



Pinellas Recovers

Hurricane Help That Puts People First

Pinellas County Action Plan for Disaster Recovery

Hurricanes Idalia, Helene & Milton



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Change Log

DRAFT

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Executive Summary

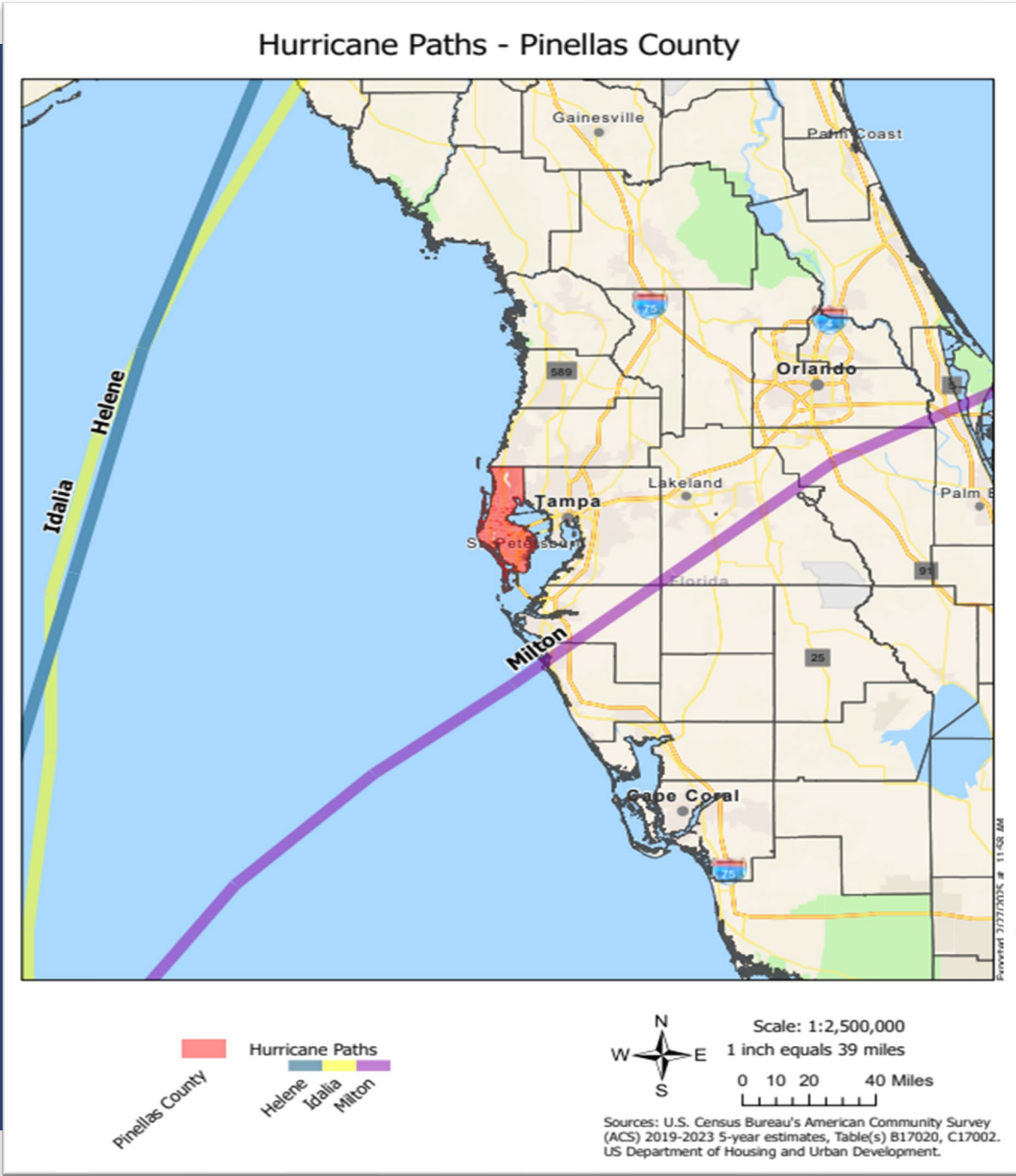
Overview

The U.S. Department of Housing and Urban Development (HUD) has allocated \$813,783,000 in Community Development Block Grant Disaster Recovery (CDBG-DR) funding to Pinellas County, Florida, to support long-term recovery efforts following hurricanes Idalia, Helene and Milton (FEMA Disasters DR-4734-FL, DR-4828-FL and DR-4834-FL). CDBG-DR funding is designed to address needs that remain after all other assistance has been used. This plan details how funds will be used to address the remaining unmet need in Pinellas County, Florida.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and facilitate a quicker recovery. The HUD allocation of \$813,783,000 in CDBG-DR funds to Pinellas County, Florida was pursuant to publication of a Federal Register notice (90 FR 4759). The funds for this allocation were made available through the American Relief Act of 2025 (Public Law 118-158).

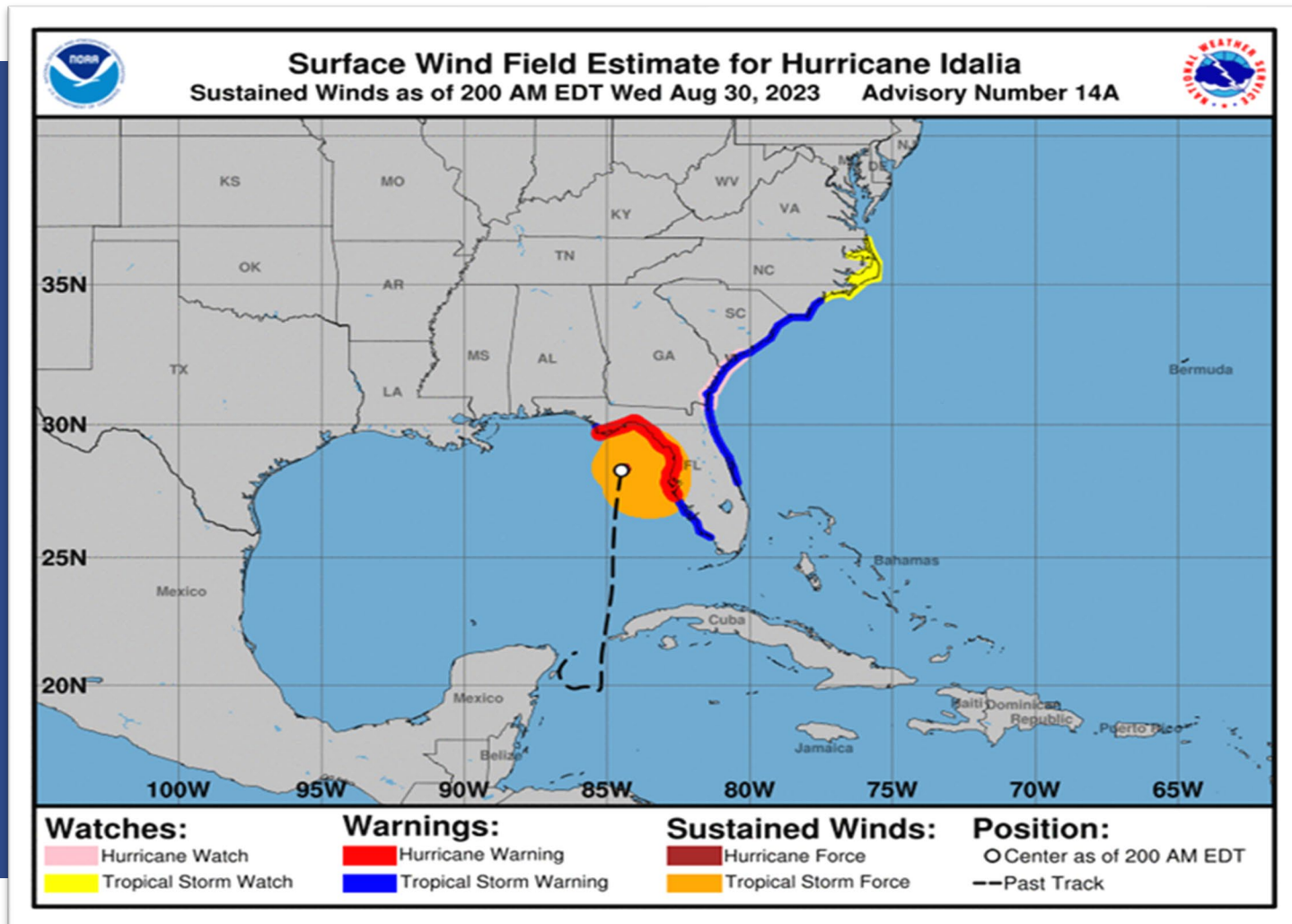
Disaster-Specific Overview

Pinellas County experienced three major disasters in 2023 and 2024: Hurricane Idalia (DR-4734-FL), Hurricane Helene (DR-4828-FL), and Hurricane Milton (DR-4834-FL). These storms led to presidential disaster declarations and to the availability of Federal Emergency Management Agency (FEMA) Public Assistance (PA) and Individual Assistance (IA) in Pinellas County.



*Map 1: Hurricane paths of hurricanes Idalia, Helene and Milton (Pinellas County)
- Image courtesy of the U.S. Census Bureau*

Hurricane Idalia (DR-4734-FL) made landfall on August 30, 2023, approximately 20 miles south of Perry, Florida, as a Category 3 hurricane. It brought heavy rainfall, powerful storm surges, and maximum sustained winds of 130 miles per hour.



Map 2: Surface Wind Field of Hurricane Idalia- Image courtesy of NOAA

Idalia was a large storm that caused significant flooding along Florida's western coast, particularly in Pinellas County. The most severe impacts were felt in coastal areas, including Shore Acres, Riviera Bay, Johns Pass to St. Pete Beach, and regions north of Dunedin. The storm surge and heavy rainfall resulted in catastrophic flooding in Pinellas County, affecting more than 1,500 homes and damaging businesses and infrastructure. Additionally, parts of the coastline experienced erosion, with some beaches losing up to five feet of sand, leading to many public beach access points being closed. Residents throughout Pinellas County also faced power outages and disruptions to essential utilities.



***Figure 1:** Pinellas County residents escaping rising flood waters and house fire (Hurricane Idalia)*
Photo credit: Denis Lestang

Fierce winds swept through the region, with gusts reaching 60 to 70 mph and a peak of 61 mph recorded at St. Petersburg-Clearwater International Airport at 3:43 AM EST on August 30. Heavy rainfall totaled between 2 to 4 inches, with a maximum of 3.83 inches near Feather Sound. Coastal flooding was significant, as Clearwater Beach recorded a peak water level of 4.05 feet above Mean High Higher Water (MHHW) at 6:00 AM EST, while other coastal areas in Pinellas County saw levels between 3 and 5 feet above MHHW. Emergency responders conducted over 70 water rescues, Damage estimates have reached \$23.4 million, with 10 structures destroyed, 45 inaccessible, 811 sustaining major damage, 1,016 suffering minor damage, and 822 affected. Power outages impacted 27,000 residents.



Figure 2: A man photographs floodwaters outside his resident in the aftermath of Hurricane Idalia in Tarpon Springs, Florida, U.S., August 30, 2023. Photo credit: Adrees Latif/REUTERS

Hurricane Helene (DR-4828-FL) made landfall on September 26, 2024, near the mouth of the Aucilla River in the Big Bend area as a Category 4 hurricane, with maximum sustained winds of 140 miles per hour and became the deadliest mainland hurricane since Katrina in 2005. The storm caused catastrophic damage across the southeastern U.S., impacting parts of Florida, Georgia, North and South Carolina, and Tennessee.



Figure 3: Satellite imagery Hurricane Helene (September 26, 2024)- Image courtesy of NOAA

Due to Helene's fast-forward motion and its distance from the coast, it did not produce significant heavy rainfall in central or south Florida. However, the storm's forward momentum and outer bands generated strong onshore winds, pushing large amounts of water ashore. Peak wind gusts peaked at 75 mph in some areas of Pinellas County.



Figure 4: Aerial drone view of damaged homes and a vehicle into the canal after storm surge from Hurricane Helene- Photo credit: Luis Santana Times

This resulted in record-high storm surge levels of 7.2 feet recorded at the East Bay coastal tide gauge station. Along rivers and waterways, storm surge was pushed up to 24 miles inland, with a depth up to eight feet. The catastrophic surge resulted in twelve (12) fatalities in Pinellas County, extensive damage to homes and businesses, and critical infrastructure rendering the Pinellas barrier islands inaccessible. The barrier islands were under mandatory evacuation, with some residents deciding to shelter in place. Crews began searching and rescuing around 4:30 a.m. Friday after the worst of the storm had passed. The storm eroded nearly all the coastal dunes along Pinellas County's coast. Almost 1.2 million Florida power customers were without electricity during and after the storm, with Pinellas County reporting over 85,000 power outages.

Hurricane Milton (DL-4834-FL) made landfall in Siesta Key, Florida, in Sarasota County on the evening of October 9, 2024, as a major Category 3 hurricane with maximum sustained winds of 120 mph. This powerful storm struck just two weeks after Hurricane Helene had already ravaged the area. While Pinellas County managed to avoid the devastating storm surge that inundated regions south of Tampa Bay, it was not spared from hurricane-force winds. At St. Petersburg Albert Whitted Airport, a wind gust of 101 mph was recorded, leaving a trail of chaos in its wake. The storm unleashed a deluge, with an astonishing 18.54 inches of rainfall measured, nearly tripling the record set in September 2001 (Tropical Storm Gabrielle), turning streets into rivers, and overwhelming drainage systems. Milton's destructive path did not stop at the coast; it propagated well inland, spawning a record number of tornadoes that further compounded the devastation. As the hurricane tracked across the peninsula, it inflicted widespread wind damage and severe flooding, leaving homes battered and communities reeling. After traversing the state, Milton entered the Atlantic Ocean, where it ultimately transitioned into an extratropical system before dissipating on October 12. The aftermath was severe: two reported deaths, downed power lines – with 3.38 million customers without power in the State of Florida and one of the highest outages reported in Pinellas County – uprooted trees, and extensive damage to neighborhoods faced extensive damage. Floodwater inundated homes, exacerbating the challenges faced by residents still recovering from Hurricane Helene's impact.



Figure 5: Manufactured Home Park Pinellas County (Hurricane Milton)- Photo credit: ABC Action News

In the aftermath of the hurricane, 75% of Pinellas County experienced power outages. Damage to over 140 pump stations limited access to clean water. Additionally, areas such as St. Petersburg and Gulfport were placed under a boil water notice due to infrastructure damage, further complicating recovery efforts. The widespread outages and utility disruptions made it difficult for homeowners to access essential services, worsening the challenges faced by residents in the storm's aftermath.

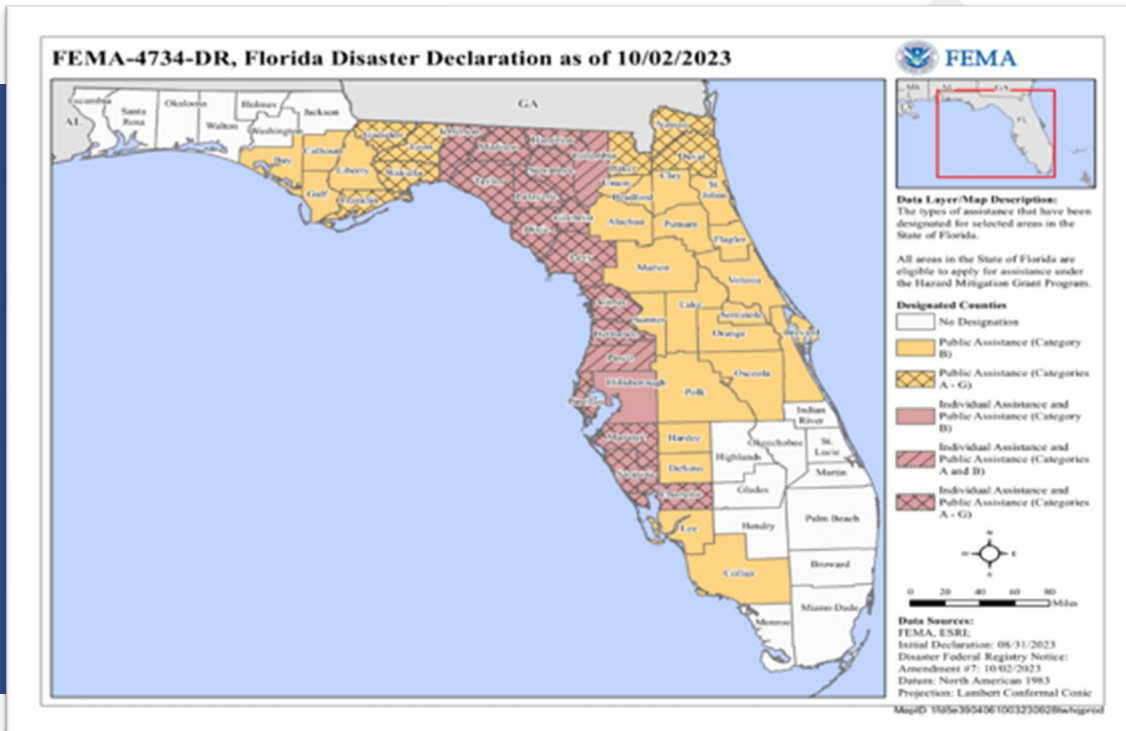
Most Impacted and Distressed (MID) Areas

As required by the Federal Register notice, Pinellas County will spend 100% of its allocation in the HUD identified MID area, which includes all of Pinellas County except St. Petersburg, since the city received its own CDBG-DR allocation. Additionally, no less than 70% of the total allocation will be expended to benefit Low- to Moderate-Income persons. Proposed programs will include some disaster recovery related mitigation initiatives, as applicable, and may allow stand-alone mitigation activities to ensure that Pinellas County complies with the 15% mitigation expenditure requirement established by HUD for this allocation of CDBG-DR funds.

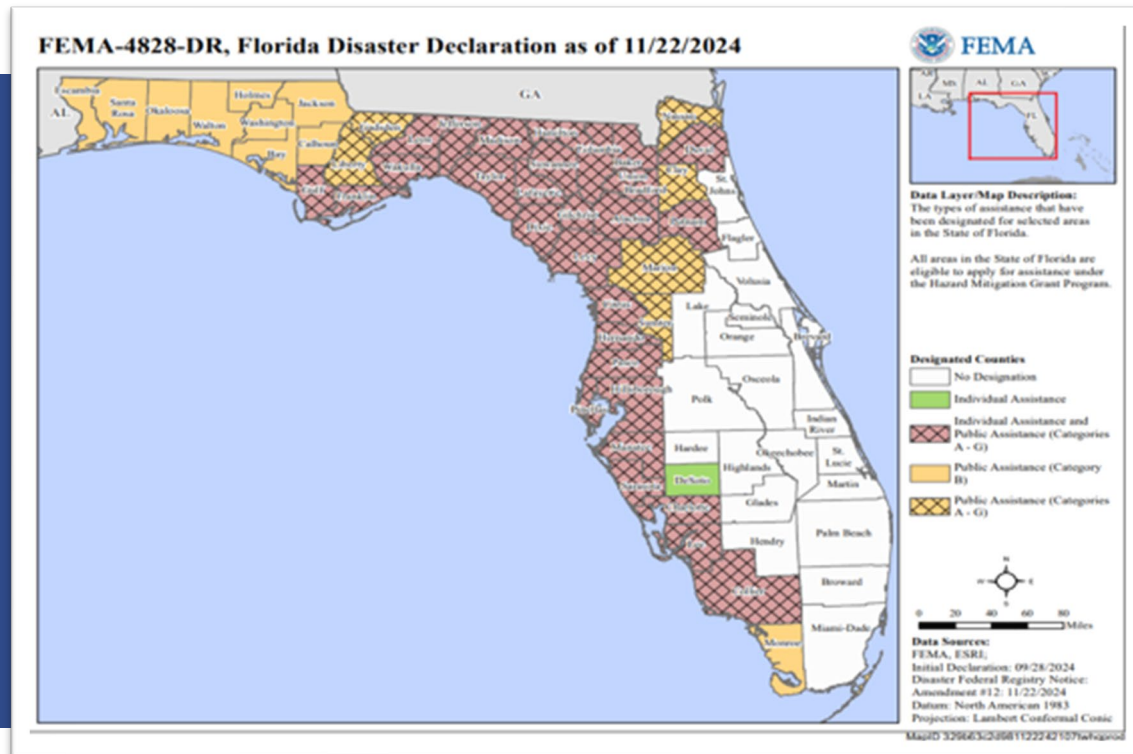
The Action Plan must also identify the use of all CDBG-DR funds, including criteria for eligibility and how the users address long-term recovery needs, restoration of infrastructure and housing, economic revitalization, and mitigation in the MID areas.

Each storm mapped below includes Pinellas County as a part of the Federal Disaster Declaration. HUD has therefore determined Pinellas County as one of the MID areas for the qualifying disasters,

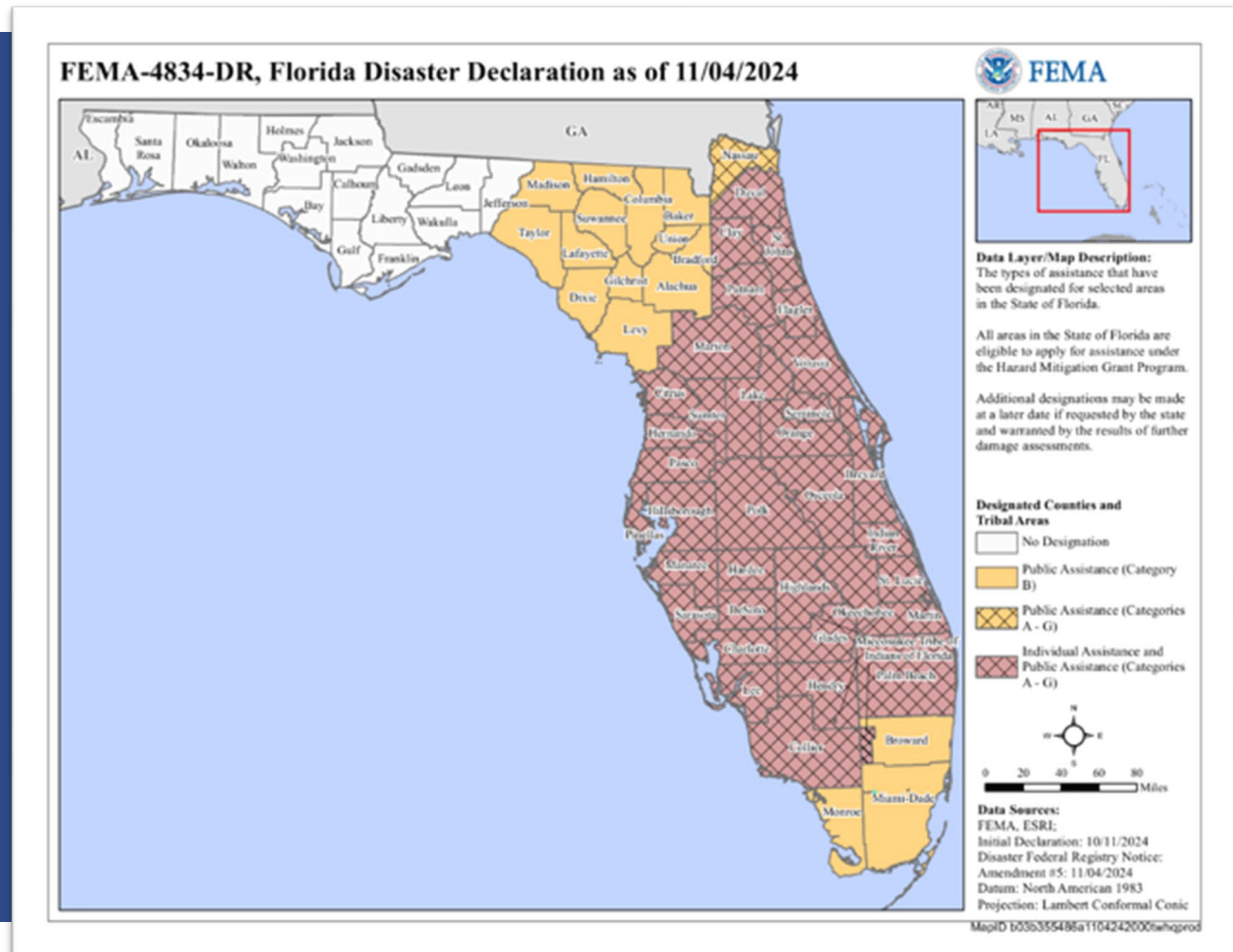
Hurricane Idalia (DR-4734-FL), Hurricane Helene (DR-4828-FL), and Hurricane Milton (DR-4834-FL).



Map 3: Hurricane Idalia (DR-4734-FL) Disaster Declaration Map



Map 4: Hurricane Helene (DR-4828-FL) Disaster Declaration Map



Map 5: Hurricane Milton (DR-4834-FL) Disaster Declaration Map

Pinellas County MID Low-to Moderate-Income Populations

Across all counties that received disaster declarations under one or more of the hurricanes, the median household income is slightly higher at \$76,133, with a per capita income of \$42,732. The number of individuals below the poverty level in these counties is 1,921,184, representing 12.30% of the population. For context, the median household income for the State of Florida is \$71,711, with a per capita income of \$42,078. Approximately 2,707,698 individuals (or 12.62%) have an income below the poverty level.

Household Income	Median Household Income	Per Capita Income	Number with Income Below Poverty Level (past 12 months)	Percent with Income Below Poverty Level (past 12 months)
State of Florida	\$71,711	\$42,078	2,707,698	12.62%
Disaster Declaration Counties	\$76,133	\$42,732	1,921,184	12.30%
MID – Pinellas County	\$73,060	\$48,977	77,534	11.32%

Table 1: Household Income for MID Area for Pinellas County

For Pinellas County (MID), the median household income is \$73,060, with a notably higher per capita income of \$48,977. The number of individuals below the poverty level is 77,534, or 11.32% of the population, indicating a lower poverty rate compared to both the state and disaster-declared counties. These figures suggest that while MID areas have higher per capita incomes, economic vulnerabilities persist, particularly for those below the poverty threshold.

	Total LMI Persons	Total Population for Which LMI is Calculated	Percentage LMI
State of Florida	7,582,303	18,094,340	41.9%
Disaster Declaration Counties	5,130,209	12,801,240	40.1%
MID – Pinellas County	243,640	668,515	36.4%

Table 2: Low to Moderate Income Population

Low to Moderate Income (LMI) data shows that 36.4% of Pinellas County's population qualifies as LMI, which is lower than both the statewide (41.9%) and disaster county (40.1%) averages. This suggests that while Pinellas County fares better economically, a sizable portion of the population still faces economic challenges, underscoring the need for targeted recovery efforts.

Overview of Impacts of the Qualifying Disaster

The qualifying disasters, Hurricane Idalia (DR-4734-FL), Hurricane Helene (DR-4828-FL), and Hurricane Milton (DR-4834-FL), caused widespread devastation in Pinellas County, primarily impacting residential areas with severe flooding, structural damage to homes, and significant infrastructure disruption, leaving a lasting impact on the community with the most pressing unmet needs currently focused on long-term housing repairs, critical infrastructure restoration, and economic recovery for small businesses, particularly in the hardest-hit neighborhoods around the Pinellas coastline. With an estimated \$5.2 billion in damages overall, Pinellas County sustained damage, including roof breaches, flood intrusion, compromised walls, rendering many uninhabitable due to storm surge, heavy rainfall, and hurricane force winds.



Figure 6: Cleanup efforts Pinellas County (Hurricane Helene) Photo Credit-Fox 13 Tampa Bay.

Despite initial FEMA assistance, many residents still require substantial funding for reconstruction of their homes, or permanent repairs, including but not limited to roof replacements, foundation repairs, and electrical rewiring, particularly for low-income families who may not qualify or lack sustainable income for full coverage insurance.

Pinellas County received extensive damage to powerlines, roads, bridges, and beach erosion, leading to prolonged power outages and hindered access to essential services, further exacerbating recovery efforts in Pinellas County.



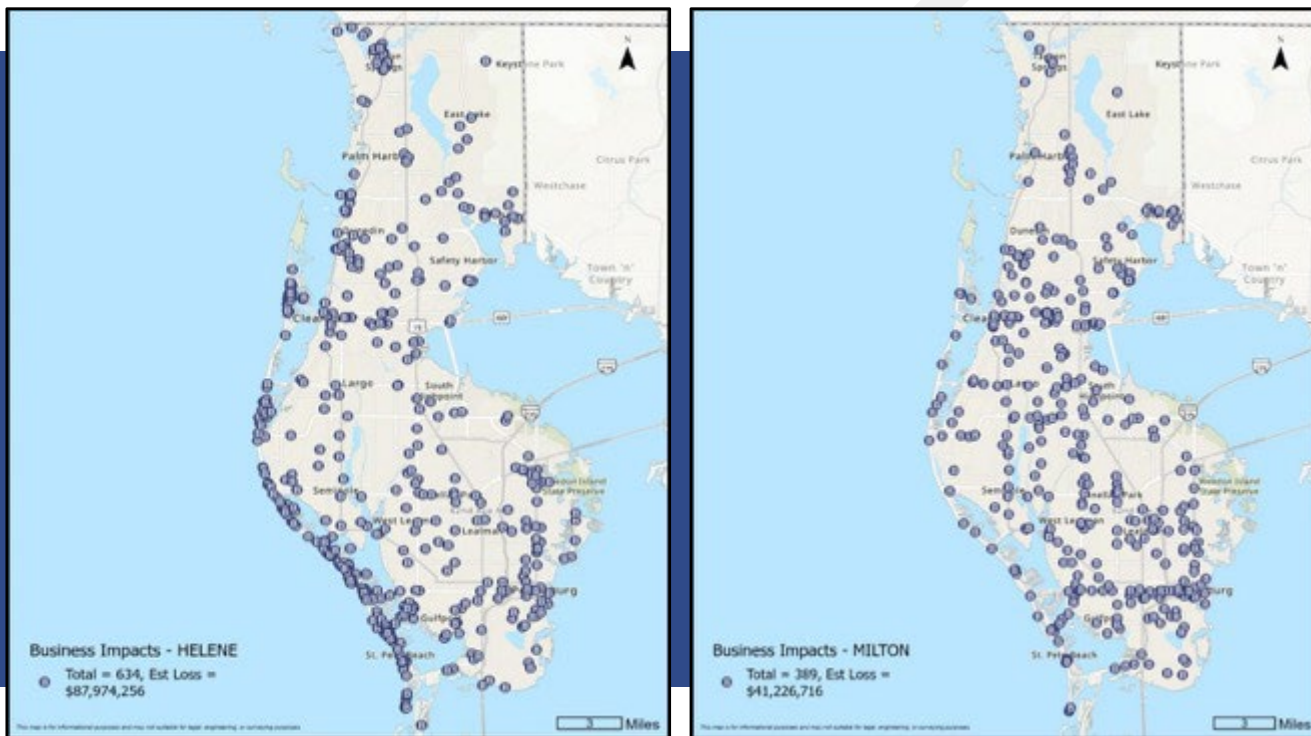
*Figure 7: Extensive beach erosion Pinellas County -
Photo Credit (Florida Department of Transportation (FDOT))*

While emergency repairs have been completed, funding remains necessary to fully restore damaged infrastructure, including bridges, drainage systems, and public utilities to pre-disaster functionality.



*Figure 8: Storm debris outside businesses in Madeira Beach, Fla. after Hurricane Helene.
Photo credit WFTS Tampa Bay*

Businesses in Pinellas County, especially along the coastline, suffered significant losses due to flooding and business interruption, leading to job losses and economic instability. The breadth of impact across the business community is extensive, as displayed in the maps below.



*Map 6: Business Impacts from hurricanes Helene and Milton for Pinellas County
(Data Source: SBA Business Loan data)*

Disaster Summary	
Qualifying Disaster:	Hurricanes Idalia, Helene and Milton with FEMA Disaster (DR-4734-FL) (DR-4828-FL) (DR-4834-FL)
HUD-identified MID Areas:	Pinellas County
Grantee-Identified MID Areas:	Pinellas County

Table 3: Disaster Overview

CDBG-DR Allocation Overview:	
CDBG-DR Allocation:	\$707,637,000
CDBG-DR Mitigation Set Aside:	\$106,146,000
TOTAL ALLOCATION:	\$813,783,000

Table 4: CDBG-DR Allocation Overview

Unmet Needs and Mitigation Needs Summary

The table below provides an overview of the \$813,783,000 in CDBG-DR funding allocated to Pinellas County to support recovery from Hurricanes Idalia, Helene, and Milton. Because Pinellas County’s unmet recovery needs exceed the available CDBG-DR resources, Pinellas County has prioritized use of funds to achieve the greatest impact in communities with the fewest resources to recover. All program activities will be carried out within Pinellas County, which is the HUD-designated Most Impacted and Distressed (MID) area.

As required by HUD, at least 70% of the funds will benefit low- and moderate-income (LMI) individuals and households. The priorities in this Action Plan reflect both the quantitative damage and unmet needs assessments and extensive input from residents, local organizations, and stakeholders.

Unmet Needs Assessment

Impacts of the Core Aspects of Recovery

This Action Plan for Pinellas County identifies the use of all CDBG-DR funds, including criteria for eligibility and how the uses address long-term recovery needs, infrastructure and housing restoration, economic revitalization, and mitigation in the most impacted and distressed (MID) areas. The purpose of the Unmet Needs Assessment (UNA) is to describe the effects of the qualifying disasters and the greatest remaining recovery needs that have not been addressed by other sources of funds, including insurance proceeds and other Federal assistance or any other funding source. These unmet needs assessment excludes St. Petersburg, Florida, because the city has its own CDBG-DR allocation.

This UNA utilizes data from FEMA, HUD, and other sources to evaluate the three core aspects of recovery — housing, infrastructure, and the economy (e.g., estimated job losses) and consider the pre-disaster needs (e.g., a lack of affordable housing) that have been exacerbated by the disaster. Federal requirements state that the assessment of housing needs must address: (1) emergency shelters; (2) interim and permanent housing; (3) rental and owner-occupied single family and multifamily housing; (4) public housing (including HUD-assisted housing) and other types of affordable housing, including those who were unhoused prior to the disaster.

Summary

Sector	Disaster Impact	Assistance	Unmet Need	% of Unmet Needs
Housing	\$3,523,861,474	\$435,466,952	\$3,088,394,522	78%
Economy	\$596,833,908	\$71,560,775	\$525,273,133	13%
Infrastructure	\$770,258,979	\$577,694,235	\$192,564,745	5%
Public Services	\$335,195,358	\$172,683,097	\$162,512,261	4%
TOTAL	\$5,226,149,719	\$1,257,405,059	\$3,968,744,660	100%

Table 5: Summary of Disaster Impact and Remaining Unmet Need

The Housing sector faces the most significant disaster impact and unmet need in the MID area of Pinellas County. With more than \$3.5 billion in estimated damages, \$435 million in assistance has been provided, leaving an unmet need of over \$3.08 billion, accounting for 78% of the total remaining need.

The local economy represents the next highest portion of unmet need in Pinellas County, accounting for more than an estimated \$525 million in unmet need. Local businesses realized an estimated \$596 million in disaster impact to business contents and property and received an estimated \$71 million in assistance, leaving \$192,564,745 of total remaining unmet need (13%).

Infrastructure has a lower unmet need of \$192 million, out of \$770 million in total impact, with \$577 million in assistance received. This represents 5% of the total unmet need.

Finally, the impact to Public Services represents approximately 4% of total unmet needs. Pinellas County estimates more than \$335 million in disaster impacts to residents, resulting in housing instability and employment losses, indicating the need for support and services. Pinellas County estimates that only approximately \$172 million was available for assistance, leaving more than \$162 million in unmet need.

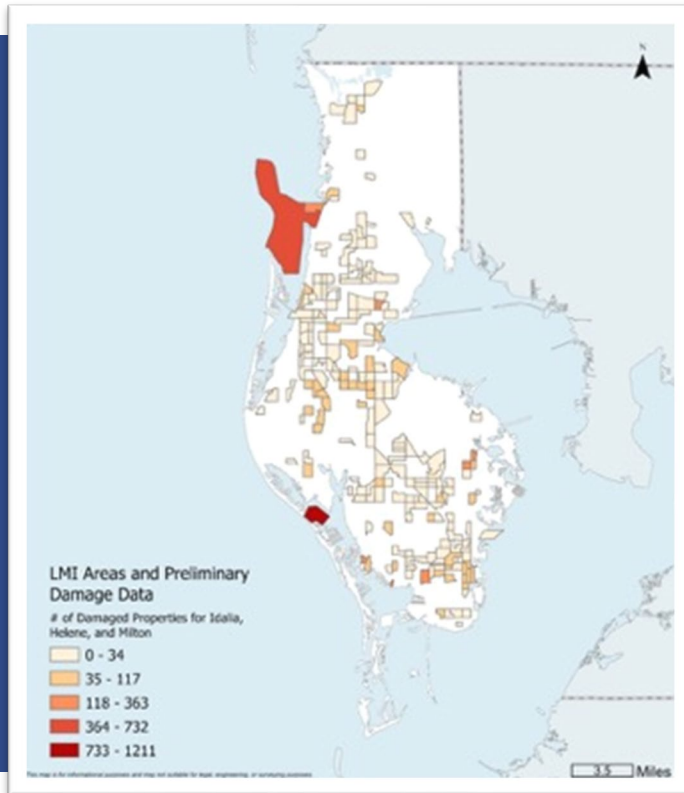
At this point in the recovery, housing is the dominant sector requiring recovery funding, with significant unmet needs concentrated on housing rehabilitation, reconstruction, and replacement efforts. However, the economy and public services support for LMI residents of Pinellas County is also representative.

Housing

Pre-Disaster Housing Conditions

The National Low Income Housing Coalition's (NLIHC) 2024 Gap Report¹ provides a comprehensive analysis of the affordable housing shortage in Florida, contextualizing it within the broader national crisis. The report highlights that Florida is among the states facing severe shortages of affordable and available housing, particularly for extremely low-income (ELI) renters, defined as those earning 30% or less of the area median income (AMI). This aligns with Pinellas County's housing crisis, which has similarly experienced a steep decline in affordable rental units and rising cost burdens among low-income households. Therefore, it is critical for Pinellas County to preserve existing housing stock impacted by the disasters and bring damaged housing units back.

¹ <https://nlihc.org/gap>



Map 7: Low to Moderate Income Areas and Preliminary Damage for Pinellas County

Low to Moderate Income, as defined by HUD, refers to households earning up to 80% of the Area Median Income (AMI), this represents the midpoint of household incomes in a specific geographic area, meaning half of the households earn more and half earn less. LMI status is determined relative to AMI, helping to assess eligibility for housing and community development assistance programs aimed at supporting lower-income populations.

The Shimberg Center for Housing Studies' analysis of Pinellas County's housing trends highlights significant affordability challenges, particularly for low-income households. Over the past two decades, home prices in Pinellas County have risen substantially. While Pinellas County experienced more moderate price

increases during the mid-2000s housing boom compared to the state, home prices have since surpassed those peak levels. In the first half of 2022, the median sale price in Pinellas County reached \$410,000, exceeding Pinellas County's mid-2000s peak of \$307,000 and the statewide median of \$385,000².

Affordable Housing Shortage in Florida

Florida faces a severe shortage of affordable housing, ranking among the lowest in the nation with only 25 affordable and available units per 100 extremely low-income renters³. This scarcity mirrors challenges seen in high-cost states like Texas and California and underscores a critical need for housing preservation strategies to prevent the further loss of affordable units.

² http://www.shimberg.ufl.edu/publications/Pinellas_County_presentation_041323.pdf

³ https://nlihc.org/sites/default/files/gap/2024/Gap-Report_2024.pdf

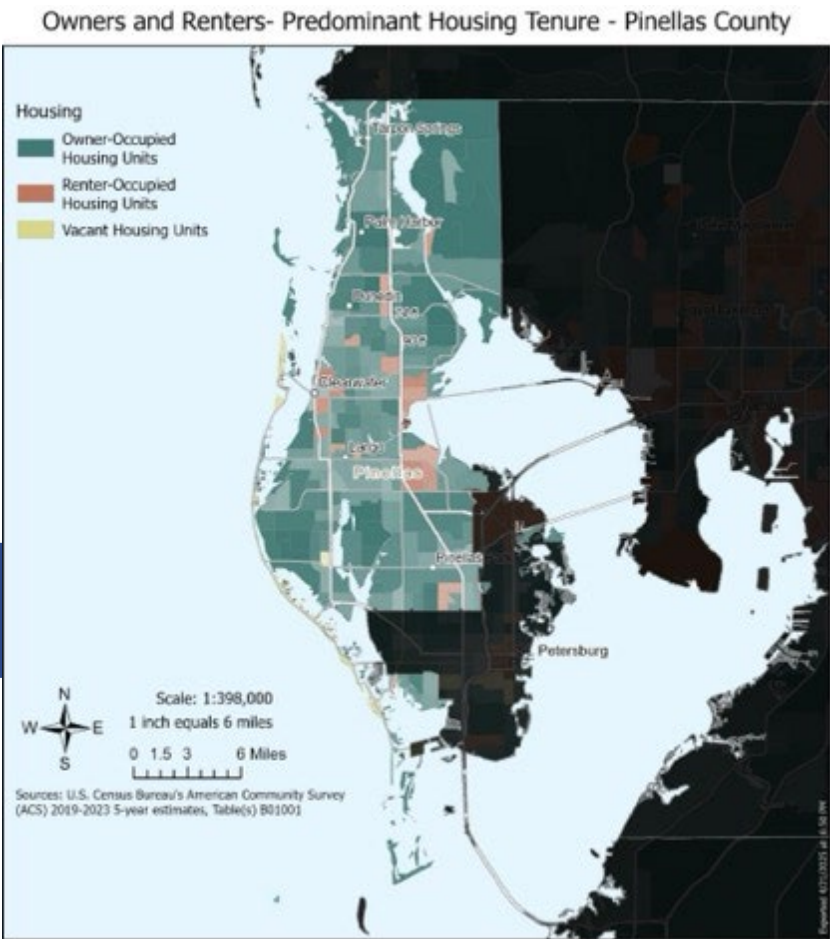
In Pinellas County, the affordable housing crisis has been further exacerbated by rising rents, stagnant wages, and increasing cost burdens. Over the past decade, the number of affordable rental units has declined sharply, placing greater pressure on existing housing stock. At the same time, median home prices have surpassed pre-recession peaks, making home ownership increasingly out of reach for many residents. Without targeted preservation efforts such as reconstruction, rehabilitation of aging housing stock, and incentives for landlords to maintain affordability, Pinellas County risks further displacement of low-income populations and a widening affordability gap.

However, the Pinellas County Consortium has in place a Five-Year (FY2020-FY2024) Consolidated Plan that identifies housing and community development needs, priorities, objectives, and strategies to support affordable housing and community development, totaling more than \$5 million.

Cost Burden and Wage Disparities

In Florida, 82% of extremely low-income renters are severely cost-burdened, meaning they spend more than 50% of their income on rent⁴. Pinellas County reflects similar trends, where many essential workers – including waiters, childcare workers, and nursing assistants – cannot afford market-rate housing based on their median wages.

Map 8: Housing Tenure for Pinellas County



⁴ https://nlihc.org/sites/default/files/gap/2024/Gap-Report_2024.pdf

Due to limited recovery funds, Pinellas County recognizes that the challenge of housing affordability and cost burdened households must begin to be addressed through the rehabilitation and reconstruction of damaged housing and the preservation of existing housing stock.

Disparities in Housing Affordability⁵

The housing crisis in Florida disproportionately affects extremely low-income renters and presents severe cost burdens. In Pinellas County, these disparities are evident in the high concentration of cost-burdened households among low-income communities, many of whom face limited access to affordable housing.

Prior to hurricanes Idalia, Helene, and Milton, Pinellas County faced a complex housing landscape influenced by several key factors:

Housing Affordability and Availability⁶

Pinellas County experienced a significant shortage of affordable housing, leading to a considerable number of residents living in exposed conditions. Many homes, especially older structures and manufactured homes, were not built to withstand severe weather events, making them particularly susceptible to storm damage.

Housing Quality and Age

A substantial portion of the housing stock consisted of older homes, many built before modern building codes were established. These structures often lacked features such as elevated foundations and reinforced materials that are designed to withstand severe weather events. Since the Federal Emergency Management Agency (FEMA) initiated its flood maps for Pinellas County after 1975, most structures built after 1975 should meet at least basic flood map requirements. However, many non-elevated homes experienced flooding during the storms.

Insurance Costs and Coverage⁷

Rising insurance premiums posed additional challenges for homeowners. Many residents faced escalating costs, with some experiencing premiums that nearly quadrupled over a few years. This financial strain made it difficult for homeowners to maintain adequate coverage, leaving them vulnerable to significant out-of-pocket expenses in the event of storm damage.

⁵ https://nlihc.org/sites/default/files/gap/2024/Gap-Report_2024.pdf

⁶ <https://nlihc.org/gap>

⁷ <https://www.wsj.com/real-estate/st-petersburg-florida-homeowners-hurricane-insurance-cost-4bc92822>

Pinellas County confronts a significant affordable housing deficit, a situation exacerbated by the recent impacts of hurricanes Idalia, Helene, and Milton. The disasters inflicted substantial damage across various housing sectors, impacting low- to moderate-income households, many of whom were already experiencing housing instability.

To help address the broader housing affordability crisis, Pinellas County implemented the Penny for Pinellas program — a voter-approved 1% sales tax shaped by extensive public input that funds capital projects, including affordable housing initiatives. Specifically, 4.15% of the Penny revenue is allocated for land acquisition and for capital projects to support affordable housing, with an anticipated contribution of approximately \$80 million over the next decade. This funding is earmarked for qualified development and rehabilitation projects aimed at increasing the stock of affordable housing units.

Despite these efforts, the demand for affordable housing significantly exceeds the resources available through the Penny for Pinellas program. Given the extensive impact of the disaster and Pinellas County's constrained financial capacity, the availability of Community Development Block Grant - Disaster Recovery funds are crucial to addressing unmet housing needs. These federal funds will augment local initiatives, expand the pipeline of affordable housing projects, and ensure that recovery efforts prioritize the most exposed residents. The strategic deployment of CDBG-DR funds will facilitate a comprehensive recovery strategy that supports both immediate stability and long-term resilience.

By aligning federal disaster recovery funds with existing local priorities, such as those outlined in the Penny for Pinellas program, Pinellas County ensures that CDBG-DR investments are both strategic and sustainable. This integrated funding approach will maximize impact, reduce administrative redundancy, and expedite the development of affordable housing units for households in greatest need.

In summary, before the recent hurricanes, Pinellas County's housing landscape, was characterized by a lack of affordable housing, a prevalence of older and exposed structures, and rising insurance costs. These factors collectively heightened the community's susceptibility to the devastating effects of the hurricanes. Pinellas County intends to focus recovery on the preservation and rehabilitation of the existing housing stock more so than new construction. By focusing on maintaining and improving current homes, Pinellas County aims to extend the longevity of affordable housing, support community stability, and make efficient use of existing infrastructure. This approach ensures that resources are directed toward addressing housing recovery needs while preserving the character and accessibility of established neighborhoods.

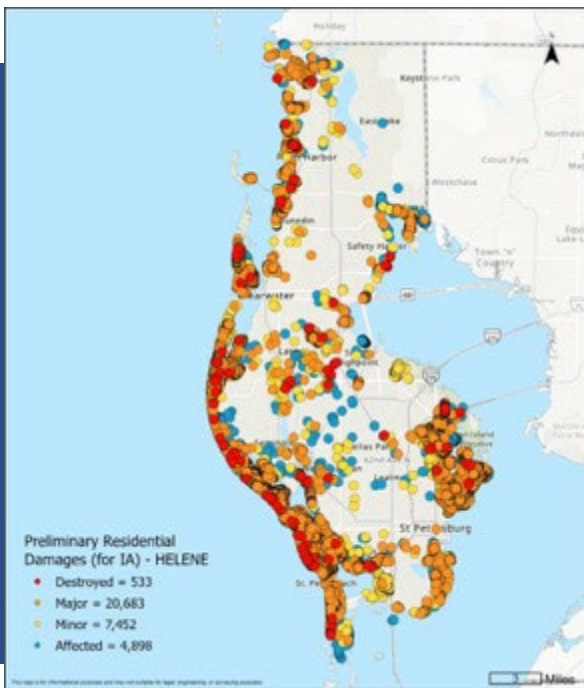
Post-Disaster Conditions

Housing Unmet Needs

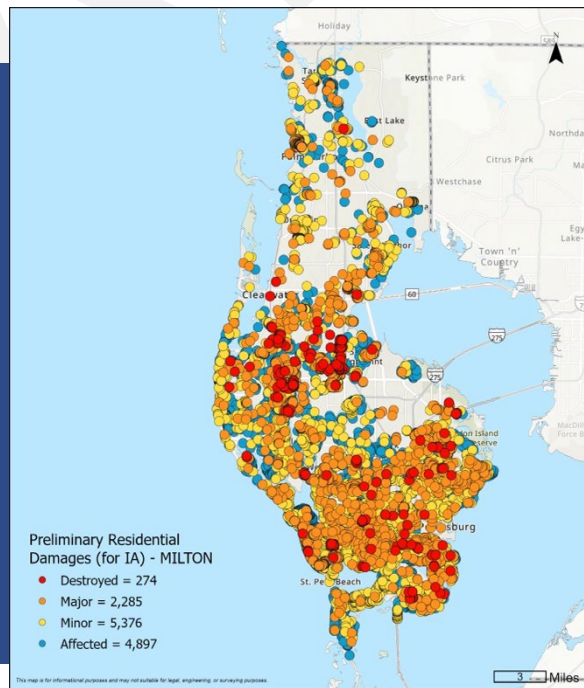
Pinellas County utilized a structured methodology to estimate disaster impacts, assistance received, and remaining unmet needs for single-family housing. Disaster-damaged single-family and manufactured homes, identified through FEMA Individual Assistance (IA) damage assessments, were categorized into three groups based on the severity of damage and housing type: Reconstruction, Rehabilitation, and Replacement.

Homes classified by FEMA as Severe or Major-High damage were assumed to require reconstruction if they were single-family homes, or replacement if they were manufactured housing units (MHUs). Homes classified as Major-Low to Minor-Low were assumed to require rehabilitation.

Map 9: Preliminary Residential Damages for Helene



Map 10: Preliminary Residential Damages for Milton



Pinellas County estimated damages for Severe and Major-High damage units by analyzing historical Small Business Administration (SBA) Verified Losses from past disasters. The analysis showed that severely damaged single-family homes averaged approximately \$300,000 in verified losses. For manufactured homes, the County used Florida market data to calculate an average replacement cost of \$184,000 per unit. This estimate is based on:

- A \$141,000⁸ replacement cost for a 1,440 SF, 3-bedroom, 2-bath manufactured home.
- An additional 30% to account for ancillary costs associated with MHU replacement, including demolition of the storm damaged unit, site preparation, haul and installation of the new unit, and activity delivery costs, rounded up to the nearest thousand.

For Major-Low to Minor-Low units, Pinellas County estimated rehabilitation costs using a proxy calculation:

- The percentage of Major-Low to Minor-Low Average FEMA Verified Loss (\$7,469) relative to Severe/Major-High Average Verified Loss (\$22,116) was determined to be approximately 34% of the \$300,000 reconstruction cost.
- An additional 30%⁹ was added to account for inflation, market volatility, and activity delivery costs, resulting in a final estimated rehabilitation cost of \$131,711 per unit.

Using the above approach, Pinellas County has estimated approximately \$3.5 billion in total disaster damage. "Assistance provided" includes \$435 million from FEMA IA, excluding SBA or Private Insurance data. This leaves an estimated \$3 billion in remaining single-family owner/renter housing unmet needs.

FEMA IA Damage Category	Damage Estimate per Unit	# of Units	Disaster Impact	Estimated Total Assistance	Est. Single Family Housing Unmet Needs
Severe/Major-High	\$300,000	4,981	\$1,494,300,000	\$435,466,952	\$3,088,394,522
Major-Low to Minor-Low	\$131,711	14,504	\$1,910,329,474		
Severe/Major-High	\$184,000	648	\$119,232,000		
TOTAL			\$3,523,861,474	\$435,466,952	\$3,088,394,522

Table 6: Single Family Unmet Needs

⁸ <https://floridavaluehomes.com/blog/cost-breakdown-of-manufactured-homes-in-florida>

⁹ Estimating 20% increase to account for inflation, supply chain, market volatility and an additional 10% activity delivery.

RENTAL AND OWNER-OCCUPIED SINGLE FAMILY AND MULTIFAMILY HOUSING

FEMA IA – Owner Damage Levels

FEMA IA - Owner Damage Levels							
MID	Total	Severe	Major High	Major Low	Minor High	Minor Low	No Damage
Pinellas (County)	116,295	725	5,774	13,577	3,112	3,105	90,002
	100%	1%	5%	11%	3%	3%	77%

Table 7: FEMA IA – Owner Damage Levels

The analysis of FEMA Individual Assistance applications for homeowners in Pinellas County reveals a significant disparity between perceived and verified damage levels. While 116,295 homeowners applied for assistance, 77% (90,002 applicants) reported no actual damage upon FEMA inspection.

Among applicants with verified damage, only 1% experienced severe damage, while 17% faced major damage and required substantial repairs. Given these numbers and the need to preserve Pinellas County's existing housing stock, disaster recovery efforts should prioritize homeowners with major and severe damage, ensuring adequate funding and resources are available for their rebuilding efforts.

FEMA IA – Renter Damage Levels

FEMA IA - Renter Damage Levels							
MID	Total	Severe	Major High	Major Low	Minor High	Minor Low	No Damage
Pinellas (County)	86,478	354	2,585	5,246	1,266	5,362	71,665
	100%	0.4%	3%	6%	1.6%	6%	83%

Table 8: FEMA IA – Renter Damage Levels

Owner/Renter - Severe/Major-High Damage Category	
Housing Type	Count
Apartment	1
Boat	30
Condo	74
House/Duplex	4,981
Manufactured Home	648
Other	1
Townhouse	323
Travel Trailer	1

Owner/Renter - Major-Low to Minor-Low Damage Category	
Housing Type	Count
Apartment	7
Boat	32
Condo	1,836
House/Duplex	11,625
Manufactured Home	2,879
Other	11
Townhouse	949
Travel Trailer	120

Table 9: FEMA IA – Owner/Renter Damage Levels by Damage Category

FEMA IA Application Analysis

The following FEMA Individual Assistance analysis, including Real Property FEMA Verified Loss (RPFVL) does not capture the entire scope of the impacts from Hurricanes Idalia, Helene and Milton because of the undervaluation of the FEMA IA data. However, the following analysis demonstrates recovery needs for single family, owner and renter occupied housing impacted by the disasters.

MID	Total FEMA IA Applicants	Total Owner Applicants	% Percent Owner	Total Renter Applicants	% Percent Renter
Pinellas (County)	190,024	107,726	57%	82,042	43%

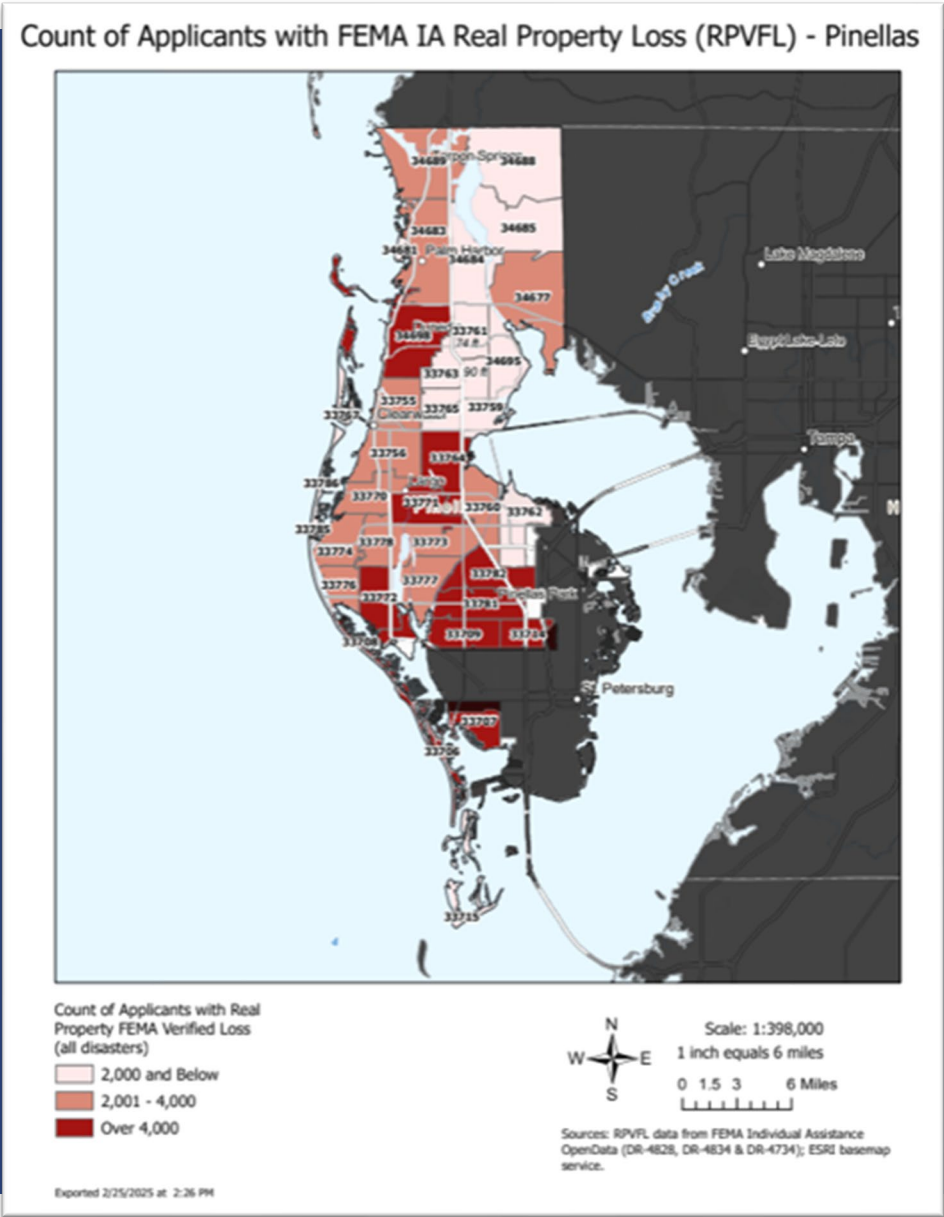
Table 10: Total Renter and Owner FEMA IA Applications for Pinellas County

Homeowners made up most of the FEMA Individual Assistance (IA) applicants at 57%, while renters accounted for 43%. This distribution aligns with the higher total loss amounts for owners, as property damage tends to have a larger financial impact than personal property losses alone.

MID	Total Owner RPFVL	Total Owner Repair Award Amount	Total Owner Unmet Need
Pinellas (County)	\$219,205,665	\$74,688,798	\$144,516,867

Table 11: Real Property FEMA Verified Losses for Pinellas County

Pinellas County homeowners experienced significant property damage, with an estimated \$219.2 million in Real Property FEMA Verified Losses. However, the awarded assistance covers only about 34% of the total losses, leaving a substantial \$144.5 million unmet need. This suggests a considerable unmet need between damage impact and available funding.



Map 11: Count of Applicants with FEMA IA Real Property Loss

MID	Total Renter PPFVL	Total Renter Personal Property Award Amount	Total Renter Unmet Need
Pinellas (County)	\$24,278,455	\$21,489,876	\$2,788,580

Table 12: Personal Property FEMA Verified Losses for Pinellas County

In contrast to homeowners, renters received a higher proportion of assistance relative to their total Personal Property FEMA Verified Losses. Awarded funds cover approximately 89% of total

renter losses, leaving an unmet need of only \$2.7 million. While renters still face some unmet needs, the disparity in assistance between owners and renters is notable.

FEMA IA – Owner Loss Analysis

FEMA IA - Owner Applications					
MID	Total Applications	Total Inspections	Inspections with Damage	Applications Received Assistance	Total FEMA Verified Loss
Pinellas (County)	107,726	28,808	17,724	9,279	\$219,205,665
		27%	16%	9%	

Table 13: FEMA IA – Owner Loss Analysis

The data on FEMA Individual Assistance (IA) for homeowners in Pinellas County underscores significant gaps in disaster recovery support. Despite 107,726 homeowners applying for assistance, only 27% of applications led to an inspection, and even fewer — 16% of applicants — had verifiable damage. Ultimately, only 9% of homeowners received assistance, despite FEMA verifying \$219.2 million in property losses.

This low assistance rate suggests that many applicants were either deemed ineligible, lacked sufficient damage verification, or faced insurance-related barriers. Given the previously identified \$3 billion in unmet needs, FEMA assistance alone is insufficient to meet the recovery needs of homeowners in Pinellas County. To bridge this gap, additional funding sources, expanded eligibility criteria, and policy adjustments are needed to provide more homeowners with the support they need for full recovery.

FEMA IA - Renter Applications					
MID	Total Applications	Total Inspections	Inspections with Damage	Applications Received Assistance	Total FEMA Verified Loss
Pinellas (County)	82,042	21,525	5,857	1,492	\$21,919,408
		26%	7%	2%	

Table 14: FEMA IA – Renter Loss Analysis

The data on FEMA Individual Assistance for renters in Pinellas County reveals significant gaps in aid distribution. While 82,042 renters applied for assistance, only 26% progressed to the inspection stage, and even fewer — 7% of applicants — had their damage verified. Ultimately, only 2% of renters (1,492 individuals) received financial assistance, despite FEMA verifying \$21.9 million in losses.

These figures highlight challenges in renter disaster recovery, where eligibility constraints and documentation challenges may have prevented many applicants from receiving assistance. Given the limited financial assistance available to renters, there is a pressing unmet need for disaster impacted renters.

FEMA IA – Housing Type Impact

Housing Type	Total Applications	Total Owner	% Owner	Total Renter	% Renter	% Overall
Apartment	36,947	38	0.02%	36,893	19%	19%
Assisted Living Facility	136	-	0%	136	0.07%	0.1%
Boat	233	181	0.10%	51	0.03%	0.1%
College Dorm	9	-	0%	9	0.005%	0.0%
Condo	18,500	13,491	7%	4,977	3%	10%
Correctional Facility	10	1	0%	9	0.005%	0.01%
House/Duplex	99,097	69,511	37%	29,465	16%	52%
Military Housing	13	-	0%	13	0.01%	0.01%
Manufactured Home	17,337	14,256	7.5%	3,044	2%	9%
Other	9,489	4,497	2.4%	4,955	3%	5%
Townhouse	7,526	5,279	2.8%	2,238	1%	4%
Travel Trailer	727	472	0.25%	252	0.1%	0.4%
GRAND TOTAL	190,024	107,726	57%	82,042	43%	100%

Table 15: FEMA IA – Housing Type Impact

The distribution of FEMA Individual Assistance applications in Pinellas County highlights significant disparities between homeowners and renters, as well as disparities across different housing types. Single-family homeowners residing in a house/duplex accounted for the largest share of owner applicants (37% of total applications), followed by renters in apartments (19%), owners in manufactured homes (7.5% of applications) and owners in condos (7% of total applications).

Renters, particularly those in apartments, were disproportionately impacted yet received limited assistance. Meanwhile, manufactured home residents represented a significant portion of affected homeowners - 7.5% of owner applications or more than 14,000 applicants - reinforcing the vulnerability of these structures to natural disasters.

FEMA IA – Applicants with Flood Damage

FEMA IA - Owner and Renter Flood Damage					
MID		Total Flood Damage	Applications with Flood Damage	Total Flood Damage	%
Pinellas (County)	Owner	\$255,857,664	13,533	\$238,046,289	93%
	Renter		4,887	\$17,794,298	7%

Table 16: FEMA IA – Applicants with Flood Damage

FEMA IA – Applicants and Damages without Flood Damage

FEMA IA Applications without Flood Damage - # of Applications			
MID	Owners without Flood Damage	Renters without Flood Damage	Total without Flood Damage
Pinellas (County)	43,075	35,795	78,870
	55%	45%	100%

Table 17: FEMA IA – Applicants and Damages without Flood Damage (# of Applications)

FEMA IA Applications without Flood Damage – Amounts			
MID	Total Owner Damages	Total Renter Damages	Total Damages
Pinellas (County)	\$22,600,106	\$3,241,652	\$25,841,758
	87%	13%	100%

Table 18: FEMA IA – Applicants and Damages without Flood Damage (Amounts)

Pinellas County received a total of 78,870 FEMA Individual Assistance applications from disaster-affected households that did not report flood damage. Among these, 43,075 applications (or 55%) came from homeowners, while 35,795 applications (or 45%) came from renters.

This data highlights the significant number of disaster-impacted households in Pinellas County that sustained damage from non-flood-related events and underscores the need for targeted recovery efforts beyond flood mitigation measures.

The total estimated damages for FEMA Individual Assistance applications without reported flood damage in Pinellas County amount to \$25,841,758. Of this total:

- Homeowners account for \$22,600,106 (or 87% of total damages).
- Renters account for \$3,241,652 (or 13% of total damages).

This data emphasizes that the majority of disaster-related damages in non-flood scenarios were sustained by homeowners, highlighting the need for focused recovery efforts to support owner-occupied housing rehabilitation and reconstruction.

FEMA IA Applicants with Flood Damage and without Flood Insurance			
MID	Total Applicants without Flood Insurance	Total Applicants Real/Personal Property FEMA Verified Loss	Total Real/Personal Property FEMA Verified Loss Amount
Pinellas (County)	164,594	10,546	\$114,740,257

Table 19: FEMA IA Applicants with Flood Damage and without Flood Insurance

FEMA IA Applicants with Flood Damage and with Flood Insurance			
MID	Total Applicants with Flood Insurance	Total Applicants Real/Personal Property FEMA Verified Loss	Total Real/Personal Property FEMA Verified Loss Amount
Pinellas (County)	25,430	8,199	\$146,359,519

Table 20: FEMA IA Applicants with Flood Damage and with Flood Insurance

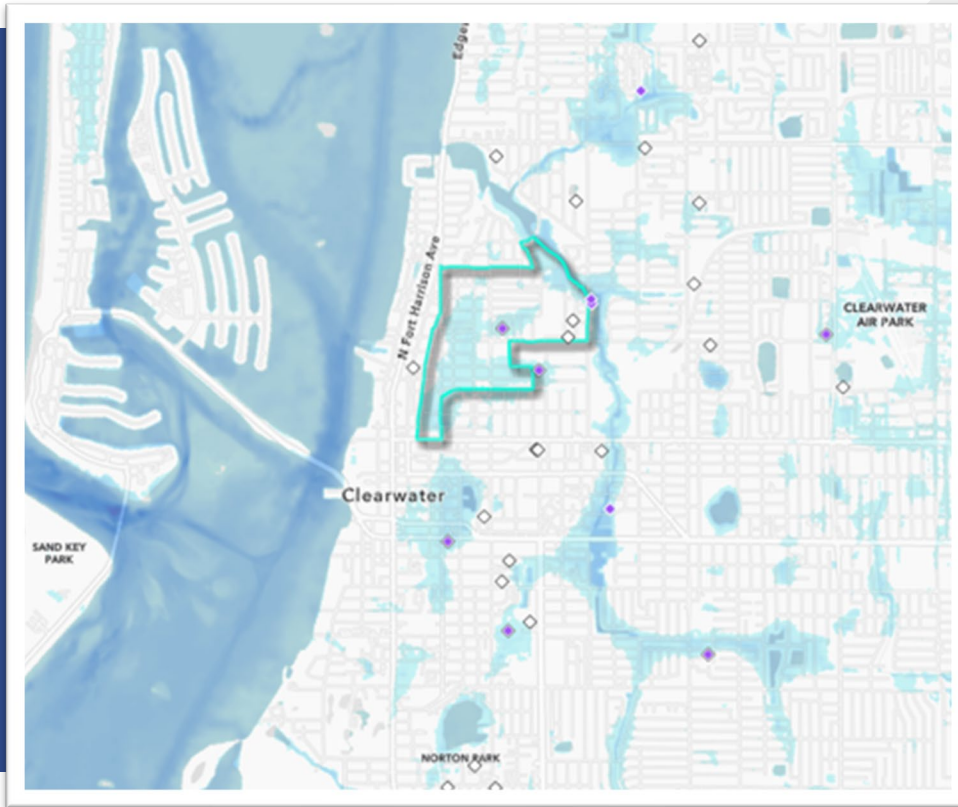
In Pinellas County, a significant number of disaster-affected households experienced flood damage without having flood insurance. A total of 164,594 applicants reported flood damage but did not have flood insurance coverage. Of these, 10,546 applicants had FEMA-verified losses for real or personal property, with total verified damages amounting to \$114,740,257. This data underscores a substantial gap in flood insurance coverage, highlighting the financial burden on uninsured households and the potential need for additional recovery assistance to address remaining unmet needs.

In Pinellas County, 25,430 FEMA Individual Assistance applicants with flood insurance coverage reported flood damage. Of these, 8,199 applicants had FEMA-verified losses for real or personal property, with total verified damages amounting to \$146,359,519. While these insured applicants had some financial assistance, the substantial amount of verified losses suggests that insurance payouts may not fully cover the cost of recovery, potentially leaving unmet need.

PUBLIC HOUSING (INCLUDING HUD-ASSISTED HOUSING) AND OTHER AFFORDABLE HOUSING

There is a total of 44 multifamily, federally assisted housing developments – including Section 8, HOME, Section 202, Public Housing and Low-Income Housing Tax Credits (LIHTC) – located within the Army Corp of Engineers' Flood Inundation Model for Pinellas County, totaling 148 assisted housing units that may have been impacted by the disasters. Although it is unlikely that individual housing units were directly flooded by the disasters, the building property management and community spaces, as well as utilities and mechanical systems, could have been damaged by the

disasters. Additionally, damage to buildings' mechanical systems creates uninhabitable conditions due to lack of power, water, and air conditioning.

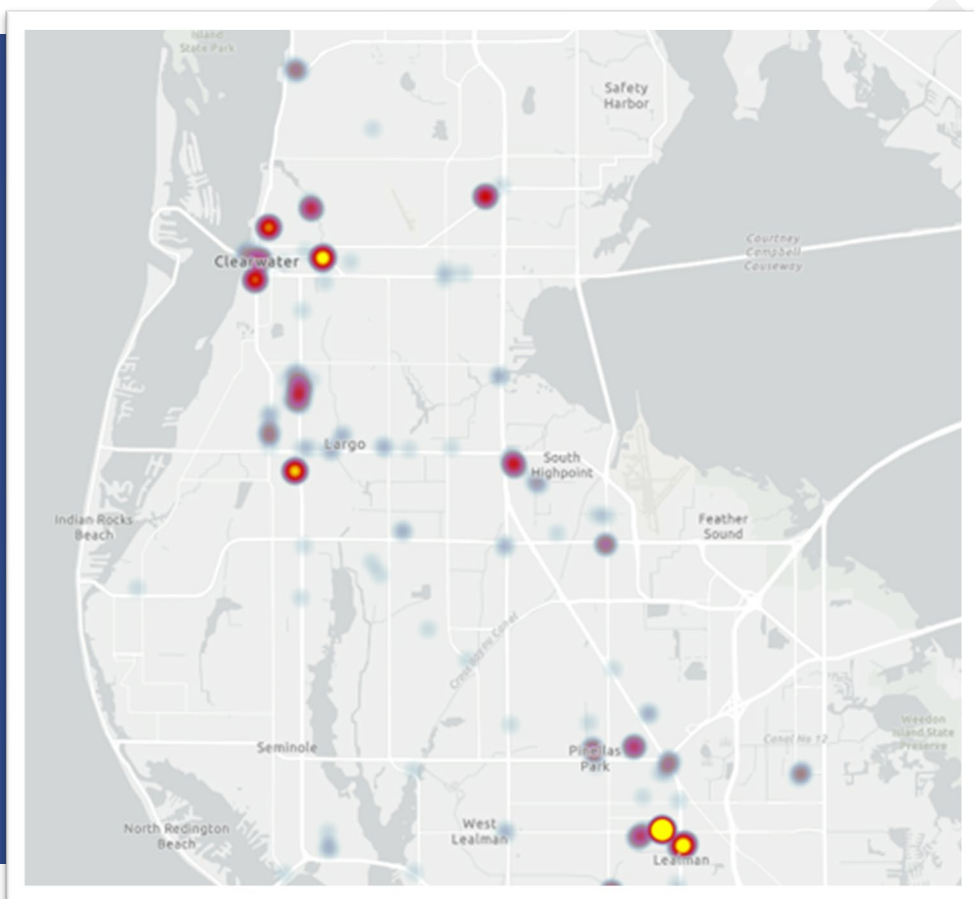


Map 12: Multifamily Assisted Properties located in the Army Corp of Engineers Flood Inundation Model, Source: USACE, National Housing Preservation Database (NHPD)

EMERGENCY SHELTERS, INTERIM AND PERMANENT HOUSING

To better align and understand housing impacts, Pinellas County consulted with the Continuum of Care program for Pinellas County. In FEMA-declared disaster areas, an estimated 20,408 individuals were homeless, with 6,104 in emergency shelters, 3,023 in transitional housing, and 11,281 unsheltered. For context, the Point-in-Time (PIT) count provides a snapshot of homelessness, including individuals in emergency shelters, transitional housing, and unsheltered settings. In Pinellas County (FL-502), an estimated 2,040 individuals were experiencing homelessness, with 1,060 in emergency shelters, 259 in transitional housing, and 721 unsheltered. Statewide, the total number of individuals impacted by disasters and experiencing homelessness was estimated to be 31,352, with 10,229 in emergency shelters, 4,155 in transitional housing, and 16,868 unsheltered. This data highlights the scope of homelessness both statewide and within disaster-affected areas, with Pinellas County reflecting a portion of the broader issue across Florida.

Per the heatmap of unsheltered individuals within Pinellas County, a high concentration of unsheltered individuals is concentrated in the cities of Clearwater, Lealman, Largo, and Pinellas Park.



Map 13: Heatmap of unsheltered individuals within Pinellas County

Geography	Emergency Shelter	Transitional Housing	Unsheltered	Total
Pinellas County (FL-502)	1,060	259	721	2,040

Table 21: Point-in-Time Count of Individuals – Type of Shelter

Geography	Emergency Shelter	Transitional Housing	Unsheltered	Total
Statewide	10,229	4,155	16,868	31,352
FEMA Declared	6,104	3,023	11,281	20,408
Pinellas County (FL-502)	1,060	259	721	2,040

Table 22: Point-in-Time Count of Individuals – Impacted by Disaster

Infrastructure

Hurricanes Idalia, Helene, and Milton caused flooding and damage infrastructure systems throughout Pinellas County, including but not limited to roadways, stormwater, and wastewater treatment systems. Many neighborhoods' streets throughout the coastal areas and flood zones along the Gulf Coast were severely impacted, driving residents and businesses away from their flooded homes and businesses. This section points to the losses and damage to infrastructure in Pinellas County as a result of the disasters.

PA Category	Estimated PA Cost	30% Resiliency	26.9% Increased Cost of Building Materials	25% Local Match (Total Unmet Need)
A - Debris	\$177,220,541	\$ -	\$ -	\$ -
B - Emergency Measures	\$13,518,518	\$ -	\$ -	\$ -
C - Roads and Bridges	\$11,576,819	\$3,473,046	\$4,048,413	\$4,774,569
D - Water Control Facilities	\$26,899,815	\$8,069,944	\$9,406,865	\$11,094,156
E - Building and Equipment	\$50,333,076	\$15,099,923	\$17,601,477	\$20,758,619
F - Utilities	\$10,856,226	\$3,256,868	\$3,796,422	\$4,477,379
G - Other	\$114,925,065	\$34,477,519	\$40,189,295	\$47,397,970
TOTAL	\$405,330,059	\$64,377,300	\$75,042,473	\$88,502,693

Table 23: Infrastructure Impacts to Pinellas County

The unmet infrastructure need is calculated by an assessment of losses to public infrastructure under the FEMA Public Assistance Program (local government cost share 25 percent) and FEMA Hazard Mitigation Projects (local government cost share 25 percent).

County	Estimated Total Cost	Estimated Federal Share 75%	Estimated Non-Federal Cost Share 25%
Pinellas	\$416,248,206	\$312,186,155	\$104,062,052

Table 24: Infrastructure Needs (HMGP) to Pinellas County

Infrastructure impacts appear to be sufficiently addressed with currently available assistance, coupled with planned mitigation set-aside funding.

Economic & Community Revitalization

In the wake of hurricanes Idalia, Helene and Milton, businesses in Pinellas County – especially along the coast of the Gulf of America – faced severe economic impact, resulting in financial losses. According to SBA Business data, the current verified losses for impacted business stand at over \$596 million. This figure represents the total estimated economic damage by business due to business content, equipment losses, and property/real estate damages. These types of losses can profoundly impact local economies, reducing revenue streams, impacting employment, and reducing economic productivity.

To support recovery efforts, total assistance provided through the SBA and private insurance amounts to approximately \$71 million. While this funding provides relief for business owners to initiate their recovery, it only covers a fraction of the estimated total loss.

The resulting economic unmet need, the difference between total verified loss, and the assistance provided amounts to more than \$525 million. This gap indicates that businesses may still need recovery and mitigation assistance to rebuild operations to pre-disaster levels.

SBA Business Disaster Analysis		
Current Verified Loss	Total Assistance	Economic Unmet Need
\$596,833,908	\$71,560,775	\$525,273,133

Table 25: SBA Business Impact Analysis

Pinellas County local businesses were impacted significantly, realizing nearly \$600M in damages to business contents and real estate, with approximately \$71M coming in from SBA and private insurance companies to cover these losses. This suggests that local businesses have unmet recovery needs for physical damage, but these impacts can also point to loss of employees and need for non-physical recovery assistance, e.g. Workforce Training.

Impacts to Nonprofit Organizations

On average, SBA loans covered only 23% of verified losses across all applicants, leaving most disaster-related damages unreimbursed. Small and mid-sized nonprofits were particularly underfunded, often receiving awards far below their verified losses despite serving critical roles in storm-impacted communities. This funding gap has severely constrained their ability to resume full operations or sustain pre-disaster service levels—particularly for the low- and moderate-income residents who depend on their programs.

Most nonprofits received loan amounts clustered around \$399,700, suggesting the use of standardized loan tiers or caps rather than a needs-based approach. Even organizations with verified losses exceeding \$45 million did not necessarily receive higher loan amounts. This pattern indicates that other factors — such as eligibility criteria, underwriting constraints, or organizational capacity — may have played a larger role in determining award levels. One of the strongest predictors of loan amount was employment size. Nonprofits with more employees were more likely to secure higher loan awards, suggesting that staffing levels may have served as a proxy for operational scale or economic impact.

Reported gross income values were consistently listed as \$0, which may reflect the structure of nonprofit reporting or limitations in SBA intake systems. However, the lack of operating income or reserve funding among many applicants reinforces the financial vulnerability of these organizations and their limited ability to absorb disaster-related losses without direct support. Given the apparent mismatch between verified damages and awarded assistance, particularly for smaller or service-based nonprofits, there is a clear unmet need for targeted financial support. These organizations often lack insurance coverage or collateral, disqualifying them from traditional lending. CDBG-DR funds provide a necessary resource to stabilize and restore critical nonprofit infrastructure, particularly those serving low- and moderate-income populations.

SBA Nonprofit Business Disaster Analysis					
Total Applications	Current Loan Amount	Sum Insurance Assistance	Current Verified Loss	Sum of Current Real Estate	Sum of Current Contents
378	\$ 1,455,800	\$ 10,538,858	\$ 135,065,205	\$ 806,305	\$ 97,200

Table 26: SBA Nonprofit Business Impact Analysis

Public Services

In the wake of Hurricanes Idalia, Helene, and Milton, thousands of households in Pinellas County experienced substantial economic hardship, including loss of income, inability to cover basic expenses, and prolonged displacement. Using a combination of FEMA Individual Assistance data and Census Household Pulse Survey findings, the County estimates more than 7,000 low- to moderate-income households face sustained hardship not fully addressed by existing federal or state programs. These findings support the establishment of a Disaster Relief Payments Program under the CDBG-DR Universal Notice to reimburse eligible households for critical out-of-pocket costs incurred in the aftermath of the storms, including housing, utilities, and other essential living expenses.

The U.S. Census Bureau, in collaboration with multiple federal agencies, developed the Household Pulse Survey (HPS) to rapidly collect and disseminate real-time data on social and economic issues affecting American households. The survey was designed to provide timely insights to inform federal and state policy decisions.

Due to the lack of specific data for Pinellas County, Pinellas County used data from the State of Florida and the Miami-Dade metro area as a proxy to estimate local economic and social conditions. This approach ensures that available data provides a reasonable approximation of the challenges faced by households in Pinellas County that are impacted by the disaster, offering a basis for assessing unmet needs and informing disaster recovery strategies. These trends were validated using county-level eviction and foreclosure data from the Florida Housing Data Clearinghouse. Notably, the timelines for evictions and foreclosures differ. According to the 2005 Florida Code – Chapter 83, a landlord may initiate eviction proceedings 10 to 15 days after providing the first notice of rent delinquency. In contrast, under Florida law (12 CFR 1024.41), a homeowner is not considered delinquent on a mortgage until 120 days (or four months) have passed without payment. Data from the Florida Housing Data Clearinghouse shows a modest decline in eviction proceedings immediately following Hurricane Idalia (August 2023). However, eviction filings began to rise in December 2023 and January 2024, and increased again after

Hurricane Helene (November 2024), continuing to rise through January 2025. This trend suggests that renters likely experienced financial instability following the disasters.

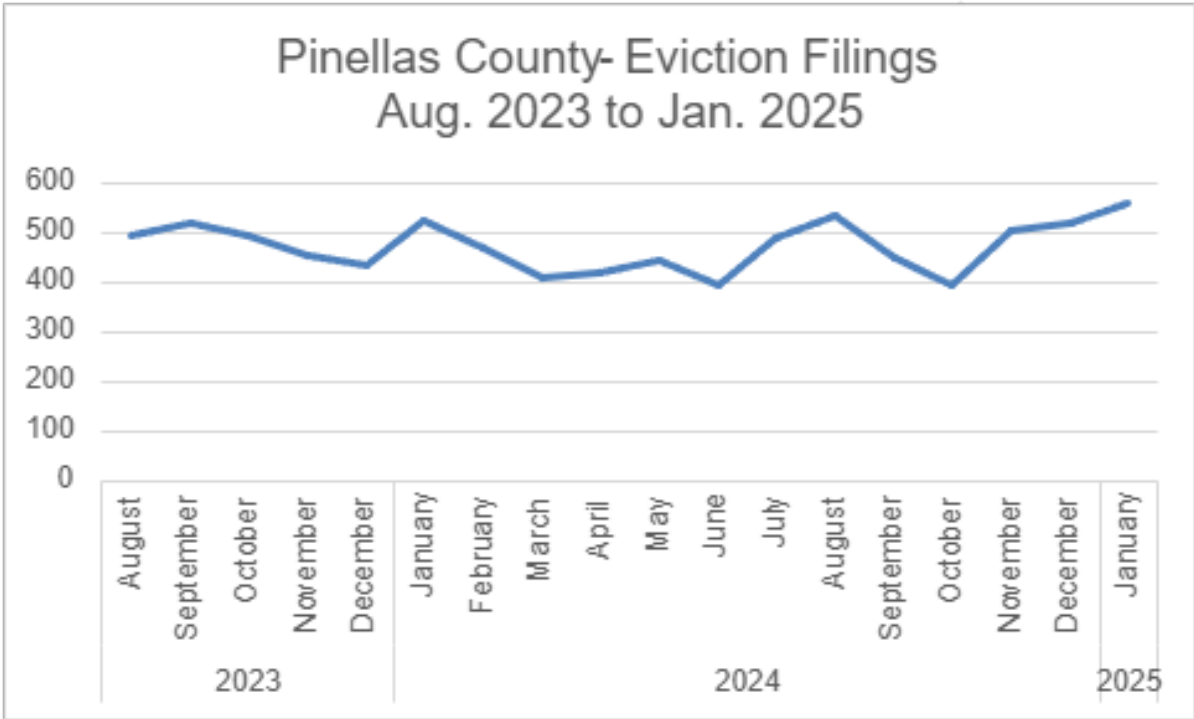


Figure 9: Eviction Filings from August 2023 to January 2025 for Pinellas County

Foreclosure data tells a similar story, though with a delayed timeline. While foreclosure filings declined in the months immediately after Hurricane Idalia, they spiked 120 days later, increasing by 741%, from 12 filings in December 2023 to 101 filings in January 2024. A similar upward trend in foreclosure filings is observed following Hurricane Helene. These findings strongly suggest the financial hardships faced by mortgage-holding homeowners as a result of the disasters.

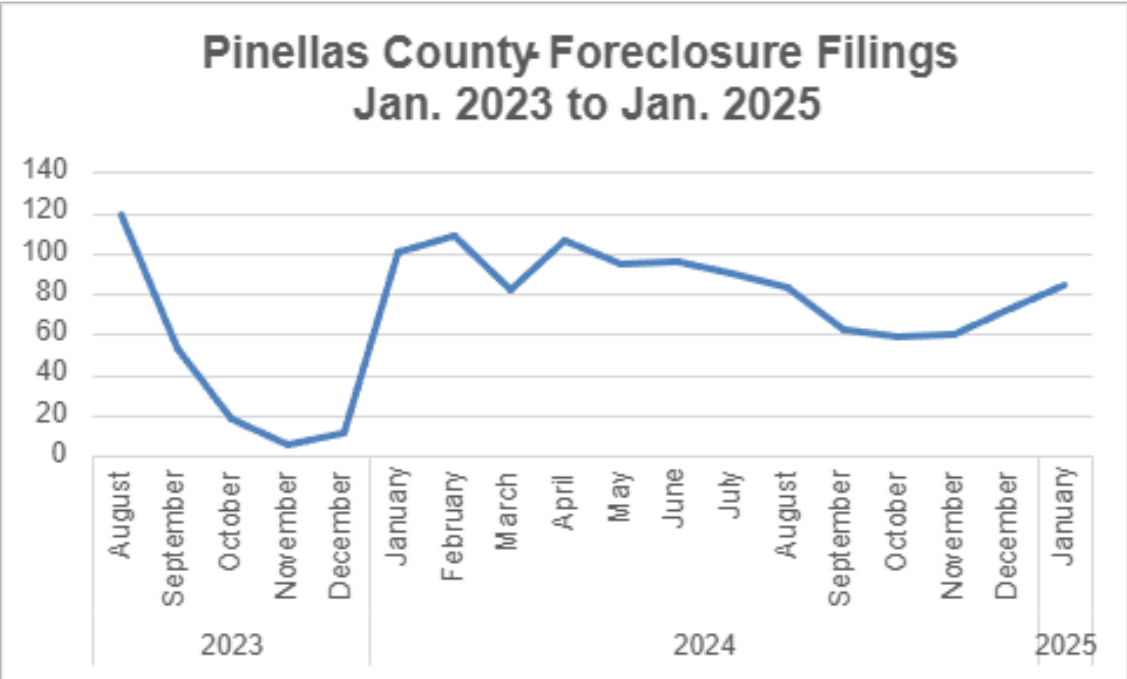


Figure 10: Foreclosure Filings from January 2023 to January 2025 for Pinellas County

Recent data from the U.S. Census Household Pulse Survey¹⁰ (August–September 2024) highlights widespread financial hardship among households, reinforcing the need for CDBG-DR disaster relief assistance to support low- and moderate-income persons.

- Household Expenses:** 41.1% of adults reported somewhat or very difficult conditions in paying for usual household expenses in the past week, indicating a significant need for financial relief.
- Eviction & Foreclosure Risk:** 14.6% of adults in households not current on rent or mortgage reported that eviction or foreclosure in the next two months is somewhat or very likely, demonstrating a clear demand for rental and mortgage assistance.
- Utility Hardship:** 20.3% of adults in households were unable to pay an energy bill in full in the last 12 months, reinforcing the necessity of utility assistance as a key component of unmet needs.
- Rising Costs:** 82.1% of adults believe prices have increased in their area over the past two months, suggesting that inflation is exacerbating financial strain for disaster-affected individuals.

The aftermath of recent disasters has led to significant economic challenges, particularly in employment and household stability. The pre-disaster unemployment rate in the impacted area was 3.1% (August 2023), but following the disasters, this rate increased to 3.8% (November 2024)

¹⁰ <https://www.census.gov/programs-surveys/household-pulse-survey.html>

- a 0.7% rise in unemployment. This increase suggests a notable impact on local labor markets, exacerbating financial strain on affected households.

An estimated 50,333 FEMA Individual Assistance inspections have been conducted for both owners and renters, reflecting potential displacement and/or wage losses. Based on Census Pulse Survey findings, an estimated 39% of LMI households reported serious difficulty paying for basic household expenses post-disaster. Based on this ratio, an estimated 7,067 of the 18,120 LMI households in the impacted area are likely experiencing hardship consistent with the types of needs Disaster Relief Payments are designed to address.

The estimated number of individuals rendered unemployed due to the disasters is 2,906. Given an assumed minimum wage of \$13 per hour and a 40-hour workweek, the weekly wage is estimated at \$520, leading to a monthly wage of \$2,080 based on 4 weeks per month. Over a six-month period, this resulted in a total disaster wage impact of \$36,271,697.

Households impacted by disaster-related unemployment face considerable financial distress. Based on an assumed monthly expense of \$2,350 (covering rent/mortgage and utilities), the total hardship is estimated at \$298,923,660. FEMA Individual Assistance and Other Needs Assistance (ONA) programs have provided \$163,092,023 to affected households, but a significant hardship unmet need of \$135,831,637 remains.

Additionally, unemployment benefits provide limited relief. The Florida Unemployment Cap is \$3,300 per individual, leading to an estimated unemployment assistance total of \$9,591,074. However, even with this aid, the unmet need for wages due to disaster-related job losses remains at \$26,680,623.

In summary, FEMA IA/ONA and unemployment benefits are capped and time-limited, and do not account for the full duration or cost of recovery-related hardship. Further, while FEMA and ONA assistance totaled \$163 million, the County estimates a remaining hardship-related unmet need of more than \$135.8 million. Unemployment assistance alone addresses only one-third of disaster-related wage losses.

Key Assumptions

- FEMA IA applicants experienced a disaster-related hardship.
- LMI and hardship household estimates are based on Census and FEMA IA data.
- The average monthly housing and utility expenses are \$2,350.
- Potential displacement periods are averaged from major disasters, including Hurricane Idalia (18 months) and two additional storms (Helene and Milton, approximately 5 months each).

The economic fallout from the disasters has placed thousands of households at financial risk, with many struggling to recover from job losses and increased living expenses. While federal and state

assistance has helped, a significant unmet need remains, requiring additional targeted support for LMI individuals and households.

Data	Figures	Calculation
Total Number of FEMA IA Inspections (Owner/Renter)	50,333	
UNA - LMI Rate	36%	18,120
US Census Hardship Average Rate	39%	7,067
Assumed Monthly Expenses (Rent/Mortgage/Utilities)	\$2,350	
Months since first disasters	18	\$42,300
Hardship Impact		\$298,923,660
Hardship Assistance (FEMA IA ONA)		\$163,092,023
HARDSHIP UNMET NEED		\$135,831,637
Assumptions		
<ul style="list-style-type: none"> Any FEMA Individual Assistance applicant who was impacted enough to apply for aid is likely experiencing some level of hardship Assumed LMI Households Assumed Hardship Households Average rent/mortgage \$2000, Utilities \$350 Time period of potential displacement, average of months from each disaster Idalia (18 months), Helene (5 months), Milton (5 months) 		

Table 27: Hardship Needs Analysis

Data	Figure
Pre-Disaster Unemployment Rate	3.1%
Post-Disaster Unemployment. Rate	3.8%
Increase Unemployment Rate	0.7%
Labor Force	415,198
Est. Unemployment	2,906
Weekly Wages (40 hours/week)	\$520
Monthly Wages (Assumes 4 weeks/month)	\$2,080
6-Month Wages	\$12,480
Disaster Wage Impact	\$36,271,697
Florida Unemployment Cap	\$3,300
Est. Unemployment Assistance	\$9,591,074
UNMET NEED (Wages)	\$26,680,623

Table 28: Wages Unmet Needs Analysis

Mitigation Needs Assessment

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

This assessment does not look only at flood risk. It also considers other natural hazards likely to threaten Pinellas County, including tropical cyclones, severe thunderstorms, wildfires, erosion, extreme heat draught, geological events, winter storms, seismic events, tsunami, and red tides. These hazards were identified in Pinellas County's Local Mitigation Strategy (LMS) as well as the State of Florida's State Hazard Mitigation Plan (SHMP).¹¹

In addition to current hazards posed to Pinellas County, the Mitigation Needs Assessment considers future threats, particularly as severe weather events become more frequent and intense. In this way, Pinellas County can ensure that it minimizes vulnerabilities to the impacts of future extreme events through its recovery and mitigation projects and programs.

This assessment will provide a basis upon which to propose programs and projects that will mitigate current and future hazards. In addition, it will inform projects undertaken through CDBG-DR so that they make the best possible use of scarce resources for recovery and mitigation while not exacerbating natural hazard threats.

As part of this assessment, Pinellas County also sought to identify and address risks to indispensable services, or those services that enable continuous operation of critical business and government functions and/or are critical to human health and safety and economic security.

Pinellas County estimates that there is an estimated total of \$3,968,744,660 in unmet recovery needs across the presidential declaration disasters (DR-4734-FL) (DR-4828-FL) (DR-4834-FL) that impacted 24 municipalities and unincorporated areas of Pinellas County.

¹¹ <https://flshmp-floridadisaster.hub.arcgis.com/>

Cities			
• Belleair Beach	• Indian Rocks Beach	• Pinellas Park	• South Pasadena
• Belleair Bluffs	• Kenneth City	• Safety Harbor	• Tarpon Springs
• Clearwater	• Largo	• St. Pete Beach	• Treasure Island
• Dunedin	• Maderia Beach	• St. Petersburg	
• Gulfport	• Oldsmar	• Seminole	
Towns			
• Belleair	• Indian Shores	• Redington Beach	
• Belleair Shore	• North Redington Beach	• Redington Shores	
Unincorporated			
• Pinellas Unincorporated			

Table 29: Pinellas County Units of Local Governments

Florida State Hazard Mitigation Plan (SHMP)

The Florida Enhanced State Hazard Mitigation Plan is designed to reduce death, injuries, and property losses caused by natural hazards in Florida. The plan identifies hazards based on the history of disasters within the state and lists goals, objectives, strategies, and actions for reducing future losses. Implementation of planned, pre-identified, and cost-effective mitigation measures not only helps reduce loss to life, property, and the environment, but also streamlines the disaster recovery process. Hazard mitigation is most effective when based on an inclusive, comprehensive, long-term plan that is developed before a disaster occurs

The 11 identified major natural hazards in the SHMP are:

- Flood
- Tropical Cyclone
- Wildfire
- Severe thunderstorm
- Sinkhole
- Extreme heat
- Erosion
- Winter weather
- Drought
- Earthquake
- Tsunami

The relative ranks of various risk analysis factors, including county area, population distribution, exposed population distribution, built environment, critical infrastructure, state operations and facilities, first responder facilities, economic consequences and environmental impact are combined to create a cumulative hazard risk index for each county.

Pinellas County Local Mitigation Strategy (LMS)

The Pinellas County LMS identifies 12 of the natural hazards that are of significant risk in Pinellas County, and specifically hazardous to the coastal communities of Pinellas County. These are categorized as Risk values, as High, Moderate and Low in the table below.

High Risk	Moderate Risk	Low Risk
Flooding	Wildfires	Winter Storms
Tropical Cyclones	Erosion	Seismic Events
Severe Storms	Extreme Heat	Tsunami
	Drought	Red Tide
	Geological Events	

Table 30: Risk Values

High Risk

Pinellas County categorizes the following three types of natural events as High Risk. These events are considered highly likely to occur and would have a critical impact.

FLOODING: HIGH RISK

Types of Flooding: A flood or flooding refers to the general or temporary conditions of partial or complete inundation of normally dry land areas from the overflow of inland or tidal water and of surface water runoff from any source. If local conditions cannot accommodate intense precipitation through a combination of infiltration and surface runoff, water may accumulate and cause flooding. Floodplains are defined as any land area susceptible to being inundated by water from any flooding source. While many people underestimate the severity of floods, it is one of the most prevalent and damaging hazards in Florida. This hazard profile will focus on two types of flooding:

1. Inland Flooding

- River Reach
- Flash floods
- Dam or Dike Failure

2. Coastal Flooding

- Tidal Flooding

Inland or Riverine Flooding: Florida's low-lying topography, combined with its subtropical climate, makes the state highly vulnerable to inland or riverine flooding. Riverine flooding occurs when the flow of runoff is greater than the carrying capacities of the natural drainage systems. Flood damage is proportional to the volume and the velocity of the water. High volumes of water can move heavy objects and undermine roads and bridges. Flooding can occur because of precipitation upstream, without any precipitation occurring near the flooded areas.

Flash floods present more significant safety risks than other riverine floods because of the rapid onset, the high-water velocity, the debris load, and the potential for channel scour. In addition, more than one flood crest may result from a series of fast-moving storms. Sudden destruction of structures and the washout of access routes may result in the loss of life. Although rural flooding is dangerous to fewer people and may be less costly than urban flooding, it can cause great damage to agricultural operations. The U.S. Geological Survey has established a system of monitoring stations to retrieve data about stream flow conditions. This system works in real time for flood warnings and for short-term trends.

River Reach: The influence of tides and storm surges on the river stage gradually increases the flood levels in bodies of water. Tides affect river stages at low and medium flows in the upper tidal reach and at all flows in the lower tidal reach. In the lower part of the lower tidal reach, stages during storm surges are higher than river flood stages. Soil is present in all riverine wetland forests, but the most nutrient-rich swamps are dry during low-flow periods. Most surface soils in the deepest riverine swamps, upper and lower tidal swamps, and lower tidal mixed forests are continuously saturated.

Upper Tidal Reach: Upper tidal mixed forests are found on low levees or in transitional areas between swamps and higher forest types. Upper tidal swamps are present at elevations below median monthly high stage and usually have surface soils that are permanently saturated mucks.

Lower Tidal Reach: The lower tidal reach in a floodplain is found on elevations that do not receive regular tidal inundation or frequent river flooding but have a high-water table and are briefly inundated by storm surges several times a decade. Lower tidal mixed forests include swamps with numerous small reaches and are found on deep muck soils that are below the elevation of the median daily or monthly high stage.

Flash Floods: As Florida's population has rapidly increased since 1960, so has the profile of the state's landscape. Rapid urbanization has manifested itself in the form of increased impervious surface areas such as asphalt roads, concrete areas, sidewalks, and structures. This increase has led to a much higher level of flash flooding during heavy rainstorms and flooding events. The design of urban drainage systems in the past has concentrated on disposing of storm water as rapidly and efficiently as possible in a concentrated area; however, stormwater is often collected and transported elsewhere without a comprehensive strategy for dealing with it as a system. As a result, drainage in many of Florida's urbanized areas is often "piecemeal" and lacks comprehensive design.

Dam/Dike Failure Flooding: The failure of a dam or dike may also result in a flood event. The amount of water impounded by a dam is measured in acre-feet; an acre-foot of water is the volume that covers an acre of land to a depth of one foot. Dam failures are not routine. Two factors influence the potential severity of full or partial dam failure: (1) the amount of water impounded, and (2) the density, type, and value of development downstream.

National Inventory of Dams, a congressionally authorized database that is maintained by USACE and documents dams in the United States, assigns structures with a high, significant, or low hazard classification based on potential for loss of life and damage to property if the dam fails. Classifications are updated based on development and changing demographics upstream and downstream.

Dam hazard is a term indicating the potential hazard to the downstream area resulting from failure or operational errors of the dam or facilities. The level of risk associated with dams is classified into three categories based on definitions from USACE.

- **LOW:** A dam where failure or operational error results in no probable loss of human life and low economic and/or environmental loss. Losses are principally limited to the owner's property.
- **SIGNIFICANT:** A dam where failure or operational error results in no probable loss of human life but can cause economic loss, environmental damage, disruption of lifeline facilities, or affect other concerns. These dams are often located in predominantly rural or agricultural areas but could be in areas with more dense populations and significant infrastructure.
- **HIGH:** A dam where failure or operational error will probably cause loss of human life.

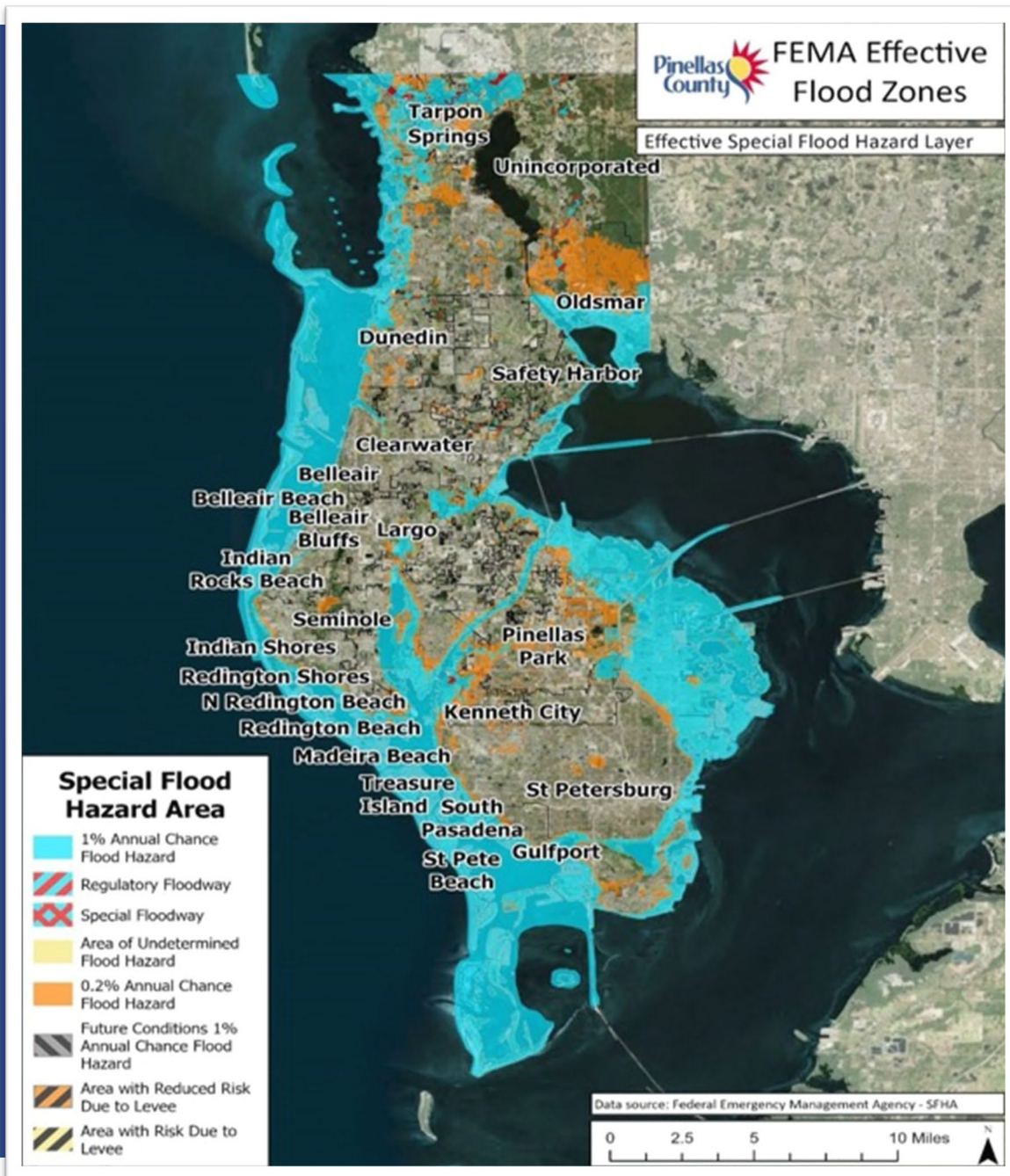
Pinellas County has 10 dams identified within the National Dam Inventory, with two of them being identified as "high," three as "significant," and the remaining five as "low".

The Florida DEP coordinates the Florida Dam Safety Program and maintains information for more than 1,200 federal and non-federal dams in the state. It has been determined that the river systems and the immediate areas around these dams are the zones with the highest vulnerability to flooding resulting from dam failure. Overall, dam failure is a low priority with respect to flooding since the risks of coastal and inland flooding is much higher.

Coastal Flooding: A coastal flood is caused by higher-than-average high tides and worsened by heavy rainfall and onshore winds. Storm surge is an abnormal rise in water levels in coastal areas caused by forces generated from a severe storm's wind, waves, and low atmospheric pressure. Storm surge is dangerous because it is capable of flooding large coastal areas. Extreme flooding can occur in coastal areas particularly when storm surge coincides with normal high tide. The damaging effects to structures in beach areas are caused by a combination of higher levels of storm surge, winds, waves, rains, erosion, and battering by debris. Sea walls, jetties, and the beach areas are affected by coastal flooding, and the loss over a period of time becomes costly. Loss of life and property damage are often more severe because a storm surge involves velocity wave action and accompanying winds.

Tidal Flooding: A tide is the periodic rise and fall of a body of water resulting from gravitational interactions between the sun, moon, and Earth. The tides are very predictable, and most coastal areas experience two high tides and two low tides every day. High tides occur about every 12 hours and 25 minutes, and it takes about half that time (6 hours and 12.5 minutes) for the tide to go from high to low or low to high. King tides are higher than normal tides and usually occur in the autumn months from September–November. These tides tend to be six inches or more above the average high tide of that area. Similar to regular high and low tides, king tides are predictable and usually last for 5–7 days. King tides can cause flooding of streets and even structures. It is also important to note that weather conditions and concurrent rainfall can exacerbate the effects of king tides.

Floodplain: FEMA identifies a floodplain as any land area susceptible to being inundated by floodwaters, from any source. The USGS further defines a floodplain as the relatively flat lowland that borders a river and is usually dry but is subject to flooding. To establish floodplains, FEMA adopted the base flood elevation, which is the level of a flood that has a 1% probability of occurring in any given year. The flood level with a 1% chance of being equaled or exceeded in any given year is commonly referred to as the base flood, the 1% flood, or the 100-year flood. The area that would be inundated by a base flood is called the 100-year floodplain. This is often misunderstood because many assume such a flood would only occur once every 100 years; however, as explained, the "100" number is referring to the 1% chance of the flood reaching that specified floodplain. The same theory is applied to understand the 500-year floodplain; it has a 0.2% chance of occurring each year.



Map 14: FEMA Effective Flood Zones (Pinellas County)

Geographic Areas affected by Flood: The entire State of Florida is particularly susceptible to flooding due to the large amounts of coastline, significant drainage systems, and the relatively low elevations. Many other factors contribute to flooding in Florida and therefore help to define the geographic area impacted by flooding. Areas along waterways, including lakes, rivers, streams, and wetlands, are particularly susceptible to flooding due to heavy storms and rain or storm surge.

All communities in Pinellas County are exposed to flood hazards and likely to be impacted frequently by flooding in the future. All communities have had flood insurance claims filed for damage in the past. All but two jurisdictions (Kenneth City and Seminole) have multiple repetitive loss properties. Variable climate impacts are likely to worsen exposure for coastal communities, but inland communities could also be impacted by more frequent, and higher volume precipitation events.

Historical Occurrences of Flood: Pinellas County has experienced a number of damaging flood events in recent history. These flooding events range from significant rain events to tropical cyclones and storm surges that hit Pinellas County.

Additionally, there have been several FEMA major disaster declarations in Pinellas County related to flooding events.

Probability of Future Floods: Based on historical knowledge and an understanding of floodplains, it is believed that Pinellas County will continue to experience flooding events on an annual basis. Specific probability is difficult to determine; however, 100-year and 500-year estimates help provide a baseline understanding. It is likely that Pinellas County will continue to be impacted annually by flooding due to any number of causes.

Flood Impacts: All communities in Pinellas could bear the following impacts due to flooding. Variable climate impacts are likely to worsen exposure for coastal communities, but inland communities could also be impacted by higher volume and more frequent precipitation events.

- **Public – Injury/Death:** Drowning, vehicle accidents, extended wait for emergency response, becoming stranded on rooftops or trapped in a flooded building or car, exposure to hazardous material or water.
- **Traffic:** Panic to evacuation, accidents from driving through flooded roads, car washed away, water deeper than expected.
- **Damage to Property:** Mold infestation, need to replace property damaged, furniture, clothes
- **Responders -Injury/Death:** Responding to calls during flooding, traversing flooded roads, drowning, dangerous rescue missions, exposure to hazardous materials.
- **Continuity of operations:** Floodwaters may hinder access to buildings (roads, sidewalks), damage buildings or electrical systems.
- **Property Facilities, Infrastructure:** Heavy debris, storm systems overwhelmed by flood waters.
- **Environment:** Release of wastewater could damage the environment, damage to habitat for plants and animals, Inundation of agricultural areas could destroy crops, Event-generated debris impacting waterway navigation and submerged wetland habitats.

- **Economic Condition:** Closure or delay of businesses because of flooded roads or water damage leads to loss in revenue, crop damage or loss leads to decline in agricultural revenues.

Mitigation Strategies: Pinellas County will continue to take steps to reduce the high risks of flooding by implementing several strategies. These strategies include continued outreach to residents and businesses, through workshops and public websites. Workshops provide an opportunity for residents and businesses to know their flood risks and share concerns regarding this hazard. These workshops also set goals and outline actions that can reduce or prevent loss of life, loss of property, or other threats caused by flooding. Other strategies include promoting flood-proofing measures for individual properties and public service buildings, enforcing strict land use planning to prevent construction in floodplains, and enhancing stormwater management systems. Pinellas County will also raise awareness about flood risks and collaborate with local government agencies to secure CDBG-DR funding for mitigation projects. All these efforts aim to minimize the impact of flooding on the community. For more detailed information please refer to Pinellas County LMS.

Tropical Cyclone: High Risk

A tropical cyclone is a rotating organized system of clouds and thunderstorms that originates over tropical or subtropical waters and has a closed low-level circulation. Tropical cyclones rotate counterclockwise in the Northern Hemisphere and clockwise in the Southern Hemisphere and have an average diameter of 200 to 400 miles across. These storms form when a developing center of low-pressure moves over warm water and pressure drops (measured in millibars or inches of Mercury) in the center of the storm. As the pressure drops, the system becomes better organized, and the winds begin to rotate around the low pressure, pulling in the moist, warm ocean air. This is what causes the wind and rain associated with a tropical cyclone. If all the conditions are favorable (warm ocean water and favorable high-altitude winds), the system could build to a point where it has sustained winds of 150 mph with gusts of up to 20 mph, and it could become catastrophic if it makes landfall in populated areas. Tropical cyclones act as a safety valve that limits the build-up of heat and energy in tropical regions by maintaining the atmospheric heat and moisture balance between the tropics and the poleward latitudes. As the storm system rotates faster, an eye forms in the center. Higher-pressure air from above flows down into the eye. Tropical cyclones occasionally strengthen to become tropical storms or hurricanes. The following are descriptions of the four general levels of development for tropical cyclones:

Tropical cyclones occasionally strengthen to become tropical storms or hurricanes. The following are descriptions of the four general levels of development for tropical cyclones:

- **Tropical depression:** The formative stages of a tropical cyclone in which the maximum sustained (1-min mean) surface wind is < 38 mph.
- **Tropical storm:** A warm core tropical cyclone in which the maximum sustained surface wind (1-min mean) ranges from 39 to 73 mph.
- **Hurricane:** A warm core tropical cyclone in which the maximum sustained surface wind (1-min mean) is at least 74 mph.
- **Major Hurricane:** A warm core tropical cyclone in which the maximum sustained surface wind (1-min mean) is at least 111 mph.

Hurricanes are further ranked by wind speed from Category 1 to 5, with 5 being catastrophic.

Tropical Storm: Tropical Storm Watch: Issued when sustained winds of 39 to 73 mph are possible in the specified area within 48 hours in association with a tropical cyclone. These watches are issued 48 hours in advance of the anticipated onset of tropical storm force winds because preparedness activities become difficult and unsafe once winds reach tropical storm force.

Hurricane: Hurricane Watch: Issued when 74 mph winds or higher are possible in the specified area within 48 hours in association with a tropical cyclone. Because preparedness activities become difficult once winds reach tropical storm force, the hurricane watch is issued 48 hours in advance of the anticipated onset of tropical storm force winds.

Hurricane Warning: Issued when 74 mph winds or higher are expected in the specified area within 36 hours in association with a tropical cyclone. Because preparedness activities become difficult once winds reach tropical storm force, the hurricane warning is issued 36 hours in advance of the anticipated onset of tropical storm force winds.

Storm Surge: Storm Surge Watch: Issued when there is the possibility of life-threatening inundation from rising water moving inland from the shoreline in the specified area, generally within 48 hours, in association with an ongoing or potential tropical cyclone.

Storm Surge Warning: Issued when the danger of life-threatening inundation from rising water moving inland from the shoreline in the specified area, generally within 36 hours, in association with an ongoing or potential tropical cyclone. Storm Surge Watches and Warnings may be issued earlier based on timing forecasts and may be issued for locations adjacent to expected life-threatening inundation areas.

Geographic Areas Affected by Tropical Cyclones: The entirety of Pinellas County is subject to the effects of tropical cyclones, but some areas are more vulnerable than others. This is due to its large areas of coastal shorelines on the Gulf Coast. The average diameter of hurricane force winds averages 100 miles, and tropical storm force winds extend out 300–400 miles; while at the same time, no point within Pinellas County is more than 20 miles from the Gulf of America. Tropical cyclones are random in distribution, so there is no specific region of Pinellas County that might experience more tropical cyclones than other regions; however coastal areas are more vulnerable to storm surge, and two-thirds of Pinellas County is at risk when it comes to Category 5 storm surge.

Historical Occurrences of Tropical Cyclones: According to the National Centers for Environmental Information (NCEI) Storm Events Database, there were 27 reports of tropical cyclones in Pinellas County from 1996 to 2023, two major hurricanes in 2024, and 14 reports of storm surge from 1998 to 2023.

Probability of Future Tropical Cyclones: Since tropical cyclones are random in distribution, it is impossible to forecast whether Pinellas County will experience a tropical cyclone. However, because of the high frequency of tropical cyclones that have affected Florida in the past, it is reasonable to assume that Florida will experience tropical cyclones again in the future.

Probability Based on Historical Occurrences: An analysis of tropical cyclone reports from 1996 to 2018 in Pinellas County from the NCEI Storm Events Database indicates that there will be less than one tropical storm, less than one hurricane, and less than one storm surge event each year in Pinellas County.

Tropical Cyclones Impact Analysis: All jurisdictions could receive the following impacts due to tropical cyclones. While communities along the Gulf of America, Tampa Bay, and intercoastal waterways face potential storm surge conditions in addition to winds, even inland communities of Kenneth City and Pinellas Park can be devastated by wind impacts.

- **Public- Injury/Death:** Car accidents because of flood waters, high winds, panic, traffic jams because of evacuations, no power after storm; not receiving emergency response during storm, like ambulance; delayed emergency response because of blocked roads, etc.; drowning in flood waters; hit or crushed by debris; stranded on roof because of flooding; exposure to hazardous materials; illness from contaminated water; pet and other animal deaths from all the above; carbon monoxide poisoning from improper generator use; chainsaw accidents and heart attacks from debris clean up.

- **Damage to Home and Property:** Power loss or damage to power connections on home; mold damage causing the need for expensive mold remediation actions cost to replace damaged and destroyed items, such as furniture, flooring, etc.; cost and labor to repair damaged homes and other structures to make the house inhabitable; if the property was uninsured, the repair cost upon the property owner; hotel room fees or having to live in a shelter until damage is repaired or home is replaced; damaged or washed-away vehicles; electrical vehicles and tool fires due to exposure of lithium-ion batteries to salt water; lost wages because there was no way to get to work if roads were blocked, if car was damaged in storm, or if employer experienced damage; cost of travel; cost to stay at hotel; loss of wages if out of town.
- **Power Outage:** Cost of generators and gas to run the generators; loss of food in the refrigerator and freezer; difficulties traveling anywhere because of outages at traffic lights; cost of purchasing disaster supplies such as flashlights; hotel room fees or having to live in a shelter until power is restored; lost wages because employers are experiencing power outage.
- **Emotional or Psychological Toll of Surviving:** If a friend or family member dies in a storm, an individual may feel a great sense of guilt or stress; if major damage occurs for an individual, they will likely experience stress and anxiety dealing with evacuating, staying in shelters, working to get insurance payments, working to get government assistance, etc.; being forced to leave or forfeit a pet in an unsafe area during or after a tropical cyclone.
- **Responders - Injury/Death:** Responding to tropical storms is unsafe; responding immediately after tropical storms is unsafe because of debris, unstable transportation infrastructure, unstable structures; rescuing people from unstable buildings or by boat; exposure to hazardous materials; stress is caused by the severity of tasks such as rescuing people; feelings of guilt for not being able to save people; witnessing gruesome scenes of injured or dead.
- **Continuity of Operations:** Loss of revenue if businesses cannot operate during or after the event; loss of wages if your employer's organization is damaged or destroyed and you cannot work; utility failures such as electricity or gas may prevent businesses from opening even if there is no damage; utility failures may impede or prevent government offices from continuing daily services; severe damage and interruption to transportation systems and infrastructure such as roads and bridges, communication systems, power, water, wastewater, etc.

- **Property Facilities, Infrastructure:** Damaged or destroyed property, such as homes and other buildings; roofing is particularly susceptible to damage from high winds; the first floor of many buildings, plus all the items on that floor, are susceptible to severe damage from flooding; cost of repairing damage to property such as buildings; cost of replacing damaged items such as furniture on the first floor of a flooded home; crop damage or loss; damage to transportation infrastructure, like a road being washed out or a bridge collapsing, and/or closure of major transportation networks; inability to get clean water ability to control wastewater; release of hazardous materials
- **Environment:** Beach and dune erosion; downed trees; eroded riverbanks; release of hazardous materials can contaminate or damage the environment; loss or damage to habitat for animals because of flooding or high winds; crop damage or loss; event-generated marine debris impacting waterway navigation and submerging wetland habitats.

Mitigation Strategies: Pinellas County is committed to enhancing its preparedness efforts through a comprehensive set of mitigation strategies. These strategies involve the rigorous enforcement of strict building codes designed to ensure that structures are resilient and able to withstand various environmental challenges. Additionally, Pinellas County will implement thoughtful land-use planning aimed at steering development away from high-risk areas, thereby safeguarding communities from potential hazards. To further bolster community safety, Pinellas County will actively protect against coastal erosion, preserving the natural barriers that shield against storm surges and flooding. Collaboration is key; Pinellas County will work closely with municipalities and local communities to devise effective evacuation plans, ensuring that residents know the best courses of action in case of emergencies. Regular updates on weather conditions will be provided to keep the community well-informed and prepared. For more detailed information, please refer to the Pinellas LMS.

Severe Storms- High Risk

Severe Storms refers to thunderstorms having one or more of these effects: lightning, flash floods, hail, straight-line winds, and tornadoes. Thunderstorms are very prevalent in the State of Florida and Pinellas County. A thunderstorm forms when moist, unstable air is lifted vertically into the atmosphere. The lifting of this air results in condensation and the release of latent heat. The process to initiate vertical lifting can be caused by:

- Unequal warming of the surface of the Earth.
- Orographic lifting due to topographic obstruction of airflow.
- Dynamic lifting because of the presence of a frontal zone.

A typical thunderstorm is 15 miles in diameter and lasts an average of 30 minutes. Despite their small size, all thunderstorms are dangerous. Of the estimated 100,000 thunderstorms that occur each year in the United States, about 10% are classified as severe. The three key elements of a thunderstorm are wind, water, and lightning. The National Oceanic and Atmospheric Administration (NOAA) considers a thunderstorm severe if it produces hail at least one inch in diameter, winds of 57.5 mph or stronger, or a tornado. Thunderstorms also vary in type, depending on size and organization.

Lightning: Lightning develops during the violent circulation of air within the cumulonimbus cloud. The friction causes the positive and negative charges within the storm to separate. Positively charged particles will rise while negatively charged descend from bottom of the storm cloud to the ground. Positive charges on the ground connect with the negative charge from the cloud, resulting in an electrical transfer or lightning. Lightning is the most lethal component of a thunderstorm. Vaisala's Total Lightning Statistics 2023 Report shows that even though Texas had the most lightning events that year, Florida ranked number one in lightning density at 112.6 events per km in 2023. This is mostly due to Florida's geography, and the combination of warm temperatures, humidity, and sea breezes. In fact, with 120,998 lightning strokes, Miami-Fort Lauderdale was the most lightning-prone U.S. metropolitan area in 2023.

Heavy Rain and Flash Floods: Heavy rains are defined as intense large amounts of rainfall in a short period. Because of this, flash floods often occur during slow moving thunderstorms. Other factors, such as the topography of the area, the soil conditions, and the ground cover can also affect flash flooding that follows from heavy rain. For example, if the ground is already waterlogged, new rainfall cannot filter into the ground, causing a flood. As stated in the Flood Hazard Profile (please refer to the Pinellas County LMS), flash flooding is a significant concern because of the rapid onset, the high-water velocity, the debris load, and the potential for channel scour. In addition, more than one flood crest may result from a series of fast-moving storms with heavy rainfall. Sudden destruction of structures and the washout of access routes may result in the loss of life. Furthermore, the rapid urbanization within the State of Florida has manifested itself in the form of increased impervious surface areas leading to less natural drainage and more flash flooding resulting from heavy rains.

Hail: Hail is frozen precipitation that can occur during a thunderstorm. Hail forms when raindrops freeze into balls of ice and usually range in size from .25 inch in diameter to 4.5 inches in diameter. Damage from hail increases with the size of hail, can damage vehicles, aircraft, and homes, and can be fatal to people and livestock. However, Florida thunderstorms do not often include hail because the hailstones usually melt before they reach the ground in generally warm temperatures.

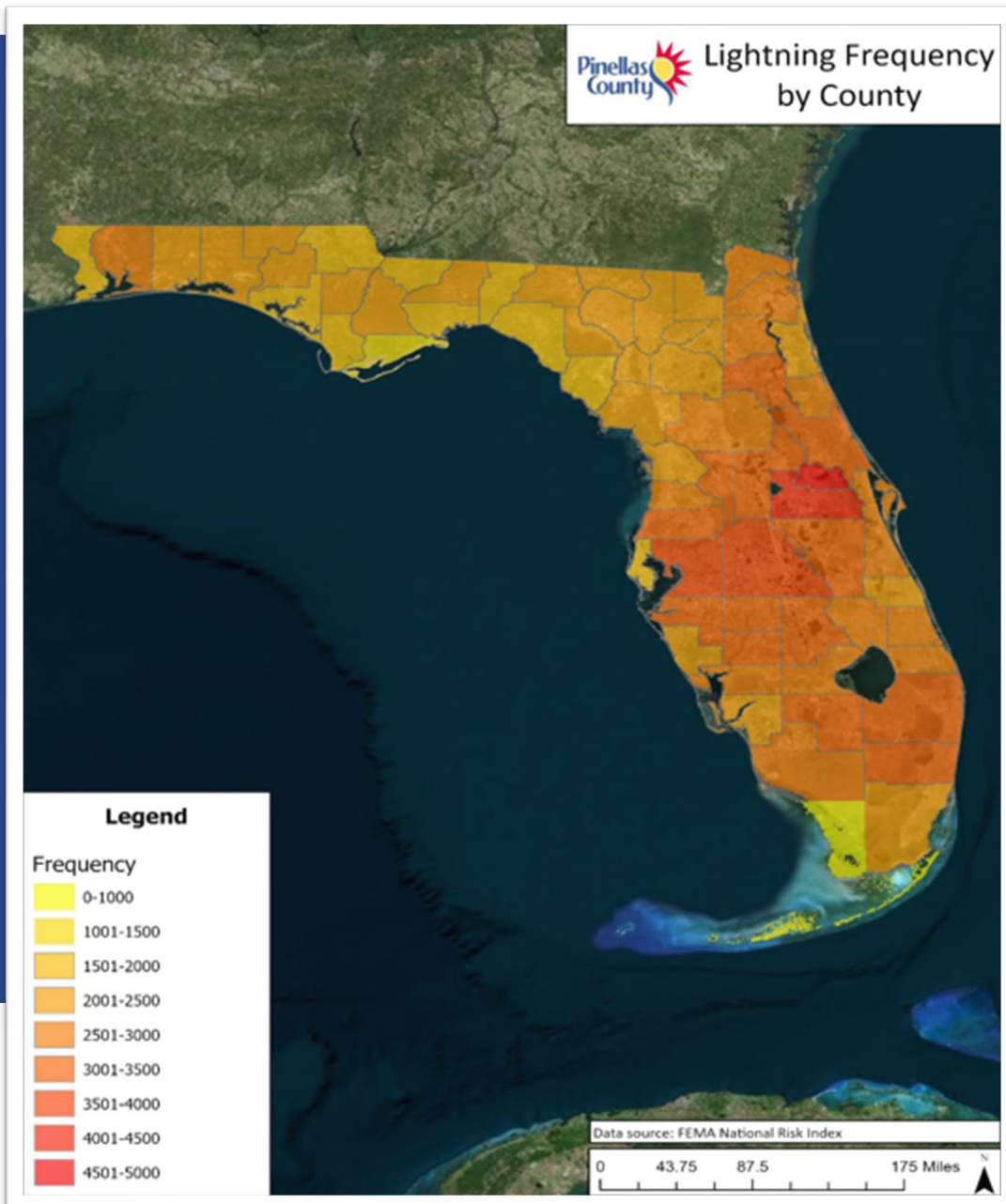
Straight Line Winds: Severe Storms often include strong winds that are called “straight-line” winds and are different than the winds in tornadoes. These damaging winds exceed 50–60 mph and can reach up to 100 mph. Damage from these winds is more common than damage from tornadoes in the continental United States. Straight-line winds form because of outflow from a thunderstorm downdraft.

- Microbursts: These are small, concentrated downbursts, typically affecting an area of 1 to 3 km (0.5 to 2 miles) in diameter.
- Macrobusts: These are larger downbursts, with horizontal dimensions larger than 4 km (2.5 miles) in diameter.

Tornadoes: The NWS defines a tornado as a violently rotating column of air touching the ground, usually spawned from a thunderstorm. Wind speeds of a tornado can reach up to 300 mph and be more than one mile wide. In Florida, tornadoes typically form along a squall line ahead of an advancing spring cold front from the North, along the squall lines in areas where masses of warm air converge, from isolated local summer thunderstorms, and/or within a hurricane. Tornadoes are measured by their intensity or their wind speed, and their area, using the Enhanced Fujita (EF) Scale. The scale ranges from EF 0, with minor damages from winds ranging 65–85 mph, to EF 5 with severe damage from winds more than 200 mph.

Geographic Areas Affected by Severe Storms: Severe thunderstorms and tornadoes can occur anywhere in Florida. As the number of structures and the population increases, the probability that a severe storm or tornado will cause property damage or human casualties also increases. Florida experiences more thunderstorms per km each year than any other state in the United States.

Based on available data, Pinellas County can anticipate experiencing between two and eight severe storm warnings annually, with the majority of these warnings occurring in the southern central region of Pinellas County.



Map 15: Pinellas County Lightning Frequency.

Historical Occurrences of Severe Storms: More than 35 severe storms occurred in Pinellas County from 1993 to 2024. Four of the storms declared major disasters in Pinellas County.

Probability of future Occurrences of Severe Storms: Based on historical analysis, severe storms and tornadoes will continue to affect Pinellas County. Not all storms are severe, and any storm that contains thunder – regardless of frequency – is classified as a thunderstorm. Given this, it can be impossible to count the number of actual thunderstorms, so the number of days with thunderstorms is counted instead. Pinellas County experiences 80 to 90 days of thunderstorms through the year, and the State of Florida has been first in the United States for lightning strike density. Due to these annual occurrences, lightning is one of the prevalent hazards in Pinellas County. Pinellas County is also likely to experience at least one tornado warning each year. Furthermore, most tornadoes in Florida are likely to be of smaller strength, usually between an EF-0 and an EF-2. The probability is high that all jurisdictions could be impacted by severe storms. Variances in how much damage these storms generate within each community would severity of storms, maintenance of vegetation and infrastructure, and strength of residential and commercial structures.

An analysis of severe storm reports from 2019 to 2024 in Pinellas County from the NCEI Storm Events Database indicates that there will be approximately three lightning events, one heavy rain event, one hail event, six wind events, and two tornado events each year in Pinellas County.

Severe Storm Impact Analysis: All jurisdictions could receive the following impacts from severe storms. Variances in how much damage these storms generate within each community depend on the severity of storms, maintenance of vegetation and infrastructure, and strength of residential and commercial structures.

- **Public- Injury/Death:** Injury or death from being struck by lightning; injury or death from hail; injury or death from flying debris; injury or death from tornadoes and not having adequate shelter; car accident Indirect death; survivor's guilt if their house was not damaged from a severe storm or tornado and many neighbors died.
- **Responders:** Responding during a severe storm can be very dangerous because of heavy rains, strong winds, hail, lightning, tornadoes.
- **Continuity of Operations:** Thunderstorms often cause power outages from wind damage to power lines or lightning damage to power stations or other electrical infrastructure.
- **Property, Facilities, Infrastructure:** Damage to property, including homes and businesses, can occur from strong winds, flooding, or tornadoes; the damage can range from minor roof damage to total structure loss; damage to critical facilities from fallen trees and limbs, causing a power outage.
- **Environment:** Damage to the environment from strong winds, flooding, and tornadoes. There may be severe damage to vegetation in localized areas from a tornado.

Mitigations Strategies: Pinellas County is committed to working alongside local municipalities and the community to actively address the challenges posed by severe storms. Proactive mitigation strategies will focus on enhancing the maintenance of public buildings, green spaces, and infrastructure. Additionally, Pinellas County will prioritize collaboration in planning and preparedness efforts to build a more resilient future for all residents. These measures aim to reduce the impacts of tornados, thunderstorms, and hail on communities and infrastructure. For more details, please see the Pinellas County LMS.

Moderate Risk

Pinellas County Categorizes the five following types of events as **Moderate Risk**. These moderate natural risks have a possibility with limited impact.

WILDFIRE: MODERATE RISK

Wildfire, or wildland fire, is an unplanned and uncontrolled fire in a natural area such as a forest, grassland, or prairie. These fires can be caused by natural sources, such as lightning, or by human activity, both intentional and accidental. Wildfires occur in Florida every year and at all times of the year and are part of the natural cycle of Florida's fire-adapted ecosystems. Wildfires can cause major environmental, social, and economic damage because of the possible loss of life, property, wildlife habitats, and timber. Fortunately, many of these fires are quickly suppressed before they can damage or destroy property, homes, and lives.

EROSION: MODERATE RISK

Coastal erosion is the wearing away of land or the removal of beach or dune sediments by wave action tidal currents, wave currents, or drainage. Waves generated by storms cause coastal erosion, which may temporarily redistribute coastal sediments or take the form of long-term losses of sediment and rocks. The study of erosion and sediment redistribution is called "coastal morpho dynamics," which can also be described as the dynamic interaction between the shoreline, seabed, and water.

DROUGHT: MODERATE RISK

Drought is a deficiency in precipitation over an extended period, usually a season or more, resulting in a water shortage. While droughts are a normal and recurring feature of our climate, sometimes they can endanger vegetation, animals, and even people. There are several types of droughts discussed below.

- Meteorological droughts are based on the amount of dryness compared to normal for that region.
- Agricultural drought refers to agricultural concerns, such as precipitation shortages and reduced ground water.
- Hydrological drought refers to the hydrological effects from extended periods with precipitation deficits. These droughts take longer to occur than meteorological and agricultural droughts.
- Economic droughts occur when the demand for an economic good reliant upon water, such as fish or hydroelectric power, exceeds supply because of a weather-related water shortfall.

EXTREME HEAT: MODERATE RISK

Extreme heat is defined as an extended period where the temperature and relative humidity combine to create a dangerous heat index. Extreme heat events occur across Florida each year. This hazard focuses on the effects to the human population, while drought focuses more on environmental interests.

GEOLOGICAL: MODERATE RISK

Landslides: Landslides are rock, earth, or debris flows down slopes due to gravity. They can occur on any terrain given the right conditions of soil, moisture, and the angle of slope. Integral to the natural process of the Earth's surface geology, landslides serve to redistribute soil and sediments in a process that can occur in abrupt collapses or in slow gradual slides. Also known as mud flows, debris flows, earth failures, and slope failures, landslides can be triggered by rains, floods, earthquakes, and other natural causes, as well as human-made causes including grading, terrain cutting and filling, and excessive development. Because the factors affecting landslides can be geophysical or human-made, they can occur in developed areas, undeveloped areas, or any area where the terrain was altered for roads, houses, utilities, or buildings. Florida has very low topographic relief, meaning that the state is flat. Because of this, landslides are not a significant natural hazard in Florida. Any risk or vulnerability to people, property, the environment, or operations would be low.

Sinkholes: Sinkholes are landforms created when overburden subsides or collapses into fissures or cavities underlying carbonate rocks. Florida is underlain by several thousand feet of carbonate rock, limestone, and dolostone, with a variably thick mixture of sand, clays, shells, and another near-surface carbonate rock unit called overburden. Those several thousand feet of carbonate rocks are host to one of the world's most productive aquifers, the Floridian aquifer system. Erosional processes, physical and chemical, have created fissures and cavities within the rock. This has created Florida's karst topography, characterized by the presence of sinkholes, swallets, caves, submerged conduits, springs, and disappearing and reappearing streams. Sinkholes are unpredictable, as they can form rapidly, within minutes to hours, or slowly, within months to years.

Low Risk

Pinellas County Categorizes the following four types of events as **Low Risk**. These low natural risks have a possibility of minor impact.

WINTER STORM: LOW RISK

Severe winter weather includes extreme cold, snowfall, ice storms, winter storms, and/or strong winds and affects every state in the continental United States. Areas where such weather is uncommon, such as Florida, may experience a greater detriment to transportation, agriculture, and people from relatively small events compared to other states that experience winter weather more frequently. Winter storm formation requires below-freezing temperatures, moisture, and lift to raise the moist air that forms clouds and causes precipitation. Lift is commonly provided by warm air colliding with cold air along a weather front. These storms move easterly or northeasterly and use both the southward plunge of cold air from Canada and the northward flow of moisture from the Gulf of America to produce ice, snow, and sometimes blizzard conditions. These fronts may push deep into the interior regions, sometimes as far south as Florida. The National Weather Service will issue Frost Advisories, Wind Chill Advisories, Watches or Warnings, and Freeze and Hard Freeze Watches and Warnings when cold weather threatens an area.

SEISMIC EVENTS: LOW RISK

A seismic event, or an earthquake, is a sudden, rapid shaking of the earth caused by the breaking and shifting of rock beneath the earth's surface that creates seismic waves. This shaking can cause buildings and bridges to collapse, disrupt gas, electricity, and phone service, sometimes trigger landslides and tsunamis, or indirectly cause flash floods or fires.

TSUNAMI: LOW RISK

Tsunamis are among the most devastating geological disasters. Tsunamis are powerful waves resulting from another non-meteorological hazard that is geological in nature, such as earthquakes, underwater landslides, volcanic eruptions, or other displacements of large amounts of water under the sea. As the waves travel towards land and along decreasing ocean depths, they build up to massive heights and appear as walls of water or turbulent waves that resemble hurricane storm surge. The speed at which a tsunami travels depends on the ocean depth rather than the distance from the source of the wave. Deeper water generates greater speed, and the waves slow down when reaching shallow waters. Where the ocean is deep, tsunamis can travel at speeds up to 500 miles an hour. Tsunamis arrive on land with enormous force and recede with nearly equal force. A tsunami is not a single wave but rather a series of waves often referred to as a "wave train." There can be as many as 60 miles between peaks of each wave series, and waves can be as far as one hour apart. Tsunamis have a much smaller amplitude (wave height) offshore and a very long wavelength (often hundreds of kilometers long), which is why they generally pass unnoticed at sea, forming only a passing "hump" in the ocean. The number of arrivals and the amplitudes of each wave will vary depending on the coastal properties, the exact travel direction, and other specifics of how the tsunami was generated. They will vary from place to place and event to event. In the largest tsunamis, surge can continue for many hours and more than a day.

RED TIDE: LOW RISK

Red tide is a harmful algal bloom (HAB), which occurs when a large concentration of microscopic algae, often called "dinoflagellates," rapidly multiply in the ocean. Sometimes red tide causes the water to appear discolored – often reddish – and it can be toxic to marine life and potentially humans due to the toxins the algae produce; the most well-known species causing red tide is "Karenia brevis" found primarily in the Gulf of America along Florida's coast. While blooms are not a new phenomenon in this region, they have resulted in increased economic costs for the west coast of Florida. Coastal regions of Florida have experienced some of the most rapid population growth and development in the United States. Beach cleanups, tourism-related losses, medical expenses, and lost workdays during red tide events can average an annual loss of more than a million dollars.

Mitigation Overall Conclusion

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

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

At least 15% of the CDBG-DR funds will be dedicated to mitigation efforts. For housing-related activities, these funds will be used to reduce risks to people and property through measures such as elevating structures, flood proofing in high-risk areas, as well as promoting the use of high-quality, durable building materials. Proposed infrastructure projects will aim to mitigate flood risks in Coastal County by implementing water and land use management strategies.

CDBG-DR Mitigation Set-Aside Needs				
Mitigation Category	Project Count	Total Need	Financial Assistance Budgeted and Obligated	Unmet Need
Airport	2	\$290,110,000	\$105,360,000	\$184,750,000
Facilities	4	\$237,221,000	\$23,821,000	\$213,400,000
Flood Control	2	\$15,302,000	\$1,404,000	\$13,898,000
Housing	1	\$148,000,000	\$98,000,000	\$50,000,000
Other Transportation	1	\$34,232,000	\$6,901,000	\$27,331,000
Parks & Recreation	6	\$102,200,000	\$8,200,000	\$94,000,000
Road & Street Facilities	8	\$266,629,000	\$107,679,000	\$158,950,000
Sewer Services	24	\$308,809,000	\$53,227,000	\$255,582,000
Water-Sewer Combination	3	\$28,288,000	\$17,556,000	\$10,732,000
GRAND TOTAL	51	\$1,430,791,000	\$422,148,000	\$1,008,643,000

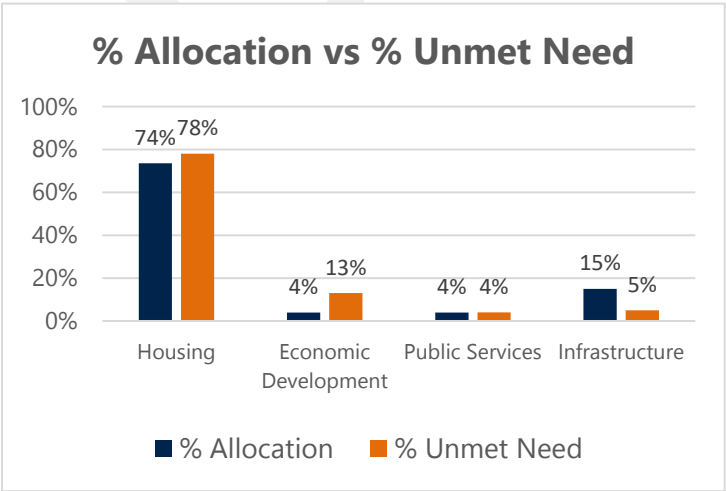
Table 31: CDBG-DR Mitigation Set-Aside Needs Assessment

Connection Between Proposed Programs and Unmet & Mitigation Needs

Pinellas County’s recovery strategy is rooted in a data-driven approach that aligns funding allocations with the most critical needs identified in Pinellas County’s Unmet and Mitigation Needs Assessments. With housing accounting for the overwhelming majority of recovery needs, approximately 78% of Pinellas County’s total unmet need, Pinellas County has dedicated 74% of its CDBG-DR allocation to housing activities under the People First Housing Initiative. This initiative prioritizes support for homeowners, renters, home buyers, and local landlords in the Most Impacted and Distressed (MID) area, with an emphasis on low- and moderate-income (LMI) households who face the steepest barriers to recovery.

Recognizing that economic disruption and disaster-related hardship significantly impacted low- and moderate-income populations and small businesses, Pinellas County has allocated funds to targeted economic revitalization and public service programs. These efforts are focused on supporting disaster-impacted LMI households, neighborhood-serving small businesses, nonprofits that provide essential services to the community, and targeted financial relief to disaster-impacted households.

Finally, while infrastructure accounts for a smaller portion of the total unmet need, Pinellas County intends to address mitigations needs identified in the mitigation needs assessment by prioritizing strategic infrastructure investments such as stormwater, drainage, and other resilience-focused public infrastructure that will be identified through a comprehensive planning process. These investments aim to reduce future risks in communities that experienced repetitive loss and structural vulnerabilities and will therefore satisfy the mitigation set-aside requirement.



Overall, Pinellas County’s funding distribution reflects a proportional and reasonable response to documented unmet needs—centered on housing, supported by economic and social recovery, and reinforced by infrastructure improvements that promote long-term resilience.

Figure 11: Budget vs. Unmet Needs Allocations

Compliance Statement:

Pinellas County will ensure all programs comply with the following:

- Section 109 of the HCDA, 42 U.S.C. 5309;
- Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq.;
- Title VII of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq.;
- Title VIII of the Civil Rights Act of 1968 (The Fair Housing Act), 42 U.S.C. 3601 – 19;
- Section 504 and 508 of the Rehabilitation Act of 1973, 29 U.S.C. 794; The Americans with Disabilities Act of 1990, 42 U.S.C. 12131 et seq.; and
- Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193) (PRWORA).

Minimizing Displacement

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

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

Allocation and Award Caps

Pinellas County is the lead agency and responsible entity for administering \$813,783,000 in CDBG-DR funds allocated for Idalia, Helene, and 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 HUD identified MID Areas	Estimated % to LMI
Administration	\$20,689,150	3%			
Planning	\$24,000,000	3%	0%		
Housing	\$598,653,065	85%	0%	100%	78%
<i>Homeowner Rehabilitation/Reconstruction Program</i>	<i>\$490,000,000</i>	<i>69%</i>	<i>0%</i>	<i>100%</i>	<i>80%</i>
<i>Homeowner Reimbursement Program</i>	<i>\$20,787,758</i>	<i>3%</i>	<i>0%</i>	<i>100%</i>	<i>30%</i>
<i>Small Rental Rehabilitation/Reconstruction Program</i>	<i>\$57,865,307</i>	<i>8%</i>	<i>0%</i>	<i>100%</i>	<i>100%</i>
<i>Strategic Relocation and Revitalization Program</i>	<i>\$10,000,000</i>	<i>1%</i>	<i>0%</i>	<i>100%</i>	<i>100%</i>
<i>Homebuyer Assistance Program</i>	<i>\$20,000,000</i>	<i>3%</i>	<i>0%</i>	<i>100%</i>	<i>30%</i>
Infrastructure (CDBG-DR Mitigation Set-aside)	\$106,146,000	0%	100%	100%	50%
Economic Revitalization	\$32,147,393	5%	0%	100%	80%
<i>Small Business Community Recovery Program</i>	<i>\$22,147,393</i>	<i>3%</i>	<i>0%</i>	<i>100%</i>	<i>75%</i>
<i>Non-Profit Community Recovery Program</i>	<i>\$10,000,000</i>	<i>2%</i>	<i>0%</i>	<i>100%</i>	<i>90%</i>
Public Services	\$32,147,392	5%	0%	100%	100%
TOTAL	\$813,783,000	100%*	100%	100%	75%

Table 32: CDBG-DR Program Allocation and Funding Thresholds. CDBG-DR % is calculated on the total of (\$813,783,000-\$106,146,000(MIT set-aside) = \$707,637,000

**Percentage discrepancy due to rounding*

Funding Criteria

General Exception Criteria

Pinellas County will make exceptions to the maximum award amounts, when necessary, to comply with federal accessibility standards, or to reasonably accommodate a person with disabilities, and to further advance an impactful and efficient recovery, in accordance with 2 CFR 200 - Cost Principles. Pinellas County may make exceptions to program policy, at its discretion. Specific guidance regarding policy exceptions will be outlined in program policies and procedures, as applicable.

General Obligation and Expenditure of Funds

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

People First Housing Recovery Initiative

Housing Programs Overview

Pinellas County's **"People First Housing Recovery Initiative"** is structured around a comprehensive set of programs designed to address disaster-related damage, prevent long-term displacement, and increase the availability of safe, code-compliant, and affordable housing. This suite of programs was developed in direct response to the unmet needs identified through Pinellas County's damage assessments and public engagement process and are tailored to meet the needs of both homeowners and renters across the most impacted areas.

The **Homeowner Rehabilitation/Reconstruction Program** offers assistance to owner-occupants through repair, reconstruction, and, where necessary, relocation support to ensure households can return to safe and habitable homes.

A complementary **Homeowner Reimbursement Program** allows eligible homeowners who have completed repairs using personal resources to recover eligible expenses.

For households residing in high-risk areas or in structures not suitable for rehabilitation, the **Strategic Relocation and Revitalization Program** supports voluntary relocation to safer, more resilient housing outside the 100-year floodplain.

To address the critical shortage of affordable rental units, Pinellas County will implement the **Small Rental Rehabilitation/Reconstruction Program (Local Landlord Program)**, which focuses on restoring and preserving small-scale rental housing, including manufactured homes and single-family units.

Finally, the **Homebuyer Assistance Program** is designed to help low- to middle-income first-time homebuyers and current renters transition to homeownership, expanding housing stability and affordability in the long term.

These coordinated housing efforts will ensure that disaster recovery investments contribute to a more resilient, and sustainable housing landscape in Pinellas County.

The following table provides an overview of the programs, their respective budgets, and estimated benefits to LMI households:

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Homeowner Rehabilitation/Reconstruction Program	\$490,000,000	80%
Strategic Relocation and Revitalization Program	\$10,000,000	100%
Homeowner Reimbursement Program	\$20,787,758	30%
Small Rental Rehabilitation/Reconstruction Program (Local Landlord Program)	\$57,865,307	100%
Homebuyer Assistance Program	\$20,000,000	30%
Housing Programs Total	\$598,653,065	

Table 33: People First Housing Programs Overview

Homeowner Rehabilitation/Reconstruction Program

Amount of CDBG-DR Funds Allocated to this Program: \$490,000,000

- At least \$392,000,000 reserved for LMI Households
- Up to \$98,000,000 reserved for Households earning up to 120% AMI

Eligible Activity(ies):

- Acquisition of real property under HCDA Section 105(a)(1), 24 CFR 570.201(a)
- Clearance, demolition, removal, reconstruction, and rehabilitation of buildings and improvements under HCDA Section 105(a)(4), 24 CFR 570.202
- Disposition of real property acquired under HCDA Section 105(a)(7) 24 CFR 570.201(b)
- Relocation payments and assistance for displaced individuals and families under HCDA Section 105(a)(11), 24 CFR 570.201(i)
- Optional Relocation Assistance under 24 CFR 570.606(d)
- Homeownership assistance under HCDA Section 105(a)(24), FR 6489-N-01 III.D.5.d, 24 CFR 570.201(n)
- Safe Housing Incentives FR-6489-N-01 III.D.5.i.
- New construction under FR-6489-N-01, III.D.5.a
- Non-federal match under HCDA 105(a)(9), 24 CFR 570.201(g), FR-6489-N-01 III.D.6.c

National Objective: Low- and Moderate-Income Housing (LMH) - 24 CFR.570.208(a)(3); Low- and Moderate-Income Housing Incentive (LMHI) - FR-6489-N-01 III.D.5.i.(i); Urgent Need FR-6489-N-01 III.B.2.

Connection to Unmet Needs: Hurricanes Idalia, Helene, and Milton caused extensive damage to single-family housing stock throughout Pinellas County, particularly for owner-occupied single-family households who show heightened remaining unmet need when compared to renter-occupied housing. To address damage to housing, Pinellas County has created the Homeowner Rehabilitation/Reconstruction Program, a centralized housing rehabilitation or replacement program for LMI and middle-income households whose home sustained damage from the hurricane. Through this program, Pinellas County aims to address unmet housing needs, increase resilience, and protect human life.

Lead Agency and Distribution Model: Pinellas County will administer the program. To evaluate environmental factors for CDBG-DR-funded projects and activities, Pinellas County, as a responsible Entity (RE), will ensure compliance with the environmental requirements listed under 24 CFR 58.

Program Description: To assist the households most severely impacted by the disaster, Pinellas County will implement the Homeowner Rehabilitation/Reconstruction Program to address the housing needs identified in the Unmet Needs Assessment. This program will provide assistance to individuals who owned and occupied their home as a primary residence at the time of the storm, including those residing in traditional single-family homes and manufactured housing units (MHU). Eligible activities under the Homeowner Rehabilitation/Reconstruction Program include:

- Rehabilitation, reconstruction, or replacement of owner-occupied, storm-damaged single-family homes that served as the applicant's primary residence at the time of the disaster.

- Elevated reconstruction or replacement of homes located within designated flood hazard areas, where elevation is required for compliance with local, state, or federal standards.
- Relocation assistance for manufactured housing unit (MHU) owners in limited instances where replacement of the damaged MHU at the original property address is not feasible due to site conditions or environmental constraints.

The primary objective of the Homeowner Rehabilitation/Reconstruction Program is to provide recovery assistance for low-, moderate-, and middle-income homeowners in Pinellas County who were impacted by Hurricanes Idalia, Helene, and/or Milton and who have a remaining unmet recovery need. The program will address disaster-related damage to homes, complete necessary improvements, and incorporate mitigation measures to reduce the risk of future disaster impacts. All rehabilitation and reconstruction activities will comply with all applicable HUD, State, County, and local building codes and requirements. Pinellas County will define "not suitable for rehabilitation" in the program guidelines to determine eligibility for reconstruction or replacement assistance.

Pinellas County will not disburse funds directly to eligible applicants. Instead, payments will be made to procured contractors for eligible repair, reconstruction, or replacement work completed. All rehabilitation, reconstruction and replacement activities funded through this CDBG-DR allocation will be managed by Pinellas County in coordination with selected vendor(s) and implemented through contracted construction firms.

Eligible Geographic Areas: Pinellas County (except the City of St. Petersburg)

Other Eligibility Criteria: To qualify for assistance:

- The applicant must have owned and occupied the home as their primary residence at the time of the qualifying disaster event(s) and must retain an ownership interest in the property at the time of application.
- The home must have remaining damage directly caused by one or more of the qualifying disasters, as verified through inspection reports, FEMA data, or other acceptable damage assessment documentation.
- The dwelling must be an eligible single-family structure type, such as a stick-built, modular, or manufactured home, or as otherwise described in the program guidelines.
- The applicant may be eligible for assistance for their owner-occupied unit within a condominium or other multi-unit structure, subject to further criteria outlined in the program guidelines.
- The total household income must be:
 - At or below 80% of Area Median Income (AMI) to receive assistance under the Low- to Moderate-Income (LMI) national objective; or
 - Between 80% and 120% of AMI if receiving assistance under the Urgent Need national objective.

- Property taxes and mortgage (if applicable) must be current or on a payment plan and in good standing at the time of application.
- If the applicant qualifies for a relocation award, they must agree to the demolition of their storm-damaged property.
- The storm-impacted property must be located within the geographic boundaries of Pinellas County.

Program Priorities: This program aims to serve both low- to moderate-income (LMI) households, and households with incomes between 80% - 120% of Area Median Income (AMI) (middle-income households).

80% of the program funding is reserved to serve LMI households. Assistance to LMI households will be prioritized as follows:

- **Priority 1:** LMI Households with an age-dependent household member (minor child(ren) or elderly person(s)) **and** disabled household member(s);
- **Priority 2:** LMI Households with an age-dependent household member (minor child(ren) or elderly person(s)) **or** disabled household member(s); and
- **Priority 3:** LMI Households.

Twenty percent (20%) of program funding is set aside to serve middle-income households on a first-come first-served basis.

Maximum Award Amount: \$375,000

Maximum Income of Beneficiary: 80% of Area Median Income (AMI), 120% of Area Median Income (AMI).

Mitigation Measures: Hazard mitigation measures will be incorporated into construction activities were determined to be necessary and cost reasonable, in accordance with applicable HUD guidance and local code requirements, and program goals for increased resilience. For relocation activities, replacement housing units, including manufactured housing units (MHUs), must be sited outside the 100-year floodplain, consistent with program objectives to relocate homeowners out of high-risk areas. Mitigation activities are defined as those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters

Reducing Impediments for Assistance: The Homeowner Rehabilitation and Reconstruction Program is available to all Pinellas County homeowners who have been impacted by the qualifying disaster events of Hurricane Idalia, Helene, and Milton. Intake centers will be accessible to individuals with disabilities (ADA compliant), and communication assistance will be provided upon request. All Pinellas County homeowners will have equal access to the application process.

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

Homeowner Reimbursement Program

Amount of CDBG-DR Funds Allocated to this Program: \$20,787,758

Eligible Activity(ies):

- Reimbursement of Disaster Recovery Expenses for Homeowners, FR-6489-N-01 III.B.14.b.

National Objective: Low- and Moderate-Income Housing (LMH) 24 CFR 570.208(a)(3), Urgent Need FR-6489-N-01 III.B.2.

Connection to Unmet Needs: Many homeowners in Pinellas County acted to repair or rebuild their disaster-damaged homes, and may have relied on personal savings, or credit to fund urgent repairs before recovery programs became available. While some may have received assistance through FEMA, SBA loans, or insurance, these sources may have fallen short of covering the full scope of repairs, particularly for code-compliant reconstruction and mitigation improvements. As a result, a significant number of residents, especially those with limited resources, may have absorbed substantial out-of-pocket costs in order to restore decent, safe, and sanitary housing. To address this unmet need, Pinellas County is launching the Homeowner Reimbursement Program, which provides financial assistance to eligible homeowners for eligible repairs, rehabilitation, or reconstruction costs incurred before applying for CDBG-DR assistance. The program acknowledges the critical role self-funded recovery has played in community stabilization and ensures that these early efforts do not destabilize housing for disaster impacted residents. The program targets low-, moderate- and middle-income who acted quickly despite financial limitations. All applicants will undergo duplication of benefits review to ensure that reimbursements are limited to eligible, unmet costs not already covered by FEMA, SBA, or insurance. By reimbursing homeowners who took early initiative, Pinellas County is reducing long-term financial strain and supporting a more efficient recovery process.

Lead Agency and Distribution Model: Pinellas County will administer the program. To evaluate environmental factors for CDBG-DR-funded projects and activities, Pinellas County, as a responsible Entity (RE), will ensure compliance with the environmental requirements listed under 24 CFR 58, as applicable.

Program Description: Pinellas County will reimburse eligible homeowners for costs incurred to rehabilitate, demolish, or reconstruct homes damaged by the qualifying disaster(s), provided the work is properly documented by the homeowner and/or verified through cost estimation tools

such as Xactimate, RSMeans, or equivalent. Reimbursable costs must be associated with code-compliant activities performed within the original footprint of the damaged structure. Eligible work must be completed prior to the homeowner's application for CDBG-DR assistance and within two years of the grantee's initial Applicable Allocation Notice (AAN) date for the disaster (January 21, 2025), or the date of application—whichever is earlier. All disaster-related repairs must be fully completed at the time of application to qualify for reimbursement.

Eligible Geographic Areas: Pinellas County (except the City of St. Petersburg)

Other Eligibility Criteria: To qualify for this program:

- The applicant must have owned and occupied the home as their primary residence at the time of the qualifying disaster event(s) (Hurricanes Idalia, Helene, or Milton) and must retain an ownership interest in the property at the time of application.
- The applicant must have documented expenditures for eligible rehabilitation, demolition, or reconstruction costs directly resulting from damage caused by one or more of the qualifying disasters (Idalia, Helene, or Milton), as verified through documentation and/or cost estimating tools.
- All disaster-related repairs must be fully completed prior to the submission of an application for reimbursement.
- Property must be an eligible single-family structure type, such as a stick-built, modular, or manufactured home.
- The total household income must be at or below 120% of the Area Median Income (AMI), based on HUD income limits adjusted for household size and applicable at the time of application.

Program Priorities: Applicants to the Homeowner Reimbursement Program will be processed on a first-come, first-processed basis.

Maximum Award Amount: \$50,000

Maximum Income of Beneficiary: At or below 120% Area of Median Income (AMI)

Mitigation Measures: N/A

Reducing Impediments for Assistance: The Homeowner Reimbursement Program is available to low- to- middle income homeowners in Pinellas County who have incurred costs to address damage to their home caused by the qualifying disaster events of hurricane(s) Idalia, Helene, and/or Milton. Intake centers will be accessible to individuals with disabilities (ADA compliant), and language and communication assistance will be provided upon request. All Pinellas County resident homeowners will have equal access to the application process.

To encourage participation in disaster recovery programs by impacted individuals, Pinellas County will identify those expected to benefit from CDBG-DR-funded programs, establish program-

specific prioritization criteria where appropriate, and implement a data-driven, targeted outreach and engagement campaign throughout the Most Impacted and Distressed (MID) area to ensure broad and effective program participation.

Small Rental Rehabilitation/Reconstruction Program (Local Landlord Program)

Amount of CDBG-DR Funds Allocated to this Program: \$57,865,307

Eligible Activity(ies):

- Clearance, demolition, removal, reconstruction, and rehabilitation of buildings and improvements under HCDA Section 105(a)(4), 24 CFR 570.202(a)
- New construction under FR-6489-N-01, III.D.5.a

National Objective: Low- and Moderate-Income Housing (LMH) 24 CFR 570.208(a)(3)

Connection to Unmet Needs: Hurricanes Idalia, Helene, and Milton caused extensive damage to already strained rental housing stock throughout Pinellas County. To address damage to rental housing and expand access to affordable rental housing for households that resided in Pinellas at the time of the storm(s), the County has created the Small Rental Rehabilitation/Reconstruction Program (Local Landlord Program), a centralized housing rehabilitation or replacement program aimed at increasing affordable rental housing stock throughout Pinellas County.

Lead Agency and Distribution Model: Pinellas County will directly administer the Local Landlord Program. To evaluate environmental factors for CDBG-DR-funded projects and activities, Pinellas County, as a responsible Entity (RE), will ensure compliance with the environmental requirements listed under 24 CFR 58, as applicable.

Program Description: To assist the most impacted low- and moderate-income (LMI) households and to address the loss of affordable rental housing caused by the hurricanes, Pinellas County will implement the Small Rental Rehabilitation/Reconstruction Program (Local Landlord Program) in alignment with the preservation of affordable rental housing needs identified in the Unmet Needs Assessment. Through this program, Pinellas County will offer:

- Rehabilitation, reconstruction, or replacement of storm-damaged single-family homes;
- Elevated reconstruction or replacement of homes located within designated flood hazard areas, where elevation is required for compliance with local, state, or federal standards.
- Relocation assistance for manufactured housing unit (MHU) owners in limited instances where replacement of the damaged MHU at the original property address is not feasible due to site conditions or environmental constraints.

All construction activities will meet all applicable HUD, State, County, and local building codes and requirements, including applicable HUD Housing Quality Standards (HQS) at a minimum. Pinellas County will define "not suitable for rehabilitation" in the program guidelines.

Pinellas County will not distribute funds directly to eligible applicants but will provide funds on a reimbursement basis to procured contractors for work performed. The program aims to rehabilitate or replace damaged housing in the impacted areas for use as rental housing. Pinellas County, along with its selected vendor, will manage all construction activities funded by this CDBG-DR allocation through contracted construction contractors.

The primary objective of the program is to expand affordable rental housing in areas affected by disasters. It is designed to address the affordable housing needs of extremely low, very low, low- and moderate-income households, including individuals who have become homeless due to disasters. Additionally, it will address disaster-related damage and make necessary improvements to ensure properties meet HUD Housing Quality Standards (HQS), as needed, while also mitigating potential future harm.

The program will assist eligible property owners in impacted areas with the repair, reconstruction or replacement of their storm-damaged properties and for the establishment of affordable rental housing. Eligible property types may include stick-built homes, manufactured home units (MHU), modular homes, and other types of single-family residences. Grant funds will be used to pay for rehabilitation and reconstruction costs directly to program-selected general contractors. No funds will be distributed directly to owners of the assisted properties.

Eligible Geographic Areas: Pinellas County (except the City of St. Petersburg)

Other Eligibility Criteria: To qualify for assistance, the applicant must:

- Not be in bankruptcy or active foreclosure.
- Be current on property taxes and mortgage (if applicable) or on a payment plan in good standing.
- Applicant must own the property at the time of application.
- The home must have unrepaired damaged as a result of the qualifying disaster.
- Property must be an eligible structure type, such as a stick-built, modular, or manufactured home, or as described in the program guidelines.
- Property must be unoccupied at the time of application.
- Agree to a five (5) year affordability period, forgivable at 20% per annum.

In addition, the County may establish limits in the program guidelines on the total number of units an applicant may own and/or the number of units eligible for assistance under the program.

Program Priorities: Applicants to the Program will generally be processed on a first-come, first-processed basis, subject to completeness of application and funding availability.

Maximum Award Amount: \$375,000

Maximum Income of Beneficiary: 80% of Area Median Income (AMI)

Mitigation Measures: Hazard mitigation measures will be incorporated into construction activities where determined to be necessary and cost reasonable, in accordance with applicable HUD guidance and local code requirements, and program goals for increased resilience. Mitigation activities are defined as those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters

Reducing Impediments for Assistance: The Local Landlord Program is available to owners of eligible properties in Pinellas County whose properties have been damaged by the qualifying disaster events of Hurricane Idalia, Helene, and Milton. Intake centers will be accessible to individuals with disabilities (ADA compliant), and communication assistance will be provided upon request. All Pinellas County residents will have equal access to the application process. The program's policies and procedures will outline Pinellas County's process for ensuring that funded rental units are accessible to persons with disabilities.

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

Strategic Relocation and Revitalization Program

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

Eligible Activity(ies):

- Acquisition of real property under HCDA Section 105(a)(1), 24 CFR 570.201(a)
- Clearance, demolition, removal, reconstruction, and rehabilitation of buildings and improvements under HCDA Section 105(a)(4), 24 CFR 570.202
- Disposition of real property acquired under HCDA Section 105(a)(7), 24 CFR 570.201(b)
- Relocation payments and assistance for displaced individuals and families under HCDA Section 105(a)(11), 24 CFR 570.201(i)
- Optional Relocation Assistance under 24 CFR 570.606(d)
- Homeownership assistance under HCDA Section 105(a)(24), 24 CFR 570.201(n), FR-6489-N-01 III.D.5.d
- Safe Housing Incentives FR-6489-N-01 III.D.5.i.
- New construction under FR-6489-N-01, III.D.5.a

National Objective: Low- and Moderate-Income Housing (LMH) 24 CFR 570.208(a)(3); Low- and Moderate-Income Housing Incentive (LMHI) - FR-6489-N-01 III.D.5.i.(i).

Connection to Unmet Needs: Hurricanes Idalia, Helene, and Milton caused extensive damage to affordable housing located throughout Pinellas County, including in mobile home parks.

The storms highlighted location-based vulnerabilities in some parks, due to proximity to the floodplain, storm surge areas, or vulnerability to flood and other hazards. The Strategic Relocation Program aims to protect and enable affordable housing solutions while minimizing future disaster-related risks to low-income households by relocating households out of harm's way.

Lead Agency and Distribution Model: Pinellas County will administer the program. To evaluate environmental factors for CDBG-DR-funded projects and activities, Pinellas County, as a responsible Entity (RE), will ensure compliance with the environmental requirements listed under 24 CFR 58, as applicable.

Program Description: Pinellas County recognizes that in certain manufactured housing communities (MHUs), particularly those vulnerable to repeated storm damage, poor infrastructure conditions, or limited site control, providing direct rehabilitation or reconstruction assistance to individual homeowners may not always be the most cost-effective or resilient recovery solution. These scenarios often present complex challenges—such as overlapping ownership structures, land use constraints, or infrastructure degradation—that limit the feasibility of unit-based assistance.

To address these realities, Pinellas County is establishing the Strategic Relocation and Revitalization Program. This program will support tailored solutions that promote safe, resilient, and efficient recovery for households residing in manufactured housing communities and similar vulnerable developments.

All activities will be carried out in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), Section 104(d), and other applicable federal, state, and local requirements. Pinellas County will implement robust anti-displacement strategies, including early and meaningful community engagement.

Program Objectives:

- Provide relocation assistance to homeowners or renters residing in MHUs where repair or reconstruction is impractical, unsafe, or not cost-effective.
- Support the acquisition and/or site development of alternative resilient housing options, including infill development or community-led redevelopment efforts.
- Enable assistance to ownership entities—such as cooperatives, nonprofit entities, or responsible for-profit corporations—that are undertaking redevelopment or revitalization projects aligned with program objectives.
- Encourage models of community ownership, long-term affordability, and sustainable infrastructure in manufactured home communities.

- Support impacted populations by prioritizing assistance for low- and moderate-income (LMI) households, including elderly, and disabled populations.

Eligible Geographic Areas: Pinellas County (except the City of St. Petersburg)

Eligibility Criteria:

Eligible applicants include:

- Homeowners and renters currently residing in MHUs residing in the floodplain, targeted under this program.
- Legal ownership entities of MHU communities in the floodplain, including but not limited to:
 - Resident-owned communities (cooperatives);
 - Nonprofit housing developers; and
 - For-profit park owners who engage in eligible revitalization efforts, subject to affordability and anti-displacement requirements.

Program Priorities: Pinellas County will conduct outreach to affected MHU communities and evaluate feasibility based on criteria such as site-specific assessments, cost-benefit analysis, and risk profiles. Projects will be prioritized based on criteria such as vulnerability, cost-effectiveness, and the ability to achieve long-term revitalization and resilient housing outcomes. Final prioritization criteria will be described in the program guidelines.

Maximum Award Amount: Awards for displaced persons will align with the assistance limits established under the URA at 49 CFR 24, as applicable; awards for applicants who are not displaced persons will be described in the Program Guidelines.

Maximum Income of Beneficiary: 80% of Area Median Income (AMI)

Mitigation Measures: Hazard mitigation measures will be incorporated into housing activities where determined to be necessary and cost reasonable, in accordance with applicable HUD guidance and local code requirements, and program goals for increased resilience. For relocation activities, replacement housing units, including manufactured housing units (MHUs), must be sited outside the 100-year floodplain, consistent with federal floodplain management and environmental review standards. Mitigation activities are defined as those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

Reducing Impediments for Assistance: The Strategic Relocation and Revitalization Program is available to all low- to moderate-income (LMI) homeowners and renters in Pinellas County who meet the program's eligibility requirements and were impacted by Hurricanes Idalia, Helene, or Milton, subject to funding availability.

Intake centers, if applicable, will be accessible to individuals with disabilities (ADA compliant), and communication assistance will be provided upon request. All Pinellas County homeowners will have equal access to the application process.

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

Homebuyer Assistance Program

Amount of CDBG-DR Funds Allocated to this Program: \$20,000,000

Eligible Activity(ies):

- Homeownership Assistance, FR-6489-N-01 III.D.5.d, 24 CFR 570.201(n), HCDA Section 105(a)(24)

National Objective: Low- and Moderate-Income Housing (LMH) - 24 CFR.570.208(a)(3); Urgent Need FR-6489-N-01 III.B.2.

Connection to Unmet Needs: To expand affordable homeownership opportunities and support long-term housing stability, Pinellas County is launching a Homebuyer Assistance Program to assist households impacted by the disaster in purchasing a home. This program is designed to reduce financial barriers to homeownership, particularly for low- to moderate-income (LMI) households—by providing critical support throughout the home-buying process. Disaster-impacted households often face compounded challenges, including displacement, rising rents, and limited access to affordable housing stock. By offering assistance to transition from renting to ownership, Pinellas County is helping to stabilize LMI households and reduce exposure to natural hazards. The program will focus on LMI renters, first-time homebuyers, and disaster-impacted households who may otherwise be priced out of the ownership market. These investments not only create new pathways to housing stability post-disaster for LMI households but also strengthen neighborhood resilience and reduce strain on the rental market.

Lead Agency and Distribution Model: Pinellas County will administer the program. To evaluate environmental factors for CDBG-DR-funded projects and activities, Pinellas County, as a responsible Entity (RE), will ensure compliance with the environmental requirements listed under 24 CFR 58, as applicable.

Program Description: To expand affordable homeownership opportunities and create new rental opportunities, Pinellas County will offer assistance to residents of Pinellas County to purchase a home. Eligible costs for homebuyer assistance may include the following:

- Subsidized interest rates and mortgage principal amounts
- Reasonable closing costs, normally associated with the purchase of a home
- Providing up to 100 percent of any lender required down payment
- Acquiring guarantees for mortgage financing obtained

Other Eligibility Criteria: To qualify for this program:

- The applicant must have maintained their primary residence in Pinellas County, outside of the City of St. Petersburg, at the time of the qualifying event(s).
- Homebuyers must purchase an eligible structure type: Single Family (1 unit structure, or one unit within a multi-unit structure such as a duplex, triples, condominium, etc.), Modular, Manufactured Home, outside of a Special Flood Hazard Area (SFHA) within Pinellas County, or as described in the program guidelines.
- Total household income must be below 120% Area Medium Income (AMI).
- Homebuyers must be able obtain first mortgage commitment for a minimum 30-year fixed-rate mortgage from an approved lending institution (no ARM, no balloon mortgages allowed, and no prepayment penalties allowed).
- Homebuyers must not own other residential property at the time of application. Exceptions may be considered on a case-by-case basis, as described in the program guidelines.

Program Priorities: Applicants to the Homebuyer Assistance Program will be processed on a first-come, first-processed basis. Assistance may be prioritized to those applicants with a direct impact from the hurricanes, as described in the program guidelines.

Maximum Award Amount: \$80,000

Maximum Income of Beneficiary: 120% Area Median Income (AMI)

Mitigation Measures: N/A

Reducing Impediments for Assistance: The Homebuyer Assistance Program is available to all low- to middle-income residents of Pinellas County who meet the program's eligibility requirements and were impacted by Hurricanes Idalia, Helene, or Milton.

Intake centers will be accessible to individuals with disabilities (ADA compliant), and communication assistance will be provided upon request. All Pinellas County homeowners will have equal access to the application process.

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

Disaster Relief Reimbursement Program

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Disaster Relief Reimbursement Program	\$32,147,392	100%

Table 34: Grantee Public Services Program Overview

While the Disaster Relief Reimbursement Program is classified as a public service activity under CDBG-DR regulations, Pinellas County is incorporating it into the People First Housing Initiative because it plays a direct and essential role in supporting household housing stability and recovery. Many residents incurred significant out-of-pocket expenses, including rent, mortgage payments, utilities, and temporary housing costs, in the immediate aftermath of the disasters, prior to the availability of formal recovery programs. These self-funded efforts were often the only means of maintaining safe and stable housing during the displacement period. By reimbursing eligible households for verified recovery-related costs not covered by FEMA, insurance, or other sources, the program prevents further financial destabilization and complements the County's broader strategy to restore safe, decent, and resilient housing across the most impacted communities

Amount of CDBG-DR Funds Allocated to this Program: \$32,147,392:

- \$8,036,848 reserved for LMI Owner Households
- \$24,110,544 reserved for LMI Renter Households

Eligible Activity(ies):

- Disaster Relief Assistance for LMI Persons, FR-6489-N-01 III.B.14.b and III.D.5.h, 24 CFR 570.201(e), HCDA 105(a)(8).

National Objective: Low- and Moderate-Income Clientele (LMC) 24 CFR 570.208(a)(2).

Connection to Unmet Needs: Disaster impact-related hardship represents a significant unmet need in Pinellas County, particularly among low- and moderate-income (LMI) households that experienced disaster-related job loss, rising costs, and housing instability. To address these challenges, Pinellas County is allocating a portion of its CDBG-DR funds to the Disaster Relief Reimbursement Program for LMI households, offering financial reimbursement for out-of-pocket expenses incurred during the disaster recovery period. This program will reimburse eligible households for essential expenses they have already paid, including rent or mortgage payments, utilities, and other expenses as delineated in the program guidelines, for a period of up to six consecutive months following the disaster event. Reimbursements will be made directly to the household through verification of eligibility and documentation of paid expenses. These reimbursements are critical to alleviating household debt, preventing further displacement, reducing strain on local nonprofit systems, and helping residents regain stability as they rebuild.

An estimated 18,120 LMI Pinellas County residents in the impacted area face prolonged recovery-related hardship, with over \$135.8 million in unmet needs related to essential household expenses. Pinellas County's program is designed to target these residents and provide a flexible, responsive reimbursement pathway that fills critical service gaps left by FEMA, SBA, and unemployment benefits. By prioritizing those who bore the highest recovery costs upfront, this program complements Pinellas County's broader housing and economic recovery efforts and promotes a more stable and resilient future for disaster-impacted households.

Lead Agency and Distribution Model: Pinellas County will administer the program. To evaluate environmental factors for CDBG-DR-funded projects and activities, Pinellas County, as a responsible Entity (RE), will ensure compliance with the environmental requirements listed under 24 CFR 58, as applicable.

Program Description: This program will provide reimbursement to eligible LMI residents of Pinellas County, for documented expenses incurred as a result of a qualifying disaster, including expenses such as rent, mortgage and utility payments and other eligible subsistence-based expenses resulting from the qualifying disaster for a period of up to six consecutive months.

To be eligible, the beneficiary must demonstrate that they have a financial need resulting from expenses and losses resulting from the qualifying disaster(s) and have used all Federal assistance that was made available for losses suffered as a result of the disaster that qualified for CDBG-DR assistance.

Eligible Geographic Areas: Pinellas County (except the City of St. Petersburg)

Other Eligibility Criteria: To qualify for this program the applicant must:

- Have a demonstrated hardship resulting in financial need as a result of the qualifying disaster, and as further defined in the program guidelines.
- Have expenses incurred prior to applying to Pinellas County for CDBG-DR assistance and within two years after the applicability date of the grantee's initial AAN (January 21, 2025) for that disaster, whichever is sooner.
- Reimbursement shall be limited to one payment to each individual household.
- The cost reasonableness criteria for the amount of reimbursement and the documentation required to demonstrate hardship which resulted in financial need will be established in the program guidelines.
- Owner-applicant households must be eligible to receive an award under the Homeowner Rehabilitation/Reconstruction Program.

Program Priorities: Owner-applicant households will be prioritized based on award date under the Homeowner Rehabilitation/Reconstruction Program. All other applicants will be processed on a first-come, first-processed basis.

Maximum Award Amount: \$15,000

Maximum Income of Beneficiary: 80% of Area Median Income (AMI)

Mitigation Measures: N/A

Reducing Impediments for Assistance: The Disaster Relief Reimbursement Program is available to LMI households of Pinellas County who have demonstrated a hardship and resulting financial need because of the qualifying disaster events of Hurricane Idalia, Helene, or Milton. Intake centers will be accessible to individuals with disabilities (ADA compliant), and communication assistance will be provided upon request. All Pinellas County LMI residents will have equal access to the application process.

To encourage participation in disaster recovery programs by impacted individuals, Pinellas County will identify those expected to benefit from CDBG-DR-funded programs, establish program-specific prioritization criteria where appropriate, and implement a data-driven, targeted outreach and engagement campaign throughout Pinellas County to ensure broad and effective program participation.

Economic and Community Revitalization

Economic and Community Revitalization Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Small Business and Community Recovery Program	\$22,147,393	75%
Nonprofit Community Recovery Program	\$10,000,000	90%
Economic and Community Revitalization Total	\$32,147,393	

Table 35: Grantee Economic Revitalization Programs Overview

The recovery of Pinellas County's economy and communities depends not only on rebuilding physical structures but also on restoring the community-serving ecosystem of small businesses and nonprofit organizations that anchor local stability. Small businesses, particularly those operating in coastal and low- to moderate-income areas, suffered extensive damage and economic disruption due to Hurricanes Idalia, Helene, and Milton, contributing to significant job loss and commercial instability. Simultaneously, nonprofit organizations, many of which provide essential services to vulnerable residents, faced operational and financial challenges that threaten their continued ability to serve disaster-impacted populations. Pinellas County's Economic and Community Revitalization Programs are designed to address these dual challenges by supporting the reactivation of small businesses and the restoration of nonprofit capacity. Together, these efforts aim to revitalize the local economy, protect community infrastructure, and promote

equitable recovery for all residents, particularly those most dependent on locally rooted services and employment opportunities.

Small Business Community Recovery Program

Amount of CDBG-DR Funds Allocated to this Program: \$22,147,393

Eligible Activity(ies):

- Economic Development Assistance to For-Profit Businesses, 24 CFR 570.203, HCDA Section 105(a)(17)

National Objective: Low- and Moderate-Income Jobs (LMJ) 24 CFR 570.208 (a)(4) and FR-6489-N-01 III.d.7(b) and (c), Area Benefit (LMA) 24 CFR 570.208(a)(1), Urgent Need FR-6489-N-01 III.B.2; and Elimination of Slum and Blight 24 CFR 570.208 (b).

Connection to Unmet Needs: Pinellas County experienced more than \$525 million in economic losses, with small businesses bearing the brunt of the impact. These losses were compounded by business interruption, job losses, and damage to commercial property and equipment, particularly in coastal and LMI communities. The Small Business Community Recovery Program provides targeted investment and prioritizes disaster-impacted businesses that serve or employ low- and moderate-income (LMI) residents, operate in the hardest-hit areas, and demonstrate a need for capital to rebuild or retain jobs. These funds are designed to stimulate local economic revitalization, promote commercial corridor stabilization, and complement housing recovery efforts by ensuring that neighborhood-serving businesses can remain open and operational. These investments are essential not only for restoring economic vitality but for reinforcing the community infrastructure that underpins long-term stability.

Lead Agency and Distribution Model: Pinellas County will administer the program. To evaluate environmental factors for CDBG-DR-funded projects and activities, Pinellas County, as a responsible Entity (RE), will ensure compliance with the environmental requirements listed under 24 CFR 58, as applicable.

Program Description: The devastation caused by the hurricanes extended beyond housing and infrastructure, deeply impacting Pinellas County's small businesses. Many small businesses suffered significant physical and operational damage and continue to face barriers to accessing the capital necessary for recovery, growth, and job creation.

Pinellas County recognizes that true community recovery and resilience are not possible without the return and revitalization of its small businesses. The Small Business Community Recovery Program is designed to provide targeted financial assistance to small businesses and micro-enterprises impacted by the disaster.

Through grants and forgivable loans, the program aims to:

- Support the recovery and stabilization of small businesses
- Create and retain jobs for residents
- Revitalize neighborhood economies
- Foster long-term resilience and sustained economic growth and the revitalization of low- and moderate-income communities

The program is structured to meet the specific recovery needs of small businesses by providing flexible funding that can support a range of eligible expenses. It is designed to ensure broad access across Pinellas County's small business sectors, including those most affected by disaster-related damage or disruption. By supporting the restoration of business operations, the program contributes directly to economic stabilization, commercial activity, and the retention and creation of jobs for residents in the impacted areas. This investment in small business recovery plays a key role in driving long-term economic revitalization throughout the county. Funding may be provided for:

- Working capital (payroll, rent, utilities, inventory);
- Replacement of equipment and machinery; and
- Repairs and renovations for disaster-damaged commercial or industrial properties with a demonstrable unmet need.

Certain restrictions may apply, including limitations on refinancing existing debt or using funds for activities that do not directly support recovery or mitigation efforts. These restrictions will be outlined in the program guidelines.

Eligible Geographic Areas: Pinellas County (except the City of St. Petersburg)

Other Eligibility Criteria: Businesses must meet all the following criteria:

- Meet the definition of a small business as defined by SBA at 13 CFR part 121.
- All eligibility criteria, including applicable underwriting requirements as established in the program guidelines.
- Must have been operational at the time of the disaster.
- Must be currently operational or able to demonstrate the ability to re-open or expand operations upon receiving assistance from the program.
- Must be able to demonstrate a direct impact from the disaster, with a documented physical or financial loss.
- Must be able to demonstrate an unmet need not covered by insurance, SBA loans, or other funding sources.

Program Priorities: Awards will be made on a competitive basis. Criteria will be described in the program guidelines, and may include:

- Disaster Impact Severity
- Job Retention and Creation
- Benefit to Low- and Moderate-Income (LMI) Residents
- Geographic Location in Most Impacted Areas
- Essential or Community-Serving Businesses
- Leveraging of Other Funds
- Operational Readiness and Sustainability

Maximum Award Amount: \$500,000

Maximum Income of Beneficiary: N/A

Mitigation Measures: Hazard mitigation and long-term resilience will be addressed in the program guidelines for rehabilitation related activities. Mitigation activities are defined as those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters

Reducing Impediments for Assistance: The Small Business Community Recovery Program is available to all eligible small businesses in Pinellas County that were impacted by Hurricanes Idalia, Helene, and Milton. To reduce barriers to access, Pinellas County will conduct targeted outreach and marketing through local media, social media, community partners, and other relevant channels to ensure widespread awareness of the program, especially in low- and moderate-income communities. Informational materials and application assistance will be available in multiple languages, and Pinellas County will provide in-person and virtual support to help applicants navigate the process. Intake centers will be ADA-compliant, and communication assistance will be available upon request to ensure accessibility for individuals with disabilities and those needing communication assistance.

Nonprofit Community Recovery Program

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

Eligible Activity(ies):

- Public Facilities and Improvements, 24 CFR 570.201(c), HCDA Section 105(a)(2)
- Clearance, Rehabilitation, Reconstruction, and Construction of Buildings (Including Housing, HCDA Section 105(a)(4)
- Special activities by Community-Based Development Organizations (CBDOs), 24 CFR 570.204, HCDA Sections 105(a)(14) and (15)
- Public Services, HCDA Section 105(a)(8), 24 CFR 570.201(e)

National Objective: Low- and Moderate-Income Jobs (LMJ) 24 CFR 570.208 (a)(4) and FR-6489-N-01 III.d.7(b) and (c), Area Benefit (LMA) 24 CFR 570.208(a)(1), Limited Clientele (LMC) 24 CFR 570.208(a)(2), Urgent Need FR-6489-N-01 III.B.2; and Elimination of Slum and Blight 24 CFR 570.208 (b).

Connection to Unmet Needs: Pinellas County experienced more than \$525 million in economic losses, with small businesses bearing the brunt of the impact. These losses were compounded by business interruption, job losses, and damage to commercial property and equipment, particularly in coastal and LMI communities. SBA disaster loan data for nonprofit organizations in Pinellas County reveals a mismatch between verified damages and loan amounts awarded. Most nonprofits received a uniform loan amount of approximately \$399,700, regardless of whether their losses were minimal or exceeded \$45 million. Loan amounts were closely tied to employment size than actual damage incurred, placing smaller nonprofits at a disadvantage. This underscores a clear unmet need among community-based nonprofits, particularly those providing critical health, housing, and social services to LMI residents. Many of these organizations operate on limited margins, lack insurance or collateral for traditional loans, and were unable to recover adequately through SBA or private sector mechanisms. Without targeted support, the continued service capacity of these nonprofits—and by extension, the recovery of the most exposed residents—is at risk. By aligning economic recovery funding with the needs of small businesses and nonprofits, Pinellas County aims to support a more extensive and resilient recovery. These investments are essential not only for restoring economic vitality but for reinforcing the community infrastructure that underpins long-term stability.

Lead Agency and Distribution Model: Pinellas County will administer the program for nonprofits awarded funding as beneficiaries. In some cases, based on the scope and the terms of the agreement, a nonprofit may be designated as a subrecipient. To evaluate environmental factors for CDBG-DR-funded projects and activities, Pinellas County, as a responsible Entity (RE), will ensure compliance with the environmental requirements listed under 24 CFR 58, as applicable.

Program Description: The devastation caused by the hurricanes extended beyond housing and infrastructure, deeply impacting Pinellas County's nonprofit organizations. Many of these entities suffered significant physical and operational damage and continue to face barriers to accessing the capital necessary for recovery, growth, job creation, and the provision of community services to low- and moderate-income areas and predominantly low- and moderate-income populations.

Pinellas County recognizes that true community recovery and resilience are not possible without the return and revitalization of its nonprofits that provide services to low- and moderate-income areas and predominantly low- and moderate-income populations. These organizations are essential drivers of neighborhood stability, employment, and vital services.

The Nonprofit Community Recovery Program is designed to provide targeted financial assistance to community-based nonprofits that serve low- and moderate-income areas or predominantly low- and moderate-income populations.

Through grants and/or forgivable loans, the program aims to:

- Support the recovery and stabilization of nonprofits that serve low- and moderate-income areas and populations
- Create and retain jobs for residents
- Revitalize neighborhood economies
- Foster long-term resilience and sustained economic growth and the revitalization of low- and moderate-income communities

The program is structured with flexibility to meet the specific recovery needs of Pinellas County's nonprofit community that provides services to predominantly low- and moderate-income areas or predominantly low- and moderate-income populations. The program is designed to ensure access to funding across Pinellas County's many communities. By empowering nonprofits through this assistance, the program supports a robust economic recovery and a renewed community revitalization effort in response to the disaster. This funding will not only support physical and operational recovery but also contribute to job creation and retention for residents in impacted areas.

Funding may be provided for:

- Repairs, renovations, or other rehabilitation activities for disaster-damaged properties owned by nonprofit entities, so long as those facilities are made available to the general public and there is a demonstrable unmet need. Facilities owned by a nonprofit must be open for use by the general public during all normal hours of operation.

Certain restrictions may apply, including limitations on refinancing existing debt or using funds for activities that do not directly support recovery or mitigation efforts. These restrictions will be outlined in the program's policies and procedures.

Eligible Geographic Areas: Pinellas County (except the City of St. Petersburg)

Other Eligibility Criteria: Nonprofit organizations must meet all the following criteria:

- Nonprofit must meet all eligibility criteria, as established in the program's policies and procedures.
- Must have been operational at the time of the disaster.
- Must be currently operational or able to demonstrate the ability to re-open or expand operations upon receiving assistance from the program.
- Must be able to demonstrate a direct impact from the disaster, with a documented physical or financial loss.

- Must be able to demonstrate an unmet need not covered by insurance, SBA loans, or other funding sources.
- In addition to the eligibility criteria, nonprofit organizations must qualify as providing services to a low- and moderate-income area of Pinellas County or a predominantly low- and moderate-income population, be a registered 501(c)(3) or (19) organization, and be in good standing with the IRS and State of Florida.

Program Priorities: Awards will be made on a competitive basis. Criteria will be described in the program guidelines, and may include:

- Continuity of Essential Services
- Demonstrated Financial Need or Operational Disruption
- Organizational Capacity & Readiness
- Service to LMI Populations:
- Job Retention or Creation

Maximum Award Amount: \$500,000

Maximum Income of Beneficiary: N/A

Mitigation Measures: Hazard mitigation and long-term resilience will be addressed in the program guidelines for rehabilitation related activities. Mitigation activities are defined as those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters

Reducing Impediments for Assistance: The People First Nonprofit Recovery Program is available to all eligible nonprofit organizations in Pinellas County that were impacted by Hurricanes Idalia, Helene, and Milton. To reduce barriers to access, Pinellas County will conduct targeted outreach and marketing through local media, social media, community partners, and other relevant channels to ensure widespread awareness of the program, especially in low- and moderate-income communities. Informational materials and application assistance will be available in multiple languages, and Pinellas County will provide in-person and virtual support to help applicants navigate the process. Intake centers will be ADA-compliant, and communication assistance will be available upon request to ensure accessibility for individuals with disabilities and those needing communication assistance.

Local Mitigation Planning Program

Eligible Cost Category	CDBG-DR Allocation	% of CDBG-DR
	Amount	Allocation
Local Mitigation Planning	\$24,000,000	3%

Table 36: Grantee Planning Activity(ies) Overview

Local Mitigation Planning Program

Amount of CDBG-DR Funds Allocated to this Program: \$24,000,000

Eligible Activity(ies):

- Planning Activities, HCDA Section 105(a)(12), 24 CFR 570.205

National Objective: N/A

Connection to Unmet Needs: The Local Mitigation Planning Program addresses unmet mitigation needs by supporting the identification, analysis, and prioritization of resilience strategies that align with the County's Mitigation Needs Assessment. By equipping Pinellas County and its municipalities with the resources to conduct data-informed planning activities, including feasibility studies, stakeholder engagement, and risk reduction analyses, this program strengthens local capacity to address persistent hazards that remain unaddressed due to limited pre-disaster planning resources. These planning activities are critical to identifying mitigation gaps and setting the foundation for targeted infrastructure investments.

The resulting pipeline of eligible, community-supported projects will position Pinellas County to make strategic, risk-informed funding decisions that maximize long-term benefits, reduce repetitive loss, and align with HUD's emphasis on forward-looking, locally driven mitigation planning.

Lead Agency and Distribution Model: Pinellas County may administer the program directly, engage eligible local governments as subrecipients, or implement a hybrid model combining both approaches.

Program Description: The Local Mitigation Planning Program provides funding to Pinellas County and eligible local governments to support the development and enhancement of mitigation strategies that reduce risks identified in the mitigation needs assessment and strengthen resilience to future disasters. This program enables Pinellas County and its municipalities to conduct comprehensive mitigation planning, feasibility studies, outreach efforts, and needs assessments—fostering informed decision-making and the strategic allocation of resources for long-term hazard reduction.

These planning efforts will culminate in the identification of eligible mitigation infrastructure projects for potential funding consideration by Pinellas County.

Eligible Geographic Areas: Local governments in Pinellas County (excluding the City of St. Petersburg).

Other Eligibility Criteria: To receive funding for the mitigation planning program, recipients must be:

- A department or agency of Pinellas County or of a local government within the County (excluding the City of St. Petersburg).

Maximum Award Amount: \$1,000,000

Maximum Income of Beneficiary: N/A

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

Reducing Impediments for Assistance: The mitigation planning program reduces impediments to assistance for populations and areas vulnerable to hazards by ensuring disaster risk reduction efforts that are comprehensive and community driven. Many at-risk communities, such as those comprised predominantly of low-income residents, the elderly, and people with disabilities have limited resources to undertake the comprehensive planning necessary to mitigate hazards. This program funds mitigation needs assessments, enabling jurisdictions to identify risks and prioritize mitigation projects in these communities, ensuring that future investments will protect those most affected at risk in future disasters.

By providing financial and technical assistance, the mitigation planning program removes barriers that often prevent communities vulnerable to hazards from benefiting from disaster resilience funding.

Local Mitigation Infrastructure Program

Program Overview

The Local Mitigation Infrastructure Program will fund local mitigation infrastructure projects identified through the Local Mitigation Planning Program. Mitigation activities are defined as those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit	Does this Program have tie back to the disaster?
Local Mitigation Infrastructure Program	\$106,146,000	50%	No

Table 37: Grantee Local Mitigation Infrastructure Activity(ies) Overview

Local Mitigation Infrastructure Program

Amount of CDBG-DR Funds Allocated to this Program: \$106,146,000

Eligible Activity(ies):

- Acquisition of Real Property, 24 CFR 570.201(a), HCDA Section 105(a)(1)
- Public Facilities and Improvements, 24 CFR 570.201(c), HCDA Section 105(a)(2)
- Clearance, Demolition, Rehabilitation, and Reconstruction of Buildings, 24 CFR 570.201 (d), HCDA Section 105(a)(4)
- Payment of Non-Federal Share, 24 CFR 570.201(g), HCDA Section 105(a)(9)
- Relocation Assistance, 24 CFR 570.201(i), HCDA Section 105(a)(11)

Connection to Unmet Needs: Although infrastructure accounted for only 5% of unmet needs (\$192.5 million), long-term mitigation remains a priority to reduce future disaster impacts. Accordingly, Pinellas County has allocated 15% of CDBG-DR funds (\$130 million) to support critical infrastructure improvements and resilience planning. This Mitigation Set-Aside Infrastructure programs (\$106.1 million), which fund projects aimed at flood protection, stormwater management, and building resilience, particularly in LMI communities.

Pinellas County's funding distribution aligns with areas of greatest need, ensuring housing remains the top priority (82%), while economic revitalization (5%) and infrastructure/mitigation (15%) provide critical support for long-term stability. This balanced approach maximizes recovery impact, promotes efficient resource distribution, and strengthens Pinellas County's resilience to future disasters.

National Objective: Low- and Moderate-Income Area Benefit (LMA) 24 CFR 570.208(a)(1), FR-6489-N-01 III.D.6.e; Limited Clientele (LMC) 24 CFR 570.208(a)(2); Urgent Need FR-6489-N-01 III.B.2.

Lead Agency and Distribution Model: Pinellas County may administer the program directly, designate eligible local governments as subrecipients, or implement a hybrid model combining both approaches. To evaluate environmental factors for CDBG-DR-funded projects and activities, Pinellas County, as a responsible Entity (RE), will ensure compliance with the environmental requirements listed under 24 CFR 58, as applicable.

Program Description: Mitigation activities are designed to promote sound, sustainable long-term recovery by supporting infrastructure projects that reduce risks from future disasters and increase community resilience. Pinellas County will award funds to eligible mitigation infrastructure projects that are identified through the Local Mitigation Planning Program or through other approved hazard mitigation plans. All projects must demonstrate a clearly defined mitigation need and cannot supplant or duplicate other federal, state, or local funding sources.

Pinellas County will promote sustainable and resilient infrastructure by incorporating principles such as water and energy efficiency, resilient infrastructure, and hazard resistance into all rehabilitation, reconstruction, or new construction activities.

Pinellas County and/or any designated subrecipients will be responsible for ensuring that mitigation principles and preparedness measures are embedded throughout project design and implementation. By integrating hazard mitigation and resilience planning into recovery, the Program ensures that communities are able to build back safer and stronger.

Eligible Geographic Areas: Local governments in Pinellas County (excluding St. Petersburg)

Other Eligibility Criteria: Eligible projects must be:

- Identified through the Local Mitigation Planning Program or an approved local mitigation planning process
- Designed to address a clearly defined mitigation need
- Supported by documentation of unmet need and not duplicative of other available funding sources
- Able to meet a HUD national objective (LMA or UN)
- Submitted by eligible units of local government or designated subrecipients

Program Priorities: Prioritization factors will be detailed in the program guidelines and may include, but are not limited to, the following:

- Shovel readiness (e.g., permitting and design status)
- Cost-effectiveness and favorable cost-benefit analysis
- Availability of other leveraged funds (e.g., state hazard mitigation or FEMA BRIC funding)
- Alignment with critical and urgent needs as defined in program guidelines
- Impact on populations vulnerable to hazards and ability to reduce risks to LMI residents

Maximum Award Amount: Up to \$106,146,000 as further defined in the program guidelines.

Maximum Income of Beneficiary: N/A

Mitigation Measures: This program is designed to support long-term infrastructure mitigation projects that reflect the unique hazards, vulnerabilities, and disaster impacts within Pinellas

County. Projects will promote resilience through sustainable design, integration of mitigation measures, and strategies that reduce future disaster risk.

Reducing Impediments for Assistance: The Program will enhance access to disaster risk reduction resources for communities vulnerable to hazards by promoting community-driven approaches to new investments in infrastructure. By funding projects selected through the Local Mitigation Planning Program, communities that might otherwise not have access to mitigation planning and infrastructure resources will be offered a new and significant pathway for enhancing their resilience to future disasters. Many low-income households, the elderly, and individuals with disabilities may reside in high hazard risk areas with limited means to prepare for or mitigate hazards. By funding mitigation needs assessments and other planning activities, the program supports local jurisdictions to identify local risks and prioritize projects that eliminate or reduce said risks.,

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

Administration

An authorized portion of 5% of the total CDBG-DR allocation, amounting to \$40,689,150, will be dedicated to program administration. These funds will support the essential activities required to plan, execute, and oversee the CDBG-DR recovery initiatives. This includes responsibilities such as compliance oversight, performance monitoring, DRGR system management, financial administration, and required reporting.

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration	\$20,689,150	2.5%

Table 38: Grantee Administration Activity(ies) Overview

General Information

Citizen Participation

Pinellas County actively seeks and values citizen participation in the development of the Action Plan and any subsequent amendments. Pinellas County's efforts will specifically target outreach to low—and moderate-income (LMI) individuals and communities. This strategy is in line with Pinellas County's commitment to citizen participation as outlined in Pinellas County's annual Community Development Block Grant (CDBG) funding plans.

To promote meaningful engagement, Pinellas County will share opportunities for public comments on the Action Plan as well as its recovery and mitigation programs, through various county and local resources. Additionally, Pinellas County will partner with municipalities to facilitate local forums, ensuring that community voices are heard and incorporated into the planning process and program implementation.

Moreover, Pinellas County is dedicated to ensuring that all populations impacted by recent storms have access to important information about recovery assistance programs for Hurricanes Idalia, Helene, and Milton. We will provide updates and resources through in-person meetings, outreach events, and a mix of online and traditional media channels, fostering a participatory environment for recovery and rebuilding.

Consultation of Developing the Action Plan

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

Pinellas County recognizes that the affected stakeholders are the center, and partners in the development and implementation of this plan. Opportunities for citizen's input were provided throughout the planning process through surveys, town hall meetings and stakeholder interviews/meetings.

Pinellas county has undertaken a broad outreach program to obtain feedback on unmet needs in the Idalia, Helene and Milton impacted areas. Consistent with HUD's guidance in the Universal Notice, Pinellas County developed a survey tool which was distributed to municipalities, tribal communities, and other stakeholders across Pinellas County in late February. The survey approach enabled Pinellas County to gather broader and more valuable feedback than would have been possible with a series of in-person or teleconference meetings.

Partners Consulted	Consultation Type
North Cities	Virtual Meeting, and Survey
South Cities	Virtual Meeting, and Survey
Big C (Beach Communities)	In-Person Meeting, and Survey
Pinellas County CoC	Virtual Meeting
Public Housing Authorities	Survey
Tribal Communities	Survey
Business Community	Survey
County Departments	Data Requests

Table 39: Action Plan Development Consultations

ENGAGEMENTS WITH LOCAL MUNICIPALITIES

Pinellas County created an online survey, distributed to local municipalities via [SurveyMonkey.com](https://www.surveymonkey.com). The purpose of the survey was to gather information from these municipalities about the remaining unmet needs following the qualifying disasters: Hurricane Idalia, Hurricane Helene, and the Milton disaster. The survey included 10 questions, which are listed below.

1.	What type of disaster impacted your jurisdiction?
2.	What were the most significant impacts on your jurisdiction?
3.	Has your jurisdiction received the cost of damages caused by the disasters?
4.	How would you describe the challenges your community's most vulnerable populations face with urgent short-term and long-term recovery?
5.	What areas require the most immediate support for recovery?
6.	What types of funding or resources does your jurisdiction need the most?
7.	Has your jurisdiction applied for or received any disaster recovery funding (FEMA PA, Insurance, or any other Federal or State Grants)?
8.	If funding has been received, what was the funding and what challenges have you faced in using the funds effectively?
9.	Are there any long-term changes that were not listed in the LMS plan needed to increase resilience against future disasters?
10.	Do you have any additional feedback or concerns regarding disaster recovery efforts in your jurisdiction?

Table 40: Municipalities Survey Questions

All 24 municipalities in Pinellas County participated in the survey and provided valuable feedback for creating this action plan and addressing Pinellas County's unmet needs. The qualifying

disasters impacted all 24 jurisdictions, with hurricane-force winds being the primary concern, followed closely by flooding and surge waters.

The survey results indicate that all municipalities agree the most significant impact of disasters on their communities is the damage to residential housing. This is followed by the effects on public infrastructure, which includes roads, bridges, and utilities. Additionally, economic impacts on businesses and environmental damage from contamination and beach erosion are also notable concerns.

The survey inquired whether any municipalities had received estimated costs resulting from the disaster. Most responses indicated that the costs were unknown, followed by estimates of over \$25,000,000 and between \$5,000,000 and \$25,000,000. Responses are indicated in the table below.

Cost of Damages	Responses
Cost Unknown	7
Less Than \$1,000,000	2
\$1,000,000 to \$5,000,000	4
\$5,000,000 to \$25,000,000	4
\$25,000,000 or more	6

Table 41: Survey Results

All municipalities reported that the challenges faced by the most exposed populations in achieving both short and long-term recovery include:

- Housing impacts that lead to residential displacement.
- Damage to low-income rental properties.
- Elderly residents on fixed incomes being unable to repair or rebuild their homes.
- Issues related to permitting and staffing.
- Limited access to essential utilities such as electricity, water, and sewer services.

The funding resources required for each jurisdiction were divided into several categories: grant funding for government and public infrastructure as well as housing rehabilitation; technical assistance for grant applications and program management; business recovery; and public services for displaced residents.

The survey also inquired whether any municipalities had applied for or received funding. Most municipalities reported that they had applied, but the majority had not yet received any funding.

Additionally, the survey asked if any long-term changes, not listed in the Local Mitigation Strategy (LMS) plan, were needed to enhance future resiliency. Most respondents answered "no," with one exception: a representative indicated that City Hall needs to be elevated due to persistent flooding.

The feedback on disaster recovery efforts highlighted several areas for improvement. Respondents expressed a need for targeted assistance specific to their jurisdiction and requested better information and communication regarding State and Federal regulations. This input provides a solid foundation for strengthening our recovery initiatives.

ENGAGEMENT WITH PINELLAS COUNTY COC

Pinellas County held a consultation session with the Homeless Leadership Alliance of Pinellas, the HUD CoC organization on April 21, 2025. The CoC indicated the continued need for permanent supportive housing, emergency shelters, and provider support. They also indicated a need for repairs and mitigative hardening of these critical facilities, but were in need for more responsive assistance from FEMA in terms of data and post-storm impacts to better document gaps in assistance and quantify needs.

ENGAGEMENTS WITH PUBLIC HOUSING AUTHORITIES

As part of the consultation process for the county's Action Plan, Pinellas County distributed an online survey via [SurveyMonkey](#) to Pinellas County's Public Housing Authorities (PHAs) to gather input on unmet housing needs. The survey included a variety of questions, which are outlined below.

1.	How many properties/sites does the Public Housing Authority (PHA) own or manage?
2.	How many households currently reside in PHA properties?
3.	Which PHA properties were impacted by Hurricanes Idalia, Helene, and/or Milton?
4.	What financial resources have been received to date for storm damage recovery?
5.	What recovery efforts have been undertaken by the PHA?
6.	What additional resources or support does the PHA need for recovery and future Mitigation?
7.	Resident Impacts: How many households were displaced due to storm-related damage? Have they been able to return?
8.	Operational Impact: Has the storm affected PHA administrative functions (e.g., staff displacement, office damage, loss of records)
9.	Utility Disruptions: Were there prolonged utility outages at any properties? If so, what impacts did they have on resident safety and livability?
10.	Resilience Planning: Has the PHA implemented or planned resilience measures (e.g., backup generators, stormwater management improvements, emergency preparedness plans)?
11.	Long-Term Recovery: What are the PHA's top priorities for long-term recovery and resilience?
12.	Is there anything else you would like to share regarding the impacts of the storm on your properties, residents, or overall operations?

Table 42: Public Housing Authority Survey Questions

Public Housing Authority Results: Pinellas County received responses from two public housing authorities: the Tarpon Housing Authority and the Pinellas Housing Authority. These survey results provided valuable insights for the creation of the Action Plan and highlighted the ongoing unmet needs for public housing in Pinellas County.

Public Housing Population: The survey results show that these authorities manage a total of 71 properties, providing housing for 4,548 families. Among these properties, four are designated exclusively for elderly residents. The Tarpon Housing Authority reported that all their residents are elderly, disabled, low-income individuals, and non-English speakers. The Pinellas County Housing Authority indicated that they have a total of 3,512 residents who are considered part of an exposed population.

PHA Disaster Impacts: The Tarpon Housing Authority faced significant disaster impacts affecting 56 residential units and one building that provides after-school services to 75 families in need. The 56 residential units were in imminent danger due to their old windows, while the afterschool building sustained damage to its roof, ceiling (caused by water intrusion), and windows.

The Pinellas County Housing Authority reported that multiple properties have sustained damage, including Rainbow, Valor Preserve at Lake Seminole, Crystal Lakes Manor, East Lake Club, Lealman, Orange Lake Village, Landings at Cross Bayou, Lakeside Terrace, Pinellas Heights, and Palms of Pinellas. The reported damages include, but are not limited to:

- Roof damage
- Fallen and removed trees
- Water damage and intrusion
- Issues with fire safety systems
- Blown-off shingles
- Destroyed fences and gates
- Compromised security
- Malfunctioning hot water and HVAC systems
- Broken windows
- Damage to soffits and fascia
- Blocked roads and gates
- Flooded offices
- Uprooted young trees

PHA Repairs Completed: Both PHA's stated they had completed some repairs which included- Roof repairs, mold mitigation/environmental services, stopping water intrusion (roof/windows), sealing windows, removal of trees, replanting of young trees, general cleanup, renovation of some offices, Regraded landscaping (more than just trees) A full needs assessment on the after school Program Building, door repairs, window replacement and tree trimming.

PHA Additional work that remains: Tarpon Housing authority: Full replacement of the roof at the After School Program Building serving 75 families in need. Window replacements for the 56 residential units that have original windows from 1969. Additional tree trimming. A solution to the flooding issue for building 511 E. Morgan Street proper drainage is needed.

Pinellas Housing Authority: Roof repairs, mold mitigation/environmental services, stopping water intrusion (roof/windows), sealing windows, removal of trees, replanting of young trees, general cleanup, renovation of some offices, landscaping (more than just trees)

PHA Mitigation Measure Taken: Tarpon has incorporated some mitigation measures, but Pinellas PHA has not due to a lack of funding. Additionally, some of the managed properties are located within high-risk flood zones.

The estimated cost for the remaining is outlined below. No funding has been secured.

- Tarpon Housing Authority \$300, 000
- Pinellas Housing Authority \$100,000

PHA Displaced Residents: The Tarpon Housing Authority reported no displaced residents. Pinellas Housing Authority responded Yes to this survey question, stating, "There are 47-50 families and approximately 60-65 families in our private sector dwellings rented to Voucher Program individuals/families."

PHA Operational Functions: Tarpon Housing Authority reported no disruptions to operational functions. Pinellas Housing Authority reported office damage, including mold, which resulted in moving some offices to temporary accommodations in garages and vacant properties.

PHA Prolonged Utility Disruptions: Tarpon Housing authority reported 'No' to this survey question. Pinellas Housing Authority reported prolonged outages for some properties which included power outages, Internet outages, HVAC outages, and fire systems that needed to be cleared at all properties.

PHA Resiliency Measures: Both PHA's have implemented resilience measures.

PHA Top priorities: The top priorities identified by the Tarpon Housing Authority in the survey are as follows:

- Installing a new roof on the After School Program Building, allowing us to continue serving the 75 families currently enrolled.
- Replacing windows in all 56 residential units to enhance storm prevention, safety, and energy efficiency.
- Tree trimming to prevent damage to the buildings and residents' properties.
- Implementing drainage and flood solutions for Building 511 E. Morgan Street, Tarpon Springs, FL.

The Pinellas Housing Authority also noted key priorities in the survey, which include:

- Continuing collaboration with future developers to create safe environments for our tenants.
- Ongoing education for both tenants and staff as part of our long-term plan.
- Active engagement from our property staff and maintenance teams, who regularly walk our properties to identify and address issues. Many of these concerns are reported by our tenants, which we highly encourage.
- Regularly reviewing our disaster plan to ensure it remains relevant; we conduct annual reviews and provide training based on this plan for both tenants and staff.

ENGAGEMENT WITH THE BUSINESS COMMUNITY

In an effort to enhance the country's Action Plan, Pinellas County distributed an online survey via [SurveyMonkey](#) to engage the local business community and gather valuable input on unmet economic needs. This survey features a range of thoughtfully crafted questions designed to capture feedback and insights, which are outlined below.

1.	<p>Business information</p> <ul style="list-style-type: none">• What is the primary industry of your business?• What is the legal structure of your business?• Is your business certified as a• How long has your business been operating?• What is the size of your business in terms of employees?• Does your business operate in a leased or owned space?• Does your business rely on physical storefronts, online sales, or both?• What percentage of your revenue comes from local customers?• Is your business located in an economically distressed area? (Promise Zone, Opportunity Zone, Neighborhood Revitalization Strategy Area, a tribal area, or Community Disaster Resilience Zone)• Has your business experienced a natural disaster in the past before this event?
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2.	Disaster Impacts: <ul style="list-style-type: none"> How was your business impacted by the disaster? Estimate the financial loss incurred due to the disaster What percentage of your normal revenue did your business lose during the first three months following the disaster? How long has your business been closed or significantly disrupted due to the disaster? Has your business revenue returned to pre-disaster levels? What percentage of employees were displaced or laid off due to the disaster? Has your business been able to restore its pre-disaster workforce?
3.	Assistance Received: <ul style="list-style-type: none"> What financial assistance has your business received to date? If you received financial assistance, what was the total amount received? Was the assistance received sufficient to cover your recovery needs? If assistance was not sufficient, what were the primary gaps? (Select all that apply)
4.	Remaining Unmet Needs: <ul style="list-style-type: none"> What is the estimated additional funding needed for your business to fully recover? What is your best estimate for what percentage of your business recovery costs remain unmet after all of the assistance received? What type of assistance is most critical to your business's recovery? How soon does your business need additional financial assistance to prevent further disruptions? Would support for adapting your business model (e.g., online sales, alternative venues) improve your recovery prospects?
5.	Resiliency, Mitigation and Infrastructure: <ul style="list-style-type: none"> If your physical location was impacted by the disasters, have you considered mitigation activities to protect your business, including but not limited to elevation, flood-resistant materials, backup generators, etc.? Did your business experience any of the following infrastructure-related impacts from the disaster? Did these infrastructure impacts delay your business recovery?
6.	Additional Feedback: <ul style="list-style-type: none"> What is the biggest challenge your business is currently facing in its recovery process? How confident are you that your business will fully recover within the next 12 months?

Table 43: Survey Results

- Pinellas County received 44 responses from the Pinellas County business community. These survey results provided valuable insights for the creation of the Action Plan and highlighted the ongoing unmet economic needs of the business community in Pinellas County.
- **Survey Results:** Pinellas County received responses from 44 local business. These survey results provided valuable insights into the creation of the Action Plan and highlighted the ongoing unmet needs for small business in Pinellas County.
- **Business Information:** The survey highlights various types of business representatives, with the majority coming from the hospitality sector. Most of the businesses surveyed are Limited Liability Companies (LLCs), closely followed by corporations. Additionally, one minority-owned company and 16 women-owned businesses are included in the survey. According to the results, most of these businesses have been operating for over 10 years.

Type of Business	Number of Type of Business
Hospitality	13
Other	12
Retail	5
Professional Services	5
Nonprofits	4
Healthcare	3
Manufacturing	1
Construction	1

Table 44: Type of Business

Twelve businesses have between 6 and 10 employees, eleven have around 1 to 5 employees, and nine businesses employ approximately 11 to 25 people. Furthermore, twenty-five of the business premises are leased, while nineteen are owned. Nineteen businesses operate physical stores exclusively, while another nineteen have both physical and online operations, and six businesses function online only. Local revenue accounts for thirteen businesses that receive between 76% to 100% of their income from the local population, while fourteen businesses receive around 51%-75% of their revenue from local sources.

Is your business located in an economically distressed area? (Promise Zone, Opportunity Zone, Neighborhood Revitalization Strategy Area, a tribal area, or Community Disaster Resilience Zone) All but two responses were “no” or unaware.

Has your business experienced a natural disaster in the past before this event? Twenty-six survey respondents stated that “no” they haven’t experienced a natural disaster in the past while 18 responded “yes”.

Did the disaster impact your business? All respondents reported that the qualifying disaster events had an impact on their businesses. Specifically, forty-one respondents experienced revenue losses, twenty-five also indicated loss of inventory and equipment, and eighteen reported some form of physical or structural damage. Additionally, fourteen respondents reported employee displacement.

Financial Losses: The table below shows reported estimated financial losses to their businesses due to Hurricanes Idalia, Helene and Milton impacts.

Survey Results	Financial Loss
2	Less than \$10,000
13	\$10,000-\$49,999
7	\$50,000-\$99,999
11	\$100,000-\$249,999
5	\$250,000-\$499,999
5	More than \$500,000

Table 45: Financial Loss

Revenue Loss: The table below shows reported estimated revenue losses of the businesses.

Survey Results	Percent of Revenue Lost
5	Less than 10%
10	10-24%
16	25-49%
4	50-74%
8	75% or More

Table 46: Percent of Revenue Lost

Duration of Business Closure After the Disaster: The table below shows the length of time businesses were closed due to the impacts of the hurricanes.

Survey Results	Length of Business Closure
8	Less than a week
16	1-4 Weeks
5	1-3 Months
7	3-6 Months
7	More than 6 Months

Table 47: Length of Business Closure

Revenue Recovery:

- Thirty-four respondents indicated that their revenue has not returned to pre-disaster levels but that they are still recovering.
- Nine respondents stated that their revenue had fully returned to pre-disaster levels.

Workforce Reinstatement:

- Twelve respondents answered "no" to the question of whether the pre-disaster workforce was reinstated, while thirty-one respondents answered "yes." The workforce was fully reinstated.

Assistance Received:

The table below indicates that half of the businesses surveyed received some form of assistance, with some entities applying for multiple types of aid. Among those that received assistance, seven used personal lines of credit, while twenty-two of the businesses surveyed did not receive any financial assistance.

Type of Assistance	Number of Businesses Who Received Assistance
SBA	5
Insurance	4
Florida commerce Bridge Loan	2
Local grant/Loan	1
Private loan/line of credit	7
State or other grant funding	5

Table 48: Businesses that Received Assistance

Among the responses that received financial assistance, seven received less than \$10,000, while four received between \$10,000 and \$49,999, Three received between \$50,000-\$99,999, three between \$100,000-\$249,999, one received over \$500,000 and four did not select an answer.

Out of the 44 respondents who participated in the survey, twenty-six indicated that they did not receive enough financial assistance to recover their business fully.

Eleven respondents reported that they had partially recovered but still lacked financial need, while three stated they had fully recovered. Additionally, four respondents did not answer this question.

This lack of support has created significant gaps in several critical areas, including repairs, inventory replacement, employee wages and benefits, rebuilding costs, and equipment.

The estimate for additional funding needed for their business to recover ranges from less than \$10,000 to more than \$500,000.

The table below represents the most critical assistance needed ranked from 1 being the most critical to 5 the least critical. The results show that twenty-five of the respondents believe (grant Funding and rebuilding and repairs) are the most critical needs, closely followed by low interest loans for equipment and inventory.

Type of assistance most critical to your business's recovery	Rank 1	Rank 2	Rank 3	Rank 4	Rank 5	No Response
Grant funding for rebuilding and repairs	25	5	3	2	1	8
Low-interest loans for equipment and inventory	7	22	7	0	0	8
Workforce support (e.g., workforce training)	2	5	19	9	1	8
Temporary housing for employees	1	1	5	21	8	8
Business relocation support	1	3	2	4	26	8

Table 49: Businesses Preferences

How soon does your business need additional financial assistance to prevent further disruptions? Eleven responded that they needed assistance immediately, Sixteen responded within the next 1-3 months, five within the next 6 months, four within the next year and eight provided no response.

Resiliency, Mitigation and Infrastructure:

- **If the disasters impacted your physical location, have you considered mitigation activities to protect your business, including but not limited to elevation, flood-resistant materials, backup generators, etc.?**
- 34 responded to this question-
 - Six responded "no" to this question but were interested in future mitigation measures. stated no but interested
 - Eleven responded "no" to this question and were not interested in future mitigation measures.

- Seventeen responded “yes” and they had considered implementing mitigation measures.
- Ten didn’t respond to this question.

All the businesses reported Power outages and water and sewer disruption, also many stated they experienced roads closures, and telecommunication disruption. Which has a huge impact on their business recovery efforts.

DRAFT

Overall conclusion: Local businesses are currently facing numerous challenges that significantly impact their operations. These challenges include limited access to financial resources for recovery, the costly and time-consuming process of repairing properties that have sustained storm damage, and a decline in customer demand due to recent disasters. Additionally, many businesses experience frustrating delays in obtaining necessary permit approvals for repairs and improvements, which can further hinder their recovery efforts. The loss of revenue during this critical period is also a pressing concern.

Despite these obstacles, most businesses that participated in the recent survey expressed a strong sense of optimism regarding the recovery initiatives underway in Pinellas County. They believe that effective support and resources will be made available to them, enabling them to rebound from the adverse effects of the severe storms and rebuild their operations more resiliently.

ENGAGEMENT WITH THE TRIBAL COMMUNITY

As part of the consultation process for the country's Action Plan, Pinellas County distributed an online survey via [SurveyMonkey](#) to Pinellas County's Tribal Communities to gather input on unmet needs in the community. The survey included a multitude of questions, which are outlined below.

Survey responses from Tribal communities in Pinellas County were not received.

1.	What type of disaster impacted your community? (Select all that apply) <input type="checkbox"/> Hurricane Force Winds <input type="checkbox"/> Hurricane Flooding <input type="checkbox"/> Hurricane Storm Surge
2.	What were the most significant impacts on your community? (Select all that apply) <input type="checkbox"/> Damage to single-family homes (Owner-occupied) <input type="checkbox"/> Damage to single-family homes (Renter-occupied) <input type="checkbox"/> Damage to multifamily housing (Owner/Condo) <input type="checkbox"/> Damage to multifamily housing (Renter-occupied) <input type="checkbox"/> Damage to community facilities (schools, emergency services, cultural centers, etc.) <input type="checkbox"/> Damage to public infrastructure (roads, bridges, utilities) <input type="checkbox"/> Environmental damage (erosion, debris, contamination) <input type="checkbox"/> Displacement of residents <input type="checkbox"/> Business closures/economic loss <input type="checkbox"/> Disruption of traditional practices or cultural sites <input type="checkbox"/> Other: _____

3.	If available, please estimate the financial cost of the damage in your community. <input type="checkbox"/> Less than \$1 million <input type="checkbox"/> \$1M - \$5M <input type="checkbox"/> \$5M - \$25M <input type="checkbox"/> More than \$25M <input type="checkbox"/> Unknown
4.	How has the disaster affected your community's most vulnerable populations, including elders, youth, and low-income households? (Open-ended)
5.	What areas require the most immediate support for recovery? (Select up to 3) <input type="checkbox"/> Housing assistance (rehabilitation, reconstruction, construction, or relocation) <input type="checkbox"/> Infrastructure repair and mitigation improvements <input type="checkbox"/> Economic recovery and business assistance <input type="checkbox"/> Restoration of essential community services <input type="checkbox"/> Planning and technical assistance <input type="checkbox"/> Temporary housing or short-term rental assistance <input type="checkbox"/> Preservation of cultural and historical sites <input type="checkbox"/> Other: _____
6.	What types of funding or resources does your community need the most? (Select all that apply) <input type="checkbox"/> Grant funding for repairing and improving infrastructure <input type="checkbox"/> Housing rehabilitation and reconstruction assistance <input type="checkbox"/> Construction of new affordable housing <input type="checkbox"/> Support for displaced residents (temporary housing, relocation, etc.) <input type="checkbox"/> Assistance for businesses and local economic development <input type="checkbox"/> Technical assistance with grant applications and compliance <input type="checkbox"/> Support to restore cultural practices or protect sacred lands <input type="checkbox"/> Other: _____
7.	Has your community applied for or received any disaster recovery funding (e.g., FEMA, State, HUD, or other grants)? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure
8.	If funding has been received, what was the source, and what challenges have you faced in using the funds effectively? (Open-ended)
9.	What long-term improvements would help your community be more resilient to future disasters? (Open-ended)
10.	Do you have any additional feedback or concerns regarding disaster recovery efforts in your community? (Open-ended)

Table 50: Tribal Communities Survey Questions

COMMUNITY ENGAGEMENT THROUGH A RESIDENT SURVEY

At the time of drafting this Action Plan, the resident survey remains open to allow for continued community input. Pinellas County is committed to incorporating feedback from residents throughout the planning process and will include the final survey results upon its closure.

Public Comments

All comments Pinellas County receives at the public hearings will be considered when developing this action plan. Any changes Pinellas County makes to the action plan in response to public comments will be included in the final version of the action plan, in addition to a summary of the comments received and Pinellas's response to each. A summary of Pinellas County's outreach and engagement activities with Indian tribes, local municipalities, and other entities during the development of this action plan is detailed in the section above.

Pinellas County citizen participation plan is posted on the public website, which can be found at the following URL:

- **Pinellas Recovers:** <https://recover.pinellas.gov/>

Public Hearings

In compliance with federal allocation notices, Pinellas County, as a recipient of HUD funds with a CDBG-DR allocation exceeding \$500 million, has proactively organized several public hearings within HUD-identified MID areas. These hearings aim to engage the community and collect valuable public feedback on the action plan allowing real-time questions from the public, and response from Pinellas County representatives. However, to foster greater citizen participation, Pinellas County hosted two community meetings in South and Mid County on **April 7, 2025**, and **April 10, 2025**, respectively, prior to the release of the action plan on the Pinellas County website and public comment. During these community meetings, Pinellas County provided a detailed overview of the CDBG-DR grant, including the action plan development and review process, a presentation on the unmet needs assessment, proposed program categories and funding, and a forum for public questions and answers.

During the public comment period (**April 23, 2025, to May 23, 2025**), Pinellas County hosted four (4) public hearings (two in-person, two virtually), after the plan was published online. These initiatives are focused on providing ample opportunities for citizen participation and community input, ensuring geographic representation, and making the process accessible for everyone so that all citizens can contribute to the discussion and stay informed about the utilization of grant funds.

Public Hearing #	Date	Method	Location
Hearing #1	4/7/2025	In-Person (South County)	5175 45th St. N., St. Petersburg, FL
Hearing #2	4/10/2025	In-Person (Mid County)	737 Loudon Avenue Dunedin, FL
Hearing #3	4/24/2025	In-Person (North County)	1190 Georgia Ave, Palm Harbor, FL
Hearing #4	5/6/2025	In-Person (Board of County Commissioners)	333 Chestnut St, Clearwater, FL
Hearing #5	5/13/2025	Virtual	NA

Table 51: Grantee Public Hearings

ACCESS TO PUBLIC HEARINGS

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

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

Materials will also be made available in various formats and shall be accessible to persons with disabilities. Persons with disabilities, or special needs who may require unique materials, services, or assistance with accessing program materials should contact Pinellas County.

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

Consideration of Public Comments

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

Citizen Complaints

Complaints alleging violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov).

Pinellas County will make available on its public website (<https://recover.pinellas.gov>) detailed Fraud, Waste, and Abuse Policies and Procedures to demonstrate that adequate procedures are in place to prevent fraud, waste, and abuse.

As required per the allocation notice and consistent with Pinellas County Citizen Participation Plan, Pinellas County will provide a timely written response to every citizen complaint it receives. The response will be provided within fifteen (15) working days of receipt of the complaint. If a response cannot be provided within fifteen (15) working days, Pinellas County will document why additional time for the response is required. A complaint or a grievance is defined as a wrong that is perceived by a citizen to have occurred or been committed during the implementation of any of the disaster recovery programs, wherein the citizen pursues resolution of that perceived wrong by bringing an action to be addressed by the affected entities or interested parties. Complaints and grievances are to be stated in writing by the aggrieved party or his representative, and are to be submitted to the applicable local, state, or federal government agency, for resolution.

Pre-Award Costs

Pinellas County intends to seek reimbursement for the costs of eligible pre-award and pre-agreement activities. These tasks were conducted in anticipation of the award and in preparation for recovery programs. These costs will be split appropriately between program administration costs, planning and activity delivery costs. Pinellas County will be seeking reimbursement for the following pre-award and pre-agreement activities:

- CDBG-DR Action Plan Development
- CDBG-DR Unmet and Mitigation Needs Assessment Development
- CDBG-DR Action Plan Translation services
- CDBG-DR Administration

Disaster Recovery Website

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

The following will be made available through the Pinellas County CDBG-DR website

- Pinellas County CDBG-DR Action Plan
- Amendments to the CDBG-DR Action Plan
- Pinellas County Citizens Participation Plan
- Vital documents that ensure meaningful access for beneficiaries and people with limited English proficiency
- Executed contracts
- Summary description and the procurement status of all services or good being procured by Pinellas County and its subrecipients using CDBG-DR funds (e.g., phase of the procurement, requirements for proposals, etc.); and
- Quarterly performance reports
- CDBG-DR program policies and procedures

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

The website is accessible to all interested parties. All materials uploaded to the Program website will be available in formats that accommodate persons with disabilities. The documents on the CDBG-DR Program website will be maintained in accordance with Pinellas County's Citizen Participation Plan.

Modifications to the Action Plan

Over time, recovery needs will change. Thus, Pinellas County will amend the disaster recovery action plan as often as necessary to best address our long-term recovery needs and goals.

Amendments

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. Pinellas County will amend its action plan to update its needs assessment, modify or create new activities, or re-program funds, as necessary. All action plan

amendments will include a chart or table that illustrates how all funds are budgeted (e.g., by program, subrecipient, grantee-administered activity, or another category) and will be published on the Pinellas County website. Each amendment will describe the changes within the context of the entire Action Plan. The current version of the action plan will be viewable as a single document. At a minimum, each amendment will: (1) identify exactly what content is being added, deleted, or changed, (2) clearly illustrate where funds are coming from and where they are moving to, and (3) include a revised budget allocation table that reflects the entirety of all funds, as amended.

SUBSTANTIAL AMENDMENT

A change to this Action Plan is a substantial amendment if it meets the following criteria: (1) A change in program benefit or eligibility criteria (including the expansion of eligible beneficiaries, (2) The addition or deletion of an activity; (3) A proposed reduction in the overall benefit requirement; (4) The allocation or reallocation of ten percent (10%) of the overall award amount, and (5) An update to the submitted initial Action Plan if the original submission was incomplete. Pinellas County will provide a 30-day comment period prior to submission of all substantial Action Plan amendments to HUD. All substantial amendments will be published on Pinellas County disaster recovery website and will afford citizens, affect local governments, and interest parties an opportunity to review and comment on the proposed amendment. Any updates or changes to the Action Plan in response to public comments will be clearly identified in the Action Plan. A summary of the public comments received regarding the amendment, and Pinellas County response to each, will be included in the amendment's finalization process.

NON-SUBSTANTIAL AMENDMENT

Under HUD requirements, any amendment to the Action Plan that does not meet the above criteria for a substantial amendment is a non-substantial amendment. Pinellas County is required to notify HUD of the non-substantial amendment at least five days in advance of it taking effect but is not required to seek public comment. Pinellas County will post every amendment to the Action Plan (substantial and non-substantial) on its disaster recovery website and will number each amendment sequentially.

Performance Reports

Pinellas County is dedicated to fostering a transparent and efficient process for the preparation of performance reports and will adhere to the specific reporting formats and data fields mandated by the U.S. Department of Housing and Urban Development (HUD) within the HUD Disaster Recovery Grant Reporting (DRGR) System. Our County's primary objective is to deliver verified information that is substantiated by comprehensive documentation. This information not only showcases the tangible impact of our efforts but also incorporates valuable community feedback, reflecting the effectiveness of the Community Development Block Grant - Disaster Recovery (CDBG-DR) projects in meeting the critical needs of our residents. Through this process, we aim to ensure accountability and enhance the overall well-being of our local community.

Changes and amendments to projects and programs will be recorded in the DRGR system. Any modifications to the Action Plan (AP) will be documented in both DRGR and the official Action Plan. Changes to projects set up in DRGR will only be made after the U.S. Department of Housing and Urban Development (HUD) approves the changes in the formally submitted AP. Programmatic changes and revisions, as well as the recording of accomplishments and reporting, will also be managed through DRGR.

Any necessary updates or changes in DRGR will occur within five business days of receiving approval from Pinellas County's CDBG-DR (Community Development Block Grant - Disaster Recovery) Grant Manager, or, in the case of Action Plan amendments, within five days of HUD approval. The CDBG-DR Grant Manager, in coordination with Pinellas County's CDBG-DR consultant, will oversee all updates, revisions, and reporting requirements needed to ensure compliance with DRGR programmatic regulations.

Pinellas County will ensure that staff receive adequate training and that consultants possess sufficient knowledge and familiarity with DRGR for effective management of the DRGR Database.

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

Program Income: Certain programs funded by CDBG-DR may generate program income. Program income is defined as the gross income received by Pinellas County that is directly generated from the use of CDBG-DR funds. This may include, but is not limited to, payments from subsidized home sales, loan repayments, or rental revenue from properties supported by the program.

Pinellas County will establish systems and processes to ensure that all program income is tracked, reported, and utilized in accordance with HUD regulations and program requirements. Any income received will be reinvested into eligible CDBG-DR activities to further support disaster recovery and promote long-term community resilience. Pinellas County will comply with all applicable federal requirements regarding the use and management of program income.

Appendix A:

Certifications

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

- a) **Uniform Relocation Act and Residential Anti-displacement and Relocation Plan (RARAP)**—Pinellas County certifies that it: (1) will comply with the acquisition and relocation requirements of the Uniform Act, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements; (2) has in effect and is following a RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.
- b) **Authority of Grantee**—Pinellas County certifies that the Action Plan for disaster recovery is authorized under State and local law (as applicable) and that Pinellas County, and any entity or entities designated by Pinellas County, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- c) **Consistency with the Action Plan**—Pinellas County certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.
- d) **Citizen Participation**—Pinellas County certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).
- e) **Use of Funds**—Pinellas County certifies that it is complying with each of the following criteria:
 - o **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.).
 - o **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. **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.

- **Special Assessment**— Pinellas County will not attempt to recover any capital costs of public improvements assisted with CDBG– DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
 - 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
 - for purposes of assessing any amount against properties owned and occupied by persons of moderate income, [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**—Pinellas County certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that [Grantee] has reviewed the requirements applicable to the use of grant funds.
- g) **Order of Assistance**—Pinellas County certifies that it will comply with the statutory order of assistance listed in Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG–DR assistance for the costs of carrying out the same activity.
- h) **Affirmatively Further Fair Housing**—Pinellas County certifies it will affirmatively further fair housing.
- i) **Anti-Lobbying**—Pinellas County certifies its compliance with the restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- j) **Section 3**—Pinellas County certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.
- k) **Excessive Force**—Pinellas County certifies that it has adopted and is enforcing the following policies, and, in addition, State grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing:

- 1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
 - 2) A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- l) Compliance with Anti-discrimination Laws**—Pinellas County certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–3619), and implementing regulations.
- m) Lead-Based Paint**—Pinellas County certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
- n) Compliance with Laws**—Pinellas County certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.
- o) Authority of Grantee**—Pinellas County certifies that the Action Plan for disaster recovery is authorized under State and local law (as applicable) and that Pinellas County, and any entity or entities designated by Pinellas County, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG–DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- p) Consistency with the Action Plan**—Pinellas County certifies that activities to be undertaken with CDBG–DR funds are consistent with its action plan.
- q) Citizen Participation**—Pinellas County certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).
- r) Use of Funds**—Pinellas County certifies that it is complying with each of the following criteria:
- 1) Purpose of the funding. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 et seq.).

- 2) Maximum Feasibility Priority. With respect to activities expected to be assisted with CDBG–DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
 - 3) Overall benefit. The aggregate use of CDBG–DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.
 - 4) Special Assessment. [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:
 - 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
 - for purposes of assessing any amount against properties owned and occupied by persons of moderate income, [Grantee] certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- s) **Grant Timeliness**—Pinellas County certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that [Grantee] has reviewed the requirements applicable to the use of grant funds.
- t) **Order of Assistance**—Pinellas County certifies that it will comply with the statutory order of assistance listed in Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG–DR assistance for the costs of carrying out the same activity.
- u) **Affirmatively Further Fair Housing**—Pinellas County certifies it will affirmatively further fair housing.
- v) **Anti-Lobbying**—Pinellas County certifies its compliance with the restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- w) **Section 3**—Pinellas County certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.

- x) **Excessive Force**—Pinellas County certifies that it has adopted and is enforcing the following policies, and, in addition, State grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing:
 - 1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
 - 2) A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- y) **Compliance with Anti-discrimination Laws**—Pinellas County certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–3619), and implementing regulations.
- z) **Lead-Based Paint**—Pinellas County certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
- aa) **Compliance with Laws**—Pinellas County certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

Appendix B:

Waivers

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

DRAFT

Appendix C:

Public Comments

Pinellas County received 96 public comments on the draft CDBG-DR Action Plan. The feedback emphasized critical housing recovery needs among seniors, persons with disabilities, and low- to moderate-income households, particularly those residing in mobile homes, manufactured housing, and condominiums. Common barriers to recovery included insurance denials, FEMA ineligibility, the 50% substantial damage rule, and burdensome application processes.

Multiple commenters raised concerns about the exclusion of condominium associations and HOAs from eligibility, despite shared infrastructure vulnerabilities, particularly in fixed-income senior communities. The need for community-level repair assistance and expanded eligibility was a recurring theme. Additionally, stormwater and drainage system failures were frequently cited as contributing factors to flood damage, with widespread support for resilient infrastructure investments and long-term mitigation.

Five comments specifically referenced Elevate Florida, with others broadly supporting elevation and hazard mitigation strategies. Based on this feedback, the County revised the Homeowner Rehabilitation and Reconstruction Program to include owner-occupied units in condominiums and other multi-unit structures. The Action Plan was also amended to include non-federal cost share assistance under HCDA §105(a)(9) as an eligible activity.

Public input also supported a more flexible income eligibility framework, acknowledging that middle-income households often face significant recovery barriers but may fall outside traditional LMI thresholds. Comments called for expanded support for renters, small landlords, and displaced households, as well as the adoption of resilient construction standards, such as FORTIFIED™ and green building certifications, which the County plans to address in applicable program guidelines.

Many respondents emphasized the urgency of streamlined implementation and interagency coordination, urging the County to accelerate program deployment and address infrastructure deficiencies that exacerbated disaster impacts.

Overall, the public comment review confirmed strong alignment between the Action Plan and community priorities. The feedback reinforced programmatic decisions and validated the County's focus on addressing the most urgent unmet needs through inclusive, efficient, and resilience-focused recovery strategies.

#	Public Comment	Response
1	Residents living in condos on fixed incomes are facing losing their home due to the upcoming high assessments caused by Helene and Milton. Our large community has two assessments, the building we live in, and the association. There is no personal gain in this request--more of a plea to please find a way to help save the home of thousands of people throughout our state. Thank you, BC	Pinellas County recognizes the burden that post-storm assessments place on condo owners, especially those on fixed incomes. While current programs focus on individual home repairs, we are exploring ways to support housing stability in multi-unit communities. Your input is valuable and will help inform ongoing program development.
2	I do not see any plans that address owners in condominiums. How will this be addressed as these owners are facing assessments from Storm Damage on top of assessments based on new laws for Milestone Inspections and SIRS.	Pinellas County recognizes the burden that post-storm assessments place on condo owners, especially those on fixed incomes. While current programs focus on individual home repairs, we are exploring ways to support housing stability in multi-unit communities. Your input is valuable and will help inform ongoing program development.
3	I would like to see some of this recovery money to go to our HOA as our area suffered from waters being directed into our neighborhood. Skye Loch Villa. We as residents will have pay to have drainage ditch dredge because of debris from other neighborhoods waters directed into our area causing home damages also.	Pinellas County understands the concerns raised by Skye Loch Villa residents and the impacts of stormwater runoff from surrounding areas. While CDBG-DR funds cannot be provided directly to HOAs, eligible drainage and infrastructure improvements may be funded if they serve a broader public purpose and address storm-related impacts. Your feedback will be considered as we assess

		potential infrastructure needs and program priorities.
4	<p>If you are looking for license general contractors please contact [name redacted] at [name redacted]@gmail.com or [phone redacted] . My question is are you giving the money to home owners for repairs and they will find their contractors or you will talk to the contractors directly to fix the infrastructure</p>	<p>Pinellas County will not disburse funds directly to eligible applicants. Instead, payments will be made to procured contractors for eligible repair, reconstruction, or replacement work completed. All rehabilitation, reconstruction and replacement activities funded through this CDBG-DR allocation will be managed by Pinellas County in coordination with procured and selected vendor(s) and implemented through contracted construction firms.</p>
5	<p>To whom it may concern As a resident of Gateway Mobile Home Park located off of 4th street we have had major damage from both storms but particularly the significant damage was water damage. In addition to the storm surge and pumps being backed up, the property abuts to 2 ditches, neither of them are on our property and under our management. We have been reaching out to try to get the rightful owners take ownership and maintenance but to no avail. If some of the money could go towards maintaining them, it may prevent future flood damage to our homes. Thank you!</p>	<p>Pinellas County understands the challenges caused by unmanaged drainage infrastructure and the risk it poses to communities like Gateway Mobile Home Park. While CDBG-DR funds cannot be used for maintenance of privately owned property, drainage improvements may be eligible if they address storm impacts and provide a broader public benefit. We will consider this issue as we assess infrastructure needs and potential projects.</p>
6	<p>My mobile home in Clearwater really needs help from Milton and Ida, I don't know where to turn, I'm on disability for my back. The ceilings, floors, skirting, steps and mold. Every day it weighs on me heavily and I'm so scared of this hurricane season. Please help.</p>	<p>The CDBG-DR Housing Recovery Program is designed to assist eligible homeowners with storm-related damage from Hurricanes Milton and Idalia.</p>

		<p>While assistance is not guaranteed, the program aims to support residents facing serious housing conditions. Your comment underscores the urgency of recovery efforts and will help guide implementation.</p>
7	<p>Loss of roof along with furniture, musical equipment etc. No insurance due to what they value an older mobile is not fair I love my home and area. The approaching summer adds to the problem with AC flowing out unrepaired section, bill with roof past months, \$80-\$90, after hurricane damage had bill of \$375 needless to say cannot afford this. Love home and area. Please Please help, my funds are now limited due to scammers. Thank you. [name redacted]</p>	<p>The CDBG-DR Housing Recovery Program is designed to assist eligible homeowners with storm-related damage from Hurricanes Milton and Idalia.</p> <p>While assistance is not guaranteed, the program aims to support residents facing serious housing conditions. Your comment underscores the urgency of recovery efforts and will help guide implementation.</p>
8	<p>Help needed for repairs to mobile home. Roof has a leak and soft floors throughout the home.</p>	<p>The CDBG-DR Housing Recovery Program is designed to assist eligible homeowners with storm-related damage from Hurricanes Milton and Idalia.</p> <p>While assistance is not guaranteed, the program aims to support residents facing serious housing conditions. Your comment underscores the urgency of recovery efforts and will help guide implementation.</p>
9	<p>I own a manufactured home at XXXX Lane, Palm Harbor, FL 34683. That had some flooding in 1993 during the No Name Storm. I was told by the seller when I purchased the home that the subfloor was replaced with plywood subfloor following that storm. That's all he told me and I don't know who paid for it. Two years ago during hurricane Idalia, my home had some flooding underneath And my two HVAC ducts</p>	<p>Thank you for your comment. Pinellas County is in the process of developing its federally funded disaster recovery programs to assist eligible residents impacted by Hurricanes Helene and Milton. While program details have not</p>

	<p>Had to be replaced. FEMA paid for that about six months later they sent me a letter telling me they had placed flood insurance on my home and would pay for it for three years. I will have to pay as well any Subsequent purchaser Subsequent to that timeframe.</p> <p>This September 27 hurricane Helene caused water damage in my community capital Crystal Bay mobile home park. The water entered the interior of the home and receded within one and 1/2 hours. I am 74 year old woman with severe arthritis. I am no longer able to do physical work or walk very far. Catholic charities and members of the Mormon church were very kind and moved almost all of my belongings to the street. I thought everything had to be thrown away. I did not keep anything with a cord no jars no supplies no cleaners no food. New sentence they cleaned out And threw away my refrigerator. My glass top range my dishwasher my garbage disposal a full-size refrigerator.</p>	<p>yet been finalized, potential assistance may address documented disaster-related damage in accordance with federal requirements. For the most current information on program availability, eligibility, and how to apply once programs are launched, please visit recover.pinellas.gov and sign up for email updates. This will ensure you receive notifications as soon as details become available.</p>
10	<p>On the last webinar I could not hear all comments regarding manufactured homes built in 1978 such as mine. Can you see if it can be raised or is it too old period? Do you have to buy a new manufactured home you can raise for me that would be within budget. I'm on floodplain approximately 3'. It's on piling and I beams up between 2 & 3 ft now. Drywall was removed about 1/2 up, carpet and laminated flooring removed, all personal property removed, outlets on low floor removed, appliances removed. Can a used manufactured home be purchased and used or any factory built homes be used to save money? I'm 75 next month, female with severe arthritis and just \$1129 monthly income and no other assets or income except 2006 sedan. Can you do this where I live? If it's mandatory I be relocated what exactly does that mean? I have no income that would pay lot rent. All my money paid for my manufactured homes built in 55plus land on Gulf of Mexico in area area I've lived and paid taxes since 1983. Doctors are all here. Of 104 homes in Crystal Bay Mobile Home Club only 11 homes are elevated. The others of all elderly people are substantially damaged from Hurricane Helene. I don't think any of the 97 unraised homes have been able to repair their homes. I will be</p>	<p>Pinellas County recognizes the significant challenges facing older manufactured home owners, particularly in flood-prone areas. While CDBG-DR funds cannot be used to assist homes built before HUD's 1976 Manufactured Home Construction and Safety Standards, the Housing Recovery Program may support eligible homeowners with reconstruction or replacement if the unit is substantially damaged and meets other federal requirements.</p> <p>Relocation may be required if a site cannot safely support reconstruction or elevation, but any such determination would be made in coordination with the homeowner and with consideration of income and housing needs. We appreciate</p>

	homeless if you or Elevate Florida doesn't raise a home for me. The comp according to Pinellas County Property Appraiser sold for \$300,000 and as of hurricane Helene my home is reduced to worth nothing? My only asset. I have no income to pay rent even in a slum. I need help very much. I'll have to die if I become homeless	your input and will take it into account as we finalize program design and outreach.
11	If there is enough funding after the most critical housing needs for lower income residents are met, it would be great to offer an increased cost of compliance supplement for homeowners with substantial damage who plan to build to new height requirements. The increased cost of compliance insurance coverage of \$30,000 won't cover the actual cost of demolition and building an elevated foundation. If someone has already qualified for ICC, that would help screen applicants. Any incentive to get people to build up is better for everyone in the long run.	Pinellas County recognizes that FEMA's Increased Cost of Compliance (ICC) coverage often falls short of covering the full cost of elevation or reconstruction to meet updated flood standards. While CDBG-DR funds must first prioritize the most urgent housing needs of low- to moderate-income households, we will consider how best to complement FEMA programs like ICC to support resilient rebuilding. Your input is appreciated and will help inform program development.
12	Homeowners need help, especially those who dealt with flood damage and are trying to navigate the substantial-damage evaluations and trying to rebuild in a manner that can eliminate future losses/issues such as Elevate Florida type grants or low interest loans such as SBA which are currently offered but not sure of adequate funding vs. needs/wants.	Pinellas County understands the difficulties homeowners face when navigating substantial damage evaluations and rebuilding to meet higher standards. The CDBG-DR Housing Program will include case management during the intake process to help guide applicants through available resources, including how CDBG-DR assistance may complement programs like Elevate Florida and SBA loans. Your input reinforces the need for coordinated support to promote resilient recovery.

13	Directing money into the Elevate Florida program, in order to approve applications for more Pinellas County residents, would be a streamlined approach to address long-term housing security.	Pinellas County appreciates the suggestion to direct funding toward the Elevate Florida program. While CDBG-DR funds must follow specific federal requirements, we are exploring opportunities to align with existing programs like Elevate Florida to support long-term housing resilience. Your feedback will be considered as we finalize program strategies and identify opportunities for coordination.
14	Keep me updated on any programs for landlords and rental properties	Pinellas County has proposed a Small Rental Rehabilitation/Reconstruction Program for local Landlords. The Action Plan contains detailed information about these programs. As the implementation phase progresses, additional details will be available at recover.pinellas.gov .
15	Loved hearing about the landlord/rental grant opportunity and hope it comes to fruition. Thank you!	Pinellas County has proposed a Small Rental Rehabilitation/Reconstruction Program for local Landlords. The Action Plan contains detailed information about these programs. As the implementation phase progresses, additional details will be accessible online at recover.pinellas.gov .
16	I am a home owner and a widow and will be thankful as they activate to find a program that will help me get my home back together.	The CDBG-DR Housing Recovery Program is being developed to assist eligible homeowners with

		<p>storm-related damage. Once the program is launched, application details and support services will be made available to guide residents through the process. We appreciate your patience and participation as recovery efforts move forward.</p>
17	<p>We are so tired of calling FEMA and we have gotten NO help. We appeal and call daily and check for updates. Nothing. Home has mold and we lost furniture and so much more. Another hurricane will come our way and still we will not get the assistance we need. There are 2 disabled people in household. My heart breaks for the people like us who really needs the assistance.</p>	<p>Pinellas County understands the frustration and hardship many households are experiencing, especially those still waiting for assistance. The CDBG-DR program is being designed to address unmet recovery needs that may not have been resolved through FEMA or other sources. Your input highlights the urgency of getting resources to those most in need, and we are committed to building a program that responds to these critical gaps.</p>
18	<p>I am a social worker with Mattie Williams Neighborhood Family Center in Safety Harbor. We often get senior clients who are in need of home repairs that exceed our small budget. It would be so helpful to have the home repair program reopened. Many of these repairs are necessary for the safety of the home owners.</p>	<p>Pinellas County appreciates the important work being done by community organizations like Mattie Williams Neighborhood Family Center. The CDBG-DR Housing Recovery Program is being developed to assist with storm-related home repairs, with a focus on addressing health and safety risks. Your feedback reinforces the need for accessible repair assistance for seniors and other vulnerable</p>

		residents and will be considered as program details are finalized.
19	I need my roof replaced and windows please help insurance company denied claim.	The CDBG-DR Housing Recovery Program is intended to assist eligible homeowners with storm-related damage not covered by insurance or other resources. Once the program is launched, applicants will be guided through the process to determine eligibility and available assistance. Your input highlights the critical need for recovery support and will help inform implementation.
20	Think it is amazing opportunity for folks as my wife and I. Forty five years we have lived in our home on causeway blvd. S. Never had water in our house. Then came Helen 4 plus ft of water in the house losing most everything we owned. We both are on SSI . The offer by fema is not even close to our needs. Homeowners Ins denied our claim. Then comes Milton which took out about 8 ft of seawall, no help from anyone. Will have to clean out our savings just to get the seawall done to stop the erosion. 5 days before Helen I had heart surgery that went bad. That was followed with a series of mini strokes. Still waiting for help trying to rebuild our life again after paying taxes, insurance bills etc after 78 years.	Pinellas County recognizes the devastating impact that Hurricanes Helene and Milton have had on long-time residents, particularly those on fixed incomes. The CDBG-DR program is being developed to help address unmet housing and infrastructure needs not covered by FEMA or insurance. Your story reflects the hardship many are facing, and it reinforces the importance of designing a program that reaches those most affected and supports long-term recovery.
21	My mom left me a treasure island home that flooded in Helene. Because of the assessed value, or not in St pete, I've qualified for no help. I'm a retired school teacher financially unable to repair my damaged home. Please base financial help on income.	Pinellas County understands the difficulties homeowners face when trying to recover from severe storm damage. Inherited properties may be eligible for assistance if they are occupied as the owner's primary residence. The Action Plan also

		prioritizes income as a key factor in determining assistance.
22	Regarding Madeira Beach Utilities. Since Helene, my house has been empty and ruined. How can Pinellas County and the city of Madeira Beach justify charging us the full fees for water and garbage? Seems ridiculous and I'm curious of these funds could help others in my situation Thank you	While CDBG-DR funds cannot generally be used to offset utility charges, the proposed Disaster Relief Payment Program may offer limited reimbursement for out-of-pocket expenses, such as utilities, for income-eligible households. This assistance would be capped and time-limited, typically covering up to six months. Your input will be considered as program policies are finalized.
23	Hi, I have read through the plan and if I skimmed it properly, Im thinking this plan will be having Pinellas were I live at XXXX 15th ave Nw largo, you will distribute all funds, Not Largo. I sent them pictures of there tree crews dropping limbs on my property destroying it to clear their tree from a power line on the 6th St side. In their responce they wrote that none of their crews were ever there and they had no reports of any damage. My whole house was crushed!!!!!!	Pinellas County is leading all CDBG-DR recovery efforts for homeowners, including the administration of housing programs. While damage from local response crews may not be eligible under these programs, homeowners with storm-related damage that is not covered by insurance or other sources of recovery funding may still qualify for assistance. Your input will be considered as part of the ongoing recovery planning and implementation process.
24	Its exhausting the paperwork. I just finished with mediation with my insurance and now have to submit to FEMA then wait another 6 months before I can apply for your grants.	Pinellas County understands how overwhelming the recovery process can be, especially when navigating multiple systems. The CDBG-DR program is being designed to support those with unmet needs after insurance and FEMA resources are exhausted. Case management will be

		<p>available during intake to help guide applicants through the process and reduce the burden where possible. Your feedback underscores the importance of making these programs as accessible and streamlined as possible.</p>
25	<p>I am a low income (social security only) senior resident living in Dunedin FL. My home was very damaged when two feet of water came through it during Idalia. I did not ask for a county grant. I used every cent of my flood insurance payment and repaired and remodeled my home. For 7 months I rented. I finally moved back into my home in April of 2024. Five months later in September of 2024, over 4 feet of seawater went through my neighborhood and my home. I lost 90% of my furnishings, my clothing, my personal belongings. In Nov. 2024 I applied for the Pinellas County Grant (up to \$30,000). After lots of paperwork, phone calls, providing documents, and two in-person visits to the Development & Community Development Office on Court St. in Clearwater, I was told I indeed qualified for this grant. My house needs windows, doors, new electrical system, new a/c, walls, sinks, cabinets, etc. etc. I was very excited that I was going to get some help. But then they told me they wouldn't give me any of the money because my insurance money is sitting in an account and they want me to spend all of that first (\$87,000). I applied for Elevate Florida on Feb 7, 2025, and attended one of their meetings at Treasure Island City Hall. There, it was made perfectly clear to me that applicants better have their 25% cost share ready when the program asks for it. Well, that insurance money is the money I will be using. As a low income resident, where else would I get the money for Elevate Florida? So here I sit, waiting to here from Elevate FL., and hoping that maybe something will change in the Pinellas County Grant program where I can actually receive help, in reality, not in words only. Is there any way for me to access any of the money from the Pinellas County</p>	<p>Pinellas County is exploring options to coordinate CDBG-DR assistance with Elevate Florida and other federally funded programs to better support homeowners facing complex recovery challenges. While CDBG-DR cannot duplicate other sources like insurance, there may be opportunities to align funding to help meet cost-share requirements or address remaining unmet needs. Your feedback helps guide these efforts as we work to create more effective, coordinated recovery solutions.</p>

	Grant that I qualified for without touching the insurance money which is set aside for the Elevate Florida program?	
26	<p>The neighborhood of Wedgewood in Pinellas County (Palm Harbor) experienced unprecedented and unexpected losses due to 2024 Hurricanes Helene and Milton. Twenty-eight homes were significantly damaged and over 45 vehicles destroyed by flood waters that intruded into the neighborhood due to overflow of water from the surrounding county managed streets (West Lake Road and County Road 95) and lack of associated working pump systems to properly address the water. After the storms, it was determined that the County had not completed an in-depth study of pump stations and systems in over 20+ years. In addition, there were to be two working pumps—one at King’s Pharmacy and one at the Honda dealership on US 19. The King’s Pharmacy located pump was not working, and we found out that the Pharmacy has been fined several times due to the non-working pump. In addition, it appears there is no working pump at the Honda dealership, so it is unclear how this business received its Certificate of Occupancy without the required working pump. The only pump in the area that was working at the time was our neighborhood lake pump at the front of the neighborhood, and it had to try to take on all the surrounding county road extreme waterflow. The Fire Department and Police Department had to rescue individuals from the neighborhood. A tremendous use of resources that could have been avoided had the county properly instituted infrastructure and oversight necessary to handle water on its roadways and oversee/manage pumps around the area. Public health and safety for county roadways cannot be left to private business pump stations to protect surrounding neighborhood constituents. Florida House of Representative Adam Anderson, Florida State Senators, the Fire Department, and Governor DeSantis finally helped secure public resources to pump out the flooded county streets, and therefore our neighborhood, and pump the water into another neighborhood area dedicated to holding water runoff. Today, we still have homeowners working to restore</p>	<p>The proposed People First Housing Recovery Program in Pinellas County aims to assist residents of owner-occupied single-family homes that were damaged during recent hurricanes. The program will support activities such as repairing, rehabilitating, and reconstructing these housing units. To qualify for any housing recovery programs, residents must demonstrate that damage to their property was caused by the hurricanes either Idalia, Helene, or Milton. Additionally, eligibility requirements will be outlined in the program guidelines, which will be posted on the Pinellas County website once they are available. Pinellas County has allocated 15% of CDBG-DR funds (\$130 million) to support critical infrastructure improvements and resiliency planning. This Mitigation set-aside infrastructure programs will fund projects aimed at flood protection, stormwater management, and building resilience, particularly in low-to-moderate income (LMI) communities.</p>

	<p>their homes and lives, as we are on the heels of another hurricane season. Some of our tax paying homeowners are older Americans and veterans trying desperately to piece by piece put their lives back together. We would appeal to the committee to commit direct funds to our specific homeowners and our community due to the significant losses experienced during these storms. In addition, we would request the county institute working pumps for the next "100 year" storm Pinellas County Palm Harbor neighborhoods may experience. Thank you.</p> <p>Wedgewood Homeowner and Pinellas County Taxpayer</p>	
27	<p>At least some part of the \$813 million dollars should go towards upgrading/updating the stormwater drainage systems in Northern Pinellas County. The system is only supported by stormwater ad-valorem tax and currently is funded only to maintain, not improve that gravity flow system. Many locations that are NOT in flood zones experienced water damage due to rising rainwater and the flow could not drain away or percolate into the ground for weeks on end. Using the disaster funds to just repair damaged homes without addressing the basic problem of updated approach's to draining stormwater runoff to somewhere does nothing to mitigate the issue. Residents of many associations, including Autumn Woods, had retention ponds overflowing for days. The ponds functioned as designed but the design can not deal with the volumes of water that runs off during large storms. The current system is a combination of publicly and privately owned land that interconnect in a systematic way that needs better management. Dependency's far downstream cause flooding issues everywhere and the entire system's ability to handle stormwater is affected by new developments (happening everywhere currently). There are solutions that engineers could design to address the large volume, high velocity flows created during storms, while maintaining the low volume low velocity system that currently exist. As more developments are approved (and there are dozens of large developments paving over surfaces increasing run off into these ponds). Within five miles of Autumn</p>	<p>Thank you for your comment regarding stormwater management in Northern Pinellas County. We recognize that major rain events can create complex runoff conditions across interconnected drainage systems, particularly in areas experiencing continued growth and development. Pinellas County has allocated a portion of its CDBG-DR funds—approximately \$130 million—for infrastructure and mitigation activities, including stormwater management projects that address disaster-related impacts and meet federal eligibility requirements. These funds must be used for publicly owned infrastructure and primarily benefit low- to moderate-income communities. In addition to project implementation funding, the County is launching the Local Mitigation Planning Program to identify long-term strategies for risk reduction, resilience, and systemwide improvements. This planning phase provides an opportunity</p>

	<p>Wood there are over a dozen new developments and thousands of units that will feed into the stormwater run off system increasing the likelihood of overflowing these older gravity flow systems. The entire Sutherland watershed needs review and updating to mitigate the effect of tropical storm and hurricane related run off. This is not a tidal flood issue, but rising water run off issue. This same issue exists in Clearwater, Largo, Pinellas Park, East Lake, Oldsmar, Safety Harbor and hundreds of examples of destroyed property can be identified to establish the nature of this problem.</p>	<p>to assess issues such as watershed-wide stormwater flow, regional coordination, and infrastructure investments needed to adapt to evolving conditions.</p> <p>Your feedback will be shared with the relevant teams to help inform both near- and long-term recovery and mitigation planning efforts.</p>
28	<p>Please consider using FEMA money for a program to replace the outdated and environmentally unstable/aging septic systems with sewer systems in unincorporated Pinellas County.</p>	<p>While this Action Plan outlines the use of CDBG-DR funds—not FEMA funds—septic-to-sewer projects may be eligible under CDBG-DR if they address documented storm impacts and serve a broader public benefit.</p> <p>Pinellas County is evaluating infrastructure needs across impacted areas, and your input will help inform potential investments that promote long-term resilience and environmental health.</p>
29	<p>Mulch's and dig out the overflow ditches on St. Pete Drive Oldsmar!??!</p>	<p>Pinellas County has allocated 15% of CDBG-DR funds (\$130 million) to support critical infrastructure improvements and resiliency planning. This Mitigation set-aside infrastructure programs will fund projects aimed at flood protection, stormwater management, and building resilience, particularly in low-to-moderate income (LMI) communities.</p>

<p>30</p>	<p>As President of Autumn Woods HOA our concern is aging stormwater infrastructure. Many associations including Autumn Woods had retention ponds overflowing for days. County engineers can design solutions to address large volume, high velocity flows created during storms. There are many developments with thousands of units being built that will increase the likelihood of the gravity flow systems to over flow and flood older communities. We need the county to look at ways to mitigate any future issues to these aging systems.</p>	<p>Thank you for your comment regarding stormwater infrastructure. We understand that during significant storm events, retention systems across the County can experience prolonged high water levels, particularly in areas with gravity-based flow systems and ongoing development.</p> <p>Pinellas County has allocated a portion of its CDBG-DR funding—approximately \$130 million—for public infrastructure and mitigation projects, including stormwater management improvements that meet federal eligibility criteria and primarily benefit low- to moderate-income communities. These funds must be used for publicly owned infrastructure and must directly address disaster-related impacts. We appreciate your feedback and will share it with the appropriate teams as part of the County's broader recovery and resilience efforts. Community input continues to be an important part of identifying and prioritizing projects that strengthen long-term risk reduction.</p>
<p>31</p>	<p>St Joe's Creek damage is threatening the lives of 500 55+ community members, many with disabilities. Access road for emergency vehicles was partially washed out 6 months ago and the county knows about it.....Someone will be injured or die. Please contact me to explain why it's not a priority ONE.</p>	<p>Thank you for your comment. CDBG-DR funds may be used for eligible public infrastructure projects that address documented disaster-related damage and serve a public</p>

	<p>Patrick Campbell , board president, Palms of Paradise Condo Association. A 55+ community.</p>	<p>purpose, particularly in areas benefiting low- to moderate-income populations. All projects must meet federal eligibility requirements, including a clear tie to the covered disaster. Input related to safety and access concerns is valuable and will be considered as part of ongoing recovery and mitigation planning efforts, including those supported through the Local Mitigation Planning Program. This process helps inform project prioritization and long-term strategies to reduce future risk.</p>
32	<p>I thought the presentation was well thought out and informative. My concern is infrastructure. I live in Pamela Estates off of 131St street in Seminole. When the electricity went out during Milton, there was a fast rise of water and my house was surrounded. I also had sewer water coming up in the bathtub and toilet. Fortunately, I had people at my house, so that we were sandbagging and vacuuming. My house did not flood, but many of my neighbors did. I am about 50 feet above sea level. I believe this was due to pump failure and I am wondering if there are plans to hard wire the pump so it does not stop working when electricity goes out.</p>	<p>Thank you for your comment. CDBG-DR funds may be used for eligible public infrastructure projects that address disaster-related impacts and benefit low- to moderate-income communities. Infrastructure improvements must meet federal eligibility criteria, including a demonstrated tie to the covered disaster and a clear public purpose. As part of ongoing recovery efforts, the County is also supporting long-term planning through the Local Mitigation Planning Program. Input received through this process helps inform the identification and prioritization of potential infrastructure projects aimed at increasing system resilience and reducing future risk.</p>

33	<p>The absence of any schedule for the repair of the Madeira Beach Access parking lot, with its sea walls, washrooms and 100 parking places, is a real dis-service to the residents in and tourists visiting Madeira Beach.</p> <p>The sea wall needs immediate reconstruction to reinstate the barrier to flooding from the Gulf, especially to prevent and mitigate further damage to the 144th and 145th Ave neighborhoods of Madeira Beach. The lack of parking is evident every day for a lot which would fill up by noon all the time. The park perimeter has still not been fully cleaned up. The repairs to the washrooms should not be too expensive, especially for a facility that can generate \$6,000.00 per day in parking fees and fines. Please reinstate the sea wall and add this area to the schedule for repair of the full park as the same high priority which the City of Madeira Beach has given to Archibald Park.</p>	<p>Thank you for your comment. CDBG-DR funds may be used for eligible public infrastructure projects that address documented disaster-related impacts and primarily benefit low- to moderate-income communities. Projects must meet federal eligibility requirements, including demonstrating a tie to the covered disaster and serving a public purpose.</p> <p>In addition, the County is undertaking planning efforts to support long-term mitigation and resilience strategies through programs such as the Local Mitigation Planning Program. Input received through this process helps inform both project prioritization and broader recovery planning.</p>
34	<p>Very interested in learning more about the plan and action items from the storms pertaining to the infrastructure.</p>	<p>Pinellas County has allocated 15% of CDBG-DR funds (\$130 million) to support critical infrastructure improvements and resiliency planning. This Mitigation set-aside infrastructure programs will fund projects aimed at flood protection, stormwater management, and building resilience, particularly in low-to-moderate income (LMI) communities. Please refer to Recovery.pinellas.gov for more information, and to sign up for email updates.</p>
35	<p>Shelters should remain open after a storm has been deemed "Cleared" for residents to evaluate the</p>	<p>Thank you for your comment.</p>

	condition and livability of their homes before they have to leave the shelter. Challenging yes, but truly the right thing to do.	
36	I would like to participate and being informed.	Pinellas County is committed to keeping the community informed and will regularly update its disaster recovery website, recovery.pinellas.gov , and through traditional and social media with information regarding the proposed CDBG-DR Action Plan, as well as the associated Programs and Projects. Stay tuned for the latest updates as we work together towards recovery and improvement.
37	Overall good plan. I would like to see more emphasis on nature-based mitigation projects (e.g. dune restoration) and development of public parks for areas with repeat flooding issues.	<p>Thank you for your comment. CDBG-DR funds may be used for eligible public infrastructure and mitigation activities that address documented disaster impacts and benefit low- to moderate-income communities. Nature-based solutions, such as dune restoration and flood-resilient public spaces, may be considered if they meet federal eligibility requirements.</p> <p>Additionally, the Local Mitigation Planning Program supports the development of long-term strategies to reduce future risks. Input received through this process will help inform recovery planning and potential project prioritization.</p>

38	<p>Pinellas County tends to lose power during even minor storms—sometimes only briefly, but often multiple times. Could a portion of the funding be allocated toward addressing the frequent and rapid loss of power in the area?</p>	<p>Thank you for your comment. CDBG-DR funds may be used for eligible public infrastructure projects that address documented disaster-related impacts and primarily benefit low- to moderate-income communities. Projects must meet federal eligibility requirements, including a clear tie to the disaster and a public purpose.</p> <p>Input on issues such as power loss will be considered as part of broader recovery planning efforts, including those supported through the Local Mitigation Planning Program. This planning process helps inform the identification and prioritization of infrastructure needs that improve long-term community resilience.</p>
39	<p>As an owner at XXXX Golf Blvd., the Penthouse Beach Club, I am requesting that the beach access be a priority so that the public stops using our facility for beach access, a wash off station, and pool access. This is private property and has been a continual problem since we reopened in February. Please refurbish the parking area the boardwalk and beach access for the public so owners of Penthouse don't pay the consequences.</p>	<p>Thank you for your comment. Pinellas County recognizes the importance of addressing storm-related impacts to local infrastructure and public access areas that serve both residents and visitors. While CDBG-DR funding is primarily intended to support the restoration of housing and publicly owned infrastructure that benefits disaster-impacted low- to moderate-income communities, all community input is valuable in helping to inform recovery</p>

		<p>priorities. Your feedback will be shared with the appropriate teams as part of the County's broader recovery and planning efforts.</p>
<p>40</p>	<p>I have 3 weeks' timeshare at the XXXX Beach Club. Please consider repairing the public beach access on the north side of our building. Beach goers are using our parking lot, cleaning off with our water & jumping in the pool. These are things that all of us owners pay for from our own dollars. Thank you for considering repairing this beach access soon.</p>	<p>Thank you for your comment. Pinellas County recognizes the importance of addressing storm-related impacts to local infrastructure and public access areas that serve both residents and visitors. While CDBG-DR funding is primarily intended to support the restoration of housing and publicly owned infrastructure that benefits disaster-impacted low- to moderate-income communities, all community input is valuable in helping to inform recovery priorities. Your feedback will be shared with the appropriate teams as part of the County's broader recovery and planning efforts.</p>
<p>41</p>	<p>XXXX Beach Club at XXXX Gulf Blvd needs consideration. The city of TI needs to repair the beach access route on the North Side of our Building. Since it is still messed up from the hurricanes,</p>	<p>Thank you for your comment regarding the conditions at Penthouse Beach Club and the adjacent beach access route.</p>

	<p>beachgoers go through our parking lot to the beach, then use our pool and wash off area when coming off the beach. Beach access routes need to have a high priority to serve tourists without taking advantage of property owners.</p>	<p>Pinellas County understands the importance of safe and functional public access to coastal areas, especially in communities that serve both residents and visitors. While CDBG-DR funding is primarily focused on restoring housing and infrastructure serving disaster-impacted low- to moderate-income households, the County is reviewing all community input to help identify and prioritize recovery needs. Your feedback will be shared with the appropriate departments to ensure it is considered as part of the broader recovery and planning efforts.</p>
42	<p>I have no issues with much of the funding of this program going to low income residents. I would hope a significant portion of the remainder would go to those residents who have or can source the funds to rebuild their homes but cannot even begin to do so for 7 months now due to the bureaucracy, inefficiency and impracticality of the little beach towns of Pinellas trying to each manage this disaster. Seven months later some residents do not even have their substantial damage letter? Each town has one building official, often not even local, trying to do a job that should have a dozen. Rebuild permits are taking weeks to months even after homeowners have jumped through the many hoops needed to get to that point? Every one of these issues is absurd. What does Pinellas County want down the road? As close to the small, funky, friendly towns as is possible with many of the small businesses priced out? Or is it happy to turn the beach over to the developers who are already swooping in because so many of us simply cannot</p>	<p>Pinellas County is dedicated to assisting its impacted residents in recovering from recent disasters. The county will work closely with all local municipalities to expedite support for residents. This collaboration includes gathering the necessary documentation to ensure that the recovery process progresses efficiently and promptly.</p>

	fight this impossible fight anymore while maintaining our emotional and financial health. Here's an idea Pinellas, make it EASIER for us to repair our homes and our lives. What a concept.	
43	<p>I was out of internet, power, and phone service for 3 weeks. I had just started a new remote job based out of Raleigh, NC and purchased a home in St Pete in between hurricane Helene and Milton. Due to these hurricanes I lost power, internet, and phone service for 3 weeks. This led to me losing my job. Because my job is remote the zipcode is not considered being in a disaster area and I am unable to get assistance. I have not been able to secure a job or pay my mortgage for 6 months. I finally was offered a job last Friday but still need to pay 6 months of mortgage. There needs to be something done about this gap in assistance. I would like to see an action plan for people who lost their remote job because of the hurricanes.</p>	<p>Thank you for your comment. Pinellas County is developing the People First Housing Initiative Disaster Relief Reimbursement Program to address verified disaster-related housing costs incurred by residents after Hurricanes Helene and Milton. This includes out-of-pocket expenses such as rent, mortgage payments, utilities, or temporary housing that were necessary to maintain stable housing before formal recovery programs became available. The program is designed to help prevent further financial hardship by reimbursing eligible costs not covered by FEMA, insurance, or other assistance. For updates on program availability and how to apply once launched, please visit recover.pinellas.gov and sign up for email notifications.</p>
44	<p>I think this county is horrible at assisting residents compared to Hillsborough and Pasco. Where is the energy assistance Tampa give \$1150 per household a year every time we had funding. Pineapple leaves residents without rental and utility assistance on a continuous basis. As if they are blind to duke energy prices and the current economy after the storm. Programs for autistic kids is also needed. You know the overlooked.</p>	<p>Thank you for your comment.</p>
45	<p>I hope I can get some assistance. I have to find a place to move. An apartment. My credit is low due to job loss. They need to fix up my apartment and I have to move. I would like something in Pinellas county since I work in Pinellas county. I'm being turned down</p>	<p>Pinellas County is incorporating it into the People First Housing Initiative Disaster Relief Reimbursement Program, because it plays a direct and</p>

	<p>because of my credit. I just got a job in January. So could use the help. 727-XXX-XXXX. I'm 65 and have a bad back due to a car accident thru no fault of my own. Thankfully I am able to walk and get around fine.</p>	<p>essential role in supporting household housing stability and recovery. Many residents incurred significant out-of-pocket expenses, including rent, mortgage payments, utilities, and temporary housing costs, in the immediate aftermath of the disasters, prior to the availability of formal recovery programs. These self-funded efforts were often the only means of maintaining safe and stable housing during the displacement period. By reimbursing eligible households for verified recovery-related costs not covered by FEMA, insurance, or other sources, the program prevents further financial destabilization and complements the County's broader strategy to restore safe, decent, and resilient housing across the most impacted communities.</p>
46	<p>I need help recovering from hurricane helene eating since February for femas rental assistance my home will not be livable till August and maybe later</p>	<p>Thank you for your comment. Pinellas County is currently developing disaster recovery programs to assist eligible residents impacted by Hurricanes Helene and Milton. While specific program details are still being finalized, assistance may be available for documented disaster-related housing needs in accordance with federal requirements. For</p>

		the latest updates on program availability and how to apply once programs are open, please visit recover.pinellas.gov and sign up for email notifications.
47	<p>How can I get help? I do not need a permit. I need help with cost that I've already put out from hurricane Milton and hurricane Helene. I have all the receipt receipts. Insurance will not help me and FEMA hasn't done anything for me. Please be specific and let me know how to apply to get some of this grant money thank you</p>	<p>Thank you for your comment. Pinellas County is in the process of developing its CDBG-DR programs in accordance with federal requirements. While specific program details and eligibility criteria have not yet been finalized, potential assistance may include reimbursement for certain documented disaster-related expenses. For the most up-to-date information as programs are launched, including how to apply, please visit recover.pinellas.gov and sign up for email updates. This will ensure you receive notifications as soon as details become available.</p>
48	<p>A lot of residents had fences that were destroyed or have been damaged severely from the storms, along with landscaping. It would be nice to see public funds made available to the community to beautiful, repair, replace damaged fencing. Many have just left their fences leaning, zip-tied, or just left in disrepair as it is \$5k+ to replace residential fencing whether it is wood or PVC. These little things matter to the residents, especially in a community like Oldsmar that is extremely dog friendly - fences are an absolute must.</p>	<p>Thank you for your comment. Under HUD's CDBG-DR requirements, repairs or replacements such as fencing may be eligible only when they are part of a broader, eligible housing rehabilitation or reconstruction project and directly tied to disaster-related damage. Standalone repairs or replacements of fences or landscaping are not eligible as</p>

		<p>separate activities.</p> <p>All CDBG-DR housing activities must meet federal eligibility requirements, including a demonstrated tie to the disaster, benefit to a low- to moderate-income household, and consistency with program design. As Pinellas County finalizes its housing recovery programs, all feedback will be considered in shaping how resources are allocated to support safe and stable housing recovery. For updates, please visit recover.pinellas.gov.</p>
49	<p>We have owned a condo in Seminole since 2019. Since then we've paid property taxes, and added to the county's sales tax base by spending money at area businesses. We are here at minimum 5 months a year. We have not become Florida residents as it would impact our NYS health insurance. We were initially approved and received the \$770 critical needs payment from FEMA back in October, however, just recently received a letter from them stating we did in fact not qualify and would now need to pay the \$770 back. We had no power for 7 days, lost food and had some water damage. The critical needs payment we received helped us take care of replacing what we lost.</p> <p>We are not looking for more. I emailed recover@pinellas.gov to see if we would be eligible for the county to reimburse us if we do in fact have to pay back the \$770. The reply from Matthew Spoor indicated since the final recovery program hasn't been finalized, to sign up for email updates. I also wanted to ask here, and provide feedback that it seems discriminatory that the requirement is only for "residents" when we consider ourselves such being owners of property here, even if we don't meet your criteria of residency. Is there someone else I can reach</p>	<p>Thank you for your comment.</p> <p>Under federal requirements established in HUD's Universal Notice, CDBG-DR funds may not be used to reimburse costs associated with rehabilitation, reconstruction, or housing incentives for properties classified as second homes. A second home is defined as a property that was not the primary residence of the owner, a tenant, or any occupant at the time of the disaster or at the time of application.</p> <p>Reimbursement for disaster-related expenses tied to the repair or restoration of second homes is not an eligible activity under this program. Pinellas County must comply with these federal requirements when determining eligibility for CDBG-DR housing assistance.</p>

	out to with assistance in this? Sincerely, Amy Mary XXXX 70th Ave Unit XXXX, Seminole FL 33772	
50	<p>Hello! I was unable to attend previous meetings but wanted to ask for consideration on secondary homes after primary homes are taken care of. Secondary homes aren't only for the wealthy. My childhood home that was passed down to me from my mother was ruined during Helene & we don't get any assistance from anyone because my name is on the title. And to knock it down costs \$15k. Could have been a future home for my children. Just so sad that we don't get assistance for having a secondary home.</p> <p>Thank you for listening.</p>	<p>Thank you for your comment. CDBG-DR funds are governed by federal requirements outlined in HUD's Universal Notice, which prohibit assistance for properties classified as second homes. A second home is defined as a property that was not the primary residence of the owner, a tenant, or any occupant at the time of the disaster or at the time of application. As a result, properties that do not meet the definition of a primary residence are not eligible for housing assistance, including rehabilitation or reconstruction, under this program. Pinellas County must follow these federal requirements in administering CDBG-DR funds.</p>
51	Thank you.	Pinellas County appreciates your engagement in the development of its Disaster Recovery Action Plan.
52	<p>How about using the money to help homeowners get there trees trimmed or removed that are endangering their property and their neighbors before the next hurricane hits</p>	<p>The Action Plan, as it stands, does not incorporate any measures for tree trimming. Instead, the plan prioritizes the urgent restoration of housing for those residents whose homes are currently deemed unlivable due to significant damage or who require essential repairs to ensure safe and</p>

		adequate living conditions. By concentrating resources on these critical housing needs, the plan aims to provide immediate relief and stability to affected families
53	LiFT - Learning Independence for Tomorrow	Pinellas County appreciates your engagement in the development of its Disaster Recovery Action Plan.
54	<p>I would like to see really affordable Spay & neuter help for cats. a Low cost/ Free wellness clinic for anyone that needs it. I spend \$260. on a stray cat. I can't do that for all the many strays and animal control is full all they can do is PTS, put to sleep. Not their fault. Please think of the many animals. also Renters Need help finding affordable Places that Would Rent to them with Pets. that is another Reason of So many homeless pets. Anyone building/remodeling homes with help from the taxpayers Needs to Make sure pets are welcome, if not the homeless pet problems will continue, get worse. and we as Tax payers will have to paid to have all those poor animals PTS by animal control or worse suffering and regular people like me can't do it all as much as I would like to. Thank you for your time and Please think of the Clearwater/Pinellas animals that Need your help. Thank you again.</p>	<p>Thank you for your comment. CDBG-DR funds are governed by federal regulations and must be used for activities that address disaster-related impacts and primarily benefit low- to moderate-income households. Eligible uses generally focus on housing, infrastructure, and economic recovery, and do not include direct funding for animal care or veterinary services. However, feedback like yours helps inform broader community recovery needs and challenges. All input will be considered as part of Pinellas County's ongoing planning efforts. For updates on available programs and initiatives, please visit recover.pinellas.gov.</p>
55	<p>Hello, I am with Habitat for Humanity Tampa Bay Gulfside. We support the budget allocated for housing, particularly the Homeownership Assistance Program. We'd like to see more funding allocated to that program. Habitat is also open to partnering to leverage these funds.</p>	<p>Pinellas County values stakeholder feedback and engagement in developing its action plan. As we progress with our programs, we aim to effectively utilize these funds and encourage participation from our partners.</p>

56	LiFT - Learning Independence for Tomorrow	Pinellas County appreciates your engagement in the development of its Disaster Recovery Action Plan.
57	1. People have destroyed homes that are caught into probate that have'nt been able to file left damaged . Buildings that are able to withstand hurricane Cat 3 are not being utilized. 3. I have a Beach Safety Disaster plan & Mental Health Initiative with water rescue for review.	Upon the implementation of the housing program, Pinellas County will develop a process for accepting alternative methods for documenting ownership, and a program-level exceptions review process to manage unique ownership structures.
58	lots of AI scams 1st -vacant lot 2nd- from google 3rd - one from your "vetted GC" website that still asks me how our project is going (4 months now) we never contacted them to start with. then the group Kitchens Today....we met at shoppalozza downtown st pete is a total mess of untraditional contractor methods! we hired them...its been nothing but lip service! and no action!	Thank you for your comment. While this concern falls outside the scope of the CDBG-DR Action Plan, feedback related to contractor experiences and consumer protection is important. If you believe you have encountered fraudulent or misleading practices, you may wish to report the issue to the Florida Department of Business and Professional Regulation or the Pinellas County Consumer Protection office. For updates on recovery programs and official information, please visit recover.pinellas.gov .
59	May 23, 2025 Brian Scott Pinellas County Commission Chairman County Administration Pinellas Recovers 315 Court Street Suite 601 Clearwater, FL 33756 Re: CDBG-DR Action Plan Chairman Scott: The Insurance Institute for Business & Home Safety (IBHS) is pleased to offer the following comments for your consideration in response to Pinellas County's CDBG-DR Action Plan for public comment. We applaud the County for making restoring housing for	Thank you for your comment regarding the inclusion of green building standards. While adherence to specific green building standards is no longer a HUD requirement, Pinellas County appreciates your input and will take it into consideration as we develop the

	<p>both renters and homeowners in hurricane-impacted areas in Pinellas County the highest priority and constructing safe, resilient, and affordable housing units to replace those destroyed by the disasters as the County’s primary housing goal. We strongly encourage the County to require a designation from IBHS’s FORTIFIED™ program for all CDBG-DR funded construction projects to repair, rebuild, or replace damaged homes, small businesses, and public facilities. Doing so will advance the survivability and insurability of affordable housing in Pinellas County.</p> <ul style="list-style-type: none">• Survivable means homes and communities that can withstand the severe weather we know they will face, so that homeowners can return home after an evacuation and get on with their lives. It provides families with physical safety and economic security and supports strong communities, stable tax bases, and healthy insurance markets.• Insurable means homes and communities that carriers want to insure because they have undertaken meaningful, verified risk reduction. It is not a guarantee of insurance from a particular carrier—but rather a risk that is more attractive to insurers. When we incorporate science-based, verifiable resilience standards—such as FORTIFIED—into affordable housing programs like those funded with CDBG-DR funds, we improve the quality and long-term affordability of the housing and the overall resiliency of the communities these projects serve. Based on decades of scientific research, IBHS’s FORTIFIED™ program is a set of voluntary, beyond-code construction upgrades that improve a building’s resistance to the effects of high winds, hail, hurricanes and even tornadoes. The FORTIFIED program is available for single-family houses, multifamily properties, and commercial structures. The program features a technical standard and an independent verification process that ensures that buildings obtaining a FORTIFIED designation from IBHS have, in fact, reduced their risk. To date, more than 78,000 structures have been designated by the FORTIFIED program in 33 states. The Florida Building Code (FBC) is substantially similar to the technical requirements of the FORTIFIED program in much of the state. The only major difference lies outside the	<p>program’s construction-related policies and procedures to promote resilient housing in accordance with local and state building codes.</p>
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	<p>hurricane coast; while the FBC does not require impact resistant windows and doors in this area of the state, FORTIFIED Silver and FORTIFIED Gold (the two higher levels of the FORTIFIED program) do require this mitigation action. Even with the substantial similarities between FBC and FORTIFIED, the program still has a strong value proposition for affordable housing projects that rely on public funding.</p> <p>Specifically, FORTIFIED requires an independent verification process—called “Evaluation”—that ensures that each FORTIFIED-designated project has been designed and constructed to IBHS’s standards. This provides the property-owner and their insurer with confidence that the property has, in fact, reduced their risk. In this way, FORTIFIED helps to improve the insurability of properties. Indeed, the FORTIFIED verification process strengthens building performance, even when the building code is substantially similar to the program’s standard. Like Florida, the coastal counties of Alabama have a building code that is on par with FORTIFIED requirements. A new study released this week by the Center for Risk and Insurance Research (CRIR) at the University of Alabama examined over 40,000 properties affected by Hurricane Sally and found IBHS FORTIFIED homes were 70% less likely to have an insurance claim compared to traditional construction. The peer-reviewed study evaluated the real-world effectiveness of the FORTIFIED program, showing that FORTIFIED homes suffered significantly less damage and required fewer insurance claims than standard homes. When a claim was filed on a FORTIFIED home, the average damage was 22% less severe. Additionally, the report estimates that if every affected home had been built to the FORTIFIED Roof standard, total damage would have been reduced by more than \$147 million—saving homeowners \$42 million and insurers \$105.6 million in losses. The study also found that FORTIFIED designated homes outperformed houses built to codes with very similar requirements by more than 50%, demonstrating the importance of the program's documentation and review process. It is the FORTIFIED’s verification process, along with the same science-based mitigation actions that underlie the FBC,</p>	
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	<p>that both improves performance and provides a critical bridge to the property insurance industry and helps make FORTIFIED-designated properties more insurable. Adding a FORTIFIED requirement to the County's CDBG-DR Action Plan will improve the performance of affordable housing and the built environment in Pinellas County without substantially increasing costs. This is a win for all stakeholders—but most particularly the recipients of CDBG-DR funded projects.</p> <p>Background IBHS is a 501(c)(3) organization enabled by the property insurance industry's investment to fund building safety research that leads to real-world solutions for home and business owners, helping to create more resilient communities. We conduct this work from our Research Center, located in Richburg, South Carolina. Severe weather disrupts lives, displaces families, and drives financial loss. IBHS delivers top-tier science and translates it into action so we can prevent avoidable suffering, strengthen our homes and businesses, inform the insurance industry, and support thriving communities. The perils we study at IBHS are part of the natural world in which we live, but social and economic disasters occur when these perils meet human populations that live or work in harm's way. To break the cycle of destruction, it is essential to address all aspects of the building performance chain: where you build, how you design and construct, and how well you maintain and repair. As a building science institute, IBHS focuses on the ways that weather behaves, what makes homes and businesses vulnerable, and how our buildings can be more resilient. We exist to help ensure that the spaces where people live, learn, work, worship, and gather are safe, stable, and as strong as the best science can equip them to be. Resilience is a Housing Issue We encourage the County to treat resilience as a housing issue. Homes are not "quality" unless they are sufficiently resilient to withstand knowable risk from severe weather. Investing in resilience for affordable housing helps ensure that people are not only housed, but that they remain housed following natural disasters. Quality housing that withstands severe weather allows working families to return home</p>	
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	<p>following natural disasters and get on with their lives, which in turn supports local economies and economic revitalization by preventing businesses from closing from low demand and want of workers, protecting the local tax base. Housing is not “affordable” unless it provides savings to the resident not just on the day of purchase (or lease signing), but on an ongoing basis as well. Investments in resilience provide ongoing savings to residents. Generally, risk reduction results in avoided damages from severe weather and reduced insurance premiums reflecting the reduction in risk.</p> <p>FORTIFIED Strengthens Resilience FORTIFIED provides property owners with the ability to achieve three increasing levels of resilience: FORTIFIED Roof is the foundation of FORTIFIED because an estimated 70 to 90 percent of catastrophic homeowners’ insurance claims include roof damage, and damaged roofs can lead to water intrusion that significantly amplifies damage. FORTIFIED Roof provides a system that strengthens the roof through (i) more and stronger nails, (ii) locked-down edges, and (iii) a sealed roof deck, which work in concert to keep the wind and rain out. FORTIFIED Silver adds increased levels of resilience through requirements on windows, doors, and siding. FORTIFIED Gold adds requirements related to a continuous load path from the roof to the foundation. The FORTIFIED hail supplement requires impact resistant shingles rated by IBHS that show they can withstand hail up to 2 inches in diameter. These shingles perform best when tested against realistic hailstones and better protect homes. IBHS’s impact test standard is currently the most representative of natural hail of any current testing protocol for building materials. Manufactured homes can also be built to IBHS’s FORTIFIED Roof standard. Studies following Hurricane Sally (in Alabama) and Hurricanes Matthew, Florence, Dorian, and Isaias (in North Carolina) concluded that FORTIFIED designated homes are less likely to have an insurance claim and, for those homes with insurance claims, claims that are smaller on average. The value of FORTIFIED has also been explored in a 2022 study from the University of Alabama’s Culverhouse College of Business, which concluded that building or retrofitting to FORTIFIED</p>	
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	<p>has relatively minimal costs and a strong rate of return. Findings include: By constructing a new multifamily building to FORTIFIED Gold, property owners could realize an 8.1 to 72 percent internal rate of return on a marginal cost increase of no more than 1.5 percent of total cost of construction. For investments in retrofitting an existing multifamily building to FORTIFIED Roof, a property owner could realize an 8.3 to 35 percent internal rate of return on the investment for the property owner. Further, a new IBHS study exploring opportunities to enhance the resilience of Section 8 multifamily and single-family housing in the Atlantic and Gulf coast regions estimates that retrofitting these properties with a FORTIFIED Roof could decrease losses by 30-50 percent. Finally, a recent state evaluation of Louisiana’s FORTIFY Homes Program found that participants in this grant program saved \$1,250 on their insurance bill and that FORTIFIED roofs pay for themselves in under five years.</p> <p>Public Investment in FORTIFIED The County would not be alone in adding FORTIFIED requirements to its affordable housing programs. The Louisiana Housing Corporation requires FORTIFIED Gold as a minimum construction standard for projects funded by HUD CDBG-DR grants. The Mississippi Home Corporation incentivizes FORTIFIED Multifamily in its 2025 QAP scoring criteria. The Minnesota Housing Finance Agency incentivizes FORTIFIED Home, FORTIFIED Multifamily, and the Hail Supplement in its 2025 - 2026 MN Overlay. The Federal Home Loan Bank of Dallas invests in FORTIFIED through two mechanisms: as an incentive in the scoring criteria for its Affordable Housing Program and through a FORTIFIED Fund grant program. The Federal Home Loan Bank of Atlanta incentivizes FORTIFIED as part of the scoring criteria for its Affordable Housing Program. For single family housing, Alabama, Louisiana, Oklahoma, and South Carolina help pay for FORTIFIED retrofits through grant programs managed by the state insurance departments. These states will soon be joined by grant programs in Arkansas, Kentucky (which also includes funding for multifamily housing), Minnesota, and Mississippi, all of which have been enacted into law since 2023 although not yet</p>	
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	<p>operational. In addition, North Carolina provides homeowners with grants through the state wind pool, the North Carolina Insurance Underwriting Association. In addition to creating more survivable and insurable housing for Pinellas County residents, resilience requirements in public funding programs have an important effect on workforce and skills development.</p> <p>We have observed in Alabama and Louisiana that references to the FORTIFIED program in government programs creates opportunities to educate developers, builders, and contractors about FORTIFIED. Once these essential participants in the housing market build to FORTIFIED because of program or funding requirements, they develop a comfort level with the work and costs associated with FORTIFIED. This can result in voluntary take-up on other projects unconnected to government funding sources (which is part of how Alabama now leads the nation with more than 51,000 FORTIFIED designations and counting). In a similar way, CDBG-DR resilience requirements can have an even broader impact on the built environment beyond the initial investment. Requiring FORTIFIED for CDBG-DR funded projects could significantly increase the number of Pinellas County residents who live and do business in resilient homes and buildings.</p> <p>* * * As Pinellas County understands all too well, weather events become natural disasters by devastating communities, damaging property, disrupting local economies, and dislocating families.</p> <p>This need not be the case. Solutions exist to strengthen the survivability and insurability of our homes—investments by the County can turn these solutions into a reality for County residents. Thank you for the opportunity to contribute to this critical issue. If you have any questions, please do not hesitate to contact me at mnewman@ibhs.org. Sincerely, Michael Newman General Counsel Insurance Institute for Business & Home Safety</p>	
60	<p>The money should be used to help the homeowners build or repair their homes. Improve water drainage on residential property to prevent flooding. Help homeowners with expensive landscaping to aid in flood prevention.</p>	<p>Thank you for your comment regarding homes and stormwater management in. Pinellas County recognizes that major rain events can create</p>

		<p>runoff conditions across interconnected drainage systems. Pinellas County has allocated a portion of its CDBG-DR funds—approximately \$130 million—for infrastructure and mitigation activities, including stormwater management projects that address disaster-related impacts and meet federal eligibility requirements. These funds must be used for publicly owned infrastructure and primarily benefit low- to moderate-income communities.</p> <p>In addition to project implementation funding, the County is launching the Local Mitigation Planning Program to identify long-term strategies for risk reduction, resilience, and systemwide improvements. This planning phase provides an opportunity to assess issues such as watershed-wide stormwater flow, regional coordination, and infrastructure investments needed to adapt to evolving conditions.</p> <p>Your feedback will be shared with the relevant teams to help inform both near- and long-term recovery and mitigation planning efforts.</p>
61	<p>Make sure the sewer systems work the back pumps and generators work. But another aqua fence. Backed up sewerage in homes in horrible and dangerous and infectious.</p>	<p>Thank you for your comment. CDBG-DR funds may be used for eligible public infrastructure projects that address</p>

		<p>documented disaster-related impacts and primarily benefit low- to moderate-income communities. Projects must meet federal eligibility requirements, including demonstrating a tie to the covered disaster and serving a public purpose.</p> <p>In addition, the County is undertaking planning efforts to support long-term mitigation and resilience strategies through programs such as the Local Mitigation Planning Program. Input received through this process helps inform both project prioritization and broader recovery planning.</p>
62	<p>Recommendation for Inclusion of HOAs in CDBG-DR Eligibility: Skye Loch Villas, Dunedin, FL During Hurricane Milton in 2024, Skye Loch Villas—a 55+ senior community located in Dunedin, Florida—experienced unprecedented flooding due to the extreme rainfall intensity of the storm. Of the 168 villa homes in the community, 54 sustained significant flood damage. These are single-story, concrete block attached villas, many of which were inundated due to aging stormwater infrastructure and insufficient drainage systems overwhelmed by the storm’s severity. Storm water drainage from 1,200 acres flows through our community. Following the disaster, the Skye Loch Villas community approached the City of Dunedin seeking financial assistance to make urgently needed infrastructure improvements aimed at flood mitigation. However, the City informed residents that the costs for such improvements are the responsibility of the Homeowners Association (HOA). This poses an insurmountable burden on our residents, the vast majority of whom are low- to moderate-income</p>	<p>Thank you for your comment regarding condominiums and homeowner associations. Pinellas County recognizes the impact the storms had on these residents and have expanded the eligibility requirements to include owner-occupied units in condominiums and other multi-unit structures.</p>

	<p>seniors living on fixed incomes. Without assistance, many face the very real threat of losing their retirement homes. Under current HUD guidelines, CDBG-DR funding typically prioritizes municipal infrastructure projects or direct aid to individual homeowners. While we understand this framework, we strongly urge HUD and Pinellas County to expand the eligibility criteria to include HOAs—particularly those serving vulnerable populations such as seniors in fixed-income communities—for infrastructure-related mitigation projects. Increased storm severity and frequency are widely expected due to climate change, and communities like Skye Loch Villas are among the most at risk. Excluding HOAs from eligibility effectively denies these residents critical support. By extending eligibility, HUD would enable proactive, community-level mitigation that protects lives, property, and public health while preserving affordable senior housing. We respectfully request that HUD and Pinellas County consider this recommendation as part of a broader, more inclusive approach to disaster recovery and resilience. Thank you for your most serious consideration. Sincerely, Daniel Borba, President Skye Loch Villas Owners Association</p>	
63	<p>I strongly urge the inclusion of credible third-party green building programs, including NGBS Green - based on the ICC-700 National Green Building Standard (NGBS) - in the Pinellas County Action Plan for Disaster Recovery. Energy-efficient, green-certified homes are not only more affordable to live in because of lower operating and maintenance costs, but also safer, healthier, and far more resilient in the face of disasters. These homes protect residents during extreme weather and power outages, lower public health burdens through improved indoor air quality, and reduce the need for emergency intervention and costly disaster recovery efforts. A green building program is most impactful when adopted for large-scale construction efforts, such as those undertaken in the aftermath of a disaster, where entire communities are being rebuilt from the ground up. In these scenarios, sustainable design practices- like heat island mitigation through reflective surfaces and green roofs, or the use of permeable landscaping to manage</p>	<p>Thank you for your comment regarding the inclusion of green building standards. While adherence to specific green building standards is no longer a HUD requirement, Pinellas County appreciates your input and will take it into consideration as we develop the program's construction-related policies and procedures to promote resilient housing in accordance with local and state building codes.</p>

	<p>stormwater- offer exponentially greater benefits when applied across a broad area. Not only do these strategies enhance environmental performance and resilience, but their effectiveness compounds at scale, transforming entire neighborhoods into more livable, energy-efficient spaces while potentially preventing future flooding and extreme temperature events.</p> <p>Green building programs like NGBS Green are a proven, cost-effective investment that ensures quality through third-party verification, supports energy independence, and strengthens long-term community resilience. They also spur local job creation and empower builders with market flexibility to choose the most appropriate and efficient solutions. Including NGBS in the County's recovery strategy is a smart, equitable use of federal funds that will lead to stronger, healthier, and more self-sufficient communities.</p>	
64	<p>As you build new housing we in the community would like to see the incorporation of sustainability and sustainability standard measures like green building certifications NGBS National Green Building Standard. This is a quality control mechanism to keep developers honest</p>	<p>Thank you for your comment regarding the inclusion of green building standards. While adherence to specific green building standards is no longer a HUD requirement, Pinellas County appreciates your input and will take it into consideration as we develop the program's construction-related policies and procedures to promote resilient housing in accordance with local and state building codes.</p>
65	<p>This program must help those of us who are substantially damaged and must demo and rebuild our home. The Elevate Florida Program doesn't help those of us who already signed contractor agreements and all the "offsets" of the program leaves Elevate Florida paying nothing (\$220,000 amount of rebuild assistance is not enough to rebuild - Flood insurance (\$109,0000) - 25% (27,7500)= \$83,500 to pay for \$600,000 in costs to rebuild. NFIP flood insurance is a fraud and is not</p>	<p>Pinellas County understands the difficulties homeowners face when navigating substantial damage evaluations and rebuilding to meet higher standards. The CDBG-DR Housing Program will include case management during the intake process to help guide</p>

	<p>paying out on claims as they should for substantially damaged homes. Besides getting an SBA loan it is essential that we get help with rebuilding our homes.</p> <p>The expense is enormous and all other current programs do not help the average person like me to rebuild. And this program MUST provide assistance to those who have already started work to demo and rebuild. A lot of these programs say you must wait to do any repairs or rebuild until application is approved or must utilize certain contractors. We CAN'T WAIT any longer to get back to our homes. I am also bearing the burden of renting a condo in addition to my demoed home. Help must be provided to those already contracted to rebuild.</p>	<p>applicants through available resources, including how CDBG-DR assistance may complement programs like Elevate Florida and SBA loans. Your input reinforces the need for coordinated support to promote resilient recovery.</p>
66	<p>To Whom It May Concern, My name is Cristina XXXX, and I'm writing to share our story and humbly ask for your compassion and support as we navigate an incredibly difficult time. Four years ago, my spouse and I moved to Pinellas County after spending decades building our lives and careers in North Carolina. We came here with the hope of starting the next chapter—downsizing into a modest 1,100 sq ft waterfront cottage and preparing for retirement. Our children are now in college, and we've committed ourselves to supporting them through school without saddling them with large student loans. For over 35 years, we've paid federal taxes and contributed to the economy through hard, honest work, and we've always believed in following the rules and doing the right thing. But then Hurricane Helene struck—and everything changed. Our home flooded, and now, due to the FEMA 50% rule, we find ourselves stuck. Knock down and rebuild a new home is our only option. We do not qualify for assistance—not because we're wealthy, but because our income exceeds certain limits. Yet we are far from financially secure. We are five years from retirement, trying to rebuild our primary residence, and currently living out of a trailer in our own yard. It's disheartening to see others around us rebuilding, sometimes bypassing regulations, while we are penalized for following the rules. We want to do things the right way. We want to rebuild safely and legally. But we need help. Not qualifying for grant assistance because we've worked</p>	<p>Thank you for your comment and for sharing your experience. Pinellas County understands that many households impacted by Hurricanes Helene and Milton are facing complex and challenging recovery circumstances. Pinellas County is currently developing its disaster recovery programs in accordance with federal requirements, which include specific eligibility criteria related to income, disaster-related impact, and property use. While not all types of assistance may be available to every household, the County is working to design programs that address a range of unmet housing needs across the community. For the most up-to-date information on program availability, eligibility, and how to apply once programs are launched, please visit recover.pinellas.gov and sign up for email updates. Your feedback will be shared with the appropriate teams as part of</p>

	<p>hard and lived responsibly feels like a punishment, not a policy. I respectfully ask that the county consider families like ours when administering grant funds and support programs. We may not meet narrow income requirements, but we are still in need. We've lost our home, our sense of security, and our peace of mind. We are living in temporary conditions while trying to uphold the values that have guided us our whole lives: responsibility, integrity, and community. Please don't overlook those of us who are trying our best to do the right thing. We are part of this community, even if we've only been here for four years. We pay taxes, support local businesses, and care deeply about the future of this county. Thank you for your time, and for considering our plea with empathy and understanding. Sincerely, Cristina XXXX Madeira Beach, FL 33708</p>	<p>ongoing planning and program development efforts.</p>
67	<p>At Johns Hopkins All Children's Hospital, we provide essential care for the children of Pinellas County. Sixty percent of our care is through Medicaid, which serves the low-and-moderate income individuals and households required by HUD. Organizations like ours have considerable infrastructure and risk mitigation needs to be better prepared for future weather events. We kindly request that the program allows for funding to be deployed to nonprofits that serve all of Pinellas County, even if they are based in St. Petersburg.</p>	<p>Thank you for your comment. CDBG-DR funds must be used for eligible activities that address documented disaster-related impacts and meet all applicable federal requirements. While the current draft of the Action Plan does not include specific projects within the City of St. Petersburg, program eligibility and geographic scope will be defined in forthcoming program guidelines. We encourage you to visit recover.pinellas.gov and sign up for email updates to stay informed as program details, including eligibility and application procedures, become available.</p>
68	<p>It seems a great deal of money is being spent on red tape. People are hurting. Funds are desperately needed to rebuild. We need help now.</p>	<p>Thank you for your comment. CDBG-DR funds are subject to federal requirements that guide how programs are designed,</p>

		<p>implemented, and monitored to ensure compliance and accountability. While these processes can take time, they are necessary to ensure funds are used appropriately and effectively. Pinellas County is working as quickly as possible to launch programs that meet these requirements and address critical recovery needs. For updates on program availability and how to apply once programs are launched, please visit recover.pinellas.gov.</p>
69	<p>I had just moved into my newly purchased mobile home when hurricane Helene hit us and got flooded. Now I'm in a rental and my mobile Home is sitting empty with the substantial damage determination. Please help people like me with these funds. We need help we have completely lost our home which now have to be demolished! What are we supposed to do? I've applied for and appealed FEMA's decision back in December and they still haven't helped 6 months later..this is so crazy and the county has only made things worse. I am devastated and need financial help from the county! Please help homeowners who lost everything like myself!</p>	<p>Thank you for your comment. Pinellas County is developing disaster recovery programs to assist eligible residents who experienced significant damage from Hurricanes Idalia, Helene, and Milton. All programs must comply with federal CDBG-DR requirements, including specific eligibility criteria related to property type, use, and documented disaster-related impact. We understand the challenges many residents are facing. For the latest updates on program availability, eligibility, and how to apply once programs are launched, please visit recover.pinellas.gov and sign up for email updates. Your feedback will be considered as program design continues.</p>
70	<p>Fix the sewage plants. Stop pouring sewage into our waterways</p>	<p>Thank you for your comment. CDBG-DR funds may be used for eligible public infrastructure</p>

		<p>projects that address disaster-related impacts and benefit low-to moderate-income communities. Infrastructure improvements must meet federal eligibility criteria, including a demonstrated tie to the covered disaster and a clear public purpose.</p> <p>As part of ongoing recovery efforts, the County is also supporting long-term planning through the Local Mitigation Planning Program. Input received through this process helps inform the identification and prioritization of potential infrastructure projects aimed at increasing system resilience and reducing future risk.</p>
71	<p>Pinellas County has deemed my mobile home substantially damaged. I tried to show I could repair it for under the 49 percent rule and they elevated the numbers for repairs and still denied my application saying it's still substantially damaged. What am I supposed to do? I've essentially lost my home. I don't have the money or resources to move it or elevate it please tell me what I'm supposed to do? I spent my life's savings on that mobile home 1 month before Hurricane Helene hit. I only had about 6 inches of water inside for about 1 hour. Please help!!</p>	<p>Thank you for your comment. Pinellas County is developing several disaster recovery programs to assist eligible residents impacted by Hurricanes Idalia, Helene, and Milton. These programs may address a range of needs, including repair, reconstruction, relocation, and certain disaster-related expenses. All programs must comply with federal requirements and are still being finalized. For updates on program availability, eligibility, and how to apply once programs are launched, please visit recover.pinellas.gov and sign up for email notifications.</p>

72	<p>I didn't think it's fair, I not only lost my place in your country, but everything inside... I had to stand and watch as everything I had in my mobile home was thrown out the door in a hour, then I had to watch as people pick through my damaged belongings, my new refrigerator, stove, washer and dryer taken away, my van towed away, I had no insurance because it went up so high... three hurricanes in thirteen months.. my new air conditioner just replaced totally destroyed.. then to make matters worse.. I had to use the money I received from my van to pay for the mobile home to be smashed, and pay thousands for permits for this.. to beat everything because it's not my primary place, and I pay higher taxes, I was told by FEMA, to bad you get nothing, I am absolutely devastated!</p>	<p>Thank you for your comment. Pinellas County is developing disaster recovery programs to assist eligible residents who experienced significant damage from Hurricanes Idalia, Helene, and Milton. All programs must comply with federal CDBG-DR requirements, including specific eligibility criteria related to property type, use, and documented disaster-related impact. We understand the challenges many residents are facing. For the latest updates on program availability, eligibility, and how to apply once programs are launched, please visit recover.pinellas.gov and sign up for email updates. Your feedback will be considered as program design continues.</p>
73	<p>Repair beach park in Madeira Beach. Provide retroactive grants for people who need to rebuild and cannot wait for this program to get off the ground.</p>	<p>Thank you for your comment. We understand the urgency for impacted households to make critical repairs or reconstruct their homes following disasters. We have proposed the Homeowner Reimbursement Program, which is designed to reimburse eligible homeowners for eligible costs incurred to rehabilitate, demolish, or reconstruct homes damaged by the disasters.</p>
74	<p>I think all money should be put toward repairs to Dunedin from storm damage. No money should be used for private boat clubs. A new public dock would be great. Also, people with limited resources and the disabled who need help should get it.</p>	<p>The CDBG-DR Housing Recovery Program is being developed to assist eligible homeowners with storm-related damage. Once the program is launched, application</p>

		<p>details and support services will be made available to guide residents through the process. We appreciate your patience and participation as recovery efforts move forward.</p>
75	<p>The financial assistance options (SBA disaster loans, hurricane recovery assistance, etc are all too intrusive into people's accounts. We would expect financial income information would suffice from Federal Income Tax reports. Instead, Pinellas required our banking account numbers and statements, even asking about specific checks written to our account. In our case, some of these were fa.kly members sending money to help pay for family vacation costs. SBA wanted a copy of our Trust. Our Trust is our Will. No one's business. I have little confidence that Pinellas County or the SBA can protect all o f our very sensitive financial information. Out of frustration, we withdrew our applications. Also, we applied for financial help immediately after the disaster from FEMA. We got a small amount. When we tried to apply after Milton, we found some person had applied in their name with another email. FEMA put a freeze on our account due to fraud and never corrected it. We weren't able to get anymore help. We hear about all this available financial help, but it's nearly impossible to get the financial help.</p>	<p>Thank you for your comment. Pinellas County takes the privacy of our residents and applicants seriously. During the implementation of the recovery programs, we will ensure that our systems comply with all federal, state, and local data security requirements.</p>
76	<p>My home owners/hurricane insurance would not help me. FEMA would not help me and I applied to the Pinellas grant and they would not help me. I have lived in Florida 20 years. I plan to sell my mobile home and move from Florida</p>	<p>The CDBG-DR Housing Recovery Program is designed to assist eligible homeowners with storm-related damage from Hurricanes Milton and Idalia. While assistance is not guaranteed, the program aims to support residents facing serious housing conditions. Your comment underscores the urgency of recovery efforts and will help guide implementation.</p>

77	Pinellas county should spend a lot of the money to upgrading our infrastructure, for example sewer system, elevating roads, elevating structures, etc.	<p>Thank you for your comment. CDBG-DR funds may be used for eligible public infrastructure projects that address disaster-related impacts and benefit low-to moderate-income communities. Infrastructure improvements must meet federal eligibility criteria, including a demonstrated tie to the covered disaster and a clear public purpose.</p> <p>As part of ongoing recovery efforts, the County is also supporting long-term planning through the Local Mitigation Planning Program. Input received through this process helps inform the identification and prioritization of potential infrastructure projects aimed at increasing system resilience and reducing future risk.</p>
78	By looking at your presentation you are trying to solve too many things with too few dollars. I suggest that you put 80% of the funds into rebuilding people's homes and 20% into small business rebuilding. Limiting it to an income based plan is noble but wrong. The county is facing a tax crisis as home valuations have plummeted massively in the coastal areas of the county. If 70% goes to low income people the tax crisis still exists. People with higher incomes will rebuild and pay more taxes, which can then be used to help people with low AMI. You lose the tax base and you have a bigger financial crisis, especially if people move out.	<p>Thank you for your comment. HUD requires at least 70% of the CDBG-DR funds to benefit Low-to Moderate-Income persons, those earning less than 80% of Area Median Income (AMI). However, under certain proposed recovery programs, the County is able to assist households earning up to 120% AMI.</p>

79	<p>I was really hoping that the subdivision of Tarpon Woods would get some of the money to help with the flooding on our streets. I would like to prioritize in Palm Harbor this subdivision Tarpon Woods, please!!</p> <p>Also because the golf course wanted to sell and become a mitigation credit area (filling in the ponds and adding more dirt into golf course), which none of the residential folks want. We want the county to step in and hopefully save this golf course so we will not be worse off in the future flooding with their selling off golf course as "mitigation area" — they will be just putting more water into our neighborhood and streets!</p>	<p>Thank you for your comment. CDBG-DR funds may be used for eligible public infrastructure projects that address disaster-related impacts and benefit low-to moderate-income communities. Infrastructure improvements must meet federal eligibility criteria, including a demonstrated tie to the covered disaster and a clear public purpose.</p> <p>As part of ongoing recovery efforts, the County is also supporting long-term planning through the Local Mitigation Planning Program. Input received through this process helps inform the identification and prioritization of potential infrastructure projects aimed at increasing system resilience and reducing future risk.</p>
80	<p>Hurricanes should not be a wealth redistribution mechanism. The feds didn't provide these funds for only low- and moderate-income households and communities. These funds are for storm damage.</p> <p>People on the beach/coast sustained the most damage. If insurance companies won't meet the need (caused by the FEMA 50% rule) then these funds should go towards making people whole, not giving people unaffected by the storm damage a leg up</p>	<p>Thank you for your comment. HUD requires at least 70% of the CDBG-DR funds to benefit Low-to Moderate-Income persons, those earning less than 80% of Area Median Income (AMI).</p> <p>However, under certain proposed recovery programs, the County is able to assist households earning up to 120% AMI.</p>
81	<p>When they're going to help the homeowners with the rebuild, can someone please contact me?</p>	<p>Thank you for your comment. The Pinellas County People First CDBG-DR Housing Recovery Program is targeted to launch in</p>

		<p>Fall 2025 and is intended to assist eligible homeowners with storm-related damage not covered by insurance or other resources. We will conduct outreach efforts in advance of the program launch to ensure impacted residents are informed. Once the program is launched, applicants will be guided through the process to determine eligibility and available assistance. Your input highlights the critical need for recovery support and will help inform implementation.</p>
82	<p>Hi I am a Disabled Senior Citizen, XXXX-31st St S,St Petersburg,FL 33712 /(727)599-XXXX MY EMAIL IS NOT WORKING / My Back Yard Is In Desperate Need For Tree Limbs,Branches,Tree Romoval unable to afford to have it removed.PLEASE HELP,THERE IS A GATE UNLOCKED,NO ANIMALS IN THE YARD,EASY TO ACCESS THANK YOU</p>	<p>Thank you for your comment. Under HUD’s CDBG-DR requirements, repairs or replacements such as fencing may be eligible only when they are part of a broader, eligible housing rehabilitation or reconstruction project and directly tied to disaster-related damage. Standalone repairs or replacements of fences or landscaping are not eligible as separate activities. All CDBG-DR housing activities must meet federal eligibility requirements, including a demonstrated tie to the disaster, benefit to a low- to moderate-income household, and consistency with program design. As Pinellas County finalizes its housing recovery</p>

		<p>programs, all feedback will be considered in shaping how resources are allocated to support safe and stable housing recovery. For updates, please visit recover.pinellas.gov.</p>
83	<p>Like other communities with CDBG-DR funds, I recommend a green building certification, where applicable, be a requirement. Certified green buildings inherently incorporate resiliency and is a great fit for such funds.</p>	<p>Thank you for your comment regarding the inclusion of green building standards. While adherence to specific green building standards is no longer a HUD requirement, Pinellas County appreciates your input and will take it into consideration as we develop the program's construction-related policies and procedures to promote resilient housing in accordance with local and state building codes.</p>
84	<p>Please update, expand, protect our sewage plants. Boil water notices make recovery after a storm so much harder. We have to stop allowing waste into our bay. It's so bad for us, and for the sea life. I recently learned our bay is the "nursery of the sea". I would love to see our community along with our water continue to recover. I would love to see some sea grass planted to help aid in the recovery of the bay. Sewage is one thing everyone can agree on fixing -so we should start there.</p>	<p>Thank you for your comment. CDBG-DR funds may be used for eligible public infrastructure projects that address disaster-related impacts and benefit low- to moderate-income communities. Infrastructure improvements must meet federal eligibility criteria, including a demonstrated tie to the covered disaster and a clear public purpose.</p> <p>As part of ongoing recovery efforts, the County is also supporting long-term planning through the Local Mitigation</p>

		<p>Planning Program. Input received through this process helps inform the identification and prioritization of potential infrastructure projects aimed at increasing system resilience and reducing future risk.</p>
85	<p>If a homeowner receives a SBA non collateral LOAN for hurricane repairs would that disqualify you from receiving grant money from recover.pinellas.gov?</p>	<p>Thank you for your comment. We encourage all impacted residents to apply for assistance and have their application reviewed for eligibility. Additionally, per federal guidelines, the County is required to review all other assistance an applicant has received—including, but not limited to, aid from the Small Business Administration (SBA), the Federal Emergency Management Agency (FEMA), private insurance, and other sources—to ensure there is no duplication of benefits. This process is known as a Duplication of Benefits (DOB) review.</p>
86	<p>Residents of the city of St Petersburg should not be left out of the Homebuyer assistance program- we lost our homes too and the city of St Pete currently does not have funding for their program for residents above 80% AMI OR those able to purchase a Home within the SSCRA. Being a single mom with a moderate income, I keep getting left out if these programs due to being in this in between space- income that can't keep up with inflation to save enough for a down payment but making too much money for just a two person household according to the city. Please include</p>	<p>Thank you for your comment. Pinellas County excluded the City of St. Petersburg from its recovery programs because the City has received its own, dedicated CDBG-DR allocation. It's draft Action Plan for Disaster Recovery is open for public comment from May 23, 2025, to June 23, 2025.</p>

	city of st Pete residents in this program- our city isn't funding enough for us.	
87	We have a nonprofit in Oldsmar that serves Pinellas County and the surrounding counties, providing help for hurricane victims by providing home items. We provide all home necessities by delivering them to families that are recovering from homelessness, including hurricane victims. We always need help buying beds for families. We give about 200 away a month. Please consider us in your hurricane help planning. We work with every shelter and nonprofit in Pinellas County and the surrounding counties, including Metropolitan ministries, endeavors, and others thank you Stephanie XXXX	Thank you for your comment. We are proposing to support nonprofit service providers in Pinellas County to recover from these disasters under the Nonprofit Community Recovery Program. For more information on this, and other recovery programs, please visit recover.pinellas.gov .
88	I think Pinellas specifically largo and clearwater needs better resources for utilities assistance and rent. There is literally no help here when you are in a financial bind. Think about the residents with kids having disabilities specifically autism. I cannot work now that he has gotten bad i get no social security since its a long process and nobody will help me pay a electric bill because im not working and cannot afford to pay to have forms notarized (Pinellas urban league) its a very broken system compared to hillsborough and pasco. Not to mention the lack of programs for autistic kids.	Thank you for your comment.
89	Strategic Relocation Program I'm VERY interested in this help. However, this category does not specify the income limits. Are they the same? I'm under the 120%. Have been a FL educator for 32 years. Am stuck with a manufactured home that is uninhabitable and having to pay rent on top of the MHP payment. I'm in a Flood Zone A. MHP had 278 out of 333 homes substantially damaged (Gateway MHP). Damages will continue if I don't elevate (my home is too old to elevate). There are 5 brand new condo buildings built high and dry within a few feet of where they created a canal that runs through my yard. I don't own the property, but own the home. I need help. I have been displaced and have moved 3 times now since Helene. I've spent these months tangled up in endless red tape and appeals with FEMA.	Thank you for your comment. Pinellas County is aware of the devastating impacts the disaster had on the Gateway community, and other mobile home communities throughout the county. Case management will be provided to support applicants as they determine their best recovery pathway based on available programs. Further details on program requirements will be provided in the program guidelines. For more information on this, and other recovery programs, please visit recover.pinellas.gov .

90	<p>Please include the requirement for a green building certificate, including options for the Florida Green Building Coalition (FGBC) and NGBS, as a requirement for this rebuild program. This helps create a more resilient and affordable home, which in turn helps Florida as a whole and the homeowner. These programs help to create a more resilient and affordable home for the homeowner, and that helps create a better and safer place to live in the long run. Promoting green and energy efficient principals in rebuild programs help create long term resilience through self sufficiency and national security. Resilient and high-performance buildings make homeowners self-reliant at the times of natural disasters, reducing the impact of hazards and the need for large federal funds in recovery efforts. If residents can shelter in place during and immediately after a disaster, it reduces the burden on government resources, including emergency shelters, medical aid, and disaster response efforts, ultimately lowering overall recovery costs. Additionally, it minimizes displacement, preserves community stability, and accelerates economic recovery by allowing businesses and services to resume operations more quickly. Green programs have been included in rebuild policies since Hurricane Irma many years ago, and the Hurricane Michael program followed that same guidance. The Hurricane Sally program in Alabama produced resilient and efficient homes, and currently the Florida rebuild programs are doing the same.</p>	<p>Thank you for your comment regarding the inclusion of green building standards. While adherence to specific green building standards is no longer a HUD requirement, Pinellas County appreciates your input and will take it into consideration as we develop the program's construction-related policies and procedures to promote resilient housing in accordance with local and state building codes.</p>
91	<p>Please include the requirement for a green building certificate, including the Florida Green Building Coalition (FGBC) and NGBS, as a requirement for this rebuild program. This helps create a more resilient and affordable home, which in turn helps Florida as a whole and the homeowner.</p>	<p>Thank you for your comment regarding the inclusion of green building standards. While adherence to specific green building standards is no longer a HUD requirement, Pinellas County appreciates your input and will take it into consideration as we develop the program's construction-related policies and procedures to promote resilient housing in</p>

		accordance with local and state building codes.
92	<p>Please include the requirement for a green building certificate, including the Florida Green Building Coalition (FGBC) and NGBS, as a requirement for this rebuild program. These programs help to create a more resilient and affordable home for the homeowner, and that helps create a better and safer place to live in the long run. Promoting green and energy efficient principals in rebuild programs help create long term resilience through self sufficiency and national security. Resilient and high-performance buildings make homeowners self-reliant at the times of natural disasters, reducing the impact of hazards and the need for large federal funds in recovery efforts. If residents can shelter in place during and immediately after a disaster, it reduces the burden on government resources, including emergency shelters, medical aid, and disaster response efforts, ultimately lowering overall recovery costs. Additionally, it minimizes displacement, preserves community stability, and accelerates economic recovery by allowing businesses and services to resume operations more quickly. Green programs have been included in rebuild policies since Hurricane Irma many years ago, and the Hurricane Michael program followed that same guidance. The Hurricane Sally program in Alabama produced resilient and efficient homes, and currently the Florida rebuild programs are doing the same. Also, Green certification programs require third-party verification to ensure that homes meet all stated performance criteria. This provides critical quality assurance for public investments and reduces the risk of substandard construction. In post-disaster contexts, where local building departments are often overwhelmed, third-party verification helps jurisdictions confirm compliance and eligibility for reimbursement without stretching thin municipal resources. The modest upfront investment—typically just 1–3% of construction costs—is more than recouped through lower utility bills, fewer repairs, and reduced damage in future disaster events. These</p>	<p>Thank you for your comment regarding the inclusion of green building standards. While adherence to specific green building standards is no longer a HUD requirement, Pinellas County appreciates your input and will take it into consideration as we develop the program’s construction-related policies and procedures to promote resilient housing in accordance with local and state building codes.</p>

	homes are not only built to last—they're built to save. Builders also make better material and design choices thus reducing material waste or waste due to ineffective designs. Finally, Green-certified homes use better ventilation, moisture control, and low-emission materials, reducing indoor air pollution, mold, and allergens. This directly contributes to healthier residents and reduced public health burdens—especially for children, the elderly, and those with respiratory conditions.	
93	<p>Please include the requirement for a green building certificate, including the Florida Green Building Coalition (FGBC) and NGBS, as a requirement for this rebuild program. These programs help to create a more resilient and affordable home for the homeowner, and that helps create a better and safer place to live in the long run. Promoting green and energy efficient principals in rebuild programs help create long term resilience through self sufficiency and national security. Resilient and high-performance buildings make homeowners self-reliant at the times of natural disasters, reducing the impact of hazards and the need for large federal funds in recovery efforts. If residents can shelter in place during and immediately after a disaster, it reduces the burden on government resources, including emergency shelters, medical aid, and disaster response efforts, ultimately lowering overall recovery costs. Additionally, it minimizes displacement, preserves community stability, and accelerates economic recovery by allowing businesses and services to resume operations more quickly. Green programs have been included in rebuild policies since Hurricane Irma many years ago, and the Hurricane Michael program followed that same guidance. The Hurricane Sally program in Alabama produced resilient and efficient homes, and currently the Florida rebuild programs are doing the same. Also, Green certification programs require third-party verification to ensure that homes meet all stated performance criteria. This provides critical quality assurance for public investments and reduces the risk of substandard construction. In post-disaster contexts, where local building departments are often overwhelmed, third-party verification helps</p>	<p>Thank you for your comment regarding the inclusion of green building standards. While adherence to specific green building standards is no longer a HUD requirement, Pinellas County appreciates your input and will take it into consideration as we develop the program's construction-related policies and procedures to promote resilient housing in accordance with local and state building codes.</p>

	<p>jurisdictions confirm compliance and eligibility for reimbursement without stretching thin municipal resources. The modest upfront investment—typically just 1–3% of construction costs—is more than recouped through lower utility bills, fewer repairs, and reduced damage in future disaster events. These homes are not only built to last—they’re built to save. Builders also make better material and design choices thus reducing material waste or waste due to ineffective designs. Finally, Green-certified homes use better ventilation, moisture control, and low-emission materials, reducing indoor air pollution, mold, and allergens. This directly contributes to healthier residents and reduced public health burdens—especially for children, the elderly, and those with respiratory conditions.</p>	
94	<p>Would love to see the Pinellas County Home Repair and Independent Living Program open up again</p>	<p>Thank you for your comment.</p>
95	<p>I need help desperately. My home is still unlivable. I am 77 years old. My husband just passed on March 2 2025. I only have my SS check of around 1500.00 a month. Please send application for grant.</p>	<p>We are very sorry for your loss and appreciate the time you spent reviewing the action plan, and providing comments. The CDBG-DR Housing Recovery Program is being developed to assist eligible homeowners with storm-related damage. Once the program is launched, application details and support services will be made available to guide residents through the process. We appreciate your patience and participation as your recovery efforts move forward. Please go to recover.pinellas.gov for updates.</p>

Appendix D:

Standard Form 424

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

DRAFT

Application for Federal Assistance SF-424*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):***** Other (Specify):***** 3. Date Received:**

01/16/2025

4. Applicant Identifier:**5a. Federal Entity Identifier:****5b. Federal Award Identifier:****State Use Only:****6. Date Received by State:****7. State Application Identifier:****8. APPLICANT INFORMATION:***** a. Legal Name:**

Pinellas County, Florida

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

59-6000800

*** c. UEI:**

R37RMC63XKG1

d. Address:*** Street1:**

315 Court Street

Street2:*** City:**

Clearwater

County/Parish:*** State:**

FL: Florida

Province:*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

33756-5139

e. Organizational Unit:**Department Name:**

Housing & Community Developmen

Division Name:

Community Development

f. Name and contact information of person to be contacted on matters involving this application:**Prefix:**

Mr.

*** First Name:**

Bruce

Middle Name:*** Last Name:**

Bussey

Suffix:**Title:** Community Development Division Manager**Organizational Affiliation:***** Telephone Number:**

727-464-8257

Fax Number:*** Email:**

bbussey@pinellas.gov

Application for Federal Assistance SF-424

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

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

11. Assistance Listing Number:

14.218;14.228

Assistance Listing Title:

Community Development Block Grant - Disaster Recovery

* 12. Funding Opportunity Number:

N/A

* Title:

N/A

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

CDBG-DR - Administration, housing, economic development, infrastructure, and public services.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

FL013

* b. Program/Project

FL013

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

10/01/2025

* b. End Date:

09/30/2031

18. Estimated Funding (\$):

* a. Federal

813,783,000.00

* b. Applicant

* c. State

* d. Local

* e. Other

* f. Program Income

* g. TOTAL

813,783,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

Mr.

* First Name:

Brian

Middle Name:

* Last Name:

Scott

Suffix:

* Title:

Chair, Board of County Commissioners

* Telephone Number:

727-464-3360

Fax Number:

* Email:

brscott@pinellas.gov

* Signature of Authorized Representative:

ATTEST: KEN BURKE, CLERK

* Date Signed:

May 28, 2025

APPROVED AS TO FORMBy: Derrill McAteer
Office of the County Attorney

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.




PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

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

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL   ATTEST: KEN BURKE, CLERK By: 	TITLE Chair, Board of County Commissioners
APPLICANT ORGANIZATION Pinellas County, Florida	DATE SUBMITTED May 28, 2025.

Standard Form 424B (Rev. 7-97) Back

APPROVED AS TO FORM

By: Derrill McAteer
 Office of the County Attorney

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.




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NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal interest in the title of real property in accordance with awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure nondiscrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL   ATTEST: KEN BURKE, CLERK By: 	TITLE Chair, Board of County Commissioners
APPLICANT ORGANIZATION Pinellas County, Florida	DATE SUBMITTED May 28, 2025.

SF-424D (Rev. 7-97) Back

APPROVED AS TO FORM
 By: Derrill McAteer
 Office of the County Attorney