



# Action Plan

## Community Development Block Grant – Disaster Recovery

Hurricane Milton



## Change Log

Version (Date)	Summary of Changes Made
<b>Version 1 (March 14, 2025)</b>	Action Plan posted for public comment.
<b>Version 1.1 (April 22, 2025)</b>	Minor Action Plan language tweaks to comply with modified universal notice.

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## Section 1: Executive Summary

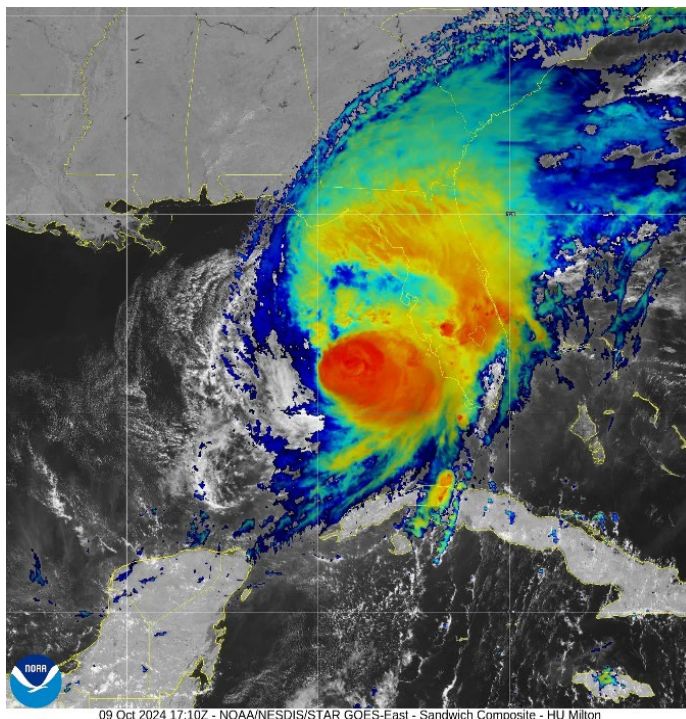
### Overview

The U.S. Department of Housing and Urban Development (HUD) announced that Volusia County will receive \$133,515,000 in funding to support long-term recovery efforts following Hurricane Milton (FEMA DR-4834-FL) through the Volusia County Office of Recovery and Resiliency. Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be used to address the remaining unmet need in Volusia County.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and facilitate a quicker recovery. HUD has allocated \$133,515,000 in CDBG-DR funds to Volusia County in response to Hurricane Milton (FEMA DR-4834-FL), through the publication of the Federal Register 90 FR 4759 dated January 16, 2025. This allocation was made available through the Disaster Relief Supplemental Appropriations Act of 2025 (Public Law 118-158).

### Disaster-Specific Overview

In October 2024, Hurricane Milton delivered significant damage across Florida, with Volusia County—home to cities like DeLand—experiencing particularly severe impacts. As the storm approached, torrential rains and sustained high winds battered the region. Meteorological reports indicated that certain areas in Volusia County received up to 10 inches of rain within a 24-hour period, which led to severe localized flooding.



*Figure 1 Hurricane Milton traverses Florida with direct impacts to Volusia County. Photo Credit: NOAA*

In low-lying neighborhoods, floodwater reportedly reached depths of 2 to 3 feet, rendering many roads impassable and complicating emergency response efforts. Critical infrastructure was heavily affected, with flooding and debris disrupting transportation and utility services for extended periods. Emergency responders deployed to assess the damage, execute search and rescue operations, and work to restore the community to some sense of normalcy. Efforts failed, as flood waters refused to subside. Shelters opened, transportation throughout the community was treacherous as best, and leaders struggled to establish clear lines of transportation for the logistics to ensure resources arrived at the areas most in need during and after the impacts of Milton.



Widespread power outages further compounded the challenges in Volusia County. Thousands of homes and businesses were left without electricity for several days, with some communities reporting that nearly 70% of residents lost power. Utility crews faced significant obstacles—downed trees, flooded roads, and accumulated debris delayed repair efforts, while the outages disrupted critical services at hospitals, schools, and emergency centers. Many residents had to rely on backup generators as crews worked around the clock to restore power.

Communities throughout Volusia County faced considerable hardships as homes and businesses suffered extensive damage, prompting emergency services to mobilize for evacuations, search and rescue operations, and debris removal. Local, state, and federal agencies coordinated relief efforts to restore power, repair damaged infrastructure, and clear debris, marking the beginning of a long road to recovery.



Figure 2 Flood damage impacts Volusia County. Image Credit: NPR

## Most Impacted and Distressed Areas

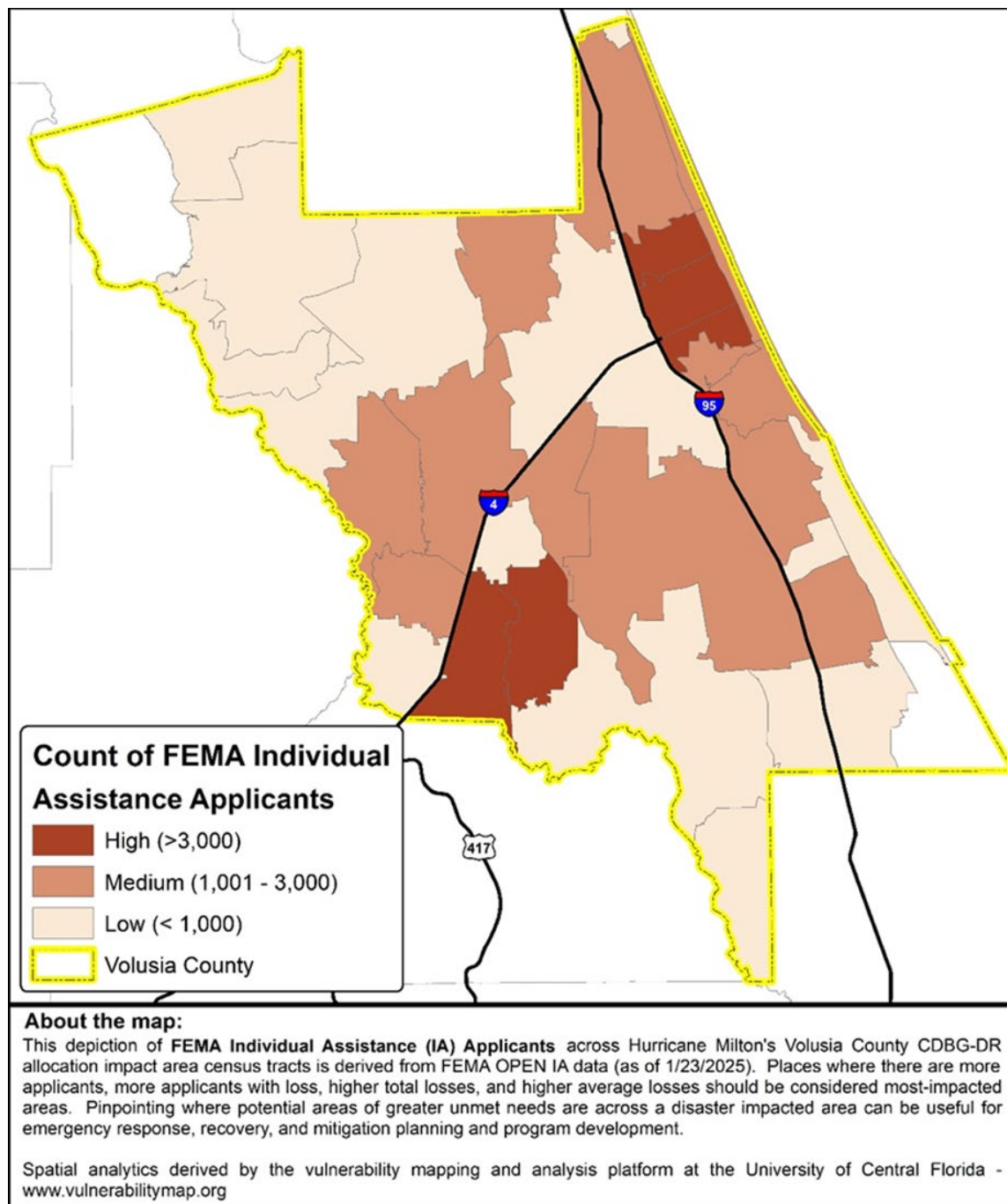
### *HUD identified MID Areas*

HUD designated all of Volusia County as Most Impacted and Distressed (MID) in the AAN: Allocations Public Law 118-158 (AAN) which was published on January 16, 2025, in the Federal Register (90 FR 4759). Volusia County will spend 100% of the funds within the county’s jurisdiction to include its incorporated municipalities.

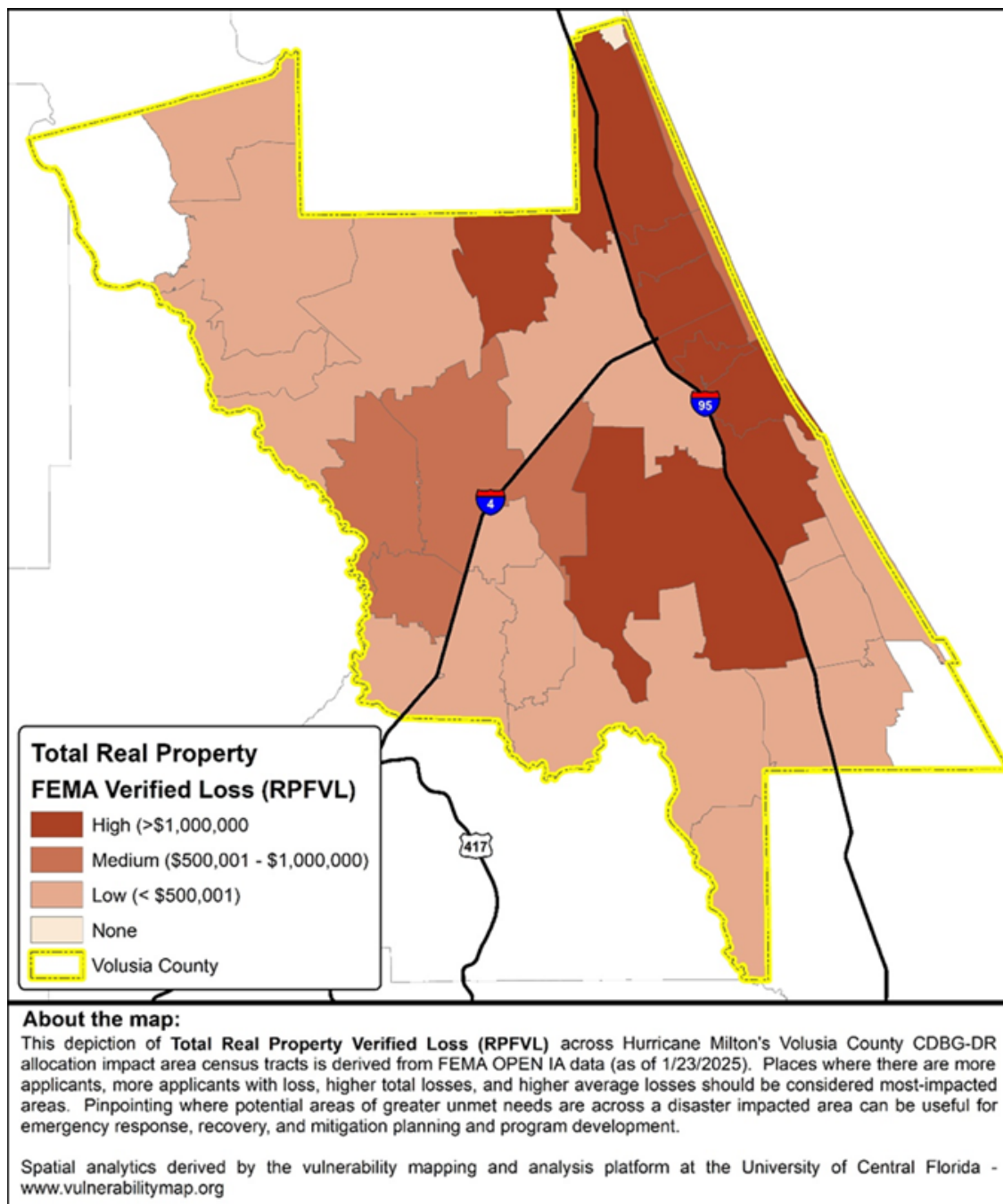
## Overview of the Impacts of the Qualifying Disaster

Disaster Summary	
<b>Qualifying Disaster:</b>	Hurricane Milton (FEMA DR-4834-FL)
<b>HUD-identified MID Areas:</b>	Volusia County, Florida
<b>Grantee-Identified MID Areas</b>	N/A

In October 2024, Hurricane Milton delivered significant damage across Florida, with Volusia County experiencing particularly severe impacts a little of two years after Hurricane Ian cut a devastating swath through the same communities.



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

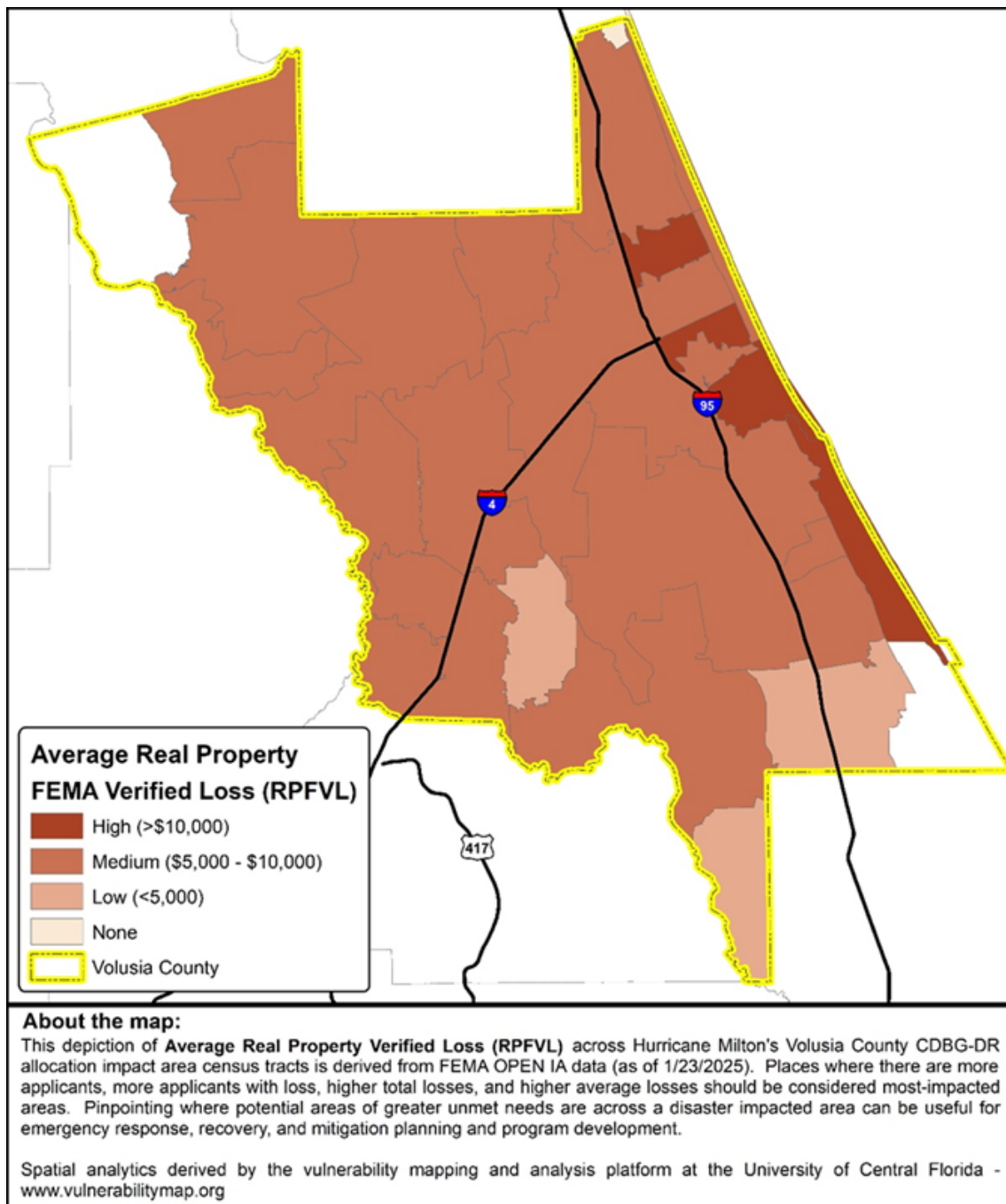


An assessment of total damage indicates that the Daytona Beach metro area absorbed the brunt of Hurricane Milton's impact. The area of the county centered on Deland had medium loss, with loss intensity growing heading towards New Smyrna Beach.

Total losses clearly depict where the greatest amount of damage occurred across the county but may not provide a complete picture of the impacts in terms of the number of damaged structures and the relative

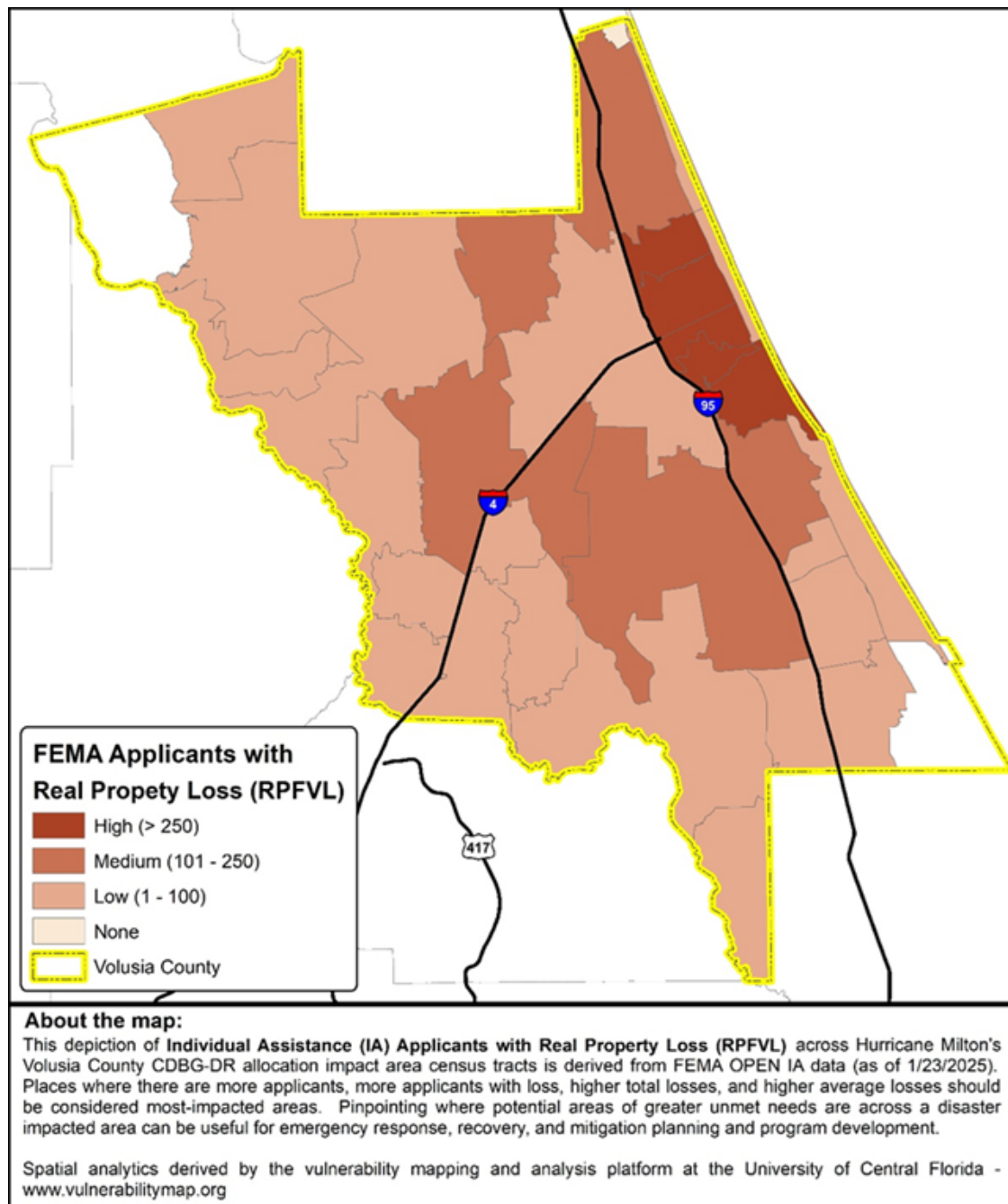


intensity of damage. To pinpoint where higher relative damage occurred and identify those areas with more damaged housing requires an assessment of the RPFVL data in two additional ways, namely: damage assessed through averages and damage assessed through counts of applicants impacted. Here, mapping places by average RPFVL highlights that impacts largely centered in on the coast of the county running from Holly Hill down to Ponce Inlet.

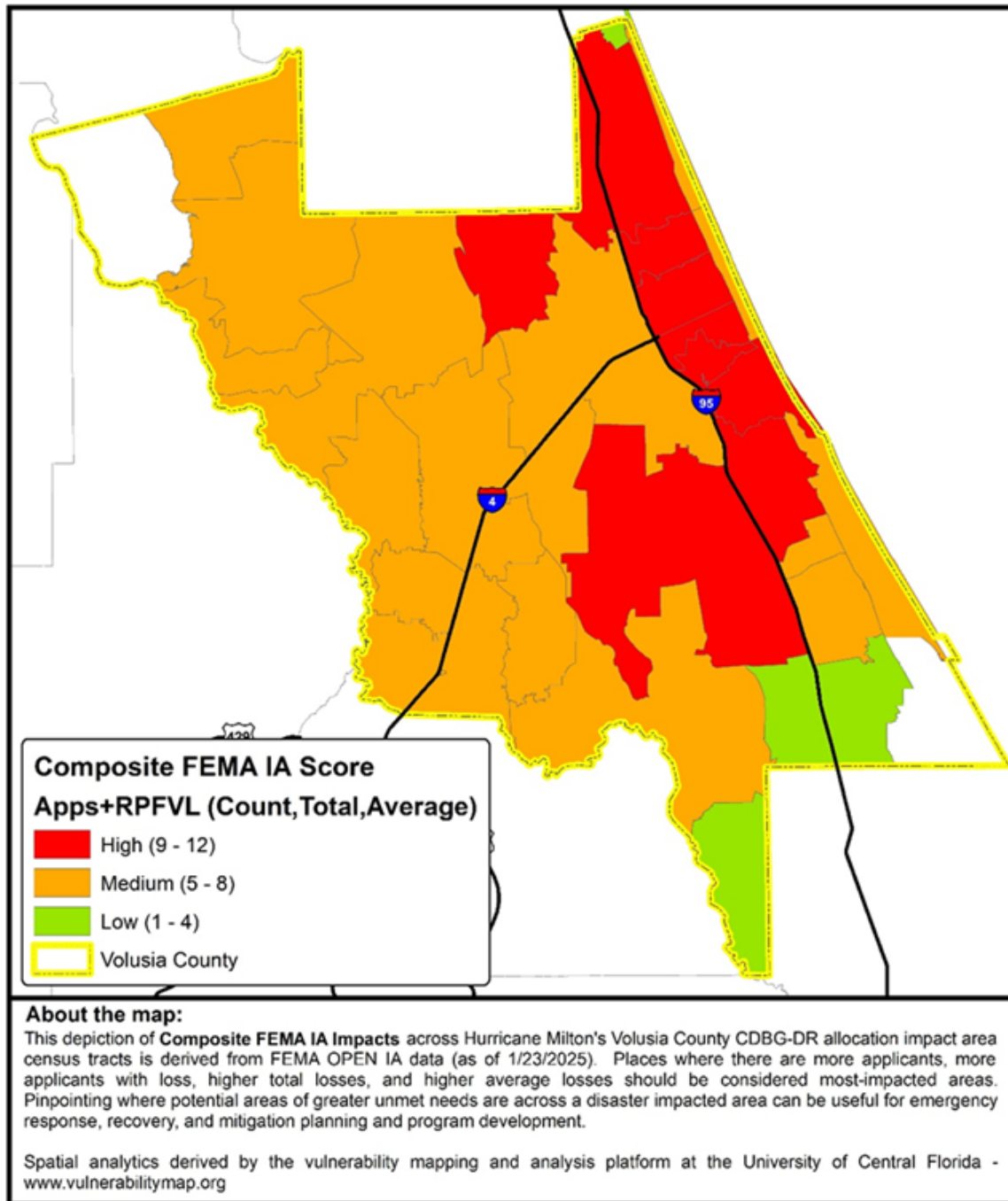


However, average real property losses do not provide a complete picture of most-impacted survivors. Zip codes with higher average damage can be categorized into either places with fewer high dollar losses, or places where many residences suffered moderate losses. Forming a more comprehensive understanding

of Hurricane Milton's impacts and pinpointing the most-impacted areas requires the addition of a different perspective of the same FEMA dataset – namely the count of applicants with RPFVL.



Mapping counts of applicants with RPFVL provides a slightly different pattern of impact across the county. Here, the emphasis of activity appears to shift back northwards, centered on the communities of Holly Hill, Daytona Beach, and South Daytona.



Combining these three perspectives on Milton's impact provides perhaps the clearest representation of where more people experienced damage, where that damage was higher (on average), and where there were more damaged housing units. Creating a composite RPFVL score ranging from 1 – 12 clearly indicates the impacts to the central coastal region of the county. These places contain disaster survivors who had higher damages in greater numbers than the remainder of the county.

<b>CDBG-DR Allocation Overview:</b>	
<b>CDBG-DR Allocation:</b>	\$116,100,000
<b>CDBG-DR Mitigation Set Aside:</b>	\$17,415,000
<b>Total Allocation:</b>	\$133,515,000

Volusia County puts forward the following action plan that will seek to address the impacts from Hurricane Milton.

### Unmet Needs and Mitigation Needs Summary

#### Unmet Needs and Proposed Allocations

<b>Eligible Cost Category</b>	<b>Unmet Need</b>	<b>% of Unmet Need</b>	<b>CDBG-DR Allocation Amount</b>	<b>% of CDBG-DR Allocation</b>	<b>Estimated % to CDBG-DR Mitigation Set-aside</b>	<b>Estimated % to LMI</b>
<b>Administration</b>	N/A	N/A	\$6,675,750	5%	N/A	N/A
<b>Planning</b>	N/A	N/A	\$6,675,750	5%	0%	N/A
<b>Housing</b>	\$248,475,884	40%	\$40,163,500	30%	50%	100%
<b>Infrastructure</b>	\$371,271,926	59%	\$62,585,000	47%	30%	57%
<b>Economic Revitalization</b>	\$5,669,717	1%	\$0	0%	N/A	N/A
<b>Public Services</b>	\$0	0%	\$0	0%	N/A	N/A
<b>Exempt Public Services</b>	\$0	0%	\$0	0%	N/A	N/A
<b>CDBG-DR Mitigation Set-Aside</b>	N/A	N/A	\$17,415,000	13% <sup>1</sup>	100%	50%
<b>Total</b>	\$714,747,281	100%	\$133,515,000	100%	15%	70%
<b>% of Total</b>	100%	100%	100%	100%	15%	70% <sup>2</sup>

<sup>1</sup> At a minimum, grantees are required to spend 15% of their unmet needs on CDBG-DR Mitigation Set-Aside activities. HUD assumes that grantees will spend well over this amount as they integrate mitigation measures into their recovery activities. Grantees should only look at the 15% CDBG-DR Mitigation Set-Aside as a cap for the activities a grantee does not have the ability to demonstrate a tieback to the disaster.

<sup>2</sup> Grantees are required to spend a minimum of 70% of their funds on LMI beneficiaries.



## Section 2: Unmet Needs Assessment

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

Volusia County evaluated the impacts of Hurricane Milton and the financial support to combat these impacts across the three major sectors as required by HUD: housing, infrastructure, and the economy. The unmet needs assessment has identified housing unmet needs of \$248,475,884 (40%), infrastructure unmet need of \$371,271,926 (59%), and economic unmet need of \$5,669,717 (1%). The total unmet need identified from the impacts of Hurricane Milton on Volusia County is estimated to be \$714,747,281 after accounting for a 30% resiliency factor across the three major sectors to account for increased resilience in construction methods.

### Summary of Unmet Needs

Summary of Impacts/Support	Housing	Infrastructure	Economy	Total
<b>Amount of Estimated Impact</b>	\$326,367,810	\$333,514,771	\$54,864,700	\$714,747,281
<b>Amount of Funds Available</b>	\$135,232,515	\$47,920,982	\$50,503,379	\$233,656,876
<b>Unmet Needs + 30% Resiliency Costs</b>	\$248,475,884	\$371,271,926	\$5,669,717	\$625,417,527
<b>Percent of Total Unmet Needs</b>	40%	59%	1%	100%

## Housing

### *Housing Unmet Needs Methodology*

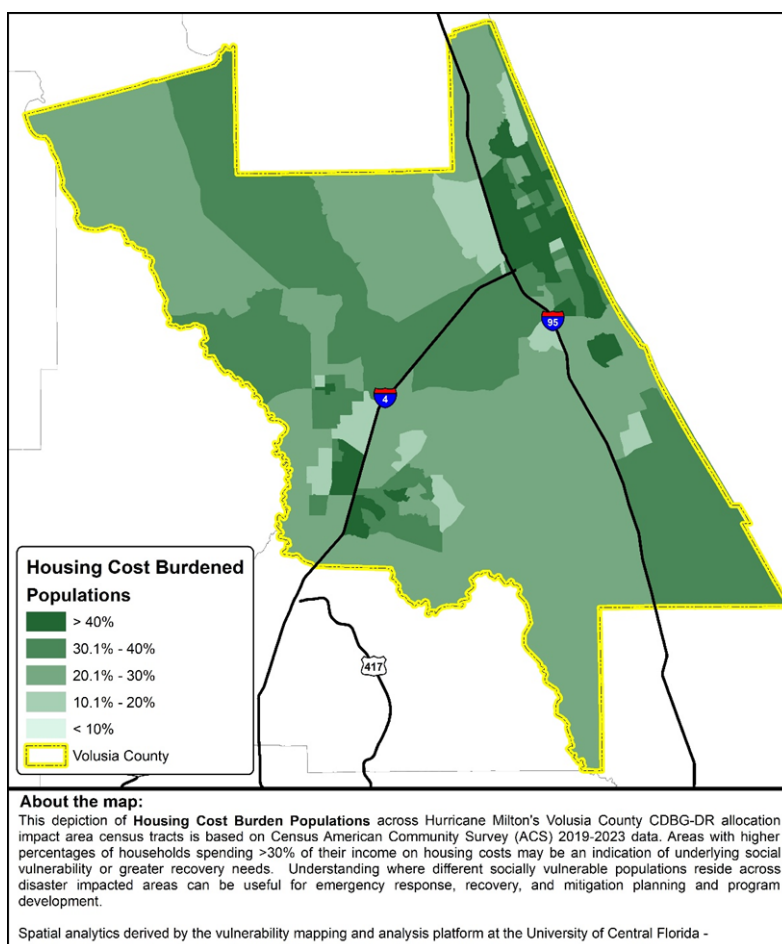
The following summary provides a breakdown of the Housing analysis of the unmet needs assessment. To derive the final unmet needs estimate for housing, the data for 44,345 FEMA registrants was analyzed, representing both owners and renters that applied for FEMA Individual Assistance. Housing unmet need was calculated using the HUD methodology of evaluating FEMA Individual Assistance information broken into five categories. The categories are:

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

Through this lens, the impacts were analyzed to account for an estimated total loss by damage category and home types (mobile homes, single family homes, condos, townhomes, etc.) to arrive at the total housing impact estimate from Hurricane Milton damages using the HUD multiplier. This data was filtered to emphasize those homes that were significantly impacted (Major-High and Severe) versus those with lessor impacts (Minor-Low, Minor-High, and Major-Low) that included water intrusion into the home. This analysis helps to identify where infrastructure solutions could prevent repetitive flooding more cost effectively than elevations and acquisitions in the impacted areas.

To identify the other variable in the equation, all known sources of support were identified to include FEMA payments, SBA loans, property insurance payments, NFIP payments, and other sources of known funding.

Subtracting the sources of housing support from the estimated impacts led to the identified unmet housing need of \$248,475,884.



### Housing Impacts

#### Disaster Survivors with Minor-Low, Minor-High and Major-Low Damage and Water Intrusion in Home

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)	18	\$17,292	\$961	\$302,178
Minor-Low Damage to FEMA IA Applicants (Other Home Types)	396	\$460,057	\$1,162	\$11,552,640
Minor-High Damage to FEMA IA Applicants (Mobile Homes)	206	\$1,192,197	\$5,787	\$9,409,187
Minor-High Damage to FEMA IA Applicants (Other Home Types)	575	\$705,184	\$1,226	\$19,405,867
Major-Low Damage to FEMA IA Applicants (Mobile Homes)	204	\$2,136,338	\$10,472	\$15,719,832
Major-Low Damage to FEMA IA Applicants (Other Home Types)	1,461	\$11,117,253	\$7,609	\$53,764,800
<b>Totals</b>	<b>2,860</b>	<b>\$15,628,321</b>	<b>\$5,464</b>	<b>\$110,154,504</b>

#### Disaster Survivors with Major-High and Severe Damage

Data	Count	Total FEMA Estimated Property Loss	Average Real Property Loss	Estimated Total Loss (HUD Multiplier)
Major-High Damage to FEMA IA Applicants (Houses)	389	\$4,234,834	\$10,886	\$17,875,328
Major-High Damage to FEMA IA Applicants (Condos/Apartments/Townhomes)	136	\$316,364	\$2,326	\$6,249,472
Major-High Damage to FEMA IA Applicants (Mobile Homes)	144	\$2,577,677	\$17,901	\$6,617,088
Major-High Damage to FEMA IA Applicants (Other Home Types)	4	\$8,754	\$2,188	\$183,808
Severe Damage to FEMA IA Applicants (Houses)	63	\$799,300	\$12,687	\$2,894,976
Severe Damage to FEMA IA Applicants (Condos/Apartments/Townhomes)	12	\$ -	\$ -	\$551,424
Severe Damage to FEMA IA Applicants (Mobile Homes)	20	\$982,579	\$49,129	\$2,696,680
Severe Damage to FEMA IA Applicants (All Other Types)	18	\$557,064	\$30,948	\$827,136
<b>Totals</b>	<b>786</b>	<b>\$9,476,572</b>	<b>\$12,057</b>	<b>\$37,895,912</b>

#### Other Quantifiable Housing Impacts

Source	Count	Amount	Average	Estimated Total
<b>SBA Verified Real Property Loss</b>	458	\$53,319,986	\$116,419	<b>\$53,319,986</b>
<b>Real Property Insurance Claims</b>	7,601	\$31,598,792	\$4,157	<b>\$31,598,792</b>
<b>NFIP Identified Damages</b>	1,479	\$88,898,616	\$60,107	<b>\$88,898,616</b>
<b>Damage to Public Housing</b>	100	\$4,500,000	\$45,000	<b>\$4,500,000</b>
<b>Total Other Quantifiable Impacts</b>	<b>9,638</b>	<b>\$178,317,394</b>	<b>\$18,501</b>	<b>\$178,317,394</b>

#### Summary of Housing Impacts

Source	Count	Amount	Average	Estimated Total
<b>Disaster Survivors with Minor-Low, Minor-High and Major-Low Damage and Water Intrusion in Home</b>	2,860	\$15,628,321	\$5,464	<b>\$110,154,504</b>
<b>Disaster Survivors with Major-High and Severe Damage</b>	786	\$9,476,572	\$12,057	<b>\$37,895,912</b>
<b>Other Quantifiable Housing Impacts</b>	9,638	\$178,317,394	\$18,501	<b>\$178,317,394</b>
<b>Total Housing Impacts</b>	<b>13,284</b>	<b>\$326,367,810</b>	<b>\$24,568</b>	<b>\$326,367,810</b>

#### Housing Support

Quantifiable Sources of Housing Support				
	Count	Amount	Average	Total Support
<b>FEMA payments to repair/replace homes</b>	1,909	\$15,070,209	\$7,894	\$15,070,209
<b>Real Property Insurance Payments</b>	4,763	\$19,800,690	\$4,157	\$19,800,690
<b>SBA Homeowner Loans</b>	239	\$11,463,000	\$47,962	\$11,463,000
<b>NFIP Building Payments</b>	1,479	\$88,898,616	\$60,107	\$88,898,616
<b>Public housing funds</b>	0	\$ -	\$ -	\$ -
<b>Total Support</b>	<b>8,390</b>	<b>\$135,232,515</b>	<b>\$16,118</b>	<b>\$135,232,515</b>



## Housing Unmet Needs Summary

	Count	Amount	Average	Total Support
<b>Total Housing Impacts</b>	13,284	\$326,367,810	\$24,568	<b>\$326,367,810</b>
<b>Total Support</b>	8,390	\$135,232,515	\$16,118	<b>\$135,232,515</b>
<b>Initial Unmet Needs</b>				<b>\$191,135,295</b>
<b>Total Unmet Housing Need (Accounting for an additional 30% resilience factor)</b>				<b>\$248,475,884</b>

## Housing Analysis by Type, Tenure, and Other Characteristics

### Emergency Shelters, Interim, and Permanent Housing

During the Hurricane Milton disaster and in its immediate aftermath, 7 shelters were opened throughout the county. These shelters first opened their doors for disaster-impacted community members on October 9, 2024, in advance of the storm's advance. 927 people utilized the shelter on the first day. This figure surged to a high of 1,033 occupants on October 10, and then quickly fell to 69 occupants on October 11, and 62 occupants on October 12. The county ceased emergency shelter operations on October 13 due to a lack of interest and necessity by the community. Unsheltered data for the county and its Continuum of Care Entity are highlighted below.

CoC Entity	Impacted County	Homeless Count
<b>Deltona, Daytona Beach/Volusia, Flagler Counties</b>	Flagler, Volusia	1,053

Point-in-time data about homelessness from several sources is highlighted in the following table.

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)
<b>Statewide</b>	25,959	10,843	4,289	15,482	142	30,756
<b>FEMA Declared</b>	25,232	10,660	4,034	14,740	142	29,576
<b>Volusia COC</b>	865	264	186	583	20	1,053

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

Population by housing Tenure for Volusia County

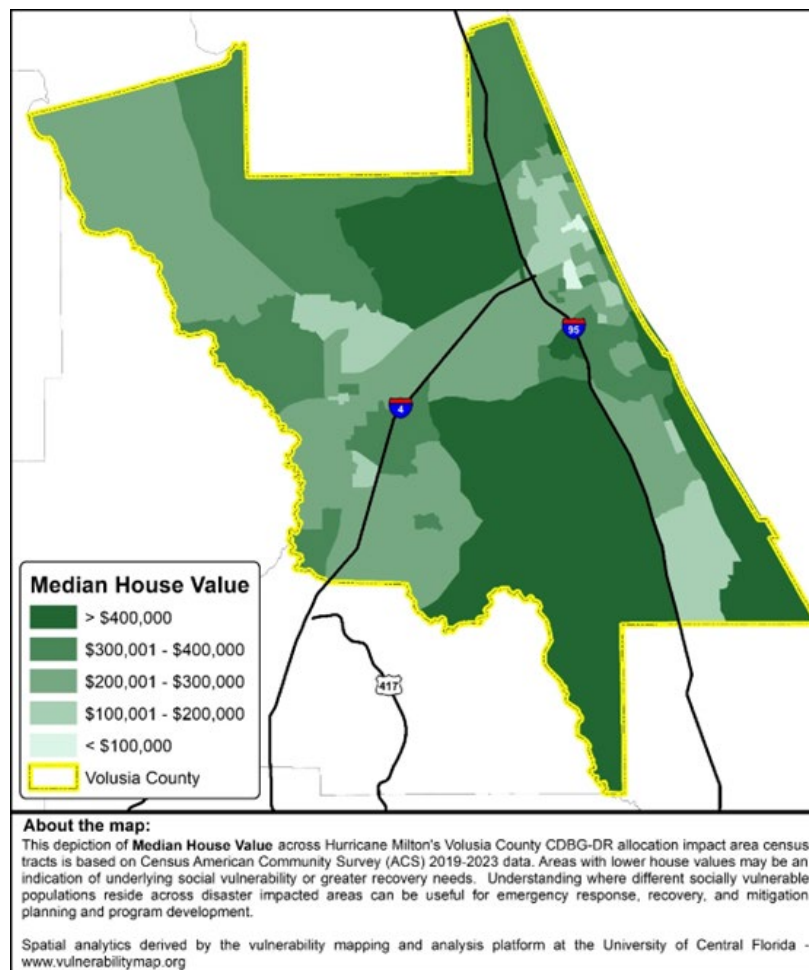
Housing Tenure	Areawide Estimate	Areawide Percentage
Homeowners	403,059	73%
Renters	149,561	27%

## FEMA Individual Assistance Owner Applicant Breakdown

County	# of Applicants	# of Inspections	# Inspected with Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Volusia	24,261	5,323	3,509	2,047	\$31,015,009	\$8,839

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

Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
1,541	798	1,434	415	67



### FEMA Individual Assistance Renter Applicant Breakdown

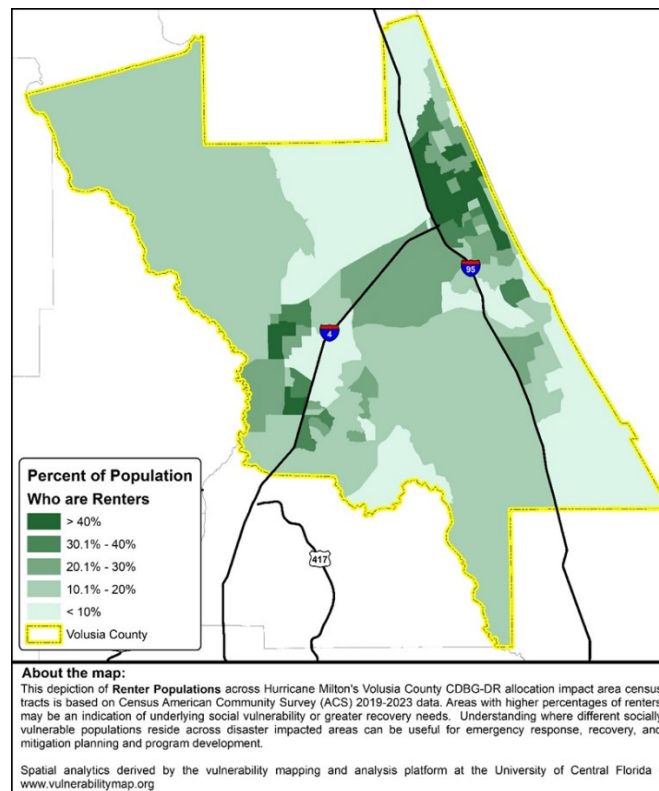
# of Applicants	# of Inspections	# Inspected with Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
20,084	4,769	2,428	1,481	\$3,874,444	\$1,596

### FEMA Personal Property Damage to Renters (as specified by HUD method)

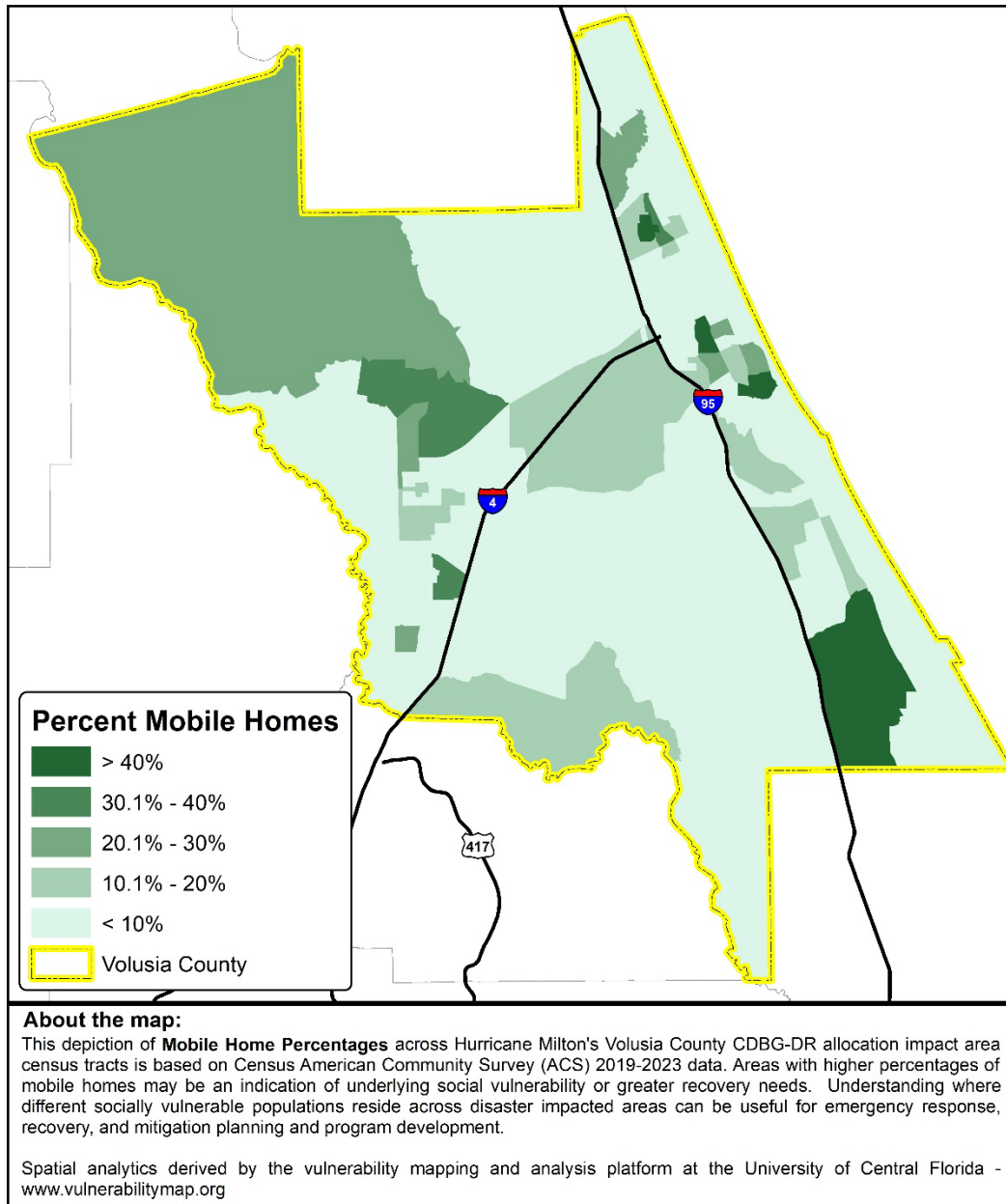
Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
912	753	469	258	46

### Volusia County Rental Units by Age of Unit

Year Built	Number of Rental Occupied Units	% of Rental Units	% of All Units
2020 or later	1,298	0%	0.03%
2000 to 2019	5,159	1%	0.14%
1980 to 1999	23,710	3%	0.64%
1960 to 1979	17,433	2%	0.47%
1940 to 1959	5,308	1%	0.14%
1939 or earlier	2,057	0%	0.06%
<b>Total Rental Units</b>	<b>54,965</b>	<b>6%</b>	<b>1.48%</b>
<b>Total Units</b>	<b>237,396</b>		<b>6.40%</b>



## Mobile Homes



Total Number of Mobile Housing Units	Number of Units Impacted	% of Total Impacted Units
23,158	4,181	18%



#### Disaster Survivors with Water In Home by HUD Damage Category

HUD Damage Category	Owners	Renters	Total Damage (Real and Personal Property)	Total Repair/Replace Support	Total Personal Property Support	Remaining Unmet Need
Minor Low	321	93	\$663,430	\$223,679	\$95,157	\$344,594
Minor High	322	459	\$2,615,312	\$1,027,725	\$534,284	\$1,053,302
Major Low	1,239	424	\$16,267,505	\$4,813,500	\$1,543,635	\$9,910,370
Major High	362	242	\$8,545,160	\$3,064,643	\$1,658,111	\$3,822,405
Severe	46	42	\$2,062,675	\$796,627	\$443,366	\$822,682
<b>Total</b>	<b>2,290</b>	<b>1,260</b>	<b>\$30,154,082</b>	<b>\$9,926,174</b>	<b>\$4,274,554</b>	<b>\$15,953,354</b>

Amongst disaster survivors with water in the home, there are a total of 2,290 owners and 1,260 renters with combined real and personal property damage of approximately \$30.15 million. Of that amount, about \$9.93 million is allocated for repair and replacement support. The remaining unmet need is just under \$15.95 million. “Major Low” accounts for the largest share of damages—over \$16.27 million—and has the highest number of households affected, with 1,239 owners and 424 renters.

The distribution of renters and owners in each category highlights the varying degrees of assistance required. Minor categories together add up to about \$3.28 million in damages, while Major and Severe categories collectively exceed \$26.87 million, reflecting the broader scale of more significant damage. The unmet need for “Major Low” alone is \$9.91 million, making it the largest single category.

#### LMI Disaster Survivors with Water In Home by HUD Damage Category

HUD Damage Category	Owners	Renters	Total Damage (Real and Personal Property)	Total Repair/Replace Support	Total Personal Property Support	Remaining Unmet Need
Minor Low	139	68	\$322,987	\$99,828	\$54,777	\$168,382
Minor High	176	307	\$1,501,856	\$627,857	\$347,457	\$526,543
Major Low	472	274	\$6,493,656	\$2,222,016	\$856,448	\$3,415,192
Major High	171	141	\$4,146,980	\$1,782,077	\$856,147	\$1,508,756
Severe	20	29	\$1,042,675	\$448,012	\$254,952	\$339,711
<b>Total</b>	<b>978</b>	<b>819</b>	<b>\$13,508,154</b>	<b>\$5,179,788</b>	<b>\$2,369,782</b>	<b>\$5,958,584</b>

Among low-to-moderate income (LMI) disaster survivors with water in their homes, a total of 978 owners and 819 renters experienced combined property damages of approximately \$13.51 million. The largest damage amounts are seen in the “Major Low” (\$6.49 million) and “Major High” (\$4.15 million) categories, while the Minor categories (Low and High) account for a smaller portion of the overall damages. These figures reflect both real and personal property losses and underscore the significant impact of water damage on this vulnerable population. There remains an unmet need of nearly \$6 million across all categories, with the Major Low category alone accounting for about \$3.42 million of this gap.

### Public Housing Authority Impacts

Authority	Total # of PHAs	Total PHAs Damaged	# of Units Damaged	Estimated Remaining Unmet Need
New Smyrna Beach HA	1	1	40	\$0
Daytona Beach HA	1	1	100	\$4,500,000
DeLand HA	1	0	0	\$0
Ormond Beach HA	1	0	0	\$0
<b>Total</b>	<b>4</b>	<b>2</b>	<b>140</b>	<b>\$4,500,000</b>

The same 40 units in New Smyrna Beach were flooded by both Hurricane Ian and Hurricane Milton. The NSB Housing Authority has been obligated funding to replace the 40 damaged units with 80 new units on the same site elevated 2 feet above the base flood elevation with the placement of three additional retention ponds. NSB Housing Authority has secured funding from FEMA, private insurance, and the Transform386 Hurricane Ian Multifamily Gap Funding Program to rebuild the impacted community.

The Daytona Beach Housing Authority is in the process of developing a plan to replace the impacted 100 units that were damaged by both Hurricane Ian and Hurricane Milton. Transform386 has earmarked funding to assist with this potential development.

### Hurricane Milton Residential Private Insurance Claims

Line of Business	Number of Claims	Closed Claims with Payment	Denied	Pending Resolution	Percent Open	Paid Loss
<b>Dwelling</b>	1,220	458	489	273	16%	\$6,800,690
<b>Homeowners</b>	9,148	3,613	3,097	2,438	14%	\$10,500,000
<b>Mobile Homeowners</b>	1,008	692	189	127	8%	\$2,500,000
<b>Total</b>	<b>11,376</b>	<b>4,763</b>	<b>3,775</b>	<b>2,838</b>	<b>25%</b>	<b>\$19,800,690</b>

## Infrastructure

### Infrastructure Unmet Needs Methodology

The following summary provides a breakdown of the infrastructure analysis of the unmet needs assessment. To derive the final unmet needs estimate for infrastructure, the data for FEMA Public Assistance across all categories was analyzed to determine the overall immediate infrastructure impact following Hurricane Milton. An analysis was conducted to identify all local capital improvement projects that were impacted by the hurricane as submitted by the county and all responsive municipal organizations within its jurisdiction.

The analysis of impacts was compared against the resources made available, primarily the federal cost share for all FEMA Public Assistance projects. The federal cost share for categories A and B, debris removal and emergency services, are covered by the federal government at 100%. Categories C-G of FEMA Public Assistance have an assumed 25% local match requirement which is considered an unmet need. The value of all impacted capital improvement infrastructure projects is then added to the unmet need amount prior to a 30% resiliency factor being incorporated to account for building back in a more resilient manner.

### Infrastructure Impacts

Infrastructure Impacts	Amount
FEMA Public Assistance Requests	\$53,546,351
County Impacted Capital Improvement Projects	\$92,065,420
Municipal Impacted Capital Improvements	\$78,278,000
Impacted Municipal HMGP Match Infrastructure Projects	\$109,625,000
Total Infrastructure Impacts	\$333,514,771

### Infrastructure Support

Source	Amount
FEMA Public Assistance Federal Share	\$47,920,982
Total Infrastructure Support	\$47,920,982

### Infrastructure Unmet Needs Summary

Infrastructure Unmet Needs Summary	
Total Infrastructure Impacts	\$333,514,771
Total Infrastructure Support	\$47,920,982
Unmet Infrastructure Need	\$285,593,789
Total Unmet Infrastructure Need (Accounting for an additional 30% resilience factor)	\$371,271,926

#### Hurricane Milton FEMA Public Assistance by Category

Public Assistance Category	Approximate Cost	Federal Cost Share	Local Match Requirement
<b>A - Debris</b>	\$25,789,588	\$25,789,588	<b>\$0.00</b>
<b>B - Emergency Measures</b>	\$5,255,286	\$5,255,286	<b>\$0.00</b>
<b>C - Roads and Bridges</b>	\$4,737,181	\$3,552,886	<b>\$1,184,295</b>
<b>D - Water Control Facilities</b>	\$1,221,938	\$916,454	<b>\$305,485</b>
<b>E - Building and Equipment</b>	\$5,618,349	\$4,213,762	<b>\$1,404,587</b>
<b>F - Utilities</b>	\$839,566	\$629,675	<b>\$209,892</b>
<b>G - Other</b>	\$10,084,443	\$7,563,332	<b>\$2,521,111</b>
<b>All Categories</b>	<b>\$53,546,351</b>	<b>\$47,920,982</b>	<b>\$5,625,369</b>

The total estimated cost for Public Assistance projects is approximately \$53.55 million, with the federal government covering about \$47.92 million of that amount and the remaining \$5.63 million required through local matching funds (the infrastructure unmet need). Notably, the largest single expense is in debris removal, which accounts for roughly \$25.79 million and is fully funded by the federal share, as is the case with emergency measures totaling about \$5.26 million.

Additional recovery efforts include infrastructure and facility improvements. Roads and bridges are estimated to cost \$4.74 million, with a local match of approximately \$1.18 million; water control facilities come in at \$1.22 million, requiring \$305,485 from local funds; building and equipment costs total about \$5.62 million, with a local share of \$1.40 million; and other categories amount to roughly \$10.08 million, with a local match of \$2.52 million.

#### Volusia County Unincorporated Infrastructure Needs by Known Project

Project	Unmet Need
<b>VOL-0546 Strickland Creek Flood Protection</b>	\$15,000,000
<b>VOL-0613 Wastewater Treatment Plant Expansion and Flood-proofing</b>	\$15,000,000
<b>VOL-0555 Lift Station #21 Refurbishment</b>	\$516,000
<b>VOL-0587 Elkcarn Blvd</b>	\$8,000,000
<b>VOL-0588 Tulsa Drive</b>	\$450,000
<b>VOL-0589 Catalina</b>	\$2,250,000
<b>VOL-0590 East Brook</b>	\$1,916,948
<b>VOL- 0594 Graves Ave</b>	\$3,541,800
<b>VOL-0591 Windsor Lake</b>	\$10,846,955
<b>VOL-0592 Lake Dupont</b>	\$4,168,498
<b>VOL-0604 Lift Stations</b>	\$1,350,000
<b>VOL-0593 Lake Angela</b>	\$3,400,000
<b>VOL-0595 Mill Lake</b>	\$800,000
<b>VOL-0596 Lift Station #7</b>	\$450,000
<b>VOL-0597 Lift Station #11</b>	\$125,000
<b>VOL-0598 Lift Station # 14</b>	\$125,000
<b>VOL-0611 Station 15 Generator</b>	\$130,000



VOL-0599 Lift Station # 16	\$100,000
VOL-0606 Storm water stations	\$2,500,000
VOL-0603 Facility retrofit	\$780,000
VOL-0605 Lift stations upgrades	\$225,000
VOL-0612 Station 35 Generator	\$70,000
VOL-0614 Flood Control Pump Station on Fleming Avenue	\$12,561,200
VOL-0615 Acquisition 293 Melrose Ave	\$384,516
VOL-0616 Elevation and Retrofit 320 Sanchez Ave	\$380,628
VOL-0617 Elevation and Retrofit 363 Putnam Ave	\$301,494
VOL-0618 Elevation and Retrofit 364 Putnam Ave	\$204,480
VOL-0619 Elevation and Retrofit 520 West Street	\$280,000
VOL-0620 Generator Public Works Facility	\$40,000
VOL-0621 Generator Standby Power for Community Center	\$180,000
VOL-0622 Generator Replacement Standby Power for Fire Station	\$70,000
VOL-0625 Acquisition 241 Cherokee Drive	\$300,000
VOL-0626 Generator Fire Stations 92 and 93	\$250,000
VOL-0628 Generator for Lift Station at 1808 Mason Ave	\$1,550,000
VOL-0629 Generator for Lift Station at 647 Shady Place	\$350,000
VOL-0630 Generator for Lift Station at 507 N. Clyde Morris Blvd.	\$150,000
VOL-0631 Generator for Lift Station at 510 Ora Street	\$350,000
VOL-0632 Generator for Lift Station at 433 Auburn Drive	\$250,000
VOL-0633 Generator for Lift Station at 1317 Avenue D	\$150,000
VOL-0634 Generator for Lift Station at 310 Yorktown Drive	\$150,000
VOL-0636 Generator for Community Center	\$120,000
VOL-0637 Elevation and Retrofit – 30 Sandalwood Lane	\$324,711
VOL-640 Slip line 20,800 linear feet of Sanitary Sewer Pipes - Southwest Service Area	\$891,240
VOL-641 Six Permanent Sanitary Sewer Emergency Bypass Pumping Systems	\$495,000
VOL_644 Two Generators for New EOC Command Center	\$160,000
VOL-0639B Two By-Pass Pumps and Slip line 5,225 lin ft of Sewer Pipes for Stone Island	\$426,950
<b>Total</b>	<b>\$92,065,420</b>

Volusia County Municipal Impacted Capital Improvement Projects

Project Name	Jurisdiction	Unfunded Amount
Pipe Addition to City Hall Pond	City of DeLand	\$111,000
W. University Ave and No. Stone Pipeline	City of DeLand	\$478,000
N. Florida Ave. and W. Rich Ave Imp.	City of DeLand	\$965,000
City Hall Pump Station Install	City of DeLand	\$4,200,000
Wakefield Circle Drainage Improvements	City of Deltona	\$1,265,000
Picasso Avenue Drainage Improvements	City of Deltona	\$1,744,000
Abby Terrace Drainage Improvements	City of Deltona	\$1,786,000
Shorecrest Avenue Drainage Improvements	City of Deltona	\$2,918,000
Teresa Basin Outfall Improvements	City of Deltona	\$7,834,000
Ariel Canal Watershed Study & Improvements	City of Edgewater	\$5,000,000
6th St Detention Pond	City of Holly Hill	\$1,200,000
Granada Street Pump Station	City of Holly Hill	\$1,500,000
Old King Rd Detention Pond	City of Holly Hill	\$1,800,000
Bishop's Farm Detention Pond	City of Holly Hill	\$2,500,000
LPGA Canal pump station	City of Holly Hill	\$3,000,000
2nd and 3rd Street Pump Station	City of Holly Hill	\$3,000,000
Walker St and 8th St Pump Stations	City of Holly Hill	\$5,000,000
Overflow - Helen to Harlan	City of Lake Helen	\$75,000
McKenzie and Cooper Lane Improvements	City of Lake Helen	\$195,000
Headwall repairs	City of Lake Helen	\$400,000
Summit to Prevatt Flow Path Improvements	City of Lake Helen	\$500,000
Elevate Canal Embankments	City of New Smyrna Beach	\$750,000
Canal Conveyance Improvements	City of New Smyrna Beach	\$750,000
Restoring Seagrass and Oyster Habitat	City of New Smyrna Beach	\$1,200,000
Historic Downtown Drainage Improvements	City of New Smyrna Beach	\$2,000,000
Hardening of EOC / City Critical Facilities	City of New Smyrna Beach	\$2,400,000
North Atlantic Ave Drainage Improvements	City of New Smyrna Beach	\$2,500,000
Beachside Flood Protection Infrastructure Upgrades	City of New Smyrna Beach	\$6,000,000
Hardening of Seawalls	City of New Smyrna Beach	\$9,000,000
Canal Ave Ditch	City of Oak Hill	\$1,750,000
Industrial Drive Stormwater Improvements	City of Orange City	\$2,457,000
Mill Lake Pump and Force main rehabilitation	City of Orange City	\$4,000,000
<b>Total Impacted Municipal Capital Improvement Projects</b>		<b>\$78,278,000</b>

Municipal HMGP Match Infrastructure Needs

Project Name	Jurisdiction	Project Cost
Sleepy Hollow Drainage Improvements	City of Port Orange	\$10,000,000
Seawall along Halifax River	City of Holly Hill	\$10,000,000
Stormwater Canal Bank Hardening: FL Shores	City of Edgewater	\$19,500,000
Turnbull Hammock Watershed Study & Improvements	City of Edgewater	\$20,000,000
Future Master Plan Projects (Flood)	City of Port Orange	\$29,000,000
Sea Level Rise Protection	City of Port Orange	\$30,000,000
Citywide Stormwater Pumpstations	City of Daytona Beach	\$40,000,000
Citywide Attenuation Ponds	City of Daytona Beach	\$70,000,000
Nova Canal Outfall to Halifax River	City of Daytona Beach	\$80,000,000
Midtown Stormwater Improvements	City of Daytona Beach	\$130,000,000
Total Estimated Project Costs		\$438,500,000
Potential Leveraged Funding Cost Share		\$328,875,000
<b>Match Required (Unmet Need)</b>		<b>\$109,625,000</b>

## Economic Revitalization

### Economic Revitalization Unmet Needs Methodology

The following summary provides a breakdown of the economic sector analysis of the unmet needs assessment. To derive the final unmet needs estimate for the economy, data on business disaster impacts was analyzed based on SBA disaster loans to businesses using the HUD-approved approach of calculating the median real estate and content loss by the following damage categories:

- Category 1: real estate + content loss = below \$12,000
- Category 2: real estate + content loss = \$12,000–\$29,999
- Category 3: real estate + content loss = \$30,000–\$64,999
- Category 4: real estate + content loss = \$65,000–\$149,999
- Category 5: real estate + content loss = \$150,000 and above

For properties with real estate and content loss of \$30,000 or more, the HUD-approved methodology calculates the estimated amount of unmet needs for small businesses by multiplying the median damage estimates for the categories above by the number of small businesses denied an SBA loan, including those denied a loan prior to inspection due to inadequate credit or income (or a decision had not been made), under the assumption that damage among those denied at pre-inspection have the same distribution of damage as those denied after inspection.

After impacts are estimated, support is calculated by identifying SBA total loans issued, known private insurance payments, and payments for commercial National Flood Insurance Program policies.

### Economic Impacts

#### Small Business Administration Verified Business Property Loss of All SBA Applicants

Category	Count	HUD Assessed (Estimated) Impact
SBA approved applicants with a verified HUD Category 1 Losses	0	\$0
SBA approved applicants with a verified HUD Category 2 Losses	1	\$22,464
SBA approved applicants with a verified HUD Category 3 Losses	8	\$365,105
SBA approved applicants with a verified HUD Category 4 Losses	16	\$1,645,967
SBA approved applicants with a verified HUD Category 5 Losses	44	\$41,954,673
SBA declined applicants with a verified HUD Category 1 Losses	2	\$7,708
SBA declined applicants with a verified HUD Category 2 Losses	2	\$57,681
SBA declined applicants with a verified HUD Category 3 Losses	5	\$196,100
SBA declined applicants with a verified HUD Category 4 Losses	8	\$853,137
SBA declined applicants with a verified HUD Category 5 Losses	10	\$9,761,865
Total Real Estate Loss for all HUD Damage Categories	43	\$20,990,447
Total Content Loss for all HUD Damage Categories	84	\$33,874,253
<b>Total Economic Impacts</b>		<b>\$54,864,700</b>

### Economic Support

Source	Count	Total Support
SBA Current Loan Amount	84	\$14,435,146
Private Insurance Payments	176	\$32,290,932
NFIP Payments	59	\$3,777,301
<b>Total Economic Support</b>		<b>\$50,503,379</b>

### Hurricane Milton Commercial Private Insurance Claims

Line of Business	Number of Claims	Closed Claims Paid	Denied Claims	Pending Resolution	Percent Open	Average Payment	Paid Loss
<b>Business Interruption</b>	10	3	3	4	40%	\$4,770	<b>\$14,309</b>
<b>Commercial Property</b>	1,000	126	156	718	72%	\$244,097	<b>\$30,756,160</b>
<b>Commercial Residential</b>	132	47	25	60	45%	\$32,350	<b>\$1,520,463</b>
<b>Total</b>	<b>1,142</b>	<b>176</b>	<b>184</b>	<b>782</b>	<b>68%</b>	<b>\$183,471</b>	<b>\$32,290,932</b>

### Economy Unmet Needs Summary

Economy Unmet Needs Summary	
<b>Total Economy Impacts</b>	<b>\$54,864,700</b>
<b>Total Economic Support</b>	<b>\$50,503,379</b>
<b>Total Initial Unmet Economic Need Estimate</b>	<b>\$4,361,321</b>
<b>Total Unmet Economic Need (Accounting for an additional 30% Resilience Factor)</b>	<b>\$5,669,717</b>



## Section 3: Mitigation Needs Assessment

Mitigation activities are defined as those activities that increase resilience and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

As part of the development of this Action Plan, the County conducted a Mitigation Needs Assessment of the County's Multi-Jurisdictional Local Mitigation Strategy as required under federal guidelines. In January of 2020, Volusia County adopted a Multi-Jurisdictional Local Mitigation Strategy (Mitigation Strategy) as required by FEMA (<https://www.volusia.org/core/fileparse.php/4453/urlt/2020-LMS-Combined-Documents.pdf>).

High-risk hazards in Volusia County are Flood, Hurricane and Tropical Storm, Storm Surge, and Tornado. The mitigation techniques employed to address these hazards with CDBG DR funds include Prevention, Property Protection, Natural Resource Protection, and Structural Projects. The County will evaluate mitigation-only projects using the Mitigation Strategy, and only projects with the greatest cost benefit will be funded. The application process will be developed in conjunction with other infrastructure and housing projects funded by CDBG DR.

The County also utilized FEMA's National Risk Index Mapping Tool which identified and ranked 18 hazards based on risk. The County has included a table below summarizing the findings from the National Risk Index and has included maps displaying the risks relative to Volusia County. Maps are not provided for any hazards indicating Insufficient Data, Not Applicable, No Rating or were of Relatively Low Risk or lower.

### *Risks Identified in the FEMA-approved Hazard Mitigation Plan*

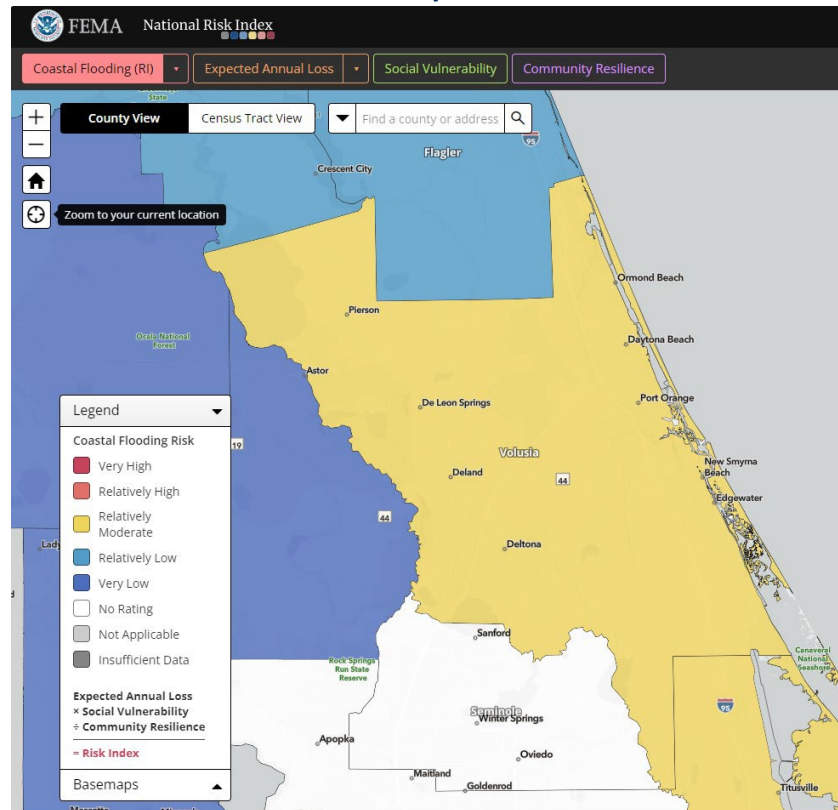
#### Volusia County Hazard Risk Summary

Hazard Type	Risk
Avalanche	Not Applicable
Coastal Flooding	Relatively Moderate
Cold Wave	Relatively High
Drought	Relatively Low
Earthquake	Relatively Low
Hailstorm	Very Low
Hurricane	Relatively High
Ice Storm	Not Applicable
Landslide	Relatively Low
Lightning	Very High
Riverine Flooding	Relatively High
Strong Wind	Relatively Moderate
Tornado	Relatively High
Tsunami	Insufficient Data
Volcano	Not Applicable
Wildfire	Relatively High
Winter Weather	No Rating

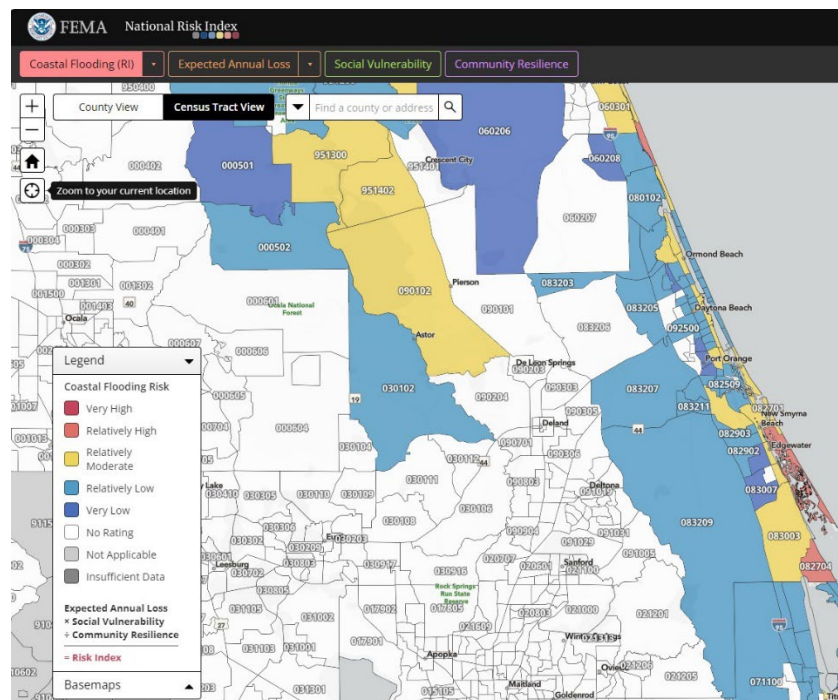
The following maps indicate the level of hazard risk by hazard as indicated in the FEMA National Risk Index.

## Coastal Flooding Risk

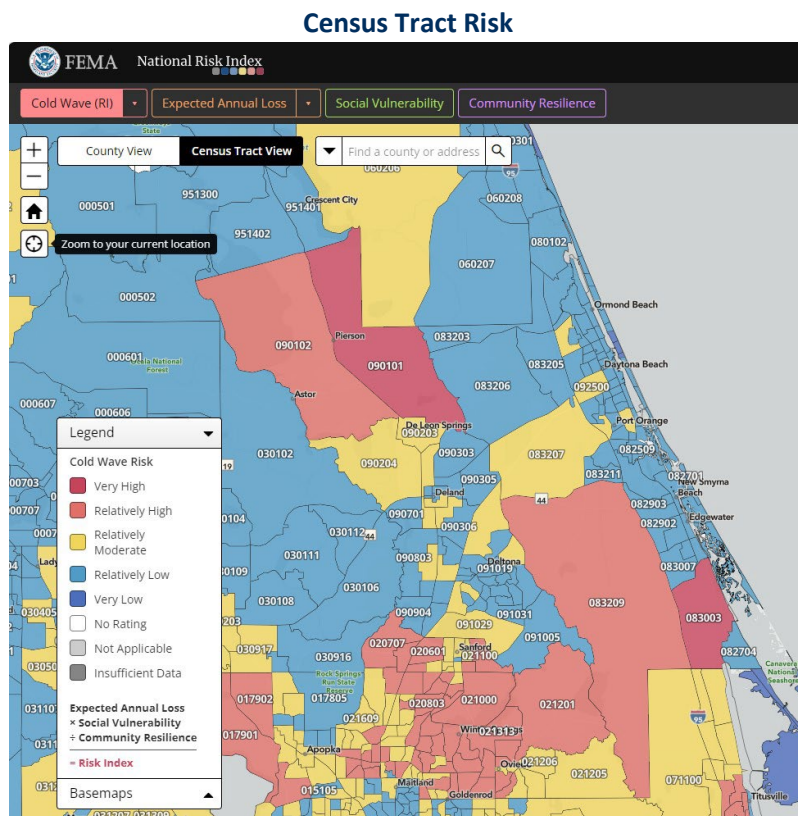
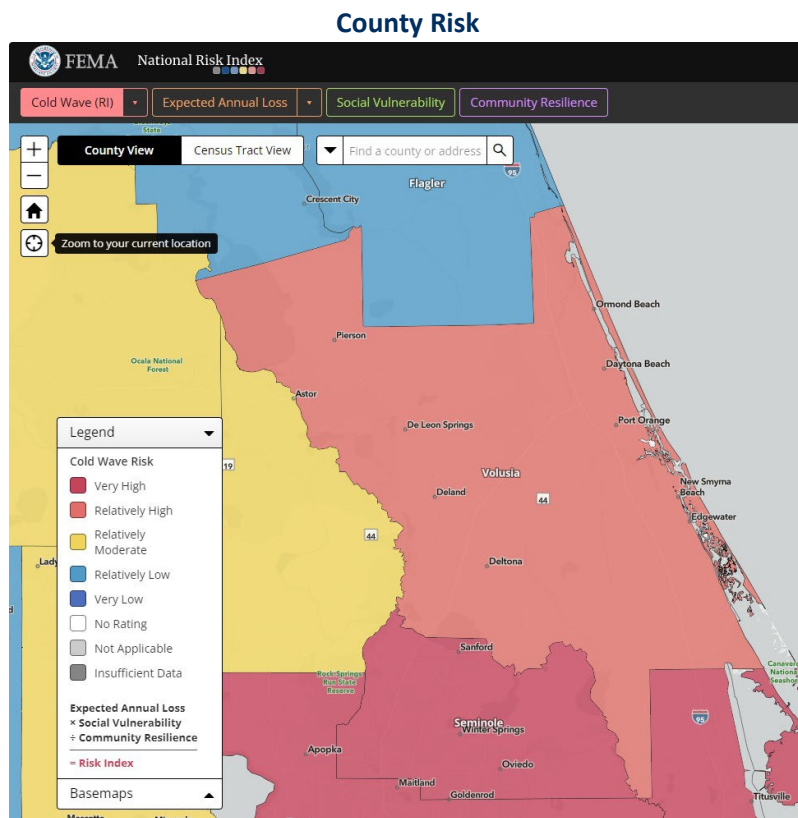
### County Risk



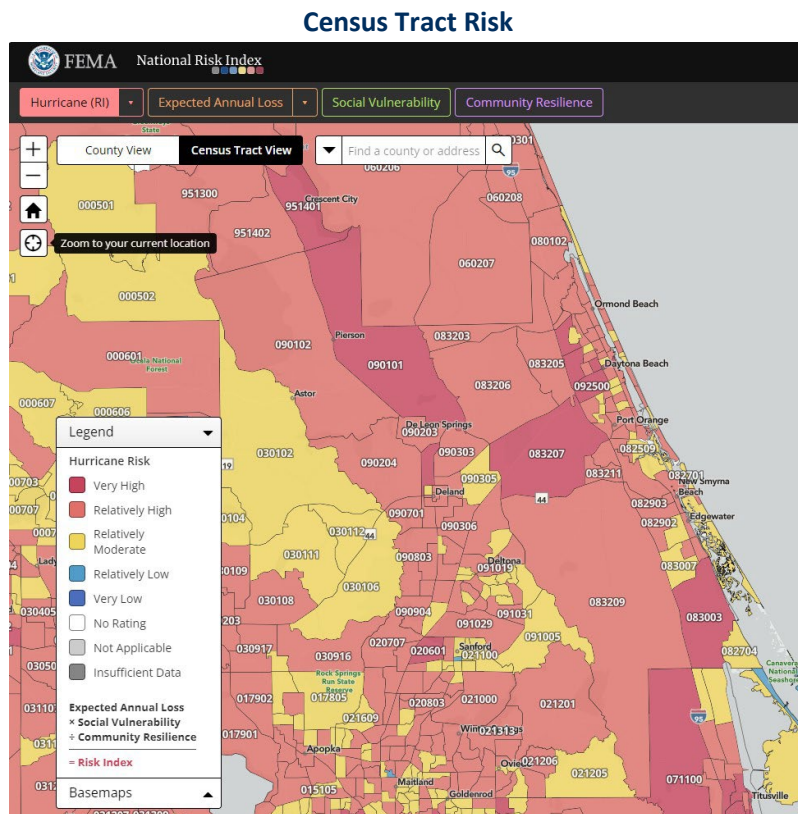
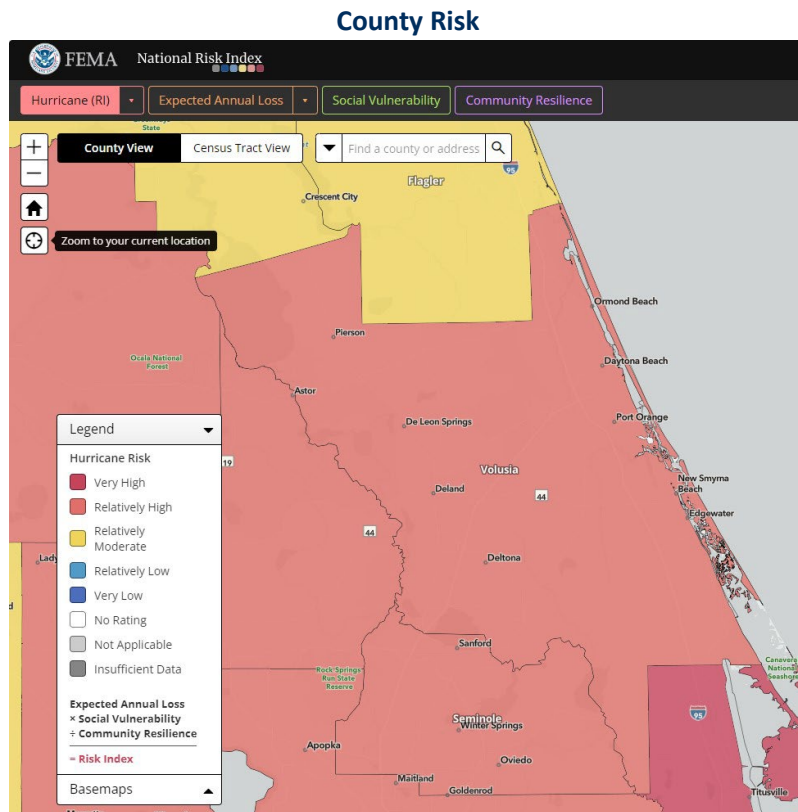
### Census Tract Risk



## Cold Wave Risk

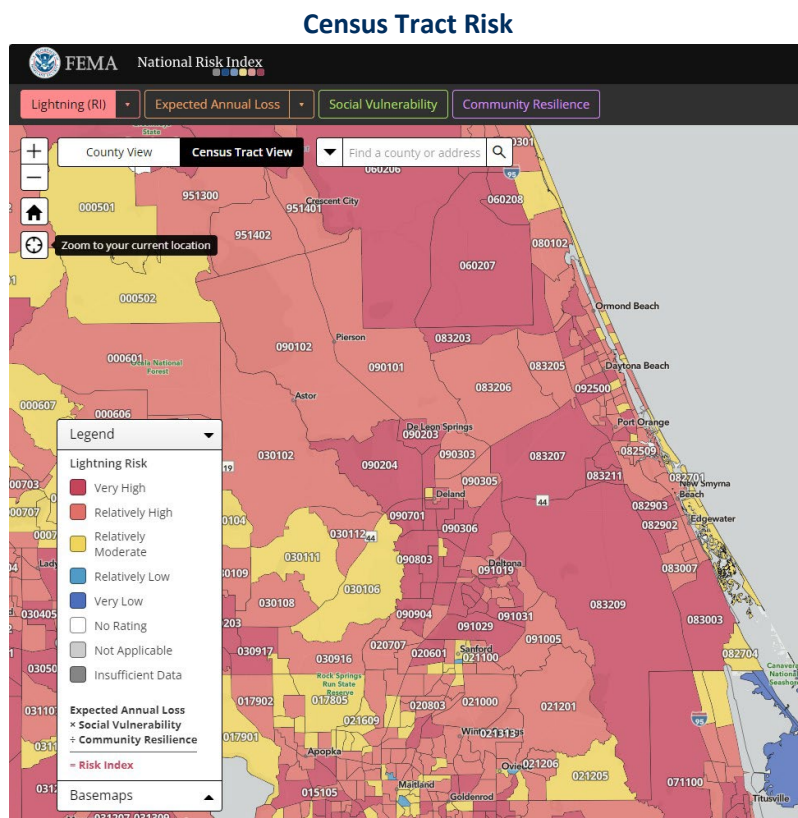
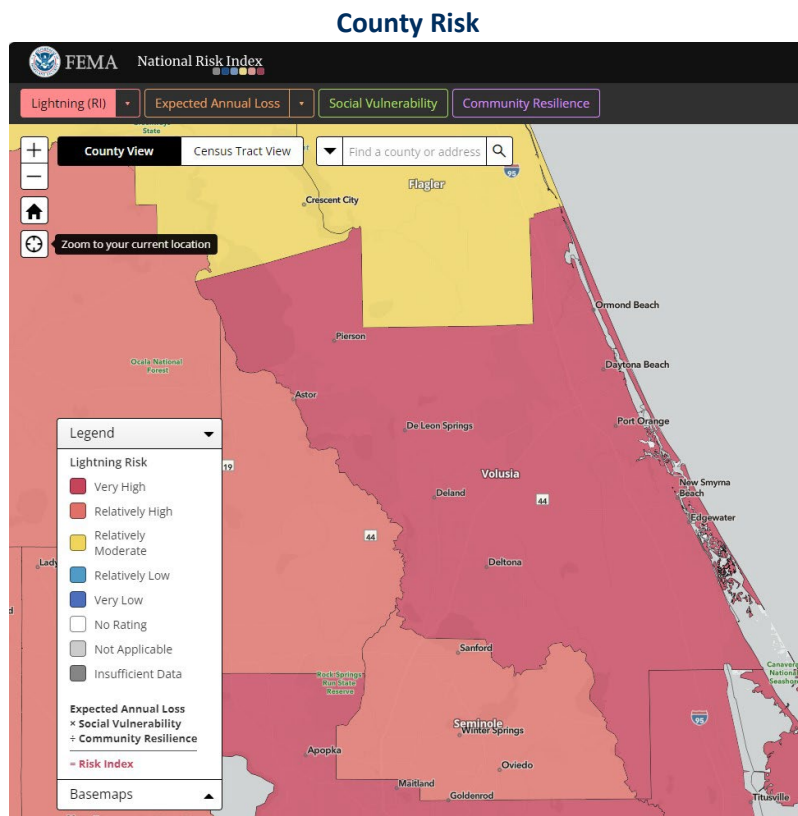


## Hurricane Risk



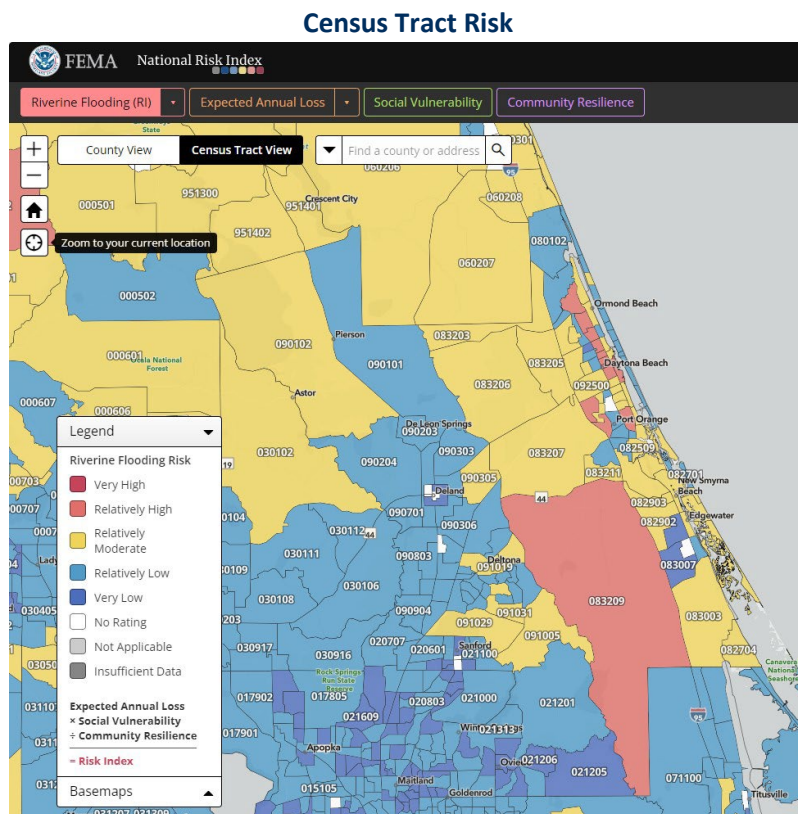
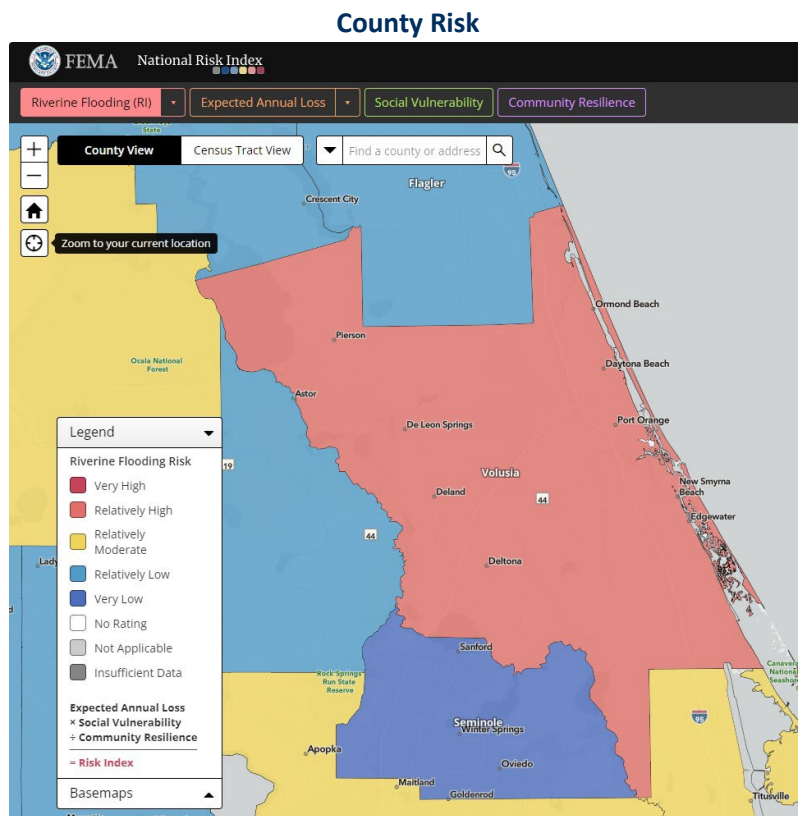


## Lightning Risk

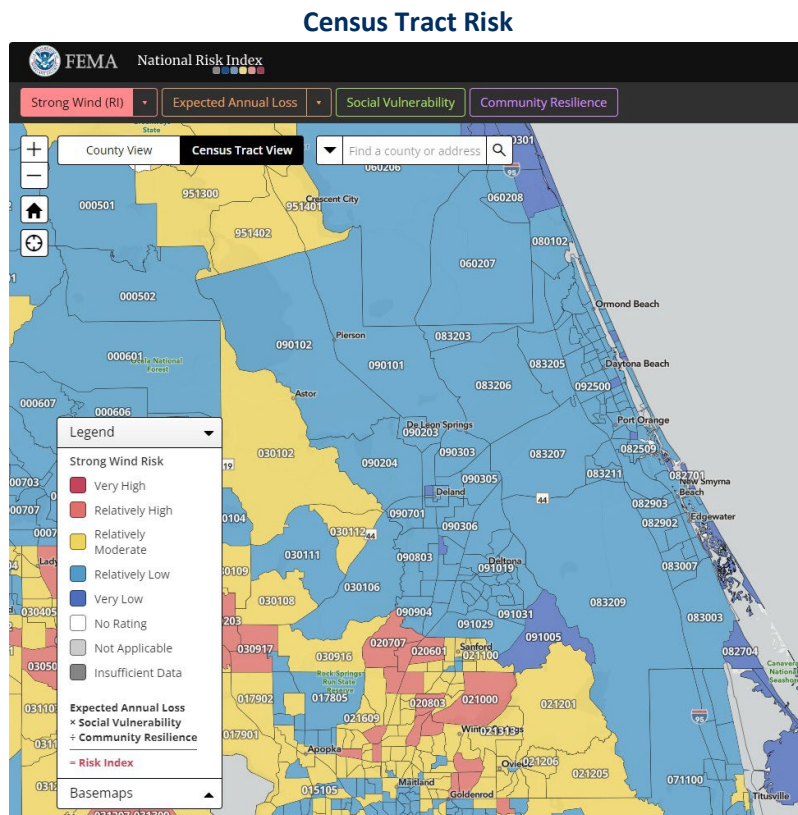
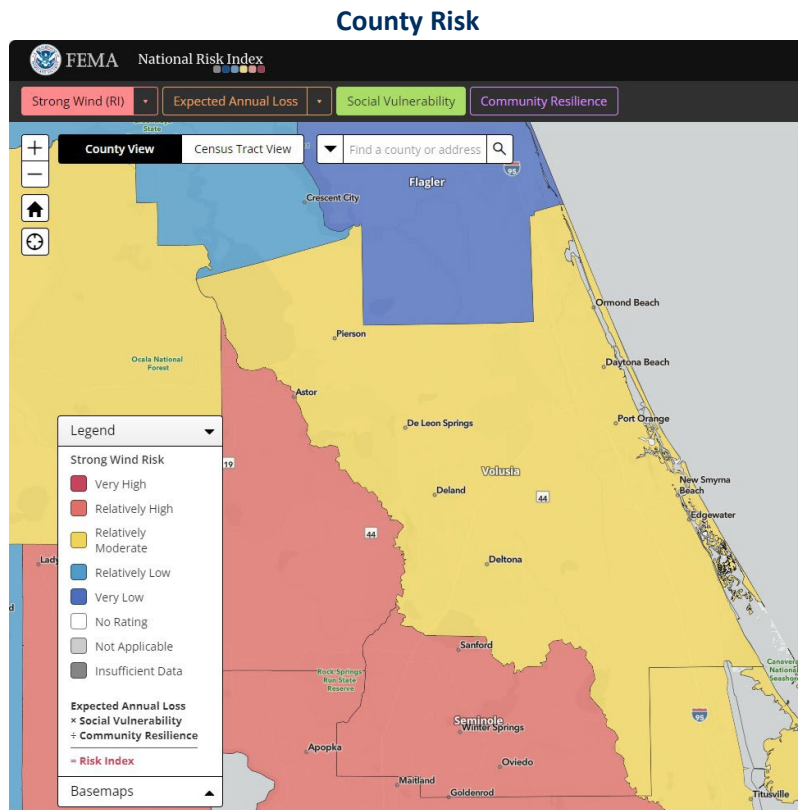




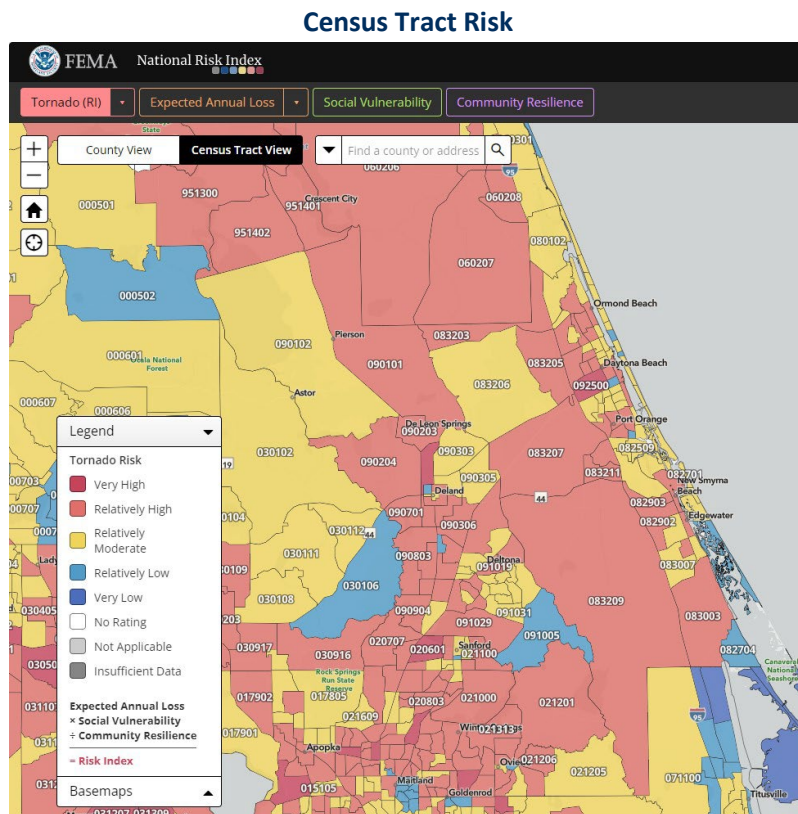
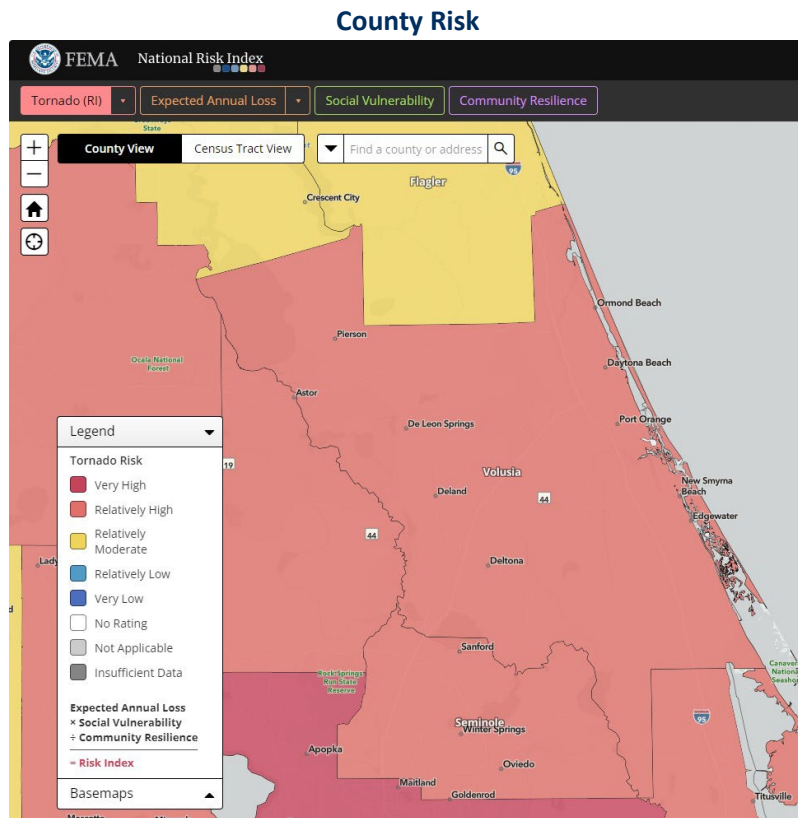
## Riverine Flooding Risk



## Strong Wind Risk

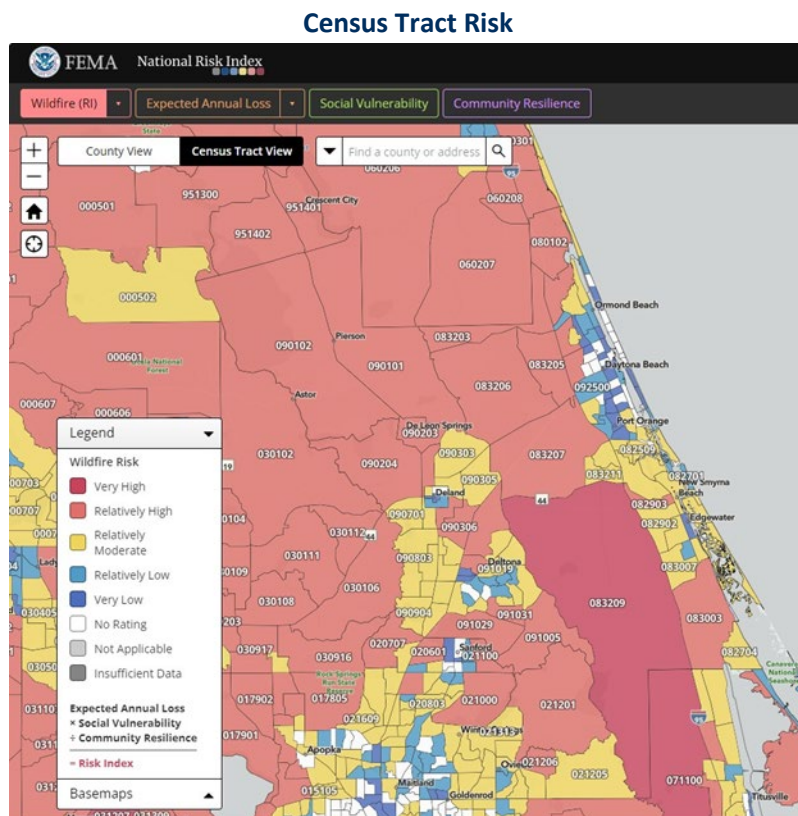
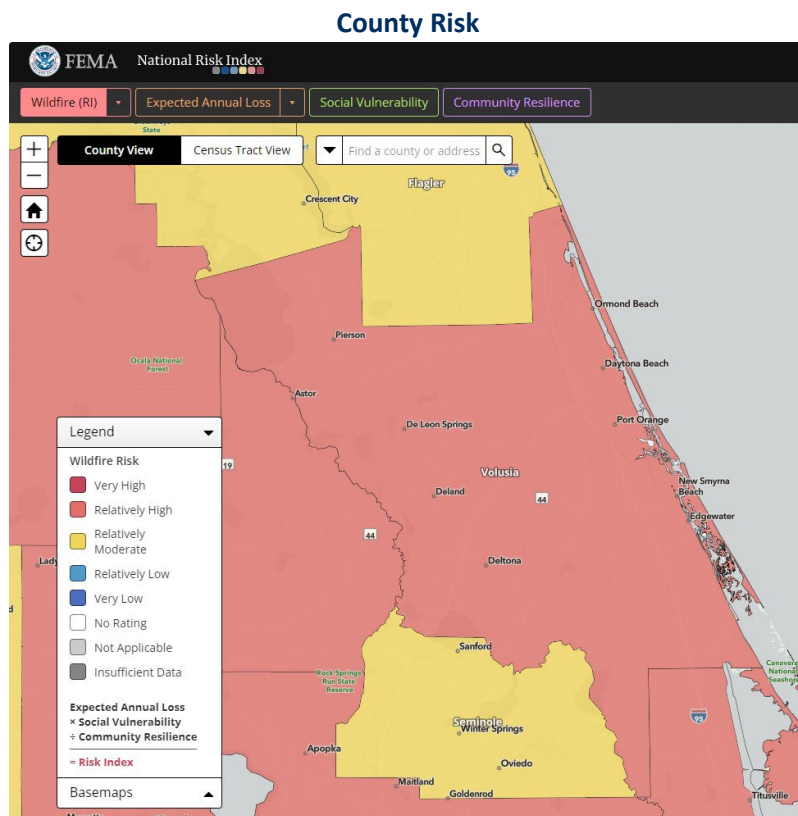


## Tornado Risk





## Wildfire Risk



## Mitigation and Resilience Planning Efforts

Volusia County and our partner agencies have conducted several plans and studies relating to mitigation, resiliency, and sustainability. These plans will serve as guiding tools for the investment of CDBG-DR funds through the county's infrastructure and mitigation programs. Plans include:

**Sustainability Action Plan – (2012)** [Sustainability Goals \(volusia.org\)](https://www.volusia.org/sustainability-goals)– This plan examined energy use and Greenhouse Gas Emissions from county operations and the county as a community and set GHG reduction targets. The SAP Identified 7 main goals with objectives for each. Of particular relevance to the CDBG project are: Promote a Healthy Community, Conserve Water and Promote Water Efficiency, and Conserve Energy and Promote Renewable Energy.

**East Central Florida Regional Resiliency Action Plan (RRAP) – (2017)** - [Resiliency initiatives \(volusia.org\)](https://www.volusia.org/resiliency-initiatives) A non-regulatory regional action plan for Volusia and Brevard Counties that focused on resiliency and sustainability. The plan officially adopts sea level rise (SLR) projections for Volusia County and a matrix of goals, objectives, and actions to foster a more resilient community.

**Resilient Volusia County Phase 1 (2017)** - [Resilient Volusia County \(r2ctpo.org\)](https://www.volusia.org/resilient-volusia-county) Volusia County Office of Emergency Management partnered with East Central Florida Regional Planning Council (ECFRPC), Florida Department of Transportation, the River to Sea Transportation Planning Organization, and UF Geoplan to assess impacts. Using the FDOT Sea Level Scenario Sketch Planning Tool along with FEMA's Hazus-MH software, impacts of sea level rise, combined with a 100-year-storm were modeled, along with hypothetical alterations of a historical hurricane under sea level rise scenarios. Using these models and Volusia County data, critical assets such as shelters, airports, power plants, and other critical facilities were assessed to determine potential impacts during such a 100-year storm event with increased coastal flooding. Assessments also included evacuation routes and property impacts. Potential economic impacts were assessed in terms of property value and damage assessments using HAZUS. After analyzing the data Volusia can now begin to prepare for the future impacts of a 100- year storm as sea levels rise.

**Resilient Volusia County Phase II (2021)** Adaptation Action Areas Plan – The work which focused on identifying areas of the unincorporated county impacted by flooding under current and future conditions to increase community resilience, protect infrastructure and personal property. The plan identified areas for AAAs and developed policy language for those areas, provided draft text to strengthen resilience in the comprehensive plan, and developed a checklist and procedures for county infrastructure capital improvement projects. This plan is pending official adoption by the county council.

**Local Mitigation Strategy (2020)** – [2020-LMS-Combined-Documents.pdf \(volusia.org\)](https://www.volusia.org/2020-LMS-Combined-Documents.pdf) The County's and participating local jurisdictions' sustained efforts to incorporate hazard mitigation principles and practices into the routine government activities and functions of Volusia County and its participating jurisdictions and partners. This includes documenting the goals and objectives that Volusia County deems necessary to protect people and property from hazards. At its most inner core, the Plan recommends specific actions to combat hazard vulnerability and protect its residents from losses to those hazards that pose the greatest risk.

**Countywide Vulnerability Assessment (2023)** – A current Resilient Florida grant project to identify and prioritize the critical infrastructure in the county that is vulnerable to sea level rise. This project also includes workshops designed to engage elected officials, staff and the public in the resilience conversation, and a social media campaign to provide information to the public about resilience and try to get more people engaged in the conversation.



## Section 4: Connection Between Proposed Programs and Projects, Unmet Needs, and Mitigation Needs

### Interchangeability of Funds

Volusia County formally requests interchangeability language be applied to the Hurricane Milton allocation, as allowed by HUD in the most recent allocations. If HUD approves the waiver to treat Hurricane Ian and Hurricane Milton applicants interchangeably, Volusia County will extend its existing homeowner repair and replacement program to those impacted by Hurricane Milton. This program, which was successfully utilized during Hurricane Ian, provides comprehensive repair and replacement services to eligible homeowners through the current HUD allocation. By leveraging the established infrastructure and processes, the County can efficiently assess damage, coordinate repairs, and ensure that Hurricane Milton victims receive the same level of high-quality assistance as those affected by Hurricane Ian. This integration streamlines application processing and maximizes the use of available resources, reducing administrative burdens while accelerating recovery efforts.

The waiver will enable Volusia County to treat applications from both disasters under a unified set of criteria, ensuring equitable and prompt access to repair and replacement services. Homeowners impacted by Hurricane Milton will be able to apply through the familiar Hurricane Ian program framework, benefiting from existing partnerships, technical expertise, and program efficiencies. This approach not only promotes a consistent and effective recovery process but also reinforces the County's commitment to meeting the needs of all affected residents, ensuring that recovery funds are used to restore safe and resilient homes across the region.

## Program Budget Overview

Eligible Cost Category	Unmet Need	% of Unmet Need	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to CDBG-DR Mitigation Set-aside	Estimated % to LMI
<b>Administration</b>	N/A	N/A	\$6,675,750	5%	N/A	N/A
<b>Planning</b>	N/A	N/A	\$6,675,750	5%	0%	N/A
<b>Housing</b>	\$248,475,884	40%	\$40,163,500	30%	50%	100%
<b>Infrastructure</b>	\$371,271,926	59%	\$62,585,000	47%	30%	57%
<b>Economic Revitalization</b>	\$5,669,717	1%	\$0	0%	N/A	N/A
<b>Public Services</b>	\$0	0%	\$0	0%	N/A	N/A
<b>Exempt Public Services</b>	\$0	0%	\$0	0%	N/A	N/A
<b>CDBG-DR Mitigation Set-Aside</b>	N/A	N/A	\$17,415,000	13%	100%	50%
<b>Total</b>	\$714,747,281	100%	\$133,515,000	100%	15%	70%
<b>% of Total</b>	100%	100%	100%	100%	15%	70%

Hurricane Milton's impacts in Volusia County were characterized primarily by minor, extended duration flooding into homes and businesses. While there is no clear solution for the business community, the Transform386 Program's Hurricane Ian Single Family Repair and Replacement Program is actively repairing and replacing homes while the application is still open. To streamline recovery and optimize management of programs, the Hurricane Milton recovery effort will direct homeowners with disaster repair needs to apply to, and work through, the Hurricane Ian recovery program.

Since reaching full operational capacity, the Hurricane Ian Recovery Program has streamlined review and approval processes for qualified homeowners in the county. Applicants pursuing this option will be streamlined for recovery under the consolidated recovery option.

### Infrastructure as a Tool to Accelerate Housing Recovery

The county's focus must switch to mitigating future disasters through infrastructure enhancements. The region's current stormwater infrastructure was operating near its limits but not catastrophically failing. The recurring nature of such events makes it imperative to invest in projects that significantly expand stormwater capacity. By doing so, the county not only addresses the immediate aftermath of Hurricane

Milton but also builds resilience against future events, ensuring that even minimal flooding does not escalate into more severe damage.

Expanding stormwater capacity provides a strategic, long-term solution that enhances the entire region's ability to manage heavy rainfall and runoff. Upgrading drainage systems, increasing retention basins, and enhancing natural water absorption areas provide a cost-effective way to mitigate flood risks across a broader area. This proactive approach allows Volusia County to better accommodate extreme weather events without resorting to the far more disruptive and expensive measures of removing or elevating every at-risk structure.

Allocating funding for infrastructure is justified by the economic and practical benefits of improved stormwater systems. While elevating or removing all structures susceptible to flooding would be a massive and costly undertaking, enhancing stormwater management systems leverages available resources to protect a wider swath of the community and ultimately indirectly assist with the housing and economic revitalization unmet needs. This method reduces long-term repair costs, minimizes economic disruption, and ensures that infrastructure improvements are scalable and adaptable to evolving weather patterns.

Volusia County believes that investing most of the CDBG-DR funds in stormwater infrastructure is a forward-thinking strategy that maximizes the benefits of disaster recovery spending. It offers a sustainable, economically viable solution that not only remedies the flooding experienced during Hurricane Milton but also fortifies the county against future disasters. By prioritizing the expansion of stormwater capacity, Volusia County can ensure a safer, more resilient community while making prudent use of recovery funds.

Volusia County will host in-person and virtual workshops on eligibility criteria, documentation requirements, and best practices for successful applications. Trained staff and volunteers will be on hand to guide applicants through each step of the process, ensuring that no one is left behind.

Volusia County is committed to minimizing the displacement of homeowners through proactive measures that prioritize repairs and rebuilds as close to the existing footprint of the home as possible. The County will work directly with homeowners to identify alternatives that enable residents to remain in their communities after participation in the programs. By coordinating with homeowners, the County ensures that support is tailored to the unique needs of individual households, maintaining vital community ties and continuity of daily life.

Should displacement become unavoidable for some homeowners, Volusia County will provide dedicated assistance to ease the transition. This support includes direct coordination to secure comparable and affordable temporary housing options, along with guidance through the application process for available relocation assistance programs. The County's approach is centered on personal engagement with homeowners, ensuring that any necessary relocation is managed efficiently and minimizes disruption to their lives. At a minimum, the county will provide stipends to ensure residents have the final authority on where they go for the duration of construction.

The County is committed to meeting the accessibility needs of homeowners with disabilities. All permanent housing solutions coordinated through Transform386 initiatives will adhere to federal and state accessibility standards, including the Americans with Disabilities Act (ADA). The program will work

directly with affected homeowners to ensure that every homeowner receives the critical resources required to maintain independence and a high quality of life because of the recovery process.

Volusia County is taking a forward-thinking approach by investing in infrastructure enhancements that significantly expand stormwater capacity while minimizing homeowner displacement. Recognizing that the region's current stormwater systems are operating near their limits, the County is directing funds toward upgrading drainage systems, increasing retention basins, and enhancing natural water absorption areas. These measures not only address the immediate infrastructure repair needs revealed by Hurricane Milton but also serve as a proactive investment to reduce flood risks. The County aims to prevent minimal flooding from escalating into severe damage, thus safeguarding homes without resorting to disruptive and costly strategies like widespread structure removal or elevation.

Volusia County remains firmly committed to minimizing displacement among homeowners. The County's approach emphasizes rehabilitation and reconstruction within the existing footprint, enabling residents to remain within their established communities. This personalized strategy leverages the existing homeowner repair and replacement program—originally established for Hurricane Ian—to support Hurricane Milton victims, if HUD approves the waiver allowing for interchangeable treatment of applicants from both events. By focusing on rehabilitation over relocation, the County not only preserves vital community ties but also mitigates the emotional and economic disruptions that often accompany displacement.

In addition to these infrastructure and housing initiatives, Volusia County is implementing a robust outreach strategy to ensure that all affected residents have equal access to recovery resources. The County is coordinating with trusted community partners to deliver accessible application assistance and will host workshops to guide homeowners through every step of the process. This comprehensive approach ensures that even as the County enhances its stormwater infrastructure to build long-term resilience, it concurrently prioritizes the stability and well-being of its residents, ensuring that every homeowner receives the support necessary to recover and thrive.

## Allocation and Award Caps

The Volusia County Office of Recovery and Resiliency is the lead agency and responsible entity for administering \$133,515,000 in CDBG-DR funds allocated for Milton recovery efforts. CDBG-DR funds available to address unmet needs will be allocated to basic program categories pursuant to the table below.

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to CDBG-DR Mitigation Set-aside	Estimated % to LMI
<b>Administration</b>	\$6,675,750	5%	N/A	N/A
<b>Planning</b>	\$6,675,750	5%	0%	N/A
<b>Housing</b>	\$40,163,500	30%	50%	100%
<b>Infrastructure</b>	\$62,585,000	47%	30%	57%
<b>Economic Revitalization</b>	\$0	0%	N/A	N/A
<b>Public Services</b>	\$0	0%	N/A	N/A
<b>Exempt Public Services</b>	\$0	0%	N/A	N/A
<b>CDBG-DR Mitigation Set-Aside</b>	\$17,415,000	13%	100%	50%
<b>Total</b>	\$133,515,000	100%	15%	70%
<b>% of Total</b>	100%	100%	15%	70%

## Funding Criteria

### General Exception Criteria

Volusia County may exceed the maximum award per project type for direct benefit activities if it is determined to serve the best interests of the applicant and the program, to comply with federal accessibility standards, or to reasonably accommodate a person with disabilities on a case-by-case basis.

### Administration

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
<b>Administration Total:</b>	\$6,675,750	5%
<b>Total</b>	\$133,515,000	100%

Volusia County allocates \$6,675,750 of the total CDBG-DR award for administrative costs associated with the life of the grant. This represents the maximum amount permissible for administrative costs per the CDBG-DR appropriation language of Public Law 118-158 and HUD's requirements under the Uniform Notice. Volusia County advises HUD that it may seek to recover pre-award and/or pre-application costs related to administrative expenses consistent with the guidance provided by Section III.B.14. of the Universal Notice. Such costs may be incurred back to the date of the presidential disaster declaration date (October 11, 2024, for DR-4834-FL).

### Planning

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
<b>Planning Total:</b>	\$6,675,750	5%
<b>Total</b>	\$133,515,000	100%

Volusia County will use planning funds for the development and amendment of the action plan and other allowable HUD uses for planning funds. Planning funds may be utilized to complete other resilience and recovery planning products at the discretion of Volusia County.

### Housing

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
<b>Hurricane Milton Single Family Homeowner Recovery Program</b>	\$40,163,500	100%
<b>Housing Program Total:</b>	\$40,163,500	100%
<b>Total</b>	\$133,515,000	100%

Housing: Hurricane Milton Single Family Homeowner Recovery Program

**Program Title:** Hurricane Milton Single Family Homeowner Recovery Program

**Amount of CDBG-DR Funds Allocated to this Program:** \$40,163,500

**Eligible Activities:** Eligible activities for the program include:



- the repair and/or reconstruction of detached single-family housing units
- the repair and/or replacement of mobile home units
- reimbursement for repairs made prior to program application for single family, duplex, triplex, and quadplex residential owner-occupied structures
- housing buyouts with incentives
- local match funds for state or federal housing mitigation programs or activities with a mandatory cost share requirement
- temporary housing assistance based on individual homeowner needs

**National Objective:** The allowable national objectives for this activity will be direct benefit to the low-to-moderate income community through housing (24 CFR 570.483(b)(3)).

**Lead Agency and Distribution Model:** Volusia County will manage and complete the construction process for the repair or replacement of damaged homes on behalf of eligible applicants. With the assistance of an implementation vendor, the county will work with a pool of qualified contractors assigned to repair or replace damaged properties; applicants will not select their own contractors. The program will pay the vendor directly and no funds will be paid to homeowners for construction services.

**Program Description:** The Hurricane Milton Single Family Homeowner Recovery Program will repair or replace disaster-damaged homes using qualified construction contractors and reimburse homeowners for eligible construction activities completed prior to completing an application to the program. Furthermore, the program will provide buyouts for disaster-damaged homeowners with flood damage (repaired or unrepaired) resulting from Hurricane Milton. These buyouts will include incentives as described through program policy and use the pre-disaster fair market valuation method.

When determining priority for service for eligible applicants, the program will consider the following components for prioritization:

- Applicants that have remaining unmet need
- Applicants with household members over the age of 64 and/or with minor children living in the home
- Applicants with a documented disability
- Applicants with a household income that is below 50% of the Area Median Income

Volusia County believes that the prioritization of households with these characteristics creates a more equitable prioritization system. Volusia County clarifies that prioritization does not “stack.” In other words, families with members both elderly and disabled household members do not receive higher priority than those with only elderly or disabled members.

The anticipated accomplishments for this program are the repair or replacement of approximately 100 homes, and the buyout of approximately 50 homes.

**Eligible Geographic Areas:** Volusia County is the geographic boundary for this program to include all its incorporated and unincorporated areas.

**Other Eligibility Criteria:** Participants in the Hurricane Milton Homeowner Single Family Repair and Replacement Program must meet the following as conditions of eligibility:

- Own, or have an ownership interest in, both at the time of the disaster, and at the time of application and service, a structure that meets the definition of a single-family housing unit
- The eligible structure must have been the applicant's primary residence at the time of the disaster
- The structure must have been damaged by Hurricane Milton and have remaining unmet need for recovery
- Have a household income below 80% of the Area Median Income
- The maximum fair market value of the structure (excluding land value) must not exceed \$450,000

**Maximum Amount of Assistance Per Beneficiary:** Eligible beneficiaries may only receive assistance from 1 of the following categories. Maximum awards by project type are:

- 1) \$125,000 for single family housing unit repair of remaining unmet needs and/or reimbursement of repairs completed by the homeowner prior to application submission, not inclusive of additional requirements imposed by local jurisdictions, exterior site conditions, homeowner's associations, or accessibility issues.
- 2) \$325,000 for single family housing unit replacement, not inclusive of additional requirements imposed by local jurisdictions, exterior site conditions, or accessibility issues.
- 3) \$200,000 for mobile home unit replacement, not inclusive of additional requirements imposed by local jurisdictions, mobile home parks, or accessibility issues.
- 4) \$400,000 for housing buyouts, not inclusive of any additional incentives as defined in program policy; buyout awards are determined using pre-disaster valuation.

The county may exceed the maximum award per project type if it is determined to serve the best interests of the applicant and the program, to comply with federal accessibility standards, or to reasonably accommodate a person with disabilities on a case-by-case basis.

**Maximum Income of Beneficiary:** 80% of Area Median Income

**Mitigation Measures:** The program will incorporate elevation to a minimum of 2 feet above the base flood elevation for all substantially damaged or improved homes in the Special Flood Hazard Area served by the program. Buyouts completed through the program will be conducted in a way that the future use of the property will be restricted to stormwater management uses and/or perpetual greenspace. All construction activities will incorporate resilient building measures as a component of construction. Components of this program are anticipated to count towards the CDBG-DR mitigation set-aside on a case-by-case basis where repairs include the aforementioned mitigation measures.

**Reducing Barriers for Assistance:** Volusia County will undertake steps to ensure that groups that have difficulty in accessing and/or using computers, such as the elderly and disabled, are given additional opportunities to apply for assistance. These steps will include conducting in-home visits to explain program requirements and/or review documentation and will be outlined in the program's policies and procedures.

## Infrastructure

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Hurricane Milton Infrastructure Program	\$62,585,000	57%
Infrastructure Program Total:	\$62,585,000	57%

### Hurricane Milton Infrastructure Program

**Program Title:** Hurricane Milton Infrastructure Program

**Amount of CDBG-DR Funds Allocated to this Program:** \$62,585,000

**Eligible Activities:** An infrastructure activity includes any activity or group of activities (including acquisition or site 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: surface transportation, including roadways and bridges; water resources projects; stormwater and sewer infrastructure; and drinking water infrastructure.

**National Objective:** The allowable national objectives for this activity will be area benefit to the low-to-moderate income community, and urgent need.

**Lead Agency and Distribution Model:** Volusia County will manage this program through a combination of direct implementation and through subrecipient models for entities determined to have the capacity to administer individual projects compliantly. All projects will be selected through an independent, competitive process wherein capacity to manage the project will not factor into scoring or selection.

**Program Description:** Volusia County will open application windows for units of general local and state governments, nonprofit organizations with remaining unrepaired disaster damage or an identified risk requiring mitigation, and public housing authorities to submit projects for consideration of funding through the Hurricane Milton Infrastructure Program.

Volusia County will evaluate project submissions and select projects based on several factors, including:

- Leveraged funding
- LMI – Area benefit percentage of project service area
- Flood risk reduction
- Cost Benefit Analysis
- Environmental impact (Incorporation of additional resilience factors such as green infrastructure)
- Ease of permitting/percentage of design complete

Volusia County Council will have the ultimate authority to select projects.

Volusia County will require the identification of a responsible owner as a condition of consideration for infrastructure funding during the application phase. The responsible owner will be required to identify its plan for funding operating and maintenance costs (if applicable) for any infrastructure project within its jurisdiction funded through the infrastructure program.

Volusia County will utilize licensed engineers or general contractors to verify costs and determine cost reasonableness on a project-by-project basis, ensuring that construction costs are reasonable and consistent with market costs at the time and place of construction.

The program anticipates completing 20 distinct infrastructure projects, but this will depend on the scale and cost of the proposed projects submitted for consideration by the local jurisdictions.

**Eligible Geographic Areas:** Volusia County is the geographic boundary for this program to include all its incorporated and unincorporated areas.

**Maximum Amount of Assistance Per Beneficiary:** Not applicable as this program will not have a direct beneficiary component.

**Maximum Income of Beneficiary:** The Hurricane Milton Infrastructure Program will not have direct beneficiaries therefore no income maximum is required.

**Mitigation Measures:** The program will prioritize projects that have a measurable reduction in flood risk. Any project that includes construction on critical actions will meet all elevation requirements with a minimum standard for elevation of 3 feet above the base flood elevation. Eligible projects that meet the definition of a mitigation activity may be counted towards the CDBG-DR mitigation set-aside. For this purpose, the mitigation definition used will be activities that increase resilience and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

**Reducing Barriers for Assistance:** Volusia County will work with capacity constrained organizations and jurisdictions to facilitate the identification of eligible projects and the completion of applications for consideration.

## CDBG-DR Mitigation Set-Aside

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

Eligible Cost Category	CDBG-DR Mitigation Set Aside Allocation Amount	% of CDBG-DR Allocation for LMI Benefit	Does this Program have tie back to the disaster?
Hurricane Milton Mitigation Program	\$17,415,000	50%	No
<b>Total:</b>	<b>\$17,415,000</b>	<b>50%</b>	<b>No</b>

### Hurricane Milton Mitigation Program

**Program Title:** Hurricane Milton Mitigation Program

**Amount of CDBG-DR Funds Allocated to this Program:** \$17,415,000

**Eligible Activities:** Stormwater management projects, acquisitions, mitigation grant matching funds for direct beneficiaries for flood mitigation activities such as elevations and buyouts.

**National Objective:** The allowable national objectives for this activity will be area benefit to the low-to-moderate income community, and urgent need.

**Lead Agency and Distribution Model:** Volusia County will manage this program through a combination of direct implementation and through subrecipient models for entities determined to have the capacity to administer individual projects compliantly.

**Program Description:** The Hurricane Milton Mitigation Program will fund stormwater infrastructure projects that do not have a direct tieback to the disaster and provide grant matching funds for direct benefit flood risk mitigation activities funded through state and federal programs.

Match recipients will be prioritized based on income with 80% Area Median Income and below having preference over those who are 80 to 120% of the AMI.

The program anticipates funding approximately 8 stormwater mitigation infrastructure projects (assuming an average cost of \$2M per project) and 40 direct beneficiary match projects.

**Eligible Geographic Areas:** Volusia County is the geographic boundary for this program to include all its incorporated and unincorporated areas.

**Other Eligibility Criteria:** Direct beneficiary match recipients must own their property, have an income that is less than 120% of the Area Median Income, and receive an award from the mitigation program in which they are seeking matching funds.

**Maximum Amount of Assistance Per Beneficiary:** Direct Beneficiary match activities have a maximum benefit of \$100,000.

**Maximum Income of Beneficiary:** 120% of the area median income for direct beneficiaries

**Mitigation Measures:** All activities within this program will count towards the mitigation set-aside. All projects will incorporate mitigation measures specific to the project or activity. All elevations will comply with elevation standards as required.

**Reducing Barriers for Assistance:** Volusia County will work with capacity constrained organizations and jurisdictions to facilitate the identification of eligible projects and the completion of applications for consideration. Volusia County will undertake steps to ensure that groups that have difficulty in accessing and/or using computers, such as the elderly and disabled, are given additional opportunities to apply for assistance.

## Section 6: General Information

### Citizen Participation

Volusia County values citizen and stakeholder engagement. The County has developed a Citizen Participation Plan in compliance with § 24 CFR 91.115 and applicable HUD requirements to set forth the policies and procedures applicable to citizen participation. The citizen participation plan reflects the alternative requirements as specified by HUD in the Federal Register. This plan is intended to maximize the opportunity for citizen involvement in the planning and development of the Volusia County CDBG-DR action plan.

### Consultation of Developing the Action Plan

In the development of this disaster recovery action plan, Volusia County consulted with disaster-affected citizens, stakeholders, local governments, public housing authorities, non-profit recovery organizations, and other affected parties throughout the county to ensure consistency of disaster impacts identified in the plan, and that the plan and planning process was comprehensive and inclusive.

Volusia County consulted with Federal, State, local agencies, and stakeholders to gain a better understanding of the disaster impacts and unmet needs in Volusia County. Those agencies and stakeholders include:

Partners Consulted	Consultation Description
Federal Partners	Federal partners consulted include the Federal Emergency Management Agency (FEMA); Department of Housing and Urban Development (HUD); Environmental Protection Agency (EPA); and the Small Business Administration (SBA)
Local Government	Transform386 coordinated with the cities throughout the planning process including regular updates at the monthly meeting of the City Managers for all jurisdictions within the county <ul style="list-style-type: none"><li>• <b>City Managers Meeting</b> – 1/22/2025</li><li>• <b>City Managers Meeting</b> – 2/26/2025</li></ul>
Private sector	Outreach efforts to the private sector included coordination with the public at community meetings and engagement with the contracting and engineering community in conjunction with the ongoing Hurricane Ian recovery programs
State and local emergency management agencies	Volusia County consulted with the Florida Division of Emergency Management on 1/17/2025 to discuss coordinating CDBG-DR funds to maximize HMGP and Elevate Florida impacts
Agencies that manage local Continuum of Care	The Volusia Flagler COC was engaged to discuss disaster-impacted populations served by the COC
Public Housing Agencies	Contacted all public housing authorities in Volusia County to identify the number of units damaged, repaired, and remaining damaged

Transform386 conducted several public meetings prior to the development of the action plan. Representatives of local governments, the media, nonprofit organizations, civic organizations, and members of the general public attended to provide input to the planning process. Meetings were held at the following locations:



- New Smyrna Beach Library – 1/23/2025
- Pictona at Holly Hill – 1/24/2025
- Deltona Regional Library – 1/27/2025
- Daytona Beach Regional Library – 1/29/2025
- Volusia County Council Chambers – 2/6/2025 (Pre-publication Public Hearing)

## Public Comments

Public comments are integral to the development of the action plan. Comments may be emailed to [Transform386@volusia.org](mailto:Transform386@volusia.org), provided in person at any public meetings, or submitted online through the Hurricane Milton survey at [www.transform386.org](http://www.transform386.org).

## Public Hearings

### *Accessibility of Public Hearings*

Volusia County recognizes that affected stakeholders are the center of, and partners in, the development and implementation of this plan. In addition to the 30-day public comment period, an opportunity for citizen input is provided through two public hearings on:

March 25, 2025 at 10AM  
Volusia County Council Chambers

April 6, 2025 at 5PM  
Daytona Beach Regional Library

The second hearing was available simultaneously to the public as an in-person and virtual meeting. The meeting facility is physically accessible and provides accommodation for people with disabilities. The county will accommodate requests for interpretation received with reasonable notice in accordance with the county policy.

The public hearings include a presentation by county representatives to provide an overview of the Action Plan. The presentation was made available on the county website afterwards. The public comments from the public hearings are included in the overall summary of citizen comments.

### *Meaningful Access*

To reduce barriers for those with accessibility challenges, the county will make every effort to accommodate the needs of residents at all public hearings.

To further increase outreach and participation, the hearing is recorded and made available to the public via a link on the disaster recovery website to be viewed on-demand.

## Consideration of Public Comments

A record of all public comments and responses will be posted in the appendix of the Action Plan prior to submission to HUD to ensure transparency.

## Citizen Complaints

The grantee will provide a timely written response to every citizen's complaint. The county's response will be provided within fifteen working days of receipt of the complaint, or Volusia County will document why additional time for the response was required. Complaints may be sent to [transform386@volusia.org](mailto:transform386@volusia.org).

Complaints alleging violation of Title VIII of the Civil Rights Act of 1964 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](mailto:hotline@hudoig.gov)).

Volusia County will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures to demonstrate adequate procedures are in place to prevent fraud, waste, and abuse.

Complaints alleging the violation of Title VIII of the Civil Rights Act of 1964 will be directed to HUD for immediate review.

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

### Modifications to the Action Plan

Over time, recovery needs will change. Thus, Volusia 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.

### Substantial Amendment

A change to the initial Action Plan is substantial if it meets the following criteria:

- A change in program benefit or eligibility criteria
- The addition or deletion of an activity
- The allocation or reallocation of \$20 million across program areas

When Volusia County pursues the substantial amendment process, the amendment will be posted on the county's CDBG-DR website for a 30-day public comment period. The amendment will be posted in adherence with the Americans with Disabilities Act. The county will review and respond to all public comments received and submit them to HUD for approval.

### Nonsubstantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the plan and does not require posting for public comment. Volusia County will notify HUD 5 business days before the change is effective.

All amendments will be numbered sequentially and posted to the website in one final, consolidated plan.

### Performance Reports

Volusia County will submit detailed and timely reports through the Disaster Recovery Grant Reporting (DRGR) system. These reports will allow HUD to track program progress, ensure compliance, and monitor the use of CDBG-DR funds throughout the lifecycle of the grant.

Quarterly Performance Reports (QPRs) will be submitted no later than 30 calendar days after the end of each calendar quarter until all grant funds are expended and recovery objectives have been met. Each report will provide a comprehensive update on project activities, expenditures, and performance metrics, including data on direct benefit activities such as the number of individuals assisted and relevant demographic information.

## Appendix

### Certifications

Volusia County certifies that it will comply with the following requirements:

- A. Uniform Relocation Act and Residential Anti-displacement and Relocation Plan – The grantee certifies that it:
  - 1) will comply with the acquisition and relocation requirements of the Uniform Act, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements;
  - 2) has in effect and is following a RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.
- B. Authority of Grantee: The grantee certifies that the Action Plan for disaster recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- C. Consistency with the Action Plan - The grantee certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.
- D. Citizen Participation-The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements).
- E. Use of Funds-The grantee certifies that it is complying with each of the following criteria:
  - 1) Purpose of the funding. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 et seq.).
  - 2) Maximum Feasibility Priority. With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
  - 3) Overall benefit. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.
  - 4) Special Assessment. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
    - a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or

- b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- F. Grant Timeliness- The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.
- G. Order of Assistance-The grantee 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.

## Needs Assessment Data Sources

Data	Source
OPEN FEMA PA Data	<a href="https://www.fema.gov/openfema-data-page/public-assistance-funded-projects-details-v1">https://www.fema.gov/openfema-data-page/public-assistance-funded-projects-details-v1</a>
OPEN FEMA PA Applicant Data	<a href="https://www.fema.gov/openfema-data-page/public-assistance-applicants-v1">https://www.fema.gov/openfema-data-page/public-assistance-applicants-v1</a> and FDEM
OPEN FEMA IA Applicant Data	<a href="https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1">https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1</a>
OPEN FEMA Disaster Declarations	<a href="https://www.fema.gov/openfema-data-page/disaster-declarations-summaries-v2">https://www.fema.gov/openfema-data-page/disaster-declarations-summaries-v2</a>
HUD LMI Data	<a href="https://www.hudexchange.info/programs/cdbg/cdbg-low-moderate-income-data">https://www.hudexchange.info/programs/cdbg/cdbg-low-moderate-income-data</a>
HUD Continuum of Care	<a href="https://www.hudexchange.info/programs/hdx/pit-hic">https://www.hudexchange.info/programs/hdx/pit-hic</a>
SBA Summary Data	SBA Home and Business Loan Report (02/26/2025)
Grantee Demographics	US Census 5-year 2019-2023 ACS, Tables S0101, S1810, B01001 & Census Quick Facts
Mobile Home Units	US Census 5-year 2019-2023 ACS, Table DP04 and <a href="https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1">https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1</a>
Rental Units	US Census 5-year 2019-2023 ACS, Table B25127
Population by Tenure	US Census 5-year 2019-2023 ACS, Table B25008

## Public Comments and Responses

Comment Received	Response