



# **Infrastructure & Mitigation Program Application Guide**

**Community Development Block Grant –  
Disaster Recovery**





All Volusia County CDBG-DR Programs operate in accordance with the Federal Fair Housing Law (the Fair Housing Amendments Act of 1988)

Anyone who feels that he or she has been discriminated against may file a complaint of housing discrimination: 1-800-669-9777 (Toll Free), 1-800-927-9275 (TIY)

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

U.S. Department of Housing and Urban Development  
Principal Deputy Assistant Secretary for Fair Housing and Equal  
Opportunity  
451 7<sup>th</sup> Street, SW  
Washington, D.C. 20410  
(202) 708 - 4252

or

Jacksonville FHEO Field Office  
Charles E. Bennett Federal Building  
400 W. Bay Street  
Suite 1015  
Jacksonville, FL 32202  
(904) 232-1241

# Table of Contents

1.0 Overview .....	1
1.1 Purpose and Objectives.....	1
1.2 Program Design .....	1
1.3 Eligible Activities .....	2
1.4 National Objective .....	2
1.5 Application Submission Process & Project Selection .....	3
1.6 Eligible Applicants .....	3
1.7 Definitions .....	3
2.0 Project Selection Criteria .....	5
2.1 Leveraged Funding (up to 20 points).....	5
2.2 LMI Area Benefit (up to 20 points) .....	6
2.3 Level of Flood Risk Reduction (up to 20 points).....	10
2.4 Quantity of Flood Risk Reduction (up to 15 points).....	11
2.5 Cost Benefit Analysis (up to 10 points) .....	11
2.6 Environmental Impact (up to 10 points) .....	13
2.7 Ease of Permitting (up to 5 points).....	13
3.0 Project Approval.....	14
3.1 Application Scoring.....	14
3.2 Volusia County Council.....	14

## Version History

Version	Date	Notes
1.0	March 25, 2024	Initial version based on model as described in the Action Plan
1.1	April 12, 2024	Sections 1.2, 1.6, 2.3, and revised.
1.2	June 7, 2024	Additional criteria related to scoring of non-profit applications added to Sections 2.3, 2.4, and 3.1.
1.2	June 17, 2024	Clarified title of program ("Infrastructure & Mitigation")
1.3	July 30, 2025	Updated and clarified CBA scoring criteria

# 1.0 Overview

Hurricane Ian made landfall over Southwest Florida, on September 28<sup>th</sup>, 2022. Over the course of the next 48 hours, the storm proceeded to cut through central Florida along a Northeast trajectory, leaving a trail of destruction in its wake. Hurricane Ian's impact on Volusia County was devastating. Storm surge brought flooding between three and five feet above ground level to Volusia's coastal communities, while the storm's heavy rains inundated the county's inland population centers with 22 inches of rain in a 24-hour period. Nearly 115,000 households in the county lost power. Of the nearly 35,000 single family homes that suffered storm damage, over 4,700 had a foot or more of flooding.

On December 29, 2022, Public Law 117-328 was signed into law by the President of the United States, providing Volusia County with a total of \$329 million in CDBG-DR funding for "disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the "most impacted and distressed" (MID) areas resulting from a qualifying major disaster in 2021 or 2022." In that same notice, HUD designated the entirety of Volusia County as a MID area. These funds are designed to satisfy a portion of the unmet need that remains after other federal assistance, such as the Federal Emergency Management Agency (FEMA), Small Business Administration (SBA), National Flood Insurance Program (NFIP), or private insurance, has been allocated.

Volusia County was designated as the responsible entity for administering the CDBG-DR funds allocated to the county. In August 2022, the Volusia County Council created the Office of Recovery and Resiliency (ORR) to administer Volusia County's CDBG-DR funding and to oversee recovery operations. The CDBG-DR Action Plan provides a concise summary of the proposed programs and activities for use of the CDBG-DR funds in order to meet the unmet needs identified through the unmet needs assessment process. Volusia County's Action Plan allocates the CDBG-DR funds across different recovery programs, including single-family housing, multi-family new construction, infrastructure, and mitigation.

## 1.1 Purpose and Objectives

The purpose of Volusia County's CDBG-DR Infrastructure & Mitigation Program is to assist critical infrastructure that was damaged by Hurricane Ian. Per the May 18<sup>th</sup> Federal Register Notice (88 FR 32046), HUD defines an infrastructure activity as "any activity that assists the development of the physical assets that are designed to provide or support services to the general public." Infrastructure and mitigation projects are intended to address the \$107 million unmet need identified in Volusia County's CDBG-DR Action Plan and may go towards projects that reduce or mitigate flood related risks.

## 1.2 Program Design

Volusia County will issue a notice of opportunity on the Transform386 webpage. Local municipalities, not-for-profits, public housing authorities, and Volusia County governmental agencies will have an opportunity to apply for project funding directly to the Office of Recovery and Resiliency. As funding is limited relative to the total unmet need, Volusia County will utilize a project scoring system for awarding projects. Scoring will be based on the following criteria, which are further described in Section 2, below:

- Leveraged Funding
- LMI Area Benefit percentage
- Level of Flood Risk Reduction



- Quantity of Flood Risk Reduction
- Cost Benefit Analysis
- Environmental Impact
- Ease of permitting

Volusia County's Office of Recovery and Resiliency will collect and review applications and, if necessary, provide technical assistance to applicants. Selected projects will then be presented to Volusia County Council, who will have ultimate authority to approve projects.

In order to receive consideration, applicants must have a designated responsible entity who will be required to identify the applicant's plan for funding both operating and maintenance costs (if applicable) for any infrastructure project within its jurisdiction. Volusia County will utilize licensed engineers or general contractors to verify costs and determine cost reasonableness during the procurement phase in order to ensure construction costs are reasonable and consistent with market costs.

### 1.3 Eligible Activities

In order to be eligible for CDBG-DR funding, infrastructure project proposals must directly address damages caused by Hurricane Ian or serve a general mitigation purpose. In the context of CDBG-DR, infrastructure refers to facilities that are publicly owned or, in some cases, owned by not-for-profit organizations but open to the general public. The acquisition, construction, rehabilitation, or installation of public facilities or their improvements are considered eligible CDBG-DR activities. Per Section 5.4 of Volusia County's CDBG-DR Action Plan, eligible infrastructure activities include any activity or group of activities (including acquisition or other improvements), whether carried out on public or private land, that assists the development of the physical assets that are designed to provide or support services to the general public in the following sectors:

- Public facilities;
- Surface transportation, including roadways and bridges;
- Water resource projects, including potable water and wastewater;
- Broadband;
- Stormwater and sewer infrastructure
- Hospitals

In addition to the standard infrastructure categories above, Volusia County will also consider projects that support a mitigation activity. The U. S. Department of Housing and Urban Development (HUD) defines mitigation as an activity that "increases resilience to disasters and reduces or eliminates the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters." 88 FR 561.

### 1.4 National Objective

As per Volusia County's CDBG-DR Action Plan, 70% of all allocated funds must meet the low-to-moderate income national objective. To be eligible for consideration, project proposals must demonstrate that at least 51% of the service area population is low-to-moderate income, as verified through either U.S. Census tract data or HUD-provided Low- and Moderate-Income Summary Data (LMISD). If a service area does not coincide with a census boundary or if the service area includes multiple census tracts, the responsible entity may submit survey data of the

proposed service area. Any projects not meeting the LMI national objective must meet the urgent need national objective.

## 1.5 Application Submission Process & Project Selection

Volusia County's Office of Recovery and Resiliency shall issue a notice of opportunity on the Transform386 webpage. The application period will open for a minimum of 30 days. After the application period closes, Volusia County will review each application and provide technical assistance to applicants to correct or clarify any discrepancies in their application. Upon completion of the review period, the Office of Recovery and Resiliency will issue recommendations to the Volusia County Council for their review and approval. Once approved, Volusia County will upload project abstracts and award amounts for all infrastructure and mitigation projects to the Transform386.org website.

## 1.6 Eligible Applicants

Applicants to Volusia County's CDBG-DR Infrastructure & Mitigation Program must be:

- Volusia County Government; or
- Municipal Government within Volusia County; or
- Public Housing Authority; or
- Not-for-Profit Corporation that meets the following criteria:
  - A Not-For-Profit corporation incorporated in the State of Florida and classified as a 501(c)(3) tax exempt under Federal Internal Revenue Service regulations and designated in compliance with s.170 of the Internal Revenue Code of 1954; and
  - Has maintained incorporated status for more than two years prior to the application deadline; or
  - Has been incorporated in the State of Florida for less than two years at the time of the application deadline, but has provided sufficient evidence of operations for a minimum of 10 years in Volusia County and provided the most recent five years of Independent Certified Audits and Management Letters of the organization;

Applicants may only submit one project proposal per application; however, applicants may submit multiple applications during the initial application period.

Applicants shall not owe Volusia County any money or have any outstanding violations of the Volusia County Code of Ordinances.

## 1.7 Definitions

**Area Median Income (AMI):** Calculated limits based on HUD-estimated median family income with adjustments based on family size.

**Critical Action:** (24 CFR 55.2 and II.B.2.c of Consolidated Notice) "any activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons or damage to property." For example, Critical Actions include hospitals, nursing homes, emergency shelters, police stations, fire stations, and principal utility lines.

**Davis-Bacon Act of 1931:** (40 USC Part 3141 et seq.) and Related Acts – All laborers and mechanics employed by contractors or subcontractors in the performance of construction work financed in whole or in part with the assistance received under this chapter shall be paid fair wages.

**Demolition:** The destruction, clearance, and proper disposal of buildings, improvements, and any other necessary items from an eligible property.

**Duplication of Benefits:** The Robert T. Stafford Disaster Assistance and Emergency Relief Act (Stafford Act) prohibits any person, business concern, or other entity from receiving financial assistance from CDBG- DR funding with respect to any part of a loss resulting from a major disaster as to which they have already received financial assistance under any other program or from insurance or any other source.

**Environmental Review:** All substantially eligible applicants must undergo an environmental review process. This process ensures that the activities comply with the National Environmental Policy Act (NEPA) and other applicable state and federal laws.

**LMI – moderate:** The moderate-income category describes applicants with household income levels between 51% and 80% of the Area Median Income level.

**LMI – low:** The low-income category describes applicants with household income levels between 31% and 50% of the Area Median Income level.

**LMI – very low:** The very low-income category describes applicants with household income levels between 0% and 30% of the Area Median Income level.

**Medium Income:** medium income describes households between 81% and 120% of the Area Median Income. While such households are eligible for assistance, they cannot meet an LMI national objective.

**Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970**, as amended (Title 49 CFR Part 24) (Uniform Act referred to URA): Applies to all acquisitions of real property or displacements of persons resulting from Federal or federally assisted program or projects. URA's objective is to provide uniform, fair, and equitable treatment of persons whose real property is acquired or who are displaced in connection with federally funded projects. For the purposes of these guidelines, URA mostly applies to residential displacements in involuntary (49 CFR Subpart B) acquisition or multi-family damaged/occupied activities that require the relocation of the tenants. A displaced person is eligible to receive a rental assistance payment that is calculated to cover a period of 42 months.

## 2.0 Project Selection Criteria

Volusia County will score project applications based on seven criteria relating to the project's ability to leverage funding, the ability to meet an LMI national objective, the level of flood risk reduction, the quantity of flood risk reduction, a cost-benefit analysis, the environmental impact, and the ease of permitting. Applications will be scored and ranked accordingly. A description of each scoring criteria and how to demonstrate it is provided in the following subsections.

In addition to addressing each of the seven scoring criteria, each application must, at a minimum, include the following administrative requirements in their technical application:

- Scope of work
- Work schedule
- Detailed cost estimate and project budget
- Long-term planning and risk mitigation considerations
- Expected construction standards
- Operation and maintenance plans

The scope of work, work schedule, and detailed cost estimate should be included in the scoping narrative section of the project proposal. This section will be used by Volusia County to assess whether the activity is eligible, whether the applicant can complete the project within the expected period of performance, and whether the project's cost are necessary and reasonable. The scoping narrative should have a short overview and description of the project's development phases, a breakdown of project milestones, and should identify the party responsible for completing each task. A description of the methods used to manage each task and to report on progress should also be included.

### 2.1 Leveraged Funding (up to 20 points)

Leveraged funding refers to other sources of funding that have been committed to the project such as local tax funding, the Federal Emergency Management Agency (FEMA), the Florida Division of Emergency Management, the Federal Highway Administration (FHWA), or the Florida Department of Transportation (FDOT). Such cost share opportunities are a beneficial factor in the overall desirability of a project and will be scored in accordance with the following scoring rubric:

- Proposals requiring CDBG-DR funding for 76 – 100% of a project's cost: 5 points
- Proposals requiring CDBG-DR funding for 51 – 75% of a project's cost: 10 points
- Proposals requiring CDBG-DR funding for 26 – 50% of a project's cost: 15 points
- Proposals requiring CDBG-DR funding for 0 – 25% of a project's cost: 20 points

#### Procedures:

Proposals should include a detailed budget that identifies all funding sources that are available for the project, including federal, state, and local sources. Please note, CDBG-DR funds are intended to supplement rather than supplant existing sources of funding. Supplanting occurs when a unit of local government reduces local funds that have previously been budgeted for an activity as a result of CDBG-DR funding being made available (or expected to be made available) to fund that same activity.

The proposed budget should also include an operations and maintenance plan that identifies responsible parties and the long-term operation and maintenance costs associated with the



project. As CDBG-DR funds may not be used to fund operations and maintenance of infrastructure projects, proposals should identify how the responsible party will fund these costs in the long term.

## 2.2 LMI Area Benefit (up to 20 points)

Projects that demonstrate an ability to meet HUD's LMI Area Benefit national objective will receive up to 20 points during project scoring in accordance with the following scoring rubric:

- The project provides a valuable public service that benefits a specific area, which has been delineated on a map, using GIS; and the service area was reasonably defined to encompass the public service needs of the population within the boundaries of the service area: 5 points; and,
- The population residing within the service area is between 51% and 70% LMI, as demonstrated through the use of HUD's LMI Summary Data (2016 – 2020 American Community Survey) or the use of local income surveys: 10 points; or,
- The population residing within the service area is between 71% and 100% LMI, as demonstrated through the use of HUD's LMI Summary Data (2016 – 2020 American Community Survey) or the use of local income surveys: 15 points

In order for a proposed activity to meet HUD's LMI Area Benefit national objective, the activity must be one in which the beneficiaries of the service area are at least 51% low to moderate income persons. According to 24 CFR 570.483:

An activity, the benefits of which are available to all the residents in a particular area, where at least 51 percent of the residents are low and moderate income persons. Such an area need not be coterminous with census tracts or other officially recognized boundaries but must be the entire area served by the activity. Units of general local government may, at the discretion of the state, use either HUD-provided data comparing census data with appropriate low and moderate income levels or survey data that is methodically sound. An activity that serves an area that is not primarily residential in character shall not qualify under this section.

### Procedures:

In order to demonstrate compliance with the LMI Area Benefit national objective, project proposals should adhere to the following two-step process:

- **Step 1: Define the Service Area**

The proposal's supporting documentation should include a description of the project's entire intended service area. The service area should be clearly delineated on a map and an analysis of how the benefits of the project were determined should be included. Any assumptions that went into determining the area LMI should be noted in the analysis section.

Service areas are generally defined by the type of activity that the project supports. Hospitals, for example, have service area boundaries that are defined by the radius of the community surrounding the hospital. If the hospital is located in an urban area, then its service area boundary is typically closer in proximity to the hospital. In cases involving rural communities, however, a hospital's service area boundary may extend further out from the hospital, particularly if there are no other hospitals/health care facilities in the vicinity.

Infrastructure projects that involve stormwater or drainage projects typically have service areas that are defined by the watershed in which the project is located. A watershed is defined by local topology, or in other words, how the ground slopes to drain water. Any area where stormwater runs into the local water network is included as part of the watershed area. Watershed boundaries, depending on the intended goal of the project, may be shortened, as many watersheds can elongate hundreds of miles downstream or upstream. Defining the appropriate service area should be based on the best available data, modeling, and/or by engineers with experience in hydrologic and hydraulic studies.

- **Step 2: Document the Percentage of Low to Moderate Income Persons within the Service Area**

Once the reasonable service area has been defined, the next step is to ascertain the LMI percentage of the target beneficiaries. In order to meet the LMI Area Benefit national objective, at least 51% of the service area's population must be of low to moderate income. Project proposals may demonstrate the LMI status of the service area using HUD-provided data from the 2016-2020 American Community Survey ("ACS") or through the use of applicant-generated survey data.

To determine which of these two methods should be used, applicants should consider the type of project being proposed and its intended beneficiaries. For example, a street improvement project that runs through the heart of a U.S. Census block group and is accessible by all residents within that block group can reasonably be determined to benefit all residents of the block group. In this case, use of the ACS block data is sufficient. However, in the case of a sewer line improvement that only impacts a handful of residents, surveys will be required to confirm the actual beneficiaries and their income status.

***Method 1: Use of Low Moderate Income Summary Data (LMISD)***

If the service area coincides with one or more census boundaries, the proposal may use HUD-published data from the 2016-2020 ACS 5-year estimates for particular census tracts. ACS block group data can be downloaded directly from HUD at:

<https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-block-groups-places/>

From the HUD Exchange webpage, users may confirm which census block their service area corresponds to via a map application and download the Excel file "ACS 2016-2020 All Block Groups," which contains the low and moderate income data for the block group (screenshot below):

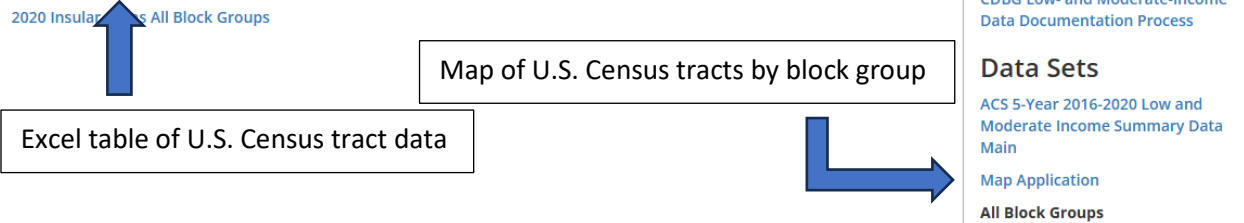
# LMISD - All Block Groups, Based on 2016-2020 ACS

These data sets provide estimates of the number of low- and moderate-income individuals (LMISD) by block group based on the 2016-2020 American Community Survey (ACS) and includes the margin of error.

These data contain codes found in [Understanding Geographic Identifiers](#) by the U.S. Census.

[ACS 2016-2020 All Block Groups](#)

[2020 Insular Areas All Block Groups](#)



Once the block group has been identified, users can confirm the low to moderate income percent of the population by checking column “M” (labelled “Lowmod\_pct”), which reflects the ratio of low to moderate income individuals denoted in column “J” (“Lowmod”) to the total population of the block group in column “L” (“Lowmoduniv”).

- Please note that when service areas include multiple block groups, the percentage of low to moderate income individuals should be determined by adding the “Lowmod” figures for each and dividing that figure by the combined “Lowmoduniv” for each, not by taking the average of the “lowmod\_pct” for each.
- Please note further that HUD does not allow percentage numbers to be rounded up to 51%.

For additional information regarding the use of the 2016-2020 ACS Census Tract data, please see HUD Notice CPD-19-02, available for download at the HUD Exchange link below:

<https://www.hudexchange.info/resource/5794/notice-cpd1902-low-and-moderate-income-summary-data-updates/>

## Method 2: Local Income Survey

If the service area does not coincide with a census boundary or if the service area includes parts of multiple census tracts, the applicant will need to survey the beneficiaries of the service area. Although applicants have some flexibility in how they design their surveys, surveys must be conducted in a confidential manner and meet the requirements of 24 CFR 570.208(a)(1)(vi) concerning statistical significance. Per HUD’s Office of Community Planning and Development (CPD) Notice 14-13, applicants for grant funding should adhere to the following steps for conducting surveys:

### Step 1: Select the Survey Type

- Applicants may use a number of survey methodologies to conduct their survey questions, including telephone, door to door, mail, or web-based questions.
- The type of survey selected should be based on the staff and resources reasonably available to the applicant and the anticipated response rate of each method.

### Step 2: Develop the Questionnaire

- Questions should be short, simple, and efficient and should be worded in a manner that is neutral, meaning they do not bias the respondent towards giving one answer over another.
- Be sure to use correct income limits relative to the Area Median Income (AMI).
- Avoid burdensome questions, i.e., questions that are irrelevant to determining the beneficiary status of the respondent.

### *Step 3: Select the Sample*

- Define the service area: the definition should include the boundaries of the service area and the size of the total population therein.
- Identify the sample: applicants should obtain a complete list of residents within the service area and randomly select a sample of the total population to survey. The methodology for selecting the sample should be described in detail.
  - Determine the appropriate sample size necessary in order to achieve an acceptable level of accuracy.
  - Randomly select the sample: be sure to add households in order to compensate for refusals and to draw from the entire service area. Document the selection pool.
  - Structure interview times and/or access in a manner that does not favor some portion of the sample population over another in response rate (for example, weekday interviews favoring retirees over working population).

### *Step 4: Conduct the Survey*

Note: for surveys conducted via in-person interview, HUD recommends that interviewers be trained in advance as the quality of survey responses often depends on how well the survey was conducted. Interviewers should be comfortable with the questions and be familiar with the following best practices:

- Describing the entire survey and its methodology
- Identifying the sponsor of the survey
- Understanding the logic of the survey and its process
- Explaining the sample methodology
- Understanding interview bias
- Understanding the respondent selection process

### *Step 5: Analyze the Results*

Based on the results of the survey, applicants should be able to extrapolate the data to confirm whether the service area population meets the 51% LMI threshold.

### *Step 6: Document and Save Survey Results*

- The list of respondents, survey questionnaires, and any other survey response data should be saved in a confidential manner.

- The description of the service area should also be saved along with the selection procedures and all training materials.

For complete information regarding the use of surveys to confirm LMI status of a service area, please see HUD Notice CPD-14-013, available for download at the HUD Exchange link below:

<https://www.hudexchange.info/resource/4103/notice-cpd-14-013-guidelines-income-surveys-lmi-persons-cdbg-activity/>

### ***Method 3: LMI-Limited Clientele***

The LMI Limited Clientele category allows communities to target specific vulnerable populations with funds, ensuring that the benefits directly reach those most in need. This method can be used for programs or activities designed for individuals or families meeting specific income criteria, typically less than or equal to 80% of the area median income. Applicants should utilize the following steps to calculate LMI limited clientele:

#### ***Step 1: Identify the Specific Beneficiaries***

- Determine the group of people who will directly benefit from the activity.

#### **Step 2: Determine LMI Status**

- Verify that at least 51% of the beneficiaries are LMI, either through income documentation or by demonstrating they fall under a presumed LMI category.

#### ***Step 3: Document the Process***

- Maintain records of the income verification or the reasons for presuming LMI status for each beneficiary.

## **2.3 Level of Flood Risk Reduction (up to 20 points)**

Project proposals that involve flood risk mitigation measures may receive up to 20 points during project scoring. Project proposals that provide a detailed description of how the project will address existing flood risks as identified in a hazard mitigation plan or other study will receive points in accordance with the following scoring rubric:

- Project provides a minimal level of flood risk reduction: 0 points
- Project protects against flooding up to a 25-year, 24-hour storm event level of protection: 5 points
- Project protects against flooding between a 25-year/24-hour storm event and a 100-year/24-hour storm event level of protection: 10 points
- Project protects against flooding above a 100-year/24-hour storm event: 20 points

*Please note that this section applies only to local government and Volusia County departments/agencies applying for CDBG-DR assistance. Non-profit applicants need not submit information related to this section in their Infrastructure & Mitigation Program application.*

### **Procedures:**

The first step is to identify the type of flood risk that is being mitigated: flash flood/ local rainfall, riverine, or storm surge/coastal. A flash flood is caused by slow moving storms in a local area that



produce heavy rainfall in a short period of time. Flash flooding often occurs in urban areas where manmade developments have obstructed the natural flow of water and decreased the ability of groundcover to absorb rainfall. Riverine flooding is a product of excessive precipitation levels and water runoff volumes within the watershed of a stream or river. Storm surge or coastal flooding is generally the result of wind-driven waves and heavy rainfall as produced by hurricanes, tropical storms, and other large coastal storms.

The second step is to determine the amount of protection that the project provides during a storm event. For example, the 25-year, 24-hour storm event refers to the maximum 24-hour precipitation event with a probable occurrence interval of once in every 25-year period, as defined by the National Weather Service and is generally considered the industry standard for stormwater infrastructure projects.

Proposals should include a detailed description of the type of protection the project provides. If the project description does not state the level of protection, the following will be assumed: minor storm water improvements such as a storm drain and retention pond installation have a 25-year storm event protection, while major infrastructure projects such as culverts, bridges, and elevations generally have protection greater than the 25-year storm event.

## **2.4 Quantity of Flood Risk Reduction (up to 15 points)**

Project proposals that involve flood risk mitigation measures may receive up to 15 points depending on the number of fixed assets that the project is intended to benefit. Proposals should include GIS maps of the flood risk reduction area that identify the structures that will benefit from the project's flood risk reduction measures. Projects will receive points for flood protection in accordance with the following scoring rubric:

- Number of fixed assets that benefit from the project is between 1 and 10: 4 points
- Number of fixed assets that benefit from the project is between 11 and 20: 8 points
- Number of fixed assets that benefit from the project is between 21 and 30: 12 points
- Number of fixed assets that benefit from the project is over 30: 15 points

A benefit is defined as any flood risk reduction measure that protects or increases value of a fixed asset. Fixed assets may include buildings/facilities, certain types of equipment such as generators or pump stations, as well as additions, improvements, or modifications to existing fixed assets that materially increase their value or extend their useful life.

*Please note that this section applies only to local government and Volusia County departments/agencies applying for CDBG-DR assistance. Non-profit applicants need not submit information related to this section in their Infrastructure & Mitigation Program application.*

## **2.5 Cost Benefit Analysis (up to 10 points)**

Project proposals that include a detailed cost-benefit analysis will receive up to 10 points in accordance with the following scoring rubric:

- The benefit to cost ratio is less than 1: ineligible; or
- The benefit to cost ratio is between 1 and 4: 7 points; or
- The benefit to cost ratio is above 4: 10 points

## Procedures:

Cost benefit analysis, or benefit-cost analysis, is the process of quantifying the advantages of an activity (benefits) and comparing them to the disadvantages (costs). If an action's benefits outweigh the costs, then is considered cost-effective. This comparison is often expressed as a ratio, known as the benefit-cost ratio (BCR):

$$\frac{\text{Benefits}}{\text{Costs}} = \text{BCR}$$

In order to ensure that benefits and costs are accounted for in a similar manner across application proposals, ORR recommends that local government and Volusia County agency/department applicants to Volusia County's CDBG-DR Infrastructure & Mitigation Program use FEMA's Benefit-Cost Calculator to conduct their benefit-cost analysis. Developed in accordance with OMB Circular A-94, which provides guidance for how to conduct benefit-cost analyses for Federal programs, FEMA's Benefit-Cost Calculator is a Microsoft Excel template that can be downloaded from FEMA's website at:

<https://www.fema.gov/grants/guidance-tools/benefit-cost-analysis/full-bca#download>

To use the template, applicants will also have to download FEMA's Benefit-Cost Analysis Calculator application, available as a free Microsoft Excel add-in from the Microsoft app store at:

<https://appssource.microsoft.com/en-US/product/office/WA200000176>

FEMA's Benefit-Cost Calculator incorporates a variety of budgetary concepts from OMB Circular A-94, "Guidelines and Discount Rates for Benefit-Cost Analysis of Federal Programs."<sup>1</sup> For additional information on how to use the FEMA Benefit-Cost Calculator, applicants should review the following training video available at the HUD Exchange at:

<https://www.hudexchange.info/trainings/courses/cdbg-mit-webinar-series-using-fema-s-benefit-cost-analysis-bca-toolkit/>

Additional training documentation, provided by FEMA is available at:

<https://www.fema.gov/grants/tools/benefit-cost-analysis/training>

### For designated non-profit applicants only:

The Cost Benefit Analysis should be based on a cost-per-person ratio using the below methodology:

- The ratio should compare the CDBG-DR application amount divided by the total number of expected beneficiaries during the useful life of the project. This calculation results in a cost per person for the useful life of the project. The lower the cost of the project per person results in higher points for the applicant.
  - If the benefit to cost ratio is greater than 200: 0 points

---

<sup>1</sup> Available at: <https://www.whitehouse.gov/wp-content/uploads/2023/11/CircularA-94.pdf>

- If the benefit to cost ratio is between 101 and 200: 7 points
- If the benefit to cost ratio is 100 or less: 10 points
- Estimates regarding the project's useful life and the number of beneficiaries served should be supported by verifiable data. If reasonable assumptions were made in determining either the useful life or expected number of beneficiaries, those assumptions should be noted in the analysis.

## 2.6 Environmental Impact (up to 10 points)

Applicant proposals will be awarded up to ten points for their impact on the environment during project scoring in accordance with the following scoring rubric:

- Projects with a negative environmental impact: 0 points
- Projects with a neutral environmental impact: 5 points
- Projects with a positive environmental impact: 10 points

Projects will be assumed to have a neutral environmental impact unless demonstrated otherwise. A project will receive maximum points if it includes a specific, quantifiable environmental improvement, including but not limited to, incorporation of a green infrastructure design component, construction of a pond or reservoir, or restoration of a developed/urban area to a natural state. Projects that have a negative environmental impact on wetlands, wetland buffers, or protected species will receive zero points during project scoring. Such changes may include alterations such as increases in impervious area, changes in natural grade, and removal of native vegetation and/or open space.

Negative environmental impacts may be offset by positive impacts. For example, a project that increases the natural grade of a structure (and thus causes an increase in runoff water) may offset this negative impact by including a drainage pond or stormwater system to catch the increase in runoff and compensate for the additional fill that has been brought in.

## 2.7 Ease of Permitting (up to 5 points)

Project proposals that require only local permitting will receive up to five points during project scoring in accordance with the following scoring rubric:

- Proposal indicates that there will be significant challenges to permit approval: 0 points
- Proposals indicates that there will be potential challenges to permit approval: 3 points
- Proposals indicates that there will be little to no challenge to permit approval: 5 points

The level of challenges depends on the following considerations: amount and type of approvals required and pushback from various stakeholders, capability of the municipality, location of the project, scope of work, timeline schedule, and number of jurisdictions impacted. Projects will be assumed to have potential challenges unless demonstrated otherwise.

## **3.0 Project Approval**

### **3.1 Application Scoring**

Project scoring includes:

For local government and Volusia County agency/department applicants, the total number of possible points is 100. For designated non-profit applicants, the total number of possible points is 65.

### **3.2 Volusia County Council**

All funding must be approved by the County Council. The Office of Recovery and Resiliency Director, or their designee, will present the recommended projects and grant awards to the County Council for review and final approval. The Council will review the recommendations, provide feedback, and approve or deny recommended projects. The County Council has final authority over all grant awards. Although not required, applicants are encouraged to attend the County Council meeting to address questions posed by the Council during their discussions of the recommended awards.