loss | Estimated Total Loss (HUD Multiplier) |
| Minor-Low Damage to FEMA IA Applicants (Mobile Homes) | 218 | \$ 168,047 | \$ 771 | \$ 3,659,711 |
| Minor-Low Damage to FEMA IA Applicants (All Other Home Types) | 1,911 | \$ 648,073 | \$ 339 | \$ 55,750,240 |
| Minor-High Damage to FEMA IA Applicants (Mobile Homes) | 180 | \$ 867,020 | \$ 4,817 | \$ 8,221,620 |
| Minor-High Damage to FEMA IA Applicants (All Other Home Types) | 830 | \$ 2,227,155 | \$ 2,683 | \$ 28,011,947 |
| Major-Low Damage to FEMA IA Applicants (Mobile Homes) | 104 | \$ 1,097,322 | \$ 10,551 | \$ 8,014,032 |
| Major-Low Damage to FEMA IA Applicants (All Other Home Types) | 297 | \$ 2,252,689 | \$ 7,585 | \$ 10,929,600 |
| Major-High Damage to FEMA IA Applicants (Houses) | 59 | \$ 653,430 | \$ 11,075 | \$ 2,711,168 |
| Major-High Damage to FEMA IA Applicants (Condos/Apartments/Town homes) | 14 | \$ 25,634 | \$ 1,831 | \$ 643,328 |
| Major-High Damage to FEMA IA Applicants (Mobile Homes) | 22 | \$ 411,361 | \$ 18,698 | \$ 1,010,944 |
| Major-High Damage to FEMA IA Applicants (All Other Types) | 1 | \$ - | \$ - | \$ 45,952 |
| Severe Damage to FEMA IA Applicants (Houses) | 19 | \$ 607,961 | \$ 31,998 | \$ 873,088 |
| Severe Damage to FEMA IA Applicants (Condos/Apartments/Town homes) | - | \$ - | \$ - | \$ - |

| | | | | |
|--|--------------|---------------------|------------------|-----------------------|
| Severe Damage to FEMA IA Applicants (Mobile Homes) | 6 | \$ 32,267 | \$ 5,378 | \$ 809,004 |
| Severe Damage to FEMA IA Applicants (All Other Types) | 4 | \$ - | \$ - | \$ 183,808 |
| Real Property Insurance Claims | - | | | |
| NFIP Identified Damages | - | | | |
| Damage to Public Housing | - | | | |
| Total Housing Loss | 3,665 | \$ 8,990,958 | \$ 95,726 | \$ 120,864,442 |
| Accounting for an additional 30% in funding needed to support rebuilding to higher standards (resilience) | | | | \$ 157,123,775 |
| FEMA payments to repair/replace homes | 788 | | \$ 6,636 | \$ 5,228,919 |
| Real Property Insurance Payments | 2,368 | | | |
| NFIP Building Payments | 17,573 | | | |
| Public Housing Funds | 1,611 | | | |
| Total Support | | | | \$ 5,228,919 |
| Initial Unmet Needs | | | | \$ 115,635,523 |
| Total Unmet Housing Need (Accounting for an additional 30% in funding needed to support rebuilding to higher standards (resilience)) | | | | \$ 151,894,856 |

Table 14: Total Derived Impacts and Unmet Needs for Housing for Orange County. Data Source: FEMA.

Infrastructure Impacts and Unmet Needs

Hurricane Milton caused flooding and damage to infrastructure systems in Orange County, including roadways, flood mitigation systems, public facilities, schools, homeless shelters, senior centers, and infrastructure that supports the county's housing stock. Many neighborhoods' streets throughout west and southwest Orange County, including Winter Park and Orlando, were completely impassable in, during, and after Milton, making it impossible for residents to leave their flooded homes and dangerous for emergency services to reach these areas.

This section highlights the resulting losses and damage to infrastructure in Orange County from Hurricane Milton. The unmet infrastructure need is calculated by an assessment of losses to public infrastructure under the FEMA Public Assistance (PA) Program (with the local government cost share or "match" at 25 percent), FEMA Hazard Mitigation Projects (with the local government "match" or cost share at 25 percent), county identified non-match projects, and mitigation activities that are not covered by other grant sources.

| PA Category | # Damaged Sites | Sum of Approx. Cost | Sum of Federal Share | Sum of Non-Federal Share |
|------------------------------|-----------------|---------------------|----------------------|--------------------------|
| A - Debris | 25 | \$6,152,185 | \$6,152,185 | \$0 |
| B - Emergency Measures | 42 | \$1,225,341 | \$1,225,341 | \$0 |
| C - Roads and Bridges | 1 | \$70,000 | \$52,500.00 | \$17,500 |
| D - Water Control Facilities | 0 | \$0 | \$0 | \$0 |
| E - Building and Equipment | 10 | \$1,742,457 | \$1,306,842.75 | \$435,614 |
| F - Utilities | 2 | \$15,340,000 | \$11,505,000.0 | \$3,835,000 |
| G - Other | 6 | \$531,657 | \$398,742.53 | \$132,914 |
| All Categories | 86 | \$25,061,639 | \$20,640,611 | \$4,421,028 |

Table 15: Infrastructure Impacts to Orange County. Data Source: FEMA.

| PA Category | Estimated PA Cost | 30% Resiliency | 25% Local Match |
|------------------------------|---------------------|--------------------|--------------------|
| | | | (Total Unmet Need) |
| A - Debris | \$6,152,185 | 0 | \$ |
| B - Emergency Measures | \$1,225,341 | 0 | \$ |
| C - Roads and Bridges | \$70,000 | \$21,000.0 | \$22,750.00 |
| D - Water Control Facilities | \$0 | \$0 | \$0 |
| E - Building and Equipment | \$1,742,457 | \$522,737.1 | \$566,298.53 |
| F - Utilities | \$15,340,000 | \$4,602,000.0 | \$4,985,500.00 |
| G - Other | \$531,657 | \$159,497.0 | \$172,788.43 |
| Total | \$25,061,639 | \$5,305,234 | \$5,747,337 |

Table 16: Infrastructure Estimated Costs and Unmet Need for Orange County. Data Source: FEMA.

| PA Category | Estimated PA Cost | 30% Resiliency | 32% Increased Cost of Building Materials | 25% Local Match (Total Unmet Need) |
|------------------------------|---------------------|--------------------|--|------------------------------------|
| A - Debris | \$6,152,185 | 0 | 0 | 0 |
| B - Emergency Measures | \$1,225,341 | 0 | 0 | 0 |
| C - Roads and Bridges | \$70,000 | \$21,000 | \$24,479 | \$28,870 |
| D - Water Control Facilities | \$0 | \$0 | \$0 | \$0 |
| E - Building and Equipment | \$1,742,457 | \$522,737 | \$609,337 | \$718,633 |
| F - Utilities | \$15,340,000 | \$4,602,000 | \$5,364,398 | \$6,326,600 |
| G - Other | \$531,657 | \$159,497 | \$185,920 | \$219,269 |
| Total | \$25,061,639 | \$5,305,234 | \$6,184,135 | \$7,293,371 |

Table 17: Infrastructure Estimated Costs and Unmet Need for Orange County. Data Source: FEMA.



Total estimated infrastructure damage is \$25,061,639, with Federal funds covering \$20,640,611 and a remaining non-federal share of \$4,421,028. Utilities in the county sustained the most significant financial impact, totaling \$15.34 million in damages, followed by debris removal costs of \$6.15 million and building and equipment repairs at \$1.74 million. Emergency measures, roads and bridges, and other infrastructure categories had lower costs, while water control facilities reported no damage.

The total remaining unmet infrastructure need for the county, after factoring in resiliency and increased material costs, amounts to \$7,293,371. Utilities face the largest funding gap at \$6.33 million, followed by building and equipment repairs at \$718,633 and roads and bridges at \$28,870. Debris removal and emergency measures are fully funded with no remaining unmet needs.

Key priorities may include closing the funding gap in utilities to restore essential services and increase resiliency, securing additional resources for building and equipment repairs, and strengthening resiliency measures to reduce future infrastructure vulnerabilities. Note that some PA projects for Milton may have originally been identified as a part of the Hurricane Ian impacts and unmet assessments. The map below shows the paths of both storms which were close in proximity and time to each other, compounding and exacerbating impacts of the first storm, Ian, with the later, Milton.

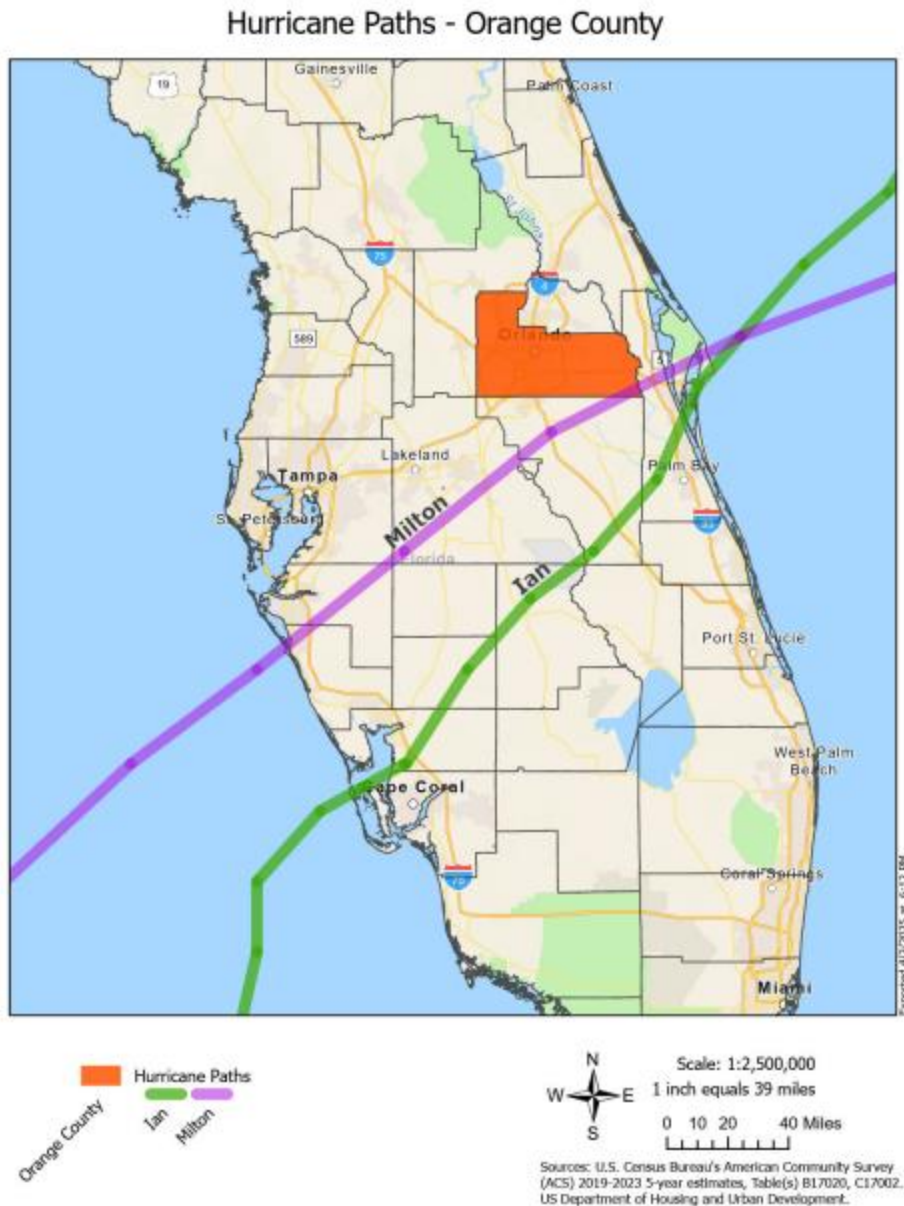


Figure 10: Hurricane Ian (2022) and Milton (2024) Paths.

These projects, however, were subsequently impacted, or further exacerbated, by Hurricane Milton. These projects will be identified as such with the appropriate tiebacks to Milton.

Economic Impacts and Unmet Needs

This Action Plan's assessment of unmet needs for economic revitalization prioritizes identifying the direct impacts of Hurricane Milton on small businesses, including damage to structures and inventory. To support recovery, the Small Business Administration (SBA) provides low-interest disaster loans to eligible businesses, and the extent to which these loans are utilized serves as a key measure of the disaster's effect on the business community. The table below presents the verified business property losses of all SBA applicants, categorizing them based on whether they were approved or declined for SBA assistance.

| | Small Business Administration (SBA) Verified Business Property Loss of All SBA Applicants | | |
|------------------------------|---|-------|---------------------------------|
| | | Count | HUD Assessed (Estimated) Impact |
| A | SBA approved applicants with a verified HUD Category 1 Losses | 3 | \$11,296 |
| B | SBA approved applicants with a verified HUD Category 2 Losses | 3 | \$66,872 |
| C | SBA approved applicants with a verified HUD Category 3 Losses | 7 | \$377,339 |
| D | SBA approved applicants with a verified HUD Category 4 Losses | 32 | \$3,149,791 |
| E | SBA approved applicants with a verified HUD Category 5 Losses | 49 | \$44,933,793 |
| F | SBA declined applicants with a verified HUD Category 1 Losses | 7 | \$12,036 |
| G | SBA declined applicants with a verified HUD Category 2 Losses | 3 | \$67,636 |
| H | SBA declined applicants with a verified HUD Category 3 Losses | 9 | \$420,077 |
| I | SBA declined applicants with a verified HUD Category 4 Losses | 40 | \$9,527,797 |
| J | SBA declined applicants with a verified HUD Category 5 Losses | 149 | \$73,159,818 |
| K | Total Real Estate Loss for all HUD Damage Categories | 40 | \$9,527,797 |
| L | Total Content Loss for all HUD Damage Categories | 149 | \$73,159,818 |
| M | Total verified loss for all businesses (Estimate) | 189 | \$82,687,615 |
| N | Accounting for an additional 30% in funding needed to support rebuilding to higher standards (resilience) | | \$85,545,954 |
| Duplication of Benefits | | | |
| O | Total SBA Loans Offered but Not Accepted | 94 | \$47,325,180 |
| P | SBA Current Loan Amount | 50 | \$1,213,912 |
| Q | Total Benefit | | \$48,539,092 |
| Overall Business Unmet Needs | | | |
| R | Total unmet business needs estimate | | \$34,148,523 |
| S | Accounting for 30% resilience addition | | \$37,006,862 |

Table 18: Verified Business Property Loss of All SBA Applicants. Data Source: Small Business Administration.

Economic impacts and unmet need were determined using the following HUD-based methods where possible. First, a HUD business loss category (1 through 5) was determined for each non-landlord and non-insured business applying for and inspected by HUD (N=156) based on the sum of real and content losses. A count of each business approved for a loan and the total losses was determined for each HUD damage category (1 through 5) (Lines A – E). Similarly, a count of businesses and total losses for those who were declined by SBA but for which a damage estimate was determined (Lines F – J). Total real estate (Line K) and content (Line L) losses were calculated across these two groups (approved and declined), and a total business loss of \$82.6 million was found based on the sum across all damage categories (Line M). When applying a 30% resilience cost (increased cost of compliance) to the real damage estimates, the total impact to businesses reaches \$85.5 million (Line N).

Subtracting the total benefit (Line Q) from the total loss without (Line M) and with (Line N) resilience results in a total remaining economic unmet need of \$34.1 or \$37 million respectively across the impact area. Among SBA-approved applicants, the majority of losses fall under Category 5, with 49 applicants. The table details verified business property losses among SBA applicants, distinguishing between those approved and declined for assistance. Among SBA-approved applicants, Category 5 losses are the most significant, with 49 businesses incurring damages totaling \$44,933,793. Category 4 follows, with 32 approved applicants experiencing losses amounting to \$3,149,791.

The support (loans) offered but not accepted for those approved for loans (Line O), which is \$47,325,180, is derived as the sum of total losses less the sum of SBA current loan amount (Line P), \$1,213,912, resulting in a total benefit available of \$48.5 million (Line Q). SBA-declined applicants report significantly higher financial losses, particularly in Category 5, where 149 businesses sustained damages totaling \$73,159,818. Category 4 losses among declined applicants are also notable, reaching \$9,527,797 across 40 businesses. The total estimated verified loss for all businesses stands at \$82,687,615, illustrating the widespread financial impact on businesses affected by the disaster.

When factoring in resilience-related rebuilding costs, the total estimated loss rises to \$85,545,954. However, only \$1,213,912 in SBA loans has been allocated, leaving a substantial funding shortfall. The overall unmet business needs amount to \$81,473,703, and after accounting for a 30% resilience adjustment, this figure increases to \$84,332,042. These figures highlight a significant gap in financial support, underscoring the need for additional funding to help businesses recover and implement necessary mitigation measures for future resilience.

Impacts to the Local Business Workforce

Based on the SBA business disaster loan data for Orange County following Hurricane Milton, a clear pattern emerges around the workforce vulnerabilities of local businesses, especially those with higher levels of damage. Businesses with verified Category 4 and 5 losses represented the majority of total estimated damages, with nearly \$120 million in combined verified losses across both approved and declined applicants. Importantly, the majority of Category 5 businesses (149 out of 198) were declined for SBA loans, signaling a large population of employers facing significant operational and financial strain without access to traditional disaster recovery funding. These

businesses, which likely include those with physical storefronts, equipment-heavy operations, and staff-intensive services, are at the highest risk of prolonged closures, layoffs, or permanent shutdowns, making them candidates for workforce stabilization programs.

The heavy concentration of losses in content (e.g., equipment, inventory, and tools) rather than real estate suggests that many affected businesses rely on specialized resources to operate—resources that directly enable employment. When these are destroyed, employers cannot reopen or rehire, and employees are displaced regardless of physical building damage. Additionally, the low uptake of SBA loans (only \$1.2M in active loans out of \$47M offered) indicates a disconnect between available financial recovery tools and actual business capacity to absorb debt. Many employers, particularly small businesses, may be unable to sustain their workforce without non-loan-based assistance

Mitigation Needs Assessment

The Mitigation Needs Assessment is a risk-based assessment that summarizes the natural threats and hazards in Orange County. The Mitigation Needs Assessment informs the use of Orange County’s 15% minimum CDBG-DR mitigation set-aside and helps build resilience and mitigation measures into the county’s CDBG-DR recovery programs and projects.

The Florida Enhanced State Hazard Mitigation Plan.³ (SHMP) is designed to reduce deaths, injuries, and property losses caused by natural hazards throughout the state. Updated in 2023 and effective through August 2028, the SHMP identifies hazards based on Florida’s disaster history and outlines goals, objectives, strategies, and actions aimed at reducing future losses. The implementation of planned, pre-identified, and cost-effective mitigation measures not only helps reduce loss of life, property, and environmental resources but also streamlines the disaster recovery process. Hazard mitigation is most effective when guided by an inclusive, comprehensive, long-term strategy developed prior to a disaster event.

The SHMP identifies the following 11 major natural hazards:

- Flood
- Tropical Cyclone
- Wildfire
- Severe Thunderstorm
- Sinkhole
- Extreme Heat
- Erosion
- Winter Weather
- Drought
- Earthquake
- Tsunami

To assess risk, the SHMP combines relative rankings across various factors—including county area, population and population distribution, built environment, critical infrastructure, state operations and facilities, first responder facilities, economic consequences, and environmental impacts—into a cumulative hazard risk index for each county.

³ <https://flshmp-floridadisaster.hub.arcgis.com/pages/natural-hazards>

To further refine its understanding of local hazard risks, Orange County reviewed its Local Mitigation Strategy⁴ (LMS), updated in 2021, which provides additional detail and prioritization of hazards specific to the county. This localized analysis complements the broader SHMP framework and supports targeted planning efforts at the local level.

The county's Local Mitigation Strategy (LMS) identifies hazards that could impact Orange County and its municipalities and determines what populations, properties, and areas of the county are most vulnerable to these various hazards so that measures can be taken to help prevent or reduce vulnerability and/or their impacts. The LMS meets the requirements of the Hazard Mitigation Plan (HMP) as specified by HUD. Additionally, as part of the County's unmet needs consultation with local jurisdictions, the County specifically requested information regarding local hazard vulnerabilities, existing mitigation and priority resilience needs. These discussions aimed to identify areas where additional resources are required to reduce disaster risk and strengthen community preparedness.

The following hazards and sub-hazards are described in the LMS and are based on the various natural disasters that have been identified as having potential impacts on Orange County:

The Orange County Local Mitigation Strategy (LMS) includes a Hazard and Vulnerability Assessment Tool. This tool evaluates the overall risk of various hazards based on the following factors:

- **Probability of Future Occurrences:** The likelihood that a hazard will happen again.
- **Severity of the Hazard:** This includes the magnitude of the hazard as it affects human life, property, spatial areas, and economic conditions.
- **Mitigation Measures:** The effectiveness of current measures in place to address the hazards.

The risk scoring system uses a scale from 0% to 100% and is calculated using the formula:

$$**\text{Probability} * (\text{Magnitude} - \text{Mitigation}) = \text{Relative Risk}**.$$

| | |
|--------------------|------------------------------------|
| Low-Risk | Risk scoring is less than 30% |
| Medium-Risk | Risk scoring is between 31% to 60% |
| High-Risk | Risk scoring is 61% or greater |

Table 19: Risk Scoring and Categorization

The potential hazards are identified in the LMS as “**High**” relative threats (risk scoring is 61% or greater), “**Medium**” relative threats (risk score is between 31% to 60%), and “**Low**” relative threats (risk score is 0% to 30%). The analysis of these potential hazards and vulnerabilities was used to inform the identification and evaluation of mitigation to be funded by CDBG-DR. The potential hazards listed below are natural hazards. Hazard/risk identification and vulnerability assessments are conducted as a process of defining, identifying, and classifying vulnerabilities and their risks to Orange County and its municipalities.

The following hazards are based on the various natural hazards that have been identified as having the potential to impact Orange County.

⁴ <https://mccmeetingspublic.blob.core.usgovcloudapi.net/edgewoodfl-meet-9ef53b149f94418dba736b4ee033ce9a/ITEM-Attachment-001-124185df174a424c9a81d049134849b1.pdf>

| High Risk | Medium Risk | Low Risk |
|-------------------------|---|---------------------------------------|
| Tropical Systems | Flood | *No Low Risk Natural Disasters |
| Sinkholes | Wildfires | |
| Tornadoes | Extreme Temperatures- Drought, Winter Storms (Freezes), and Heat Waves | |
| | Severe Thunderstorms- Hail and Lightning | |

Table 20: High and Medium Risk Orange County LMS (Natural Hazards)

TROPICAL SYSTEMS: HIGH RISK

Tropical Systems: Tropical Systems such as tropical storms and hurricanes are among the most destructive natural hazards. They can cause considerable damage and property loss in Florida and Orange County. These storms are characterized by sustained high-velocity winds that circulate around a low-pressure center. They form and develop over warm waters due to atmospheric instability and can impact entire regions, affecting the lives of thousands of people, as well as homes and businesses. Mitigating the hazards associated with tropical cyclones is an essential and ongoing effort. Sometimes referred to as coastal storms because of their paths toward Florida, the impacts can extend far inland, as the sheer size of these storms affects areas beyond just coastal communities. There are different classifications of tropical cyclones that may affect Florida and, specifically, Orange County: tropical depressions, tropical storms, and hurricanes.

Tropical Depression: A Tropical Depression (TD/SD) is a weather phenomenon characterized by a cluster of storms that produce considerable rainfall and are linked to a dynamic low-pressure system. This system features sustained wind speeds of less than 39 mph, which, while not strong enough to warrant a name, still indicates significant atmospheric activity. For this document's purposes, tropical depressions are not tracked as "named storms," despite their moderate frequency and potential for affecting weather patterns.

Tropical Storms: Tropical Storms (TS) are characterized by a well-defined moving low-pressure system that carries substantial amounts of rain. They exhibit better organization and a slight counterclockwise rotation, with sustained winds ranging from 39 to 73 mph. The center of the storm, known as the "eye," may be present but can be difficult to identify.

Hurricanes: Hurricanes are classified as H1, H2, H3, H4, and H5 on the Saffir-Simpson Wind Scale. These storms exhibit a full rotation around a low-pressure center and feature a distinct eye. Hurricanes can generate a variety of severe weather-related hazards and may release a significant amount of rain over extensive areas. Depending on the hurricane's category, sustained winds can range from 74 mph to more than 157 mph, with even stronger gusts possible. Other hazards may include tornadoes, lightning, and flooding.

Previous Occurrences: The Local Mitigation Strategy (LMS) indicates that Orange County has experienced 38 different tropical systems, all within a 65-mile radius of its center point. The following list includes those systems for which the "eye," or center, crossed the county's borders. It is

important to note that the LMS has not been updated since Hurricane Ian in 2022 and Hurricane Milton in 2024, during which time CDBG-DR funds were received.

| Storm name | Date of impact | Magnitude Crossing Orange County Border | Greatest Magnitude | Areas of Direct Impact within Orange County |
|--------------------|----------------|---|--------------------|---|
| Easy | 09/06/1950 | TS | H3 | Winter Garden, Ocoee, Apopka |
| King | 10/18/1950 | H1 | H3 | Ocoee, Apopka |
| Unnamed 1959 | 06/18/1959 | TD | H1 | Incorporated Orange County |
| Donna | 09/11/1960 | H3 | H4 | Apopka |
| Cleo | 08/28/1964 | TS | H5 | Incorporated Orange County |
| Brenda | 06/19/1968 | TD | H1 | Incorporated Orange County |
| Jenny | 10/04/1969 | TD | TS | Incorporated Orange County |
| Subtropical 1 1974 | 06/25/1974 | SS | SS | Incorporated Orange County |
| Subtropical 3 1976 | 09/13/1976 | TD | SS | Windermere, Ocoee, Apopka |
| Dennis | 08/18/1981 | TS | H1 | Incorporated Orange County |
| Gabrielle | 09/14/2001 | TS | H1 | Bay Lake, Lake Buena Vista, Orlando, Winter Park |
| Henri | 09/06/2003 | TD | TS | Winter Garden, Ocoee, Orlando, Eatonville, Maitland |
| Charly | 08/14/2004 | H1 | H4 | Lake Buena Vista, Orlando, Eatonville |
| Irma | 09/10/2017 | TS | H5 | Unincorporated Orange County |

Table 21: Tropical Systems within Borders of Orange County 1950-2017. Data Source: NOAA Historical Hurricane Tracks.

Impacts: Tropical systems, such as hurricanes and tropical storms, have significantly impacted Orange County. Damages include destructive winds, heavy rainfall leading to inland flooding, power outages, damage to infrastructure (including buildings and roads), disruptions in communication networks, loss of life, and environmental damage affecting agriculture, local economies, and tourism.

Future Impacts: The vast majority of Atlantic Ocean tropical cyclones occur during a period from June 1st to November 30th each year, also known as “Hurricane Season.” Through data collected from the National Oceanic and Atmospheric Administration's (NOAA) National Hurricane Center, probabilities were created for the estimated return periods of hurricanes to coastal regions of Florida based upon their storm category. Since Orange County is an inland county, there is an assumption that each storm that hits the coast will decrease in intensity before reaching Orange County, thus making the estimated return period slightly lower.

The probability of a hurricane impacting Orange County sometime in the future, either directly or indirectly, is a near certainty. The Florida peninsula has historically received the highest number of tropical system activity in the nation. The category of a storm or its pathway for a strike is not as well-known and depends on several factors. The return rates for weaker systems like tropical depressions and tropical storms are more frequent. Orange County and its jurisdictions are much more likely to experience a lower category of hurricane, storm, or depression than the more severe systems.

Any hurricane could cause property damage to all building types and significant economic impacts and disruption of services, such as utilities (electric, sewer, water). An influx of debris due to high winds and torrential rains could cause utility outages and cut off transportation routes for emergency and first responders. The economy could also be affected, as businesses and industries are not able to operate normally in the aftermath of a tropical system.

Mitigation Strategies: The LMS cites that the county is highly vulnerable to the effects of tropical systems, and all areas throughout the county are vulnerable to their impacts. The probability/frequency of the most severe tropical systems is low in Orange County, but smaller storms with shorter return periods can cause moderate damage to the county and its jurisdictions. The state of Florida puts a great deal of emphasis on preparedness and mitigation for tropical systems, particularly hurricanes. Orange County participates in various emergency response exercises and training, including damage assessment courses, electronic incident management systems, and periodic review of Emergency Operations Center protocols. The LMS also suggests that the county can increase public awareness about the dangers of tropical systems through outreach events. There are also opportunities to continually review and improve buildings codes to better address the potential impacts to property, as well as evaluate and improve the most critical infrastructure so that it is equipped to handle the most frequent types of tropical systems that the county faces. The LMS also cites tropical systems as a high threat, mainly because of the significant impacts that they can pose to humans, structures and property, the geographic area, and the potential disruption to economics and services. The county has already engaged in several mitigation efforts, which can help reduce recovery times, but tropical systems will continue. Hurricanes are more predictable than other types of hazards, although predictions are not always 100% accurate. The LMS recommends that while impacts can be reduced through better detection

technology, public outreach, and emergency notification systems, it is incumbent upon residents to continue to plan, train, exercise, and equip themselves in preparation for an incident.

SINKHOLES/LAND-SUBSIDENCE: HIGH RISK

Sinkholes: A sinkhole is a type of land subsidence that occurs when the carbonate layers of limestone or dolomite beneath the ground's surface are eroded by flowing acidic groundwater. Initially, the water supports the walls of the cavity; but over time, if the water table drops, the support from the groundwater diminishes, and the cavity continues to erode. Additionally, the weight of the ground above the void increases stress on the cavern, leading to a collapse. This collapse can happen suddenly and can be catastrophic for infrastructure, roadways, homes, or any buildings situated above the sinkhole.

Previous Occurrences: According to the Florida Department of Environmental Protection (FDEP) Florida Geological Survey (FGS) Subsidence Incident Report (SIR) database, there have been 195 sinkholes reported by citizens in Orange County from 1961 to 2014. These land subsidence events have not been verified by a geologist but are reports from citizens when they noticed a land subsidence. The greatest number of sinkholes reported to the FGS in one (1) year was in 1981 with 23 instances. This included the Winter Park Sinkhole (1981) that was reported to have been over 107 feet deep, with a length of 350 feet by a width of 350 feet. There have not been any significant sinkholes that have occurred since 2010.

The number of reported sinkholes received by the FDEP FGS SIR is quite different from the number of property insurance claims received. Between 2006 – 2010 Orange County had over 510 claims filed, or 2.06% of all claims filed in the State of Florida during the same time period.

| Depth (In Feet) | Number of Sinkholes |
|-----------------------|---------------------|
| Less than 5 feet | 102 |
| 5-9 feet | 29 |
| 10-24 feet | 39 |
| 25-49 feet | 15 |
| 50-99 feet | 7 |
| 100-109 feet | 2 |
| Greater than 200 feet | 1 |

Table 22: Sinkholes in Orange County, FL, 1961-2021. Data Source: Florida Department of Environmental Protection (FDEP) Florida Geological Survey (FGS) Subsidence Incident Report (SIR).

Location: The state's geology contributes to sinkhole locations in Orange County and comprises three different areas: Area I, Area II, Area III.

- **Area I** is described as bare or thinly covered limestone where sinkholes are few, shallow and broad, and develop gradually where solution sinkholes dominate. This encompasses most of Lake Apopka and the restoration found to its north.



- **Area II** occurs where the cover is 30 to 200 feet thick and consists mainly of incohesive and permeable sand where sinkholes are few, small, of small diameter and develop gradually, dominated by cover-subsidence sinkhole. Large portions of the eastern, southwestern, and south-central county and some parts of Orlando, Belle Isle, and Edgewood are in this category.
- **Area III** has cover 30 to 200 feet thick as well. However, it is comprised of cohesive clayey sediments of low permeability where sinkholes are most numerous, of varying size, and develop abruptly. Cover-collapse sinkholes are more prevalent in this area that includes such as parts of Apopka, Maitland, Oakland, Ocoee, Orlando, Windermere, Winter Garden, and Winter Park.

Sinkholes can be found throughout Orange County, though they are concentrated in certain areas. The unincorporated portions of the county have about 104 reported sinkholes in its boundaries, primarily in the northwestern, central, and southwestern portions. Other jurisdictions with a prevalence of sinkhole include Apopka, Maitland, Ocoee, Orlando, Windermere, and Winter Park. Others like Belle Isle, Eatonville, Edgewood, Oakland, or Winter Garden have few, though not unheard of, instances of reported sinkholes.

Impacts: Direct impacts due to sinkholes are difficult to determine as FDEP FGS does not currently track damage estimates for each of the reported sinkholes that have occurred previously in Orange County. Some of the estimated side effects across the State have included decreases in home values due to sinkholes, as well as a significant increase in insurance premiums. Loss estimates from the entire State were reported at greater than \$1.4 billion across 24,671 claims from 2006 to 2010.

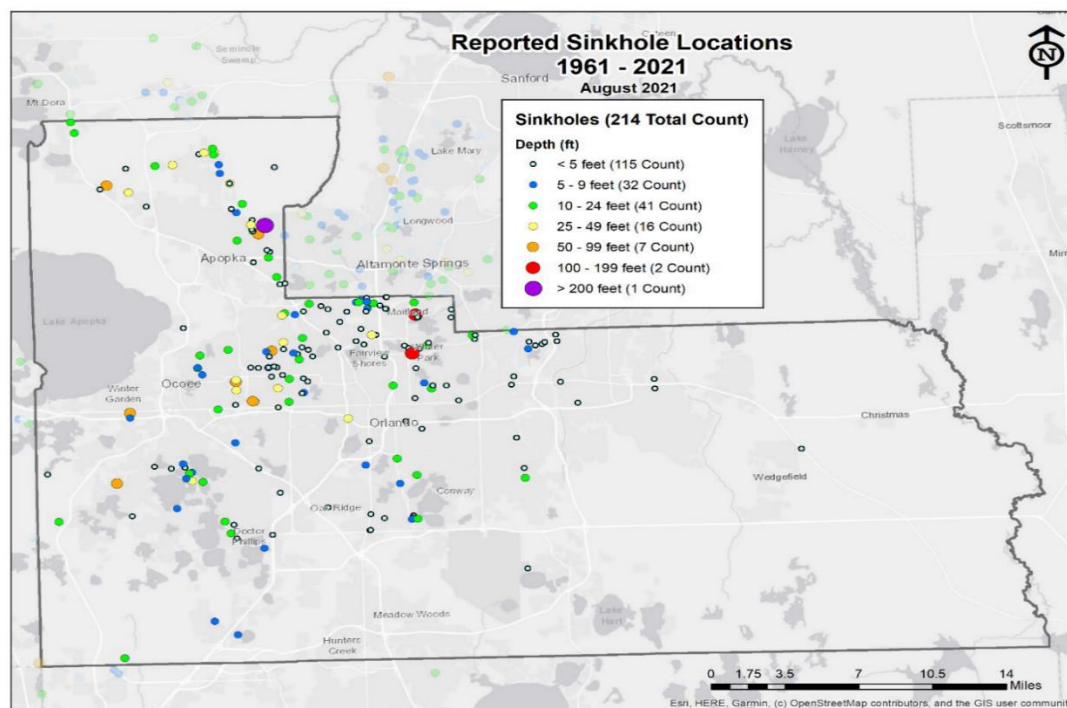


Figure 11: Map of Sinkhole Locations in Orange County, FL, 1961-2021. Data Source: FDEP FGS SIR.

Orange County has not experienced any human impacts for loss of life or injuries related to this hazard. Property damages for Orange County are not currently tracked, as noted previously. According to the Florida Office of Insurance Regulation, from 2006 to 2010 there were approximately 510 property insurance claims made in Orange County for sinkhole damage. The average expense for both open and closed claims was \$9,936.35, which would mean about \$5,067,538.50 total insurance expenses for Orange County sinkhole claims. While this is not an exact dollar for dollar amount of actual property damages, this is the most current and available data that exists.

Future Impacts: Orange County is especially vulnerable to sinkholes, a recurring hazard that can be highly unpredictable in where or how often they occur. The overall impacts are to property and economic disruptions. These subsidence events are geographically isolated from a concentrated area and normally occur in certain portions of the county. While there have not been reported losses of life or casualties due to sinkholes, other parts of the state have seen them, so there is some potential that this could take place in Orange County. The severity of sinkholes varies from large incidents that cover collapses to smaller depressions that are cover-subsidence. Though property insurance coverage may not be enough to properly mitigate this hazard for the future, other mitigation measures are tough to come by for this hazard due in part to its unpredictable nature.

Mitigation Strategies: The LMS cites that the overall risk from sinkholes is a **high threat**, mainly because of the significant impacts this hazard poses to property and economics. In addition, there is a high probability of multiple occurrences in the county that will affect residents and even businesses. The mitigation measures that are currently in place can only have a limited mitigation impact, some impacts may be reduced through better research and predictive modeling because of the pilot study. Further training and exercises related to this hazard are needed so that first

responders and emergency managers are better aware of what can or should be done to address sinkholes as a major hazard.

SEVERE THUNDERSTORMS – MEDIUM RISK

Thunderstorms: Thunderstorms are created when warm, moist air rises and meets cooler air; these storms can produce lightning, high winds, hail, tornados, and heavy rain, which can cause flooding. Only about 10% are considered severe, according to NOAA. To be considered severe, the NWS states that the thunderstorm must include one of three characteristics: winds greater than 58 miles per hour, hail that is 0.75 inches in diameter or greater, or conditions that produce tornadoes. Thunderstorms, hail, and lightning affect a relatively small area when compared to other weather events such as tornadoes or tropical systems. A typical thunderstorm is about 15 miles in diameter and lasts an average of 30 minutes. Despite their small size, all thunderstorms can be dangerous. Of the estimated 100,000 thunderstorms that occur each year in the United States, about 10% are classified as severe. **The Severe Thunderstorm hazard is comprised of three (3) other sub-hazards – tornadoes, hail, and lightning – described below.**

TORNADO'S SUB-HAZARD- HIGH RISK

Tornadoes: Tornadoes are violently rotating, massive columns of air in contact with the earth's surface and its cloud base. A tornado's wind speed normally ranges from 40 mph to more than 300 mph. They are also described by several names, such as "twisters," "vortexes," or "cyclones." "Funnel clouds" are shaped like their name suggests, but they do not make contact with the ground. Not all tornados have visible funnel-shaped clouds. "Waterspouts," which form overwater bodies, are usually weaker than their land-based counterparts. Waterspouts occasionally move inland, becoming tornadoes and causing damage and injuries.

Although most people associate tornadoes with the Midwest, Florida has nearly as many tornadoes as many midwestern states, though Florida tornadoes are generally short in duration and have a narrower path. These funnel clouds can be spawned by hurricanes and appear predominantly along the right-front quadrant of the storm. While tornadoes are more prevalent in west-central Florida, southeast Florida, and portions of the panhandle, Orange County has seen many of these types of severe weather events over the years.

Previous Occurrences: According to data from the NWS, a total of 68 tornadoes occurred in Orange County from 1950 to 2021. The most frequent were weaker tornados classified as an F/EF-0, with 32 events, and F/EF-1, at 21 reported tornadoes. Stronger storms like F/EF-2 reported nine events, and F/EF-3 tornadoes reported three occurrences. Orange County has not experienced anything stronger than an F/EF-3. Since 1950, the State of Florida has only experienced one (1) F/EF-4 tornado and no instances of an F/EF-5 magnitude.

Impacts: Tornadoes have caused severe impacts in Orange County and its jurisdictions. Records indicate that there have been at least four reported casualties and more than 159 injuries in Orange County. If you include tornadoes that originated in other areas around Orange County, these human impacts would be even higher. The seven tornadoes that struck East Central Florida in 1998 are considered to be the deadliest tornado event in Florida history with a total of 42 casualties and 260 injuries. One of the tornadoes formed in Lake County as a F/EF-3 and veered into the western portion

of Orange County, continuing into Winter Garden, Oakland, Ocoee, and portions south of Apopka. Three people in Orange County died, and more than 70 were injured. Total property damages for the 68 recorded tornadoes in Orange County are listed at over \$37 million. The 1998 tornado event mentioned previously caused over \$15 million worth of property damage alone. This was the single most costly tornado event to occur in Orange County.

Future Impacts: With 68 tornadoes occurring in the span of 71 years, there is a good chance that Orange County will experience a tornado on average about once every 1 – 3 years. These will generally be weaker tornadoes as measured by the Enhanced Fujita Scale. More severe storms have occurred less frequently in the past but based upon the frequency of severe thunderstorms forming across Orange County and its jurisdictions, there is equal potential for those stronger tornadoes each year. For this reason, the probability for a tornado to occur is categorized as high.

Mitigation Strategies: The LMS cites that, due to the prevalence of severe thunderstorms, Orange County has taken several steps to mitigate the hazard. There are multiple other plans that address tornadoes as a hazard. Where tornadoes can strike is not as predictable; all of Orange County and its jurisdictions have the same probability of being hit. For this reason, training and exercise drills take place to help familiarize response personnel with their roles and responsibilities and outline their actions to respond to a tornado event. Because tornadoes can spawn from tropical systems like hurricanes or tropical storms, there is usually some emphasis placed on the possibility for tornadoes during the annual State Hurricane Exercise. Other support supplies and equipment have been purchased by the county as part of their anticipated response to tornado events. The county also has a Citizen Assistance Response Team that has gone out to neighborhoods to help residents with debris from fallen trees and putting up tarps on impacted roofs so that water leaks do not enter the building.

HAIL: SUB-HAZARD-MEDIUM RISK

Hail: Hail is composed of ice and ranges widely in size. Hailstorms are closely associated with thunderstorms, which form hail stones as they cycle through the storm clouds multiple times. The hailstones are suspended by the strong upward motion of the air until the weight of the hail can no longer be carried by the updraft of wind and they fall to the ground. Hail stones generally fall at faster rates as they grow, though other factors such as melting, friction, wind, and rain or other hail stones can slow them down. Severe weather warnings are usually issued for hail when the stones reach a damaging size, causing serious property damage to automobiles and structures, as well as agricultural interests.

Previous Occurrences: Many times, hail is combined with other severe weather hazards. Since 1960, there have been over 259 recorded hail events in Orange County with a magnitude greater than 0.75” size hail according to NWS data. The most common hail size was 0.75”, with 101 occurrences, followed by 1.00” (73) and 0.88” (33). In some cases, multiple hail events were recorded on the same day, but they were in a different location or were of a different magnitude (size).

Impacts: There have been moderate impacts due to hail in Orange County. To date, there has been no loss of life or reported casualties to people. There has been some property damage, though; other property damage, especially to vehicles from visitors or those driving through the county, may not be

recorded by the NWS. Reported property damages are listed at \$60,300 from three (3) hail events. The Spatial Hazard Events and Loss Database for the United States (SHELDUS™) reports much more significant damages for both property damage (\$31,623,066.67) and crop damage (\$500,500.00) in its statistics. Spatial impacts have been isolated as hail does not generally affect large areas of the county or its municipalities all at once. Economic effects on critical infrastructure have been minor at best. An increased number of hailstorms could lead to a more significant amount of overall damage, even though individual events do not produce a large amount of damage on their own.

Future Impacts: Orange County and its jurisdictions are vulnerable to the effects of hail due to its frequency and probability of return. Fortunately, reported damage from the NWS remains relatively low, with no loss of life or injuries. Spatial impacts are limited to a small location, but nearly all of the jurisdictions in Orange County have experienced hail at some point in time. They are likely to experience it again. The potential for damage to occur is moderate, especially to property, buildings, vehicles, and other infrastructure assets that could be compromised by hail. Hail is generally a component of different hazards that may have more significant impacts in Orange County.

Mitigation Strategies: Citing the LMS-Due to its high frequency but low impacts, hail can be difficult to mitigate on a large-scale basis. Property owners could install impact resistant roofing materials to help prevent severe impacts from larger sized hail. This hazard is mentioned in the Orange County CEMP, but very few other plans. Training and exercise in hail does not occur with any degree of regularity. Very little logistical resources or support teams are devoted to hail on its own, but it may be included as part of a response to other associated hazards like severe thunderstorms, lightning, or tornados.

LIGHTNING: SUB-HAZARD MEDIUM RISK

Lightning: Lightning is one of the other products of severe thunderstorms that can cause damage, casualties, or deaths. Lightning is a giant electrical charge that sparks in the atmosphere or between the atmosphere and the ground. In the initial stages of development of a thunderstorm, the air acts as an insulator between the positive and negative charges in the cloud and between the cloud and the ground. When the difference in charges becomes too great, the capacity of the air to act as an insulator breaks down. Then, there is a rapid discharge of electricity seen in the form of lightning. Lightning can occur between opposite charges within the thunderstorm cloud (intra-cloud lightning) or between opposite charges in the cloud and on the ground (cloud-to-ground lightning). One of the main dangers of this hazard is that lightning cannot be forecasted.

Previous Occurrences: Actual occurrences of lightning strikes in Orange County and its jurisdictions are too numerous to count. Table #23 shows the annual lightning strikes from 2010 through 2020, with a total of 1,024,219 strikes.

| Year | Number of Strikes |
|--------------|-------------------|
| 2010 | 53,494 |
| 2011 | 32,943 |
| 2012 | 40,082 |
| 2013 | 39,645 |
| 2014 | 53,124 |
| 2015 | 182,748 |
| 2016 | 121,471 |
| 2017 | 124,619 |
| 2018 | 151,990 |
| 2019 | 108,064 |
| 2020 | 116,039 |
| Total | 1,024,219 |

Table 23: Annual lightning Strikes in Orange County. Data Source: Earth Networks Weather Stations in Orange County, 2010 – 20120.

Impacts: Since 1960, there have been more than 70 lightning strikes that harmed people, property, or natural environments. A worst-case scenario for a lightning strike in Orange County would be measured by the number of damages, injuries, or casualties caused by a single event. On August 22, 2010, several houses in Windermere were struck by lightning, which destroyed the homes. Property damage was estimated at over two million dollars. During one lightning event on August 16, 2011, there was a report of eight injuries at a local theme park. Three guests and five employees who were not directly struck by lightning were taken to the hospital as a precaution and released the next day. Two men were struck and killed by lightning on August 16, 1998, while they were fishing in a canoe on Lake Mack in Orlando. The above-mentioned events directly resulted from lightning. These do not account for the indirect hazards that lightning can create, such as wildfires.

Future Impacts: There are thousands of cloud-to-ground lightning strikes that may occur in Orange County each year. So far, there have been 70 lightning strikes that have caused damage or losses since 1960. This is not a full list of all the lightning strikes in Orange County. This number represents only a small portion of total strikes that take place and does not include cloud-to-cloud strikes or other lightning without impact. The probability of lightning strikes in Orange County and its jurisdictions will remain high, as strikes are directly tied to the occurrence of severe thunderstorms. Due to its unpredictability, lightning has the potential to cause damage during each strike. The lightning strikes that cause property damage, injuries, or casualties are more infrequent. Lightning has the potential to strike during each month of the year. Much like hail, the height of lightning activity aligns with the height of probability for thunderstorms, in the late spring to summer months.

Mitigation Strategies: Citing the LMS, lightning can be difficult to mitigate on a large-scale basis due to its high frequency and low impacts. This hazard is mentioned in the Orange County CEMP but very few other plans. Training and exercise on lightning may be covered as an ancillary hazard for first responders during an event, but is covered very rarely, if ever, as a stand-alone hazard. Some logistical resources or support teams are devoted to responding to the effects of lightning, but those



responses are mainly for electrical restoration. Other resources are included as part of a response to other associated hazards like severe thunderstorms, hail, or tornadoes.

FLOODS: MEDIUM RISK

Flood: Flood or flooding refers to the general or temporary conditions of partial or complete inundation of normally dry land areas from the overflow of inland or tidal water and surface water runoff from any source. Water can collect in floodplains, defined as any land areas susceptible to being inundated by water from any flooding source. In Orange County and most of its jurisdictions, that flood source is normally rain that exceeds the carrying capacity of its drainage systems. Tropical systems like tropical depressions, tropical storms, or hurricanes can also bring with them substantial amounts of falling water. The average annual rainfall in Orlando is 50.6 inches (1,290 mm), the majority of which occurs in the period from June to September. The months of October through May are Orlando's driest season. Other bodies of water like rivers, lakes, streams, wetlands, or even overburdened stormwater systems, can also cause flooding through rising waters where water systems collect. Low lying areas and/or poorly drained land can also accumulate rainfall through ponding on the surface. Floodplains help to store water for eventual release after the end of the storm. In many communities, flooding can cause severe damage and justifies the importance of carrying flood insurance.

Previous Occurrences: While the Local Mitigation Strategy (LMS) indicates that there have been no significant flooding events in Orange County over the past five years, it's important to note that the LMS was last updated in 2021, prior to the impacts of Hurricane Ian and Hurricane Milton on the county. Hurricane Ian caused approximately 16 inches of rain in Orange County, leading to substantial flooding. Flash flooding also affected parts of the area. The Orlando metro region experienced extensive flooding, with Lake Eola overflowing and interstate ramps along I-4 transforming into rivers. Hurricane Milton resulted in more than 10 inches of rain in certain areas of the county, which caused localized flooding in neighborhoods and businesses, as well as rises in local rivers and creeks.

Impacts: Flooding in Orange County causes widespread property damage, disrupted essential services, health risks due to water contamination, displaced residents, damaged infrastructure, and disrupted local economies.

Future Impacts: There is a high probability that Orange County will experience flooding in the future. The potential rate of return of a flood incident is about 2.33 years. The amount of area that resides in the 100-year flood plain for the unincorporated county is high, but most other districts are less than 25% of their area.

Mitigation Strategies: Citing the LMS, there are several current mitigation measures being undertaken by Orange County and its districts regarding flooding. One of the most significant steps is participating in the National Flood Insurance Program (NFIP) Community Rating System (CRS) communities should continue to work towards recertifying them or achieving higher class levels. Other communities at risk of flooding should also be encouraged to participate in the CRS. Orange County has addressed its flood hazard in multiple other plans. Training and exercises on flooding occur at least every other year with simulated events geared towards flooding and damage

assessment. There are some logistical support equipment and teams used by Orange County and its districts to mitigate flood hazards, including a sandbag program and other public works equipment that can be deployed prior to or following a flood event. Warning systems like strafe flow gauges, rainfall monitors, and public notification systems allow Orange County to alert residents and visitors to flooding, especially in areas prone to inundation. Additionally, the County may consider implementing other flood proof measures for future infrastructure projects.

WILDFIRES: MEDIUM RISK

Wildfires: Wildfire is defined by the Florida Forest Service (FFS) as “any fire that does not meet management objectives or is out of control.” Wildfires occur in Orange County every year. They are a part of the natural cycle of Florida’s fire-adapted ecosystems. Many of these fires are quickly suppressed before they can damage or destroy property, homes, and lives. Orange County’s wildfire season runs from January through May when the weather is cooler, rainfall amounts are lower, and vegetative fuel is dry. A combination of these factors, along with moderate winds, makes conditions exactly right for the spread of fire.

There are several types of wildfires that occur in Orange County:

- **Surface Fires:** Burn along the forest floor consuming the litter layer and small branches on or near the ground.
- **Ground Fires:** Smolder or creep slowly underground. These fires usually occur during periods of prolonged drought and may burn for weeks or months until sufficient rainfall extinguishes the fire, or it runs out of fuel.
- **Crown Fires:** Spread rapidly by the wind, moving through the tops of the trees.
- **Wildland/Urban Interface (WUI) Fires:** Occur within the WUI in areas where structures and other human developments meet and intermingle with undeveloped wildland or vegetative fuels. Homes and other flammable structures can become fuel for WUI fires.

Previous Occurrences: Orange County experiences wildfires every year in some fashion, but most of these are small brushfires and do not require vast amounts of resources to extinguish. Over the past five years, there have not been any significant wildfires in Orange County. The Florida Forest Service (FFS) lists only one “significant” wildfire in Orange County during the period of March 2011 to March 2021. This significant fire was called the “Whispering Pines” fire and occurred on May 27, 2011, due to lightning strike in south-central area of Orange County, east of Orlando and south of the Beachline (SR-528). The fire burned 3,924 acres and was fully contained on June 3, 2011.

The most devastating wildfire season in Florida’s recent history was in 1998, when a series of wildfires caused major damage in north central Florida, including Orange County. An unusually wet, mild winter that had encouraged plant growth was followed by extremely hot, dry conditions that turned the heavy growth into prime wildfire fuel. By the early summer of 1998, weather conditions had created a perfect scenario for destructive wildfire, and by July 22, a total of 2,277 fires had burned almost a half million acres of forest in Brevard, Flagler, Orange, Putnam, Seminole, and Volusia counties and destroyed 340 homes and 33 businesses. Statewide, there were 4,902 wildfires that consumed 506,976.7 acres of land that year.

Other wildfire breakouts occurred in 2009, when 44 wildfires burned about 9,540 acres scattered from southeast Orange County to Southern Volusia County.

Impacts: While there have been several large wildfires that have taken place in Orange County in the past, there has not been a significant wildfire event over the past five years. During this time, there have been no injuries or deaths due to this hazard, either from residents or responders. While it is rare, there is some potential for harm to occur to humans, but they usually occur during the beginning stages of wildfires when sudden flare-ups result from high wind conditions or changing weather. Most people have a chance to evacuate the area and avoid harm. Responders are at the greatest risk during the fire suppression process. Property damage and impacts can be much more severe as homes, businesses, and other structures cannot move out of harm's way. According to a report funded by the Joint Fire Science Program, the total damages from the 1998 fires ranged from \$622 – 880 million. The bulk of the losses were incurred by timberland owners and the tourism industry. Depending on their size, wildfires can sometimes cover thousands of acres and send smoke across multiple counties that impact the air quality for miles. Most fires in Orange County are much smaller events and consume a couple dozen acres of land.

Future Impacts: Due to the number of forested areas and availability of fuel sources, Orange County is very vulnerable to wildfires. Their common occurrence increases this vulnerability for much of the county, especially in the Wildland-Urban Interface (WUI), which is where structures and other developments meet or intermingle with undeveloped wildland areas. This creates an environment where fire can move between vegetative and structural fuels. Historical events have shown that large wildfires can and do occur in Orange County and have far-reaching impacts to its jurisdiction, air quality, and even the economy.

Mitigation Strategies: Citing the LMS, due to the common occurrence of wildfires, there are a variety of mitigation actions that are conducted in Orange County. The Office of Emergency Management is working on the Community Wildfire Protection Plan, a specific plan to address wildfire hazards, but it is not yet complete. Other plans also discuss wildfire, such as the CEMP. The Wedge field subdivision is in the eastern portion unincorporated county and, as part of the WUI, is surrounded by heavily wooded areas with high burn probabilities. Due to their proximity in the WUI, the residents here developed a plan to address their vulnerability and became a Firewise Community in 2002, the first designated community in Florida. A Firewise Community provides public education and outreach to neighborhoods about the threat wildfires pose and mitigation tactics that residents can implement to help keep their homes safe. Training occurs normally for wildfire suppression from a firefighting standpoint for fire departments and the Florida Forestry Service. Exercises are less common than the training but would be closer to about every other year. Wildfire preparedness receives a moderate amount of logistical consideration, as prescribed burnings are conducted routinely as weather conditions allow to reduce the supply of fuel for wildfires. In times of drought or high winds, prescribed burning is less commonly used to prevent a planned event from getting out of control and turning into a disaster event.

EXTREME TEMPERATURES: MEDIUM RISK

Orange County can experience natural temperature changes throughout the year; generally, the temperatures are characteristic of a tropical climate, but its geography has the county is situated on

the southern fringe of the humid subtropical climate zone. There are two main climatic seasons each year. The first is warm, with reasonable amounts of rainfall that lasts from May until late September. The second is drier and more incredible, from late October through April, which has less rainfall. The county's warm and humid climate is due to a low, flat elevation near the center of the Florida peninsula. Several types of sub-hazards are associated with Orange County's Extreme Temperatures: drought, freezes/winter storms, and heat waves. Each of these hazards has its list of previous occurrences, affected locations, extent of damage, probability of future incidents, impacts, vulnerabilities, and overall risks. **As such, these sub-hazards will each be described and evaluated separately.**

DROUGHT- SUB-HAZARD: MEDIUM RISK

Drought: Drought is a deficiency of precipitation over an extended period, resulting in a water shortage for some type of activity, group, or an environmental sector.

Previous Occurrences: Since 2000, the longest duration of drought (D1-D4) in Florida lasted 124 weeks, beginning on April 11, 2006, and ending on August 19, 2008. The most intense period of drought occurred the week of February 27, 2001, where D4 (Exceptional Drought) affected 39.08% of Florida land. No major drought events have taken place since the last LMS update.

| Category | Description | Possible Impacts |
|----------|--------------------------------|--|
| None | No Drought Conditions | No impacts |
| D0 | Abnormally Dry (not a drought) | Going into drought: short-term dryness slowing planting, growth of crops or pastures. Coming out of drought: some lingering water deficits; pastures or crops not fully recovered |
| D1 | Moderate Drought | Some damage to crops, pastures; streams, reservoirs, or wells low, some water shortages developing or imminent; voluntary water-use restrictions requested |
| D2 | Severe Drought | Crop or pasture losses likely; water shortages common; water restrictions imposed |
| D4 | Extreme Drought | Major crop/pasture losses; widespread water shortages or restrictions |
| D4 | Exceptional Drought | Exceptional and widespread crop/pasture losses; shortages of water in reservoirs, streams, and wells creating water emergencies |

Table 24: Categorical U.S. Drought Monitor Statistics Drought Classification. Data Source: U.S. Drought Monitor.

Impacts: Drought is usually associated with long periods of intense heat and/or small amounts of precipitation. Drought usually does not directly affect humans, but extreme heat associated with a drought period can cause injury and even death, particularly among vulnerable populations such as children, elderly citizens, transient populations, and/or other special needs populations. Injuries and potential deaths are most likely to affect rural or economically disadvantaged areas that lack air conditioning and immediate medical care. The most significant impact of periods of prolonged drought is the monetary impact on the agriculture industry for crops or livestock. Severe drought would destroy crops before harvest or limit the number of animals that could be reared. Exceptional droughts would devastate much of the agricultural and ornamental plants sector for Orange County.

According to the Small Business Administration (SBA), there has not been a disaster loan issued for drought from 2008 to 2021. This does not eliminate the fact that drought has potentially affected agricultural businesses over the past several years; it only illustrates that there has not been a declared disaster by the SBA related to drought. While drought may not have a measurable effect on residences, public facilities, or critical infrastructure, other consequences could be felt. Impacts on water supplies or water utilities would be the worst-case scenario for a period of severe drought.

Future Impacts: The likelihood of drought returning in Orange County is high, as it is likely for an occurrence, in some form, to be nearly annual. However, the severity of the incident is variable and can range anywhere from a D1 (moderate drought) to a D4 (exceptional drought). A lower severity is more likely to occur and precedes the higher severity for many weeks before the more significant impacts are felt. Drought conditions have typically improved since the last peak drought period in 2012. Weather outlooks extend only so far, but as new data is gathered and interpreted, these predictions can change. As our nation moves into an El Niño weather system for the next few months, we can expect a period of above-average precipitation and cooler temperatures. However, this does not guarantee that drought will not occur in the coming years.

Mitigation Strategies: According to the Local Mitigation Strategy, as a result of recurring droughts, the local St. Johns River Water Management District (SJRWMD) and the South Florida Water Management District (SFWMD) have imposed watering restrictions for landscaping irrigation in Florida to improve efficient use of water resources that can become scarce during drought periods. Limiting the number of days per week and the time-of-day watering occurs has helped to reduce drought impacts and conserve our water resources for some of the most necessary places. Orange County has adopted ordinances for water use and drought-resistant landscaping to help reduce watering needs during drought. Other jurisdictions, such as Apopka, Maitland, Ocoee, Winter Garden, and Winter Park, have adopted similar types of ordinances.

WINTER STORMS/FREEZES- SUB-HAZARD MEDIUM RISK

Winter storm: A winter storm is defined as a storm that can range from a few hours of moderate snow to blizzard-like conditions with wind-driven snow that can last for days. Winter storms can impede visibility, affect driving conditions, and can have an impact on communications, electricity, or other critical services. Winter storms can range from several states to one county. Orange County is not susceptible to winter storms, because temperatures rarely reach snow producing levels. This does not mean that snow and winter weather is unheard of, but that it is a rare occurrence. The climactic conditions for long-lasting winter storms are also not favorable.

Previous Occurrences: During the winter season, humidity is normally lower and the temperatures are more moderate, but those can easily change back and forth from high to low. Temperatures can dip below the freezing mark on an average of 2.4 nights per year. The lowest recorded temperature was 18 °F, which was set on December 28, 1894. These low temperatures caused great damage to the burgeoning citrus industry in Orange County and are known as the “Great Freeze of 1894-1895.”

Impacts: Orange County has not experienced high amounts of human impacts directly due to freezes or winter storms. Property damage to residences or other buildings has also been low with only minor physical losses. These are caused by burst water pipes or outdoor faucets that are not insulated. The spatial impacts can be felt by the entire county during a freeze or winter storm, but

typically when they occur, the impacted areas are isolated. For economic impacts, rural areas like Apopka, Winter Garden, and Oakland are more susceptible due to their agricultural lands.

Future Impacts: Winter storms and freezes are unpredictable as to when they occur, or at least unpredictable in severity, and that, in part, makes us vulnerable to them. Orange County has experienced only minimal impacts to property with very little directly caused by freezes and winter storms. However, there have been economic damages in the past to agriculture, crops, and plants that have brought moderate losses to the county. Orange County and its jurisdictions are equally vulnerable to freezes and winter storms. Transient populations would be vulnerable during a freeze or winter storms and would need to seek an overnight shelter. Farm workers may be impacted if agricultural crops suffered from freezing conditions.

Mitigation Strategies: Citing the LMS, in general, due to their infrequency, few mitigation measures are enacted by the county or its jurisdictions in regard to freezes or winter storms. Freezes and cold weather are identified as a hazard and are addressed by the Orange County CEMP. There have been no training or exercises conducted regarding this hazard in at least the past decade. There is very little equipment, teams, or other logistical support to address this hazard.

HEAT WAVES- SUB-HAZARD: MEDIUM RISK

Heat waves: Heat waves, which are different from a drought, are when temperatures are abnormally and uncomfortably hot for a long time. This event could last from one day to several weeks. Heat waves are often accompanied by high humidity and can have a great impact on lives, including heat strokes, heat exhaustion, and even death. Heat kills by pushing the human body beyond its limits.

Previous Occurrences: Orange County has experienced thirty-six days of record temperatures over 100° F since 1892 with nine days even higher than 100°F. While individual days of record temperatures may not equal a heat wave, these record days are usually flanked by multiple days of high temperatures. According to SHEL DUS™, there are two dates that were recorded as hazard instances for heat: on July 3, 1997, with one recorded death and June 1, 1998. No property damage or crop damage was reported as a direct result of either of these occurrences.

Impacts: The impacts for heat wave are very similar to drought. Loss of life or other injuries that have been recorded as a direct result of heat waves are very low, with only one reported death from 1997 according to SHEL DUS™. The potential for casualties in the future will persist, especially in populations such as children, the elderly, transient populations, or other individuals with special needs that are vulnerable to high temperatures. Visitors to Orange County that are not acclimated to higher temperatures and humidity may also be at risk of various heat disorders.

Future Impacts: The likelihood of long periods of high temperatures and heat waves returning to Orange County is high as it is likely for an occurrence, in some form, to be nearly annual. The severity for each incident is variable. High temperatures occur normally in the summer months and may peak for many days during a heat wave. Weather outlooks extend only so far, but as new data is gathered and interpreted, these predictions can change.

Mitigation Strategies: Citing the LMS, in general, there are few mitigation measures enacted by the county or its jurisdictions regarding heatwaves. Heatwaves and other extreme temperatures are identified as a hazard and are addressed by the Orange County CEMP. There has been no training or exercises conducted in regard to this hazard in at least the past decade. There is no equipment, teams, or other logistical support to address this hazard.

OVERALL MITIGATION STRATEGIES

This Mitigation Needs Assessment highlights that Orange County faces significant risks from at least **ten natural hazards and sub hazards**, among which are **tropical systems, sinkholes, and severe storms, which include tornadoes and are the most frequent and pose the highest risk**. By analyzing these hazards in terms of their frequency and the county's vulnerability, Orange County and its recovery partners can utilize this assessment to identify current and future risks in their communities. This will enable them to target CDBG-DR funds toward cost-effective solutions for long-term mitigation.

Additionally, this assessment will guide all CDBG-DR programs and activities associated with this funding allocation, ensuring that they not only avoid existing hazards but actively work to lessen their future impact.

| CDBG-DR Mitigation Set-Aside Needs Assessment | | | |
|---|-----------------------|---|----------------------|
| Categories Affected | Total Need | Financial Assistance Budgeted and Obligated | Unmet Need |
| Housing | - | - | - |
| Infrastructure | \$ 128,989,976 | \$ 100,079,669 | \$ 28,910,307 |
| Economic Development | - | - | - |
| Total | \$ 128,989,976 | \$ 100,079,669 | \$ 28,910,307 |

Table 25: CDBG-DR Mitigation Set-Aside Needs Assessment.

By analyzing responses to the Hurricane Ian Infrastructure and Public Facilities Request for Applications (RFA) submitted and reviewed in January 2025, Orange County gained critical insights into real-world unmet mitigation needs. The data collected highlights existing funding gaps in shovel-ready resilience projects, offering a grounded, evidence-based understanding of local hazards. This analysis informs local policy decisions, aligns with hazard mitigation planning, and provides a data-driven foundation for seeking additional state and federal resources. At least 15% of the CDBG-DR funds will be dedicated to mitigation efforts, which currently target high-impact infrastructure projects.

Orange County recognizes that while mitigation needs evolve over time, the core hazards facing the region have remained relatively consistent since Hurricane Ian. Persistent risks such as flooding, high winds, and severe storms continue to threaten the community's infrastructure, housing, and overall resilience. As recovery progresses and new data becomes available, the County remains

committed to updating both the Mitigation Needs Assessment and the Action Plan to reflect emerging conditions and resource availability.

To ensure that mitigation strategies remain grounded in local realities, Orange County works closely with key partners—including emergency management agencies, and county departments. These stakeholders provide valuable, on-the-ground insight into the ongoing hazards and resilience priorities of the County’s communities. Their expertise is instrumental in shaping mitigation investments that are both responsive and locally informed.

The Mitigation Needs Assessment serves as a critical tool in guiding mitigation strategies across proposed recovery programs. By identifying consistent and emerging risks, the assessment ensures that recovery investments are strategically targeted to reduce future disaster impacts, safeguard people and property, and strengthen the long-term resilience of Orange County.

Unmet and Mitigation Needs Connection to Proposed Programs

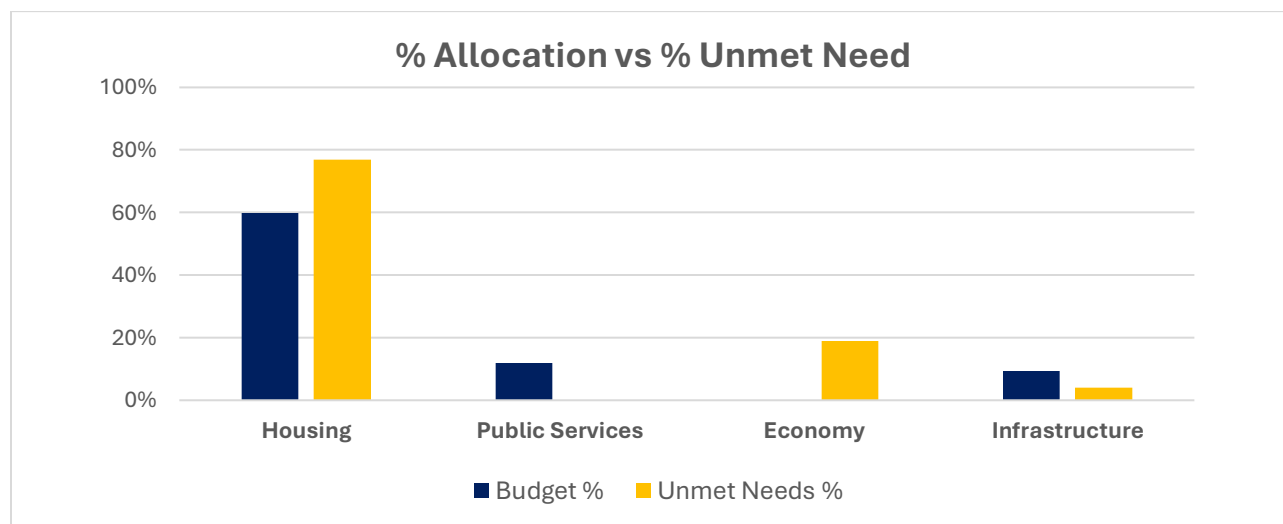


Table 26: CDBG-DR Program Allocation and Unmet Need.

INCORPORATION OF UNMET NEEDS ASSESSMENT TO MID AND TO PROPOSED PROGRAMS

The programs proposed by Orange County in response to Hurricane Milton align with the unmet needs outlined in the needs assessment and demonstrate a proportionate allocation of resources that targets the areas of greatest impact. This ensures that funding and program design directly respond to the most critical unmet needs in the HUD and locally identified MID areas. The Unmet Needs Assessment shows that housing needs account for 77% of total unmet recovery needs, followed by economic recovery (19%) and infrastructure (4%). The program allocations reflect this

prioritization, with approximately 60% of CDBG-DR recovery funds directed to housing programs, 12% to economic revitalization via workforce development⁵, and 9% to infrastructure.

Housing programs proposed directly address the substantial \$151.9 million housing recovery gap. These programs focus on repairing and restoring single-family homes and affordable rental properties, with a strong emphasis on serving LMI residents. Economic revitalization will be addressed through public service activities, such as workforce development, which addresses economic needs by supporting displaced and underemployed workers in gaining skills relevant to the recovery process. Similarly, the Infrastructure and Public Facilities Recovery Program targets the unmet infrastructure needs, focusing on resilient repairs and enhancements that improve access and safety in Orange County communities.

INCORPORATION OF MITIGATION NEEDS ASSESSMENT TO MID AND TO PROPOSED PROGRAMS

Orange County is taking a proactive and strategic approach to disaster recovery by embedding comprehensive hazard mitigation measures throughout its CDBG-DR programs. Guided by the findings of its Mitigation Needs Assessment, the County has identified a range of natural hazards that pose significant risk to its communities—including tropical systems (hurricanes), sinkholes, severe storms, flooding, and tornadoes. These hazards were assessed based on their frequency, geographic exposure, and the vulnerability of local infrastructure and populations.

In response, the County is incorporating mitigation into all aspects of its recovery framework to ensure that investments not only repair past damage but also reduce the impact of future disasters. This approach is informed by both qualitative community input and quantitative data, including past disaster impacts, infrastructure performance, and socioeconomic vulnerability.

To address these risks, the County has prioritized resilience-focused infrastructure improvements, including:

- **Stormwater management and flood control systems** to reduce flooding during high-rainfall events.
- **Hardening of critical infrastructure** such as water, sewer, and broadband networks to ensure continuity of services during extreme events.
- **Improved building standards** for shelters and public facilities to withstand high-intensity storms and wind damage.
- **Septic-to-sewer conversions** and other environmental infrastructure upgrades to prevent system failures during flooding.

Orange County has established clear project selection criteria to ensure that funded activities align with its long-term mitigation goals. Projects are prioritized if they address critical vulnerabilities, demonstrate cost-effectiveness, align with existing plans such as the County's Hazard Mitigation Plan and Consolidated Plan, and are implementation ready.

⁵ Orange County is addressing impacts to the economy through proposed the proposed public service program.

To further strengthen outcomes, the County emphasizes:

- **Integration with regional and local planning.**
- **Sustainability and maintenance planning** to preserve resilience investments.
- **Targeted funding**, ensuring that resources benefit low-to-moderate income (LMI) communities who are often most susceptible to disaster impacts.

This approach allows Orange County to build back safer and smarter, reducing future risk while fostering a culture of preparedness and resilience across all communities. By leveraging mitigation as a core component of recovery, the County is not only addressing past damage but also laying the foundation for a more secure and sustainable future.

DISPLACEMENT OF PERSONS OR ENTITIES

To minimize the displacement of persons and other entities that may be affected by the activities outlined in this action plan, Orange County will coordinate with federal, state, and local organizations; homeowners; and tenants to minimize displacement. When implementing activities using CDBG-DR funds, Orange County and its partners and subrecipients will follow the State's Residential Anti-displacement and Relocation Assistance Plan (RARAP). This CDBG-DR specific RARAP has been developed and adopted to describe the steps Orange County, its partners, and subrecipients will take to avoid or minimize displacement in the implementation of CDBG-DR activities and, where displacement cannot be avoided, to ensure that the following requirements and regulations are met: Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended; Section 104(d) of the Housing and Community Development Act of 1974, as amended; and implementing regulations at 24 CFR Part 570.496(a).

These regulations and requirements apply to both property owners and tenants when proposed projects cause the displacement of persons or other entities. Orange County will include detailed policies and procedures for when proposed programs or projects could cause the displacement of people or other entities. It is not anticipated that the proposed activities will result in permanent displacement.

The Fair Housing Act prohibits discrimination based on physical, mental, or emotional disability. To ensure program accessibility for displaced persons with disabilities, Orange County will provide “reasonable accommodations” in accordance with County and program policies. Reasonable accommodation may include physical changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). Orange County will coordinate with all subrecipients, implementation vendors, and Orange County departments to minimize the displacement of persons with disabilities. Should any proposed projects or activities cause the displacement of people with disabilities, even temporarily, Orange County will collaborate with the impacted individual(s) to determine the necessary accommodation(s), (e.g., an accessible temporary dwelling unit), and will make reasonable efforts to accommodate. Orange County will also make reasonable modifications to policies and procedures to ensure that applicants have an equal opportunity for program participation.

NATIONAL OBJECTIVES

Each activity proposed with CDBG DR funding must meet one of three national objectives (as defined by 24 CFR Part 570):

1. Benefit to Low and Moderate Income (LMI) Residents
2. Urgent Need
3. Elimination of Slum and Blight

Of these national objectives, LMI Benefit is the most widely used, and 70% of all program funds must fall under this category of eligibility. Urgent Need can also be utilized in circumstances where specific needs have a particular urgency impacting the health and welfare of the County. Finally, Elimination of Slum and Blight is a rarely used national objective in the CDBG DR program that addresses urban decay within defined geographic areas (This national objective is unlikely to be used in Orange County's program).

ALLOCATION AND AWARD CAPS

Orange County is the lead agency and responsible entity for administering \$33,357,000 in CDBG-DR funds allocated for Hurricane Milton recovery efforts. CDBG-DR funds available to address unmet needs will be allocated to basic program categories pursuant to the table below.

| CDBG-DR Program Allocation and Funding Thresholds | | | | | |
|---|---------------------------|-------------------------------|------------------------------|--|---------------------|
| Eligible Cost Category | CDBG-DR Allocation Amount | Percent of CDBG-DR Allocation | CDBG-DR Mitigation Set-aside | Estimated Percentage to HUD-Identified MID Areas | Overall LMI Benefit |
| Planning | \$ 200,000 | 1% | 0% | 100% | 0% |
| Administration | \$ 1,667,850 | 5% | 0% | 100% | 0% |
| Housing | \$ 20,000,000 | 60% | 0% | 100% | 70% |
| Public Services | \$ 4,000,000 | 12% | 0% | 100% | 70% |
| Infrastructure and Public Facilities | \$ 3,138,150 | 9% | 0% | 100% | 70% |
| Mitigation Set Aside | \$ 4,351,000 | 15%* | 100% | 100% | 70% |
| TOTAL | \$ 33,357,000 | | 100% | 100% | 70% |
| *Mitigation set aside is equal to 15% of Unmet Needs allocation of \$29,006,000, therefore column will not equal 100% | | | | | |

Table 27: CDBG-DR Allocation and funding Thresholds.

FUNDING CRITERIA

General Exception Criteria

Orange County will make exceptions to the maximum award amounts, when necessary, to comply with federal accessibility standards or to reasonably accommodate a person with disabilities, and in accordance with Cost Principles, as outlined below.



General Obligation and Expenditure of Funds

In accordance with the March 31, 2025 HUD Memorandum 25-03 that revises additional sections of the Universal Notice (90 FR 1754), pursuant to 2 CFR Part 200 and Executive Order 14218 (90 FR 10581), and subject to the exceptions provided by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (as amended), Orange County ensures that no federal public benefit is provided to any individual who is an ineligible alien, defined as someone who has entered the U.S. illegally or is otherwise unlawfully present.

Cost-Effectiveness

As a recipient of federal funds, Orange County is responsible for ensuring that the costs of its disaster recovery activities are allowable, reasonable, necessary, and cost effective. Orange County will establish policies and procedures to assess the cost-effectiveness of each proposed project undertaken to assist a household under any residential rehabilitation, reconstruction, or new construction program, and for other activities funded by CDBG-DR funds. Housing program specific policies and procedures will address criteria for determining when the cost of rehabilitation, reconstruction, or new construction is not cost-effective (for example, reconstruction and elevation if the cost of repair exceeds a specified threshold) and address possible alternatives if found not to be cost-effective. Similar policies and procedures will be established for any economic revitalization and infrastructure programs funded with the CDBG-DR allocation.

Any exceptions to maximum award limitations are subject to grant fund availability. The limited instances of providing exceptions to maximum award amounts will be based on criteria specified in the policy, such as:

- The process used to analyze the circumstances under which an exception was necessary.
- How the amount of assistance is necessary and reasonable, per 2 CFR part 200, subpart Cost Principles.
- Justifying the reasonable accommodation requests under Section 504 or measures to address program recognized environmental conditions, which can be addressed through construction measures necessary to mitigate the consequences of those conditions.

All projects are evaluated on a case-by-case basis based on the individual circumstances, maximum award allowed, and additional considerations such as the level of demonstrable hardship, to grant an exception. For the purpose of the CDBG-DR Program, a demonstrable hardship is defined as “the significant, adverse and demonstrable impact on the housing and economic stability of an individual as a result of Hurricane Milton”. Examples of a demonstrable hardship may include substantial loss of income or ability to earn an income, loss of a business, loss of an individual’s primary housing due to Hurricane Milton, severe illness or disability, injury, death of a spouse, or amount of debt incurred due to damages caused by Hurricane Milton. The hardship cannot be a self-created hardship and must be attributable to Hurricane Milton. An internal committee will evaluate the need to establish exceptions to the maximum assistance allowed if it is determined to be necessary and reasonable. The policies and procedures will include a specific process to request an exception when an individual meets the demonstrable hardship criteria.

Program Partners and Participation

During the implementation of the CDBG-DR Program, Orange County may establish partnerships through formal agreements such as subrecipient agreements, vendor contracts, memorandums of understanding, interlocal agreements, or informal partnerships. If necessary, Orange County will engage a range of partners to ensure that programs are accessible and tailored to effectively address the unmet needs of disaster-impacted residents and neighborhoods, as well as the community's mitigation needs.

Identified partners will be evaluated to ensure that they possess the necessary expertise, financial resources, and organizational capacity to execute the CDBG-DR Program's programs and activities within the established guidelines and timelines. Formal agreements with program partners will include requirements that are consistent with federal regulations and the Federal Register notice, encompassing financial and programmatic performance and reporting procedures.

To encourage participation in disaster recovery programs by impacted individuals, Orange County will identify those expected to benefit from CDBG-DR-funded programs, establish program-specific funding criteria where appropriate, and implement a data-driven, targeted outreach and engagement campaign throughout the Most Impacted and Distressed (MID) areas to ensure broad and effective program participation.

ADMINISTRATION

| Administration | | |
|------------------------------|---------------------------|-------------------------|
| Eligible Cost Category | CDBG-DR Allocation Amount | % of CDBG-DR Allocation |
| Administration Total: | \$ 1,667,850 | 5% |

Table 28: Grantee Administration Activity Overview.

An authorized portion of 5% of the total CDBG-DR allocation, amounting to \$1,667,850, will be dedicated to program administration. These funds will support the essential activities required to plan, execute, and oversee the CDBG-DR recovery initiatives. This includes responsibilities such as compliance oversight, performance monitoring, DRGR system management, financial administration, and required reporting.

PLANNING

| Planning | | |
|------------------------|---------------------------|-------------------------|
| Eligible Cost Category | CDBG-DR Allocation Amount | % of CDBG-DR Allocation |
| Planning Total: | \$ 200,000 | 1% |

Table 29: Grantee Planning Activity Overview



A total of \$200,000, representing 1% of the allocation, is designated for planning-related activities. These funds will be accessible to Orange County departments, divisions, municipal governments, and quasi-governmental agencies to support studies, analyses, and expanded planning initiatives. The goal is to identify additional recovery and mitigation priorities or assist in the development and execution of the existing CDBG-DR programs. Planning funds may also be applied toward costs associated with creating or revising the Unmet Needs Assessment component of the CDBG-DR Action Plan.

HOUSING

Housing Programs Overview

| Housing Program(s) Overview | | |
|-------------------------------------|---------------------------|---|
| Eligible Cost Category | CDBG-DR Allocation Amount | % of CDBG-DR Allocation for LMI Benefit |
| Homeowner Rehabilitation | \$ 6,000,000 | 70% |
| Rental Housing Rehabilitation | \$ 4,000,000 | 70% |
| New Affordable Housing Construction | \$ 10,000,000 | 70% |
| Housing Program Total: | \$ 20,000,000 | 70% |

Table 30: Grantee Housing Programs Overview.

Homeowner Rehabilitation Program

Amount of CDBG-DR Funds Allocated to this Program: \$6,000,000

Eligible Activity(ies): Rehabilitation of Single-Family Owner-Occupied Housing Units, HCDA Section 105(a)(4), 24 CFR 570.202(a)(1)

National Objective: Low to Moderate Income Housing (LMH), Urgent Need (UN)

Lead Agency and Distribution Model: Orange County Housing and Community Development (HCD) Division will manage the Homeowner Rehabilitation Program as part of the CDBG-DR Program, supported by qualified contractors, vendors, participating jurisdictions, nonprofit organizations, and community partners. The Homeowner Rehabilitation Program will implement specific policies and procedures to ensure compliance with all relevant state and federal regulations. To evaluate environmental factors for CDBG-DR-funded projects and activities, Orange County, as a Responsible Entity (RE), will ensure compliance with the environmental requirements listed under 24 CFR 58.

All applicants for the Homeowner Rehabilitation Program must, with the county, enter into formal agreements detailing the terms and conditions of the housing program.

Program Description: The housing rehabilitation program aims to assist low-to moderate income households in Orange County that were impacted by Hurricane Milton. To address the housing needs identified in the unmet needs assessment, Orange County will implement the Homeowner Rehabilitation Program. This program will include:

- Repair and/or rehabilitation of existing owner-occupied single family housing units.
- Repair and/or rehabilitation of storm damaged mobile/manufactured homes.

The program is designed to assist in the rehabilitation of single-family homes that were damaged during Hurricane Milton and continue to have unmet needs. Its primary goal is to provide Orange

County residents who were affected by the disaster with decent, safe, and sanitary housing conditions.

To qualify for assistance, applicants must own or have an ownership interest in their home at both the time of the disaster and when applying for the program. Additionally, it is essential that the home was the applicant's primary residence during the disaster. The program prioritizes support for low-to moderate-income (LMI) individuals and families, specifically those with incomes up to 80% of the Area Median Income (AMI). Recognizing that some applicants may still have unmet needs, the program allows exceptions on a case-by-case basis for those whose incomes are up to 120% of the AMI. To qualify for assistance, the home must be classified as a single-family housing unit and demonstrate ongoing repair needs that were not covered by insurance or grants that the applicant may have previously received. Applicants will not have the ability to choose their contractors; all payments will be made directly to the service providers.

Eligible Geographic Areas: All areas within the Orange County jurisdiction, designated by HUD as Most Impacted and Distressed (MID) due to Hurricane Milton.

Eligibility Criteria: To qualify for single-family rehabilitation assistance the applicant must meet the following criteria:

- **Ownership-** The applicant must have owned and occupied the home at the time of the qualifying event (Hurricane Milton) and still have an ownership interest.
- **Primary Residency-** The applicant must have occupied the home as their primary residence at the time of the qualifying event (Hurricane Milton).
- **Located in Most Impacted and Distressed Area (MID):** The disaster impacted property must be located within Orange County.
- **Tie-Back-** The home must have unrepaired damage as a direct result of the qualifying event (Hurricane Milton).
- **Structure Type-** The applicant's home must be an eligible structure type-Single Family Unit (stick built), Modular, Mobile Home, or Duplex.
- **Property Taxes-** All property taxes must be current/or on an approved payment plan.
- **Mortgage-** The applicant's mortgage (if applicable) must be in good standing or on an approved payment plan.

Funding Goals: Orange County will prioritize review of owner-occupied applicants based on the following factors:

- Goal 1: Applicants with household income less than 50% AMI
- Goal 2: Applicants with household income between 50 - 80% AMI AND have minor children and/or a household member with a documented disability.

Any additions or changes to the ranking of projects selected for assistance will be detailed in the County's Housing Policies and Procedures developed for this program.

Maximum Amount of Assistance Per Beneficiary: \$250,000 for Rehabilitation, \$200,000 for Mobile/Manufactured Home Units (MHU), \$375,000 for Reconstruction.

Orange County will make exceptions to the maximum award amounts, when necessary, to comply with federal accessibility standards or to reasonably accommodate persons with disabilities. This determination will be initiated during the initial inspection process. If additional funds are warranted based on cost estimates, the County will waive the award limits and authorize a revised, predetermined limit. The revised limit will be clearly stated and approved prior to the award of grant funds. In the event additional funds are required after an award, the County will address such instances on a case-by-case basis.

Maximum Income of Beneficiary: 80% AMI (Low- to Moderate- Income) or 120% AMI (Urgent Need)

Mitigation Measures: The program prioritizes hazard mitigation and long-term resilience. Its goal is to fund essential and appropriate measures to achieve these objectives. The focus will be on enhancing safety and resilience by providing financial support for vital mitigation strategies. Strategies include employing hazard-resistant construction techniques and materials to best prepare properties to withstand potential risks.

Reducing Impediments for Assistance: The Homeowner Rehabilitation Program is available to all low- to moderate-income (LMI) residents of Orange County who have been affected by Hurricane Milton. Intake centers will be staffed by case managers who will assist applicants with the intake and eligibility process. These centers are designed to be accessible to all Orange County residents, including individuals with disabilities (ADA-compliant). Additionally, language and communication assistance will be provided upon request. All LMI residents of Orange County will have equal access to the application process.

To encourage participation in disaster recovery programs by impacted individuals, Orange County will identify those expected to benefit from CDBG-DR-funded programs, establish program-specific funding criteria where appropriate, and implement a data-driven, targeted outreach and engagement campaign throughout the Most Impacted and Distressed (MID) area to ensure broad and effective program participation.

Rental Housing Rehabilitation Program

Amount of CDBG-DR Funds Allocated to this Program: \$4,000,000

Eligible Activity(ies): Rehabilitation of Rental Units- HCDA Section 105(a)(4), 24 CFR 570.202(a)(1)

National Objective: Low to Moderate Income Housing (LMH), Urgent Need (UN)

Lead Agency and Distribution Model: Orange County Housing and Community Development (HCD) Division will manage the Rental Housing Rehabilitation Program as part of the CDBG-DR Program, supported by qualified contractors, vendors, participating jurisdictions, nonprofit organizations, and community partners; this program will have established policies and procedures to ensure proper implementation and compliance with all relevant state and federal regulations. To evaluate environmental factors for CDBG-DR-funded projects and activities, Orange County, as a Responsible Entity (RE), will ensure compliance with the environmental requirements listed under 24 CFR 58.

All applicants for the Rental Housing Rehabilitation Program will be required, with the county, to enter into formal agreements that specify the terms and conditions of the program.

Program Description: To assist low- to moderate-income (LMI) households, Orange County is implementing the Rental Housing Rehabilitation Program to address the affordable rental housing needs identified in the unmet needs assessment. This housing program includes:

- Repair and rehabilitation of storm-damaged affordable rental housing.
- Repair and rehabilitation of storm-damaged mobile/manufactured homes (MHU) for use as affordable rental housing.

Qualified entities must submit a complete proposal during the established Request for Applications (RFA) period. Affordability restrictions will be enforced through deed restrictions, agreements, and/or similar instruments. Eligible entities will include private and nonprofit organizations and public housing authorities providing affordable housing to LMI persons. The maximum rental rehabilitation assistance available for repairing damaged rental housing units is \$100,000 per unit, or \$200,000 per unit when repairs to the damaged unit are beyond the scope and limits of the rental rehabilitation program.

Eligible Geographic Areas: All areas within the Orange County jurisdiction, designated by HUD as Most Impacted and Distressed (MID) due to Hurricane Milton.

Other Eligibility Criteria:

- **Tie-Back to Disaster Unmet Need:** All projects or activities must demonstrate a tie-back to Hurricane Milton or meet the definition of mitigation.
- **Program National Objective:** All eligible projects or activities will be required to meet a national objective under CDBG-DR in accordance with HUD guidelines in 24 CFR 570.208. Orange County will only consider projects that benefit low to moderate-income persons or LMI areas.
- **Eligible Entities or Applicants:** Eligible entities will include private and nonprofit organizations, and public housing authorities providing affordable housing to LMI persons.

Funding for the rental housing rehabilitation: Projects will be awarded to eligible applicants for eligible projects based on a competitive selection process. Orange County will require the submission of project proposals in response to competitive Request for Proposals (RFPs) and Request for Applications (RFAs) for for-profit and nonprofit organizations, respectively. Orange County will be developing the applicable guidelines, policies, and procedures for these projects. All housing projects will be required to meet affordability requirements, which will be enforced through land-use restrictive agreements, deed restrictions, or similar instruments. Project selection must follow all county regulations related to procurement and also adhere to the procurement standards outlined in 2 CFR Part 200, HUD guidelines for determining cost reasonableness.

Maximum Amount of Assistance Per Beneficiary: \$100,000 per unit; (\$200,000 for reconstruction of units)

Orange County will make exceptions to the maximum award amounts, when necessary, to comply with federal accessibility standards or to reasonably accommodate persons with disabilities. The County will determine the requirements for such award agreements during the inspection and estimation process, to the extent possible. Awards may be increased if costs for reasonable accommodation exceed program limits during construction.

Maximum Income of Beneficiary: 80% AMI (Low- to Moderate- Income), or 120% AMI (Urgent Need)

Mitigation Measures: The Rental Housing Rehabilitation Program focuses on enhancing safety and resilience by providing funding for essential mitigation methods. This includes the use of hazard-resistant construction techniques and building materials, ensuring that properties are well-equipped to withstand potential risks.

Reducing Impediments for Assistance: The Rental Housing Rehabilitation Program is available to all property owners, including both private and nonprofit entities whose properties have been damaged by Hurricane Milton. Orange County will provide information, documentation, and assistance through its website and designated intake centers. These centers are accessible to all residents of Orange County, including individuals with disabilities, and comply with ADA standards. Moreover, language and communication assistance will be offered upon request.

To encourage participation in disaster recovery programs by impacted individuals, Orange County will identify those expected to benefit from CDBG-DR-funded programs, establish program-specific funding criteria where appropriate, and implement a data-driven, targeted outreach and engagement campaign throughout the Most Impacted and Distressed (MID) area to ensure broad and effective program participation.

New Affordable Housing Construction

Amount of CDBG-DR Funds Allocated to this Program: \$10,000,000

Eligible Activity(ies): Construction of Rental Units- HCDA Section 105(a)(4), 24 CFR 570.202(a)(1), CDBG DR Universal Notice: Waivers and Alternative Requirements, III.D.5.a. New Housing Construction Waiver

National Objective: Low to Moderate Income Housing (LMH), Urgent Need (UN)

Lead Agency and Distribution Model: Orange County Housing and Community Development Division will manage the New Affordable Housing Construction Program as part of the CDBG-DR Program, with the assistance of qualified contractors and vendors participating jurisdictions, nonprofit organizations, and community partners; this program will have established policies and procedures to ensure proper implementation and compliance with all relevant state and federal regulations. To evaluate environmental factors for CDBG-DR-funded projects and activities, Orange County, as a Responsible Entity (RE), will ensure compliance with the environmental requirements listed under 24 CFR 58.

All applicants for the New Affordable Housing Program will be required, with the county, to enter into formal agreements that specify the program's terms and conditions.

Program Description: To assist affected low- to moderate-income (LMI) households, Orange County is implementing the New Affordable Housing Program to address the affordable rental housing needs identified in the unmet needs assessment. The program will include both single family and multi-family units.

The New Affordable under the CDBG-DR will include the following activities:

- Construction of affordable rental housing units targeting workforce segments impacted by Hurricane Milton
- Housing for residents such as seniors, homeless, and individuals at risk of homelessness.
- Expansion of housing for special needs populations, including permanent supportive housing.
- Affordable housing preservation

It should be noted that, if leveraging funds from other federal programs such as CDBG and HOME for new affordable housing construction activities using CDBG-DR funds, the County will be required to follow the standard requirements of the URA and Section 104(d) regulations. Additionally, if land is acquired for the new construction activities, the County and its subrecipients (as applicable) must document and comply with the applicable URA acquisition requirements (49 CFR 24.101 or 49 CFR 24.102). Additional details are to be provided in policies and procedures for the program.

Eligible Geographic Areas: All areas within the Orange County jurisdiction, designated by HUD as Most Impacted and Distressed (MID) due to Hurricane Milton.

Other Eligibility Criteria:

- **Tie-Back to Disaster Unmet Need:** All projects or activities must demonstrate a direct or indirect tie-back to Hurricane Milton or meet the definition of mitigation.
- **Program National Objective:** All eligible projects or activities will be required to meet a national objective under CDBG-DR in accordance with HUD guidelines in 24 CFR 570.208. Orange County will only consider projects that benefit low to moderate-income persons or LMI areas.
- **Eligible Entities or Applicants:** Eligible entities will include private and nonprofit organizations, and public housing authorities providing affordable housing to LMI persons.

Funding for the new construction rental units: The CDBG DR Universal Notice: Waivers and Alternative Requirements, III. D. 5. a. allows for the construction of new housing, which is generally prohibited in the CDBG program. Projects will be awarded to eligible applicants for eligible projects based on a competitive selection process. Orange County will require the submission of project proposals in response to competitive Request for Proposals and Request for Applications for for-profit and nonprofit organizations, respectively. Orange County will be developing the applicable guidelines, policies, and procedures for this project. All housing projects will be required to meet affordability requirements, which will be enforced through land use restrictive agreements, deed restrictions, or similar instruments. Project selection must also adhere to the procurement

standards outlined in 2 CFR Part 200, HUD guidelines for determining cost reasonableness, and follow all of the County regulations related to procurement.

Maximum Amount of Assistance Per Beneficiary: \$200,000

Orange County will make exceptions to the maximum award amounts, when necessary, to comply with federal accessibility standards or to reasonably accommodate persons with disabilities. The County will note possible exceptions during the RFP process and will anticipate higher costs for accessible units.

Maximum Income of Beneficiary: 80% AMI (Low- to Moderate- Income), or 120% AMI (Urgent Need)

Mitigation Measures: The program prioritizes hazard mitigation and long-term resilience. Its goal is to fund essential and appropriate measures to achieve these objectives. The focus will be on enhancing safety and resilience by providing financial support for vital mitigation strategies. This includes employing hazard-resistant construction techniques and materials to ensure that properties are well-prepared to withstand potential risks.

Reducing Impediments for Assistance: The New Affordable Single-Family Rental Housing Program is available to all citizens, including both private and non-profit entities as well as public housing authorities. Orange County will provide information, documentation, and assistance through its website and designated intake centers. These centers are accessible to all residents of Orange County, including individuals with disabilities, and comply with ADA standards. Moreover, language and communication assistance will be offered upon request.

To encourage participation in disaster recovery programs by impacted individuals, Orange County will identify those expected to benefit from CDBG-DR-funded programs, establish program-specific funding criteria where appropriate, and implement a data-driven, targeted outreach and engagement campaign throughout the Most Impacted and Distressed (MID) area to ensure broad and effective program participation.

INFRASTRUCTURE

Infrastructure Programs Overview

| Infrastructure and Public Facilities Program(s) Overview | | |
|--|---------------------------|---|
| Eligible Cost Category | CDBG-DR Allocation Amount | % of CDBG-DR Allocation for LMI Benefit |
| Infrastructure and Public Facilities Total: | \$ 3,138,150 | 9% |

Table 31: Grantee Infrastructure Programs Overview.

Infrastructure and Public Facilities Recovery Program(s)

Amount of CDBG-DR Funds Allocated to this Program: \$3,138,150

Eligible Activity(ies):

- Section 105(a)(1)- Acquisition of Real Property
- Section 105(a)(2) - Public facilities and improvements
- Section 105(a)(4) - Clearance, demolition, removal, reconstruction, and rehabilitation of buildings and improvements
- Section 105(a)(5)- Architectural Barrier Removal
- Section 105(a)(9) - Payment of non-federal share required in connection with a federal grant-in-aid program
- Section 105(a)(11)- Relocation Assistance
- Section 105(a)(14)- Activities Carried Out through Nonprofit Development Organizations

National Objective: Low to Moderate Income Area Benefit (LMA), Urgent Need (UN)

Lead Agency and Distribution Model: Orange County Housing and Community Development Division will serve as the lead agency for the Infrastructure and Public Facilities Recovery Program(s) with the assistance of qualified contractors and vendors, participating jurisdictions, nonprofit organizations, and community partners; this program will have established policies and procedures to ensure proper implementation and compliance with all relevant state and federal regulations. To evaluate environmental factors for CDBG-DR-funded projects and activities, Orange County, as a Responsible Entity (RE), will ensure compliance with the environmental requirements listed under 24 CFR 58. All applicants for Infrastructure and Public Facilities Recovery Program(s) will be required, with the county, to enter into formal agreements that specify the program's terms and conditions.

Program Description: The Infrastructure and Public Facilities Recovery Program(s) allocates CDBG-DR funds to address significant infrastructure damage from Hurricane Milton (DR-4834-FL), particularly in communities facing compounded recovery challenges. Infrastructure projects may include but are not limited to stormwater management, sewer system repairs, drinking water infrastructure improvements, emergency shelter upgrades, public facility rehabilitation, and expanding broadband access.

The disaster impact assessment identified substantial unmet infrastructure needs totaling more than \$7.29 million. Infrastructure failures during Hurricane Milton — particularly flooding, utility outages, and significant damage to roads and bridges — severely impacted communities and exposed significant disparities in infrastructure resilience. Many neighborhoods, especially in west and southwest Orange County, were inaccessible during and immediately after the hurricane, hindering emergency response and recovery efforts. The storm exacerbated existing inequities in infrastructure, including aging sewer systems and insufficient broadband connectivity, restricting access to essential services during critical recovery periods.

In response, the county will prioritize resilient infrastructure design to withstand future extreme weather events, and flooding risks. Projects will be selected based on their ability to mitigate identified vulnerabilities, improve public safety, and enhance overall community resilience.

Eligible Geographic Areas: All areas within the Orange County jurisdiction, designated by HUD as Most Impacted and Distressed (MID) due to Hurricane Milton.

Other Eligibility Criteria: All projects or activities must demonstrate a “tie-back” to Hurricane Milton or meet the definition of mitigation. Projects also must meet an identified need in the CDBG-DR Action Plan:

- Address critical infrastructure vulnerabilities identified in the unmet needs assessment.
- Demonstrate cost-effectiveness and sustainability.
- Enhance community resilience to future disasters.
- Demonstrate readiness to proceed promptly, including clear timelines, planning status, and permitting readiness.
- Leverage additional resources or funding streams, maximizing the impact of CDBG-DR funds.
- Demonstrate preliminary compliance or clear understanding of environmental and historic preservation requirements.
- Align with existing local or regional comprehensive plans, hazard mitigation plans, or other community planning documents.
- Include a clear sustainability and maintenance plan outlining ongoing operational funding and responsible stewardship.

Project Selection Overview: Orange County will provide funding for infrastructure and public facilities projects undertaken by the county, local municipalities, and nonprofit organizations. The county will develop additional guidelines and procedures and utilize a Notice of Funding Availability (NOFA) package to solicit project proposals and gather the necessary information to assess each project and potential subrecipient. County staff will establish threshold criteria that applications must meet for funding consideration under any NOFA. These criteria may include determining whether the proposed activity is eligible under CDBG-DR, whether it meets a national objective, and whether the applicant is capable of carrying out the activity.

Additional evaluation criteria may also be used to select projects that ensure effective access to public resources and provide opportunities for historically disadvantaged communities in Orange County. Project selection must adhere to the procurement standards outlined in 2 CFR Part 200, HUD guidelines for determining cost reasonableness, and follow all County regulations related to procurement.

Maximum Amount of Assistance Per Project: Projects will be evaluated for cost and impact to the MID area prior to award. The maximum amount of assistance per project is \$3,138,150.

Orange County will make exceptions to the maximum award amounts, when necessary, to comply with federal accessibility standards or to reasonably accommodate persons with disabilities.

Maximum Income of Beneficiary: Beneficiaries must reside in LMI census tracts, or projects must primarily benefit LMI populations (at least 51%).

Mitigation Measures

All infrastructure projects must incorporate resilience measures to mitigate impacts from future disasters, including:

- Enhancing flood control and stormwater management.
- Upgrading building standards for shelters and public facilities to withstand high-intensity weather events.
- Reinforcing critical infrastructure (water, sewer, broadband) to ensure continued operation during disasters.

Infrastructure improvements under this program directly contribute to Orange County's required CDBG-DR mitigation set-aside by creating sustainable and resilient community infrastructure.

Reducing Impediments for Assistance:

Orange County will enhance access to infrastructure assistance through:

- Extensive public outreach and community engagement efforts
- Providing technical assistance workshops for municipalities and nonprofits on application processes.
- Ensuring equitable geographic distribution of resources.
- Prioritizing projects in areas with significant historical underinvestment.
- Facilitating accessibility enhancements for facilities benefiting persons with disabilities.

PUBLIC SERVICES

Public Services Programs Overview

| Public Services Program(s) Overview | | | |
|-------------------------------------|---------------------------|---|---|
| Eligible Cost Category | CDBG-DR Allocation Amount | % of CDBG-DR Allocation for LMI Benefit | Is this Program Exempt from the 15% Public Service Cap? |
| Public Services Program | \$ 4,000,000 | 12% | No |

Table 32: Grantee Public Services Programs Overview

Public Services Program

Amount of CDBG-DR Funds Allocated to this Program: \$4,000,000

Eligible Activity(ies): Provision of public services via job training, HCDA 105(a)(8), 24 CFR 570.201(e)

National Objective: Benefitting Low to Moderate Income Persons (LMI) **Lead Agency and Distribution Model:**

Orange County's Housing and Community Development Division will serve as the lead agency managing the Public Services Program, with the assistance of qualified contractors and vendors, participating jurisdictions, nonprofit organizations, and community partners; this program will have established policies and procedures to ensure proper implementation and compliance with all relevant state and federal regulations. To evaluate environmental factors for CDBG-DR-funded projects and activities, Orange County, as a Responsible Entity (RE), will ensure compliance with the environmental requirements listed under 24 CFR 58. All applicants for the Public Service Program will be required, with the county, to enter into formal agreements that specify the program's terms and conditions.

Program Description:

The Public Services Program will assist low- to moderate-income households and communities by providing essential services that promote economic recovery, housing stability, and resilience against future disasters. Funding for public services through the Community Development Block Grant Disaster Recovery will be specifically directed to support the delivery of critical services to the households most affected by Hurricane Milton.

The allocated funds will be distributed, as needed, to qualified local nonprofit service providers for various services, including, but not limited to:

- Self-sufficiency services (such as financial literacy, housing search and counseling, and legal assistance).
- Health and mental health services.
- Job training and placement.
- Economic recovery-related services, including disaster planning tools for small businesses in disaster-prone areas.

Public service activities are designed to complement other programs funded under CDBG-DR. Consequently, public service funding will be awarded on a competitive basis over the next five years.

Eligible Geographic Areas: The entire Orange County jurisdiction, as identified by HUD as the Most Impacted and Distressed area due to Hurricane Milton (DR-4834-FL).

Program Tieback to Disaster Unmet Need: The need for a public services program under CDBG-DR was supported by the unmet needs assessment, which primarily included input received during the community engagement and outreach processes.



Other Eligibility Criteria:

- Low- to Moderate-Income individuals
- Individuals residing within areas disproportionately impacted by Hurricane Milton
- Unemployed or underemployed due to the hurricane or subsequent economic disruptions
- Section 3 eligible workers or targeted Section 3 workers per 24 CFR Part 75

Eligible Entities or Applicants: Eligible entities are qualified local nonprofit organizations with the ability to deliver the specified services to LMI populations and in Hurricane Milton’s impacted areas. The entities will be selected through a competitive process that includes a project risk assessment, evaluation of the organization’s financial capacity, and other standards outlined in 2 CFR Part 200 and HUD guidelines.

Project Selection Overview: Funding for public services will be awarded to qualified nonprofit organizations through a competitive selection process. Orange County will require the submission of public service project proposals in response to a competitive Request for Applications for local nonprofit organizations. Orange County will be developing the guidelines, criteria, and procedures for these CDBG-DR projects. Project selection must also adhere to the financial standards outlined in 2 CFR Part 200 and HUD guidelines for determining the organization’s capacity and the cost-reasonableness of the project.

Maximum Amount of Assistance Per Beneficiary: \$500,000 per agency

Public service grants will be awarded based on the agencies’ proposals.

Maximum Income of Beneficiary: Participants must have household incomes not exceeding 80% of the Area Median Income as defined by HUD for Orange County.

Mitigation Measures: The Public Services Program will incorporate resilience and mitigation training components into the curriculum, including hazard-resistant construction techniques, sustainable building practices, and resilient infrastructure management. These components aim to mitigate risks from future disasters and enhance long-term community resilience. This activity does not directly count towards the CDBG-DR mitigation set-aside but complements the overall mitigation strategies established by Orange County

Reducing Impediments for Assistance:

Orange County will actively enhance access to this program through:

- Partnering with local nonprofits and community-based organizations to maximize program reach to all eligible populations.
- Ensuring training sites are physically accessible and compliant with ADA standards.
- Prioritizing outreach and enrollment assistance across the most impacted areas.

CDBG-DR MITIGATION SET-ASIDE

CDBG-DR Mitigation Set-Aside Programs Overview

| CDBG-DR Mitigation Set-Aside Allocation Summary | | | | | |
|---|-----------------------|-----------------|---|--|--|
| Eligible Cost Category | Unmet Need | % of Unmet Need | % of Funding to be Expended in HUD and Grantee Identified MID | CDBG-DR Mitigation Set-Aside Allocation Amount | % of CDBG-DR Allocation Mitigation Set-Aside |
| Planning (15% cap) | | | 100% | \$ - | 0% |
| Housing | \$ 151,894,856 | 77% | 100% | \$ - | 0% |
| Infrastructure | \$ 7,293,371 | 4% | 100% | \$ - | 0% |
| Economic Revitalization | \$ 37,006,862 | 19% | 0% | \$ - | 0% |
| Mitigation Infrastructure | \$ - | 0% | 100% | \$ 4,351,000 | 100% |
| Total | \$ 196,195,089 | 100% | 100% | \$ 4,351,000 | 100% |
| Funds that have not been allocated: | | | | \$ - | 0% |
| Grant Total (Recovery funds + Mitigation + Unallocated): | | | | \$ 33,357,000 | |

Table 33: CDBG-DR Mitigation Set-Aside Allocation Summary.

| Grantee CDBG-DR Mitigation Set-Aside Program(s) Overview | | | |
|--|--|-------------------------|--|
| Eligible Cost Category | CDBG-DR Mitigation Set Aside Allocation Amount | % of CDBG-DR Allocation | Does this Program have tie back to the disaster? |
| Mitigation Total: | \$ 4,351,000 | 15% | No |

Table 34: Grantee CDBG-DR Mitigation Set-Aside Programs Overview

Mitigation Program

Amount of CDBG-DR Funds Allocated to this Program: \$4,351,000

Eligible Activity(ies): 24 CFR 570.201(c), Public facilities and improvements HCDA Section 105(a)(2)
- Public facilities and improvements

National Objective: Low to Moderate Income Area Benefit (LMA), Low to Moderate Income Clientele (LMC), Urgent Need (UN)

Lead Agency and Distribution Model: Orange County Housing and Community Development Division will manage the Mitigation Set Aside Programs as part of the CDBG-DR Program, with the assistance of qualified contractors and vendors, participating jurisdictions, nonprofit organizations,

and community partners. The mitigation program will implement specific policies and procedures to ensure compliance with all relevant state and federal regulations. Orange County intends to include mitigation measures into all activities funded with CDBG DR. The County will develop program guidelines that include mitigation measures into all activities to construct, reconstruct or rehabilitate non-residential and residential structures with CDBG-DR funds. To evaluate environmental factors for CDBG-DR-funded projects and activities, Orange County, as a Responsible Entity, will ensure compliance with the environmental requirements listed under 24 CFR 58.

Program Description: The Mitigation Program will ensure that Orange County as a community is better equipped to face disaster-type events in the future and to provide long-term sustainability for county residents and neighborhoods. The county will strive to incorporate mitigation measures into all rebuilding activities conducted using CDBG-DR funds. The set-aside must also meet the eligibility for low to moderate-income households or low to moderate-income areas. Consistent with the mitigation needs assessment, Orange County will undertake mitigation activities to increase resilience to future natural disasters. These activities will be centered on strengthening existing housing and public infrastructure, flood diversion and prevention, efforts to diminish the risk of damage and loss of property, and other improvements, in addition to the proposed housing and infrastructure programs. All projects incorporating mitigation measures will specifically identify the mitigation measures and associated costs to adhere to CDBG DR budget requirements.

Eligible Geographic Areas: All areas within the Orange County jurisdiction, designated by HUD as Most Impacted and Distressed (MID) due to Hurricane Milton.

Other Eligibility Criteria: Any other eligible criteria will be established by Orange County in their program policies and procedures.

Maximum Amount of Assistance Per Beneficiary: Mitigation projects will be selected based on their cost and relative benefit to the MID area. The maximum amount of assistance per project is \$4,351,000.

Maximum Income of Beneficiary: 80% AMI, Urgent Need

Mitigation Measures: This program is designed to promote sound, sustainable long-term recovery plans and projects that account for the unique hazards, opportunities, vulnerabilities, and disaster impacts within Orange County's MID disaster impacted area.

Reducing Impediments for Assistance: The Mitigation Program aims to enhance access to assistance for impacted populations by promoting community-driven disaster risk reduction efforts. Many at-risk communities, including low-income residents, the elderly, and people with disabilities, often reside in high-risk areas and have limited resources to address potential hazards.. Additionally, by providing both financial and technical assistance, the program helps eliminate obstacles that typically prevent communities from accessing disaster resilience funding.



PLANNING

A total of \$200,000 will be used for planning activities. This funding will be available to the Orange County Housing and Community Development Division to support and administer CDBG-DR unmet needs, and mitigation needs assessments for the Hurricane Milton Disaster Recovery Action Plan.

General Information

CITIZEN PARTICIPATION

Consultation of Developing the Action Plan

To ensure that the disaster recovery action plan is comprehensive, addresses Orange County's unmet needs, and aligns with regional redevelopment plans, Orange County consulted with stakeholders, citizens, local municipalities, and other entities to solicit feedback in the development of this plan. To implement this strategy Orange County engaged in the following outreach efforts.

1. Engaged in public meetings to solicit feedback from citizens affected by the disaster
2. Consulted with local municipalities, public housing authorities and other entities
3. Provided comment cards, and fact sheets to citizens, local governments, housing authorities, and other entities to solicit feedback on unmet needs
4. Engaged with public service providers, and other entities that work with low- and moderate-income populations.

Orange County acknowledges that the stakeholders involved are not only the focus of this plan but also essential partners in its development and implementation. Throughout the planning process, opportunities for citizen input were made available. Below is a summary of the outreach and engagement efforts made with community members, stakeholders, local governments, and other entities during the creation of this action plan.

| Partners Consulted | Consultation Type |
|---|------------------------------|
| Community Partners/NGOs/Advocacy Groups | Virtual Consultation Meeting |
| Community Meetings | In Person |
| Public Housing Authorities | Virtual Consultation Meeting |
| Orange County Departments/Divisions | Virtual Consultation Meeting |
| Local Jurisdictions | Virtual Consultation Meeting |
| Community Partners | Virtual Consultation Meeting |
| FEMA/SBA | Data Sharing |
| State and local Emergency Management Agencies | Data Sharing |

Table 35: Recovery Partner Consultation(s).

Engagement with Community Partners, NGOs, Advocacy Groups, and Tribal Entities.

As part of its proactive outreach and engagement efforts, the county organized a meeting to gather valuable input from community partners, nonprofits, and advocacy groups. This virtual meeting, held via Microsoft Teams, on February 24, 2025, allowed Orange County staff to share important information about the CDBG-DR Action Plan and the planning process. Stakeholders were encouraged to provide feedback on their remaining unmet needs related to Hurricane Milton, fostering collaboration and ensuring that the community's voices are heard in the recovery efforts.

The County directly engaged Tribal entities with interests in Orange County to gather input from Tribal leadership regarding the impacts, assistance needs, and unmet needs of Tribal community members. Outreach and consultation efforts included:

- The Seminole Tribe of Florida
- Muscogee (Creek) Nation
- Miccosukee Tribe
- Coushatta Tribe of Louisiana

| Agency/Organization | Agency/Organization Description |
|----------------------------------|---|
| Hispanic Federation | The agency serves as a national model for Latino economic, social, and political empowerment. |
| Coalition for the Homeless | Homeless service provider (emergency shelter, services and programs) assisting homeless people with ending their crisis of homelessness and regaining stable housing. |
| United Way 211 | The nonprofit agency serves those in poverty by providing crisis care, food and household subsidies, employment training, etc. |
| State of Hope | State of Hope is a non-profit organization that provides resources and supporting services to the veterans that reside at the Katerina Orlando |
| Catholic Charities | Ministries and faith-based service provider focusing on their areas of needs: preventing homelessness, alleviating hunger, access to healthcare, caring for immigrants and refugees |
| Aspire Health Partners | Behavioral healthcare organization that provides a full continuum of behavioral healthcare services across six Central Florida Counties |
| Central Florida Jobs for Justice | Community organization that engages local residents in addressing the root causes of poverty, organizing support for workers treated unjustly in the workplace, and builds an economic base that respects the dignity of the entire community |
| Matthew Hope Center | The ministry serves to help successfully move people forward from homelessness towards a life of independence and self-sustainability. |
| Primrose Center | Transforms the lives of people with intellectual and developmental disabilities by providing programs aimed at developing productivity and independence (housing, job training and placement, etc.) |
| Impower | Behavioral health and child well-being nonprofit service provider accredited by the Council on Accreditation (COA) based in Central Florida that offers services throughout the state of Florida to children, youth, and adolescents |

Table 36: Community Partner Engagement.

Participants identified the primary unmet needs in their communities. Below is a summary of the input received:

- **Housing:** Significant issues related to water damage, primarily due to flooding, continue to affect veterans and the Apopka Mobile Home Community.
- **Mitigation Activities:** Implementing home hardening measures would be beneficial. New housing construction is necessary, particularly to provide units for the homeless and additional shelter beds. Backup power sources are essential for populations vulnerable to hazards during and after storms.
- **Rental Assistance:** Many residents face financial limitations due to the disaster's impact and other complications. We need to explore which buildings in Orange County can be repurposed for housing and shelter for affected residents. After multiple storm impacts, insurance companies are not compensating for additional damages, and FEMA assistance has been insufficient. United Way has received over 2,000 calls for disaster relief, with 25% of those calls related to housing and shelter services.
- **Infrastructure:** There is a sinkhole in the sidewalk near the building on Alley Road in Winter Park, FL.
- **Economic Revitalization:** Many very small businesses do not meet SBA support requirements. Numerous businesses had to close for several days, resulting in income loss for both owners and employees.
- **Additional Unmet Needs or Impacts:** Following the disaster, there has been an increase in applications for emergency relief services, financial assistance, and FEMA applications. Immediate cash assistance is urgently needed. Additionally, FEMA communications are primarily in English, which poses challenges for many Spanish- and Portuguese-speaking populations. There is a clear need for streamlined coordination and expanded services following storms to ensure continued support.

Community Meetings

Orange County held three community meetings – on March 11, 12, 13, and 25, 2025. These meetings took place at Olo Vista Elementary School, Barnett Park, Bithlo Community Park and Sadler Elementary School. The purpose of these meetings was to inform the public about how citizens and stakeholders could provide feedback directly to staff regarding the impacts of Hurricane Milton in their communities. During the community meetings, participants received a brief overview of the program and had the opportunity to ask questions from the staff. Most sessions included open dialogue, allowing community members to engage with local government staff, who answered their queries. In addition to serving as an outreach platform, these meetings enabled Orange County to address specific issues and challenges faced by the community. Comment cards were distributed to citizens to collect feedback on unmet needs within their neighborhoods. The comment cards asked five questions, listed below.

Question 1: What areas and/or communities do you believe were hardest hit by Hurricane Milton or at a higher risk of housing instability due to natural disasters?

Question 2: In your opinion, which perspective areas would be the most helpful in addressing unmet long-term recovery and housing needs?

Question 3: Are you aware of any damage to community infrastructure due to Hurricane Milton?

Question 4: Are you aware of any damage to businesses due to Hurricane Milton? (Close of business, structure damage, loss of staff, etc.)

Question 5: Other than housing, what is another current unmet social service need in Orange County as a result of Hurricane Milton?

Table 37: Responses received from the public comment cards resulted in a mixture of housing, infrastructure, and economic unmet needs in the communities.

Engagements with Public Housing Authorities

On February 25, 2025, Orange County held a virtual meeting via Microsoft Teams with representatives from the Public Housing Authority (PHA). The main goal of the consultation was to gather feedback on the impact of Hurricane Milton on public housing. During the meeting, the following information was collected:

- Number of housing authorities
- Number of total housing units
- Number of damaged units
- Remaining unmet needs

Two Public Housing Authorities (PHAs) were present: **Orlando Housing Authority** and **Winter Park Housing Authority**. Both PHAs reported that they fared well during the hurricane, experiencing only minor damage and flooding. Overall, they indicated that there were no significant unmet needs. However, looking ahead, the PHA mentioned that some properties could benefit from mitigation measures. They also expressed the need for funding to support redevelopment, meeting housing needs, or developing new housing.

Engagement with Local Governments and Municipalities

Orange County conducted two virtual meetings for local municipalities and county department divisions on February 27, 2025. Both sessions were held via Microsoft Teams. The purpose of these meetings was to inform local governments and county departments about the allocation of \$33,357,000 in Community Development Block Grant - Disaster Recovery funds to Orange County for Hurricane Milton. Additionally, the meetings aimed to gather feedback on unmet needs in their communities.

Orange County Departments/Divisions: A collaborative group of representatives – including engineers from Orange County Public Works, Youth Services representatives, program managers, and various stakeholders – came together to create a constructive dialogue. A comprehensive overview of funding and timelines was presented through an engaging PowerPoint presentation. Stakeholders were invited to contribute their insights into the following key areas:

- Identification of impacted areas within their communities
- Suggestions for potential recovery or mitigation projects
- Cost estimates for proposed initiatives
- Assessment of departmental capacity for implementation
- Clear connections to Hurricane Milton (or indications of issues that may have been worsened by Hurricane Milton)

Moreover, representatives were encouraged to participate in the upcoming town hall meetings to support community members with their inquiries and gather valuable feedback.

Local Jurisdictions: Local municipalities were consulted on the proposed uses of CDBG DR funding. An informative overview of funding and timelines was shared via PowerPoint, setting the stage for constructive feedback on:

- Identification of impacted areas within their communities.
- Detailed project descriptions.
- Estimated costs for proposed projects.
- Classification of storm impacts (Milton vs. Ian).

The insights gained from both consultations underscored the priority of addressing unmet housing and infrastructure needs in low- to moderate-income areas as we develop the Action Plan, ensuring that our community's voices are heard and addressed effectively.

PUBLIC COMMENTS

All comments that Orange County receives at the public hearings will be considered when developing this action plan. Any changes Orange County makes to the action plan in response to public comments will be included in the final version of the action plan, in addition to a summary of the comments received and Orange County's response to each. A summary of Orange County's outreach and engagement activities with Indian tribes, local municipalities, and other entities during the development of this action plan is detailed in the section above. Orange County citizen participation plan is posted on the public website, which can be found at the following URL: <https://www.orangecountyfl.net/NeighborsHousing/OCDisasterRecovery.aspx>.

PUBLIC HEARINGS

As required per the federal allocation notices, Orange County, as a HUD recipient whose CDBG-DR allocation is less than \$100 million, will conduct one public hearing in HUD-identified MID areas to solicit public comments related to this action plan. To maximize citizen participation efforts, the hearing will provide reasonable opportunity, geographic balance, maximum accessibility for citizen

comment, and ongoing citizen access to the use of grant funds. The public hearing was held on April 16, 2025 and June 3, 2025 at the Orange County Administrative Building.

| Public Hearing # | Date | Method | Location |
|---|-----------------------|------------------|--|
| <i>Orange County – Community Development Advisory Board (CDAB) - Public Hearing # 1</i> | <i>April 16, 2025</i> | <i>In Person</i> | <i>County Administration Cypress Rooms 201 S. Rosalind Avenue Orlando, FL</i> |
| <i>Orange County Board of County Commissioners (BCC) - Public Hearing #2</i> | <i>June 3, 2025</i> | <i>In Person</i> | <i>Commission Chambers, First Floor, County Administration Center, 201 S. Rosalind Avenue, Orlando, FL</i> |

Table 38: CDBG-DR Action Plan Public Hearings

Accessibility of Public Hearings

The public hearing will be advertised on the Orange County website 14 days prior to the first hearing. It will be publicized in print and online versions in accordance with the Orange County Citizen Participation Plan. The hearing will be held in a facility physically accessible to persons with disabilities, with accommodations to ensure full participation opportunities, and will also be accessible for Limited English Proficiency persons. The notice of the public hearing will also include instructions for persons with disabilities or special needs who may require unique materials, services, or assistance to contact Orange County so that accommodation can be arranged. Following the hearing, Orange County will also post to the public website a video recording of the entire hearing that includes closed captions and subtitles.

Accessibility

The Action Plan, substantial Action Plan amendments, and performance evaluation reports shall be made available to citizens, citizen groups, public agencies, and other interested parties upon request and will also be available on the public website. Information regarding how to obtain the materials will be made available through public hearings that are held throughout implementation of the CDBG-DR grant.

Meaningful Access

Materials will also be made available in various formats and in Spanish, and Haitian Creole upon request, and shall be accessible to persons with disabilities and to persons of Limited English Proficiency. Persons with disabilities, limited English proficiency, or special needs who may require special materials, services, or assistance with accessing program materials should contact:

Human Resources Department
 Title VI/Nondiscrimination Coordinator
 Orange County Government
 450 E. South Street
 Orlando, Florida 32801
 Phone: (407) 836-5825
 Email: Access@ocfl.net .

Additionally, all published citizen participation advertisements will include a statement in Spanish and Haitian Creole indicating that materials are available in Spanish upon request. Furthermore, a Spanish translation icon is provided on the Orange County website so all CDBG-DR information can be easily translated.

Citizens, citizen groups, public agencies, and other interested parties will be allowed access to program-related information, documents, and records covering at a minimum the preceding five-year period. The materials will be accessible during regularly scheduled business hours of the local government, agency, or other entity responsible for administering the applicable program, or at the time, location, and in the format decided by the responsible entity and according to the applicable situation or circumstance.

Conclusions from a four-factor analysis that is included in Orange County's Language Access Plan for Limited English Proficiency persons (for all HUD-assisted programs) will guide Orange County in determining which language assistance measures will be undertaken to guarantee access to the CDBG-DR program by LEP persons.

Consideration of Public Comments

Comments that are received during the public comment period will be organized into categories and given a response. Comments and the corresponding responses will be made available in the final version of this Action Plan that is submitted to HUD, see Appendix D: Public Comments.

CITIZEN COMPLAINTS

Complaints alleging violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov). Orange County has made available on its public website Diaster.Recovery@ocfl.net detailed fraud, waste, and abuse policies and procedures to demonstrate that adequate procedures are in place to prevent fraud, waste, and abuse.

As required per the allocation notice and consistent with Orange County Citizen Participation Plan, Orange County will provide a timely written response to every citizen complaint it receives. The response will be provided within fifteen working days of receipt of the complaint. If a response cannot be provided within fifteen working days, Orange County will document why additional time for the response is required. A complaint or a grievance is defined as a wrong that is perceived by a citizen to have occurred or been committed during the implementation of any of the disaster recovery programs, wherein the citizen pursues resolution of that perceived wrong by bringing an action to be addressed by the affected entities or interested parties. Complaints and grievances are to be stated in writing by the aggrieved party or their representative, and are to be submitted to the applicable local, state, or federal government agency, for resolution. All such comments, complaints, and grievances submitted to Orange County or to HUD shall be addressed in writing to the following designees:

Orange County

Via email at: Disaster.Recovery@ocfl.net
Online at: www.ocfl.net/NeighborsHousing/OCDisasterRecovery/Complaints.aspx
Mailed to: Orange County Housing and Community Development Division
Attn: CDBG-DR Program 525 E. South Street, Orlando, FL 32801

All verbal complaints Orange County receives will be considered informal and not subject to the same resolution process described above. Orange County will attempt to resolve any such complaint(s) it receives. Complainants needing assistance submitting a formal written complaint may call Orange County (407-836-5150)

Appeals

An appeal is a written request that challenges a decision affecting eligibility or assistance. Decisions that can be appealed include determinations regarding eligibility, award amounts, inspection results, and funding requirements.

Policies that have been approved and incorporated into a program, as well as statutory and regulatory guidelines, cannot be appealed. Orange County will implement an appeals process for beneficiaries and subrecipients concerning program eligibility and the application process as part of program development. Specific details, including points of contact and procedures for submitting an appeal, will be outlined in the relevant program policies and procedures.

PUBLIC WEBSITE

Orange County will maintain a public website that provides information on how all Community Development Block Grant - Disaster Recovery funds are utilized, managed, and administered. The website will feature links to the disaster recovery action plan, any amendments to that plan, program policies and procedures, performance reports, requirements for citizen participation, activity descriptions, and program information outlined in this plan. Additionally, it will include details on all contracts and ongoing procurement processes.

The following items will be made available through the CDBG-DR website (www.ocfl.net/NeighborsHousing/OCDisasterRecovery/OCDR-Hurricane-Milton.aspx):

- Orange County CDBG-DR Action Plan (Hurricane Milton)
- Amendments to the CDBG-DR Action Plan
- Orange County Citizens Participation Plan
- Procurement policies and procedures
- Essential documents that ensure meaningful access for beneficiaries and people with limited English proficiency.
- All executed contracts
- Summary description and the procurement status of all services or goods being procured by Orange County and its subrecipients using CDBG-DR funds (e.g., phase of the procurement, requirements for proposals, etc.)
- Submission to HUD, a version of the quarterly performance report that omits personally identifiable information

Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted to a grantee's website.

The Program website will provide information on all disaster recovery activities funded by CDBG-DR. It will be updated regularly to ensure that the latest information about fund usage, along with any changes in policies and procedures, is available. At a minimum, updates will be made quarterly by the Orange County Housing and Community Development Division, in compliance with the requirements outlined in the Federal Register notice.

The website is accessible to all interested parties from the Orange County homepage (www.ocfl.net) through a link to Resources/Long-Term Storm Recovery, as well as direct links to the CDBG-DR Program website. The documents on the CDBG-DR Program website are translated in accordance with Orange County's Citizen Participation Plan, the Orange County Title IV Nondiscrimination Policy and Plan (Language Access Plan), and the Language Access Plan Addendum for federal programs.

All documents related to citizen access to the aforementioned information (including the latest updates and versions) can be found on the CDBG-DR Program website (<https://www.ocfl.net/NeighborsHousing/OCDisasterRecovery/OCDR-Hurricane-Milton.aspx>) under the "Community Engagement" tab.

Additionally, the county website can be translated into various languages, including Spanish, using a one-click translation feature located at the top of each page. The website is maintained to ensure accessibility for persons with disabilities, in compliance with 24 CFR 8.6 and Orange County's ADA policies.

MODIFICATIONS TO THE ACTION PLAN

Amendments

Over time, recovery needs will change. Thus, Orange County will amend the disaster recovery action plan as often as necessary to best address our long-term recovery needs and goals. This plan describes proposed programs and activities. As programs and activities develop over time, an amendment may not be triggered if the program or activity is consistent with the descriptions provided in this plan. Orange County will amend its action plan to update its needs assessment, modify or create new activities, or re-program funds, as necessary. All action plan amendments will include a chart or table that illustrates how all funds are budgeted (e.g., by program, subrecipient, grantee-administered activity, or another category) and will be published on the Orange County website. Each amendment will describe the changes within the context of the entire Action Plan.

The current version of the action plan will be viewable as a single document. At a minimum, each amendment will:

- Identify exactly what content is being added, deleted, or changed.
- Clearly illustrate where funds are coming from and where they are moving to.
- Include a revised budget allocation table that reflects the entirety of all funds, as amended.



Substantial Amendment

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

- A change in program benefit or eligibility criteria (including the expansion of eligible beneficiaries)
- The addition or deletion of a program
- A proposed reduction in the overall benefit requirement
- The allocation or reallocation of a reasonable monetary threshold specified by the grantee in its Action Plan (25%)
- An update to the submitted initial Action Plan if the original submission was incomplete.

Orange County will provide a 30-day comment period prior to submission of all substantial Action Plan amendments to HUD. All substantial amendments will be published on the Orange County disaster recovery website and will afford citizens, local governments, and interest parties an opportunity to review and comment on the proposed amendment. Any updates or changes to the Action Plan in response to public comments will be clearly identified in the Action Plan. A summary of the public comments received regarding the amendment, and the Orange County response to each comment, will be included in the amendment's finalization process.

Non substantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and/or budget changes that do not meet the monetary threshold for substantial amendments to the plan and does not require posting for public comment. Orange County will notify HUD five (5) business days before the change is effective. All amendments will be numbered sequentially and posted to the website into one final, consolidated plan.

In accordance with Orange County's Citizen Participation Plan and 24 CFR 91.505, a non-substantial amendment is defined as:

- Technical corrections or clarifications;
- Addition/Deletion or modification of an activity;
- Budgetary changes that do not meet the monetary threshold for substantial amendments to the Action Plan.

Non-substantial amendments do not require public notices or posting for public comment. However, Orange County will utilize the established reporting system (DRGR) to notify HUD five (5) business days before the change is effective.

Every amendment, substantial or not, will be numbered sequentially, and an amendment chart will be posted on the CDBG-DR Program website:

(www.ocfl.net/NeighborsHousing/OCDisasterRecovery/OCDR-Hurricane-Milton.aspx)



PERFORMANCE REPORTS

Orange County is firmly dedicated to fostering a streamlined and transparent process for the preparation of performance reports. It will align with the reporting formats and data fields mandated by the U.S. Department of Housing and Urban Development (HUD) within the HUD Disaster Recovery Grant Reporting (DRGR) System. The County's foremost aim is to deliver reliable and substantiated information supported by comprehensive documentation. This information not only highlights the significant impact of the County's initiatives but also incorporates invaluable community feedback, illustrating the effectiveness of the Community Development Block Grant - Disaster Recovery projects in addressing the critical needs of our residents.

All changes and amendments to projects and programs will be documented in the Disaster Recovery Grant Reporting (DRGR) System. Adjustments to the Action Plan (AP) will be recorded in both DRGR and the official Action Plan. Changes to projects established in DRGR will only be implemented after receiving HUD's approval on the formally submitted AP. Furthermore, the County will manage programmatic changes, revisions, and the recording of accomplishments through DRGR, ensuring that our community continues to thrive through active engagement and responsiveness.

Quarterly Reports

Orange County is required to complete Quarterly Performance Reports for each calendar quarter. These reports must be submitted to HUD no later than 30 days after the end of each quarter. They will provide detailed information regarding Orange County's CDBG-DR activities. Once approved by HUD in the DRGR system, these reports will be published on Orange County's CDBG-DR website. Reporting will continue until all CDBG-DR funds are spent and programs and projects are closed out.

Program Income

Certain programs funded by CDBG-DR (Community Development Block Grant - Disaster Recovery) may generate program income. Program income is defined as the gross income received by the county that is directly generated from the use of CDBG-DR funds. This may include, but is not limited to, payments from subsidized home sales, loan repayments, or rental revenue from properties supported by the program.

Orange County will ensure that all program income is tracked, reported, and utilized in accordance with HUD (Housing and Urban Development) regulations and program requirements. Any income received will be reinvested into eligible CDBG-DR activities to further support disaster recovery and promote long-term community resilience. The county will comply with all applicable federal guidelines regarding the use and management of program income.

Appendix A:

CERTIFICATIONS

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

A. Compliance with Anti-discrimination Laws: Orange County certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.

B. Affirmatively Further Fair Housing: Orange County certifies that it will affirmatively further fair housing.

C. Uniform Relocation Act and Residential Anti-displacement and Relocation Plan: Orange County certifies that it: (1) will comply with the acquisition and relocation requirements of the Uniform Act, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements; (2) has in effect and is following a RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.

D. Anti-Lobbying: Orange County certifies its compliance with restrictions on lobbying required by 24 CFR 87, together with disclosure forms, if required by part 87.

E. Authority of Grantee: Orange County certifies that the Action Plan for disaster recovery is authorized under state and local law (as applicable) and that Orange County, and any entity or entities designated by Orange County, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.

F. Consistency with the Action Plan: Orange County certifies that activities to be undertaken with CDBG-DR funds are consistent with its Action Plan.

G. Section 3: Orange County certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.

H. Citizen Participation: Orange County certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).

I. Consultation with Local Governments (STATE ONLY) - Not Applicable.

J. Use of Funds: Orange County certifies that it is complying with each of the following criteria:

a. Purpose of the Funding. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C.5121 et seq.).

b. Maximum Feasibility Priority. With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.

c. 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% (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.

d. Special Assessment. Orange County will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, Orange County certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

K. Excessive Force: Orange County 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:

a. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations'. 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.

L. Grant Timeliness: Orange County certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that Orange County has reviewed the requirements applicable to the use of grant funds.

M. Lead-Based Paint: Orange County certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.

N. Environmental Requirements: Orange County certifies that it will comply with environmental requirements at 24 CFR 55 (as applicable) and 24 CFR 58.



O. Compliance with Laws: Orange County certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

P. Order of Assistance: Orange County certifies that it will comply with the statutory order of assistance listed in Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG–DR assistance for the costs of carrying out the same activity.

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.



Appendix B: Waivers

Orange County does not request any waivers as part of the initial submission of this Action Plan for Disaster Recovery but may seek waivers via independent submission of such requests at any time.



Appendix C: Standard Form 424

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

Appendix D: Public Comments

| | Comment | Response |
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| 1 | <p>On behalf of Home Innovation Research Labs, I respectfully request that Orange County amend its Community Development Block Grant- Disaster Recovery (CDBG-DR) Action Plan for Hurricane Milton to include green building programs as a requirement for all CDBG-DR funded residential reconstruction and new construction projects. Recognition of Green Building Programs</p> <p>Orange County's current Draft Action Plan references the use of hazard-resistant construction techniques and materials as part of the mitigation measures. While this language is a strong step in the right direction, the absence of specific program references may create uncertainty for developers, builders, and other stakeholders, seeking guidance on compliance and implementation. The Draft Action Plan also identifies several high- and medium-risk hazards, including sinkholes, floods, wildfires, and extreme temperatures. A proven strategy for mitigating these risks during reconstruction is the implementation and rigorous verification of above-code construction practices- an approach that is inherent of green building programs. We respectfully request that the following programs be explicitly referenced within the 'Mitigation Measures' in page 59 under section 'Homeowner Rehabilitation Program.' This inclusion would provide clear directions to stakeholders and promote the consistent use of hazard-resistant construction practices and materials.</p> <ol style="list-style-type: none"> 1. ICC-700 National Green Building Standard (NGBS) 2. Green 2. Enterprise Green Communities 3. LEED (New Construction, Homes, Midrise) <p>In particular, we advocate for the County to recognize the NGBS in the final action plan. The NGBS is rigorous yet cost-effective for all different types of residential construction.</p> | <p>Thank you for your comment regarding the inclusion of green building standards in the Action Plan. While the County values sustainability and recognizes the role of green building practices in promoting long-term resilience, the inclusion of specific green building standards is no longer a requirement under HUD's Universal Notice. As such, these standards are not addressed within the Action Plan itself. However, this does not preclude the County from incorporating such considerations at later stages. As we move into the development of detailed program policies and procedures, we will carefully evaluate opportunities to integrate green and other construction standards that align with local priorities and comply with applicable local and state building codes. These considerations will help ensure that funded activities promote safe, durable, and energy-efficient housing solutions for impacted residents. For more information, and to stay up-to-date on Orange County's Milton recovery, please visit: https://www.orangecountyfl.net/Neighborshousing/OCDisasterRecovery/OCDR-Hurricane-Milton.aspx</p> |
| | <p>We, the undersigned organizations, appreciate the opportunity to submit comments on Orange County's draft CDBG-DR Action Plan. We applaud the County's efforts to invest in long-term recovery and resilience through expanded affordable housing, especially for</p> | <p>Thank you for your comment. Orange County, as the CDBG-DR Grantee, will rigorously implement Section 3 requirements and promote Section 3 job opportunities over the life of its programs.</p> |

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| 2 | <p>those most impacted by Hurricane Milton and future climate-related disasters.</p> <p>As the County allocates these critical funds, we encourage you to ensure that this investment also supports the local workforce and promotes quality job creation. Affordable housing projects built with public dollars should uplift our communities not only through stable housing, but also by creating pathways to meaningful, safe, and fairly compensated work.</p> <p>In particular, we urge the County to explore approaches that expand access to job opportunities for local residents. Prioritizing local hiring and investing in workforce development programs will help ensure that Orange County residents, especially those from historically underserved communities, can build the skills and access the careers needed to fully benefit from these investments. Combined with responsible labor practices, this strategy can strengthen Orange County's workforce, promote equity, and enhance project outcomes as the population of the County grows and changes over time to allow for our region to continue to thrive in the future.</p> <p>We also encourage the County to ensure that community organizations, labor unions, and frontline workers have a seat at the table in shaping how the programs which use these disaster resilience funds most effectively reach, and stay within our communities. Their firsthand insights are essential to creating effective, inclusive, and sustainable housing and workforce strategies. Ongoing dialogue and meaningful engagement with these stakeholders will be key to the success of the Action Plan.</p> <p>We also note that other local governments, such as the City of Houston, have begun taking meaningful steps to incorporate clearer labor expectations into their housing procurement processes, as reflected in recent RFP clarifications. Orange County can do the same. We believe that public investment in housing can and should reflect our shared values: equity, opportunity, and accountability. We encourage the County to adopt a thoughtful, inclusive approach to implementation that advances these principles.</p> <p>Thank you for your leadership and for your commitment to building a stronger and more resilient Orange County. We look forward to continued partnership as this important work moves forward.</p> | <p>Section 3 is a provision of the Housing and Urban Development Act of 1968 whose purpose is to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing federal, state, and local laws and regulations, be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing and to business concerns which provide economic opportunities to low- and very low-income persons. While the County is fully committed to complying with all Section 3 requirements, HUD does not require grantees to include Section 3 implementation details in the Action Plan. These requirements will instead be addressed in the program's policies and procedures. Additionally, the County has proposed a Public Services Program to provide assistance to local nonprofit service providers for various services that include, but are not limited to, job training and placement. The County will take into consideration impactful workforce training as we develop the program's policies and procedures. For more information on Section 3, please visit: https://www.hudexchange.info/programs/section-3/resources-and-tools/#section-3-tools. For more information, and to stay up-to-date on Orange County's Milton recovery, please visit: https://www.orangecountyfl.net/Neighborshousing/OCDisasterRecovery/OCDR-Hurricane-Milton.aspx</p> |
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