



Pinellas Recovers

Hurricane Help That Puts People First

Pinellas County Action Plan for Disaster Recovery

Hurricanes Idalia, Helene & Milton

4/23/2025



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Change Log

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Executive Summary

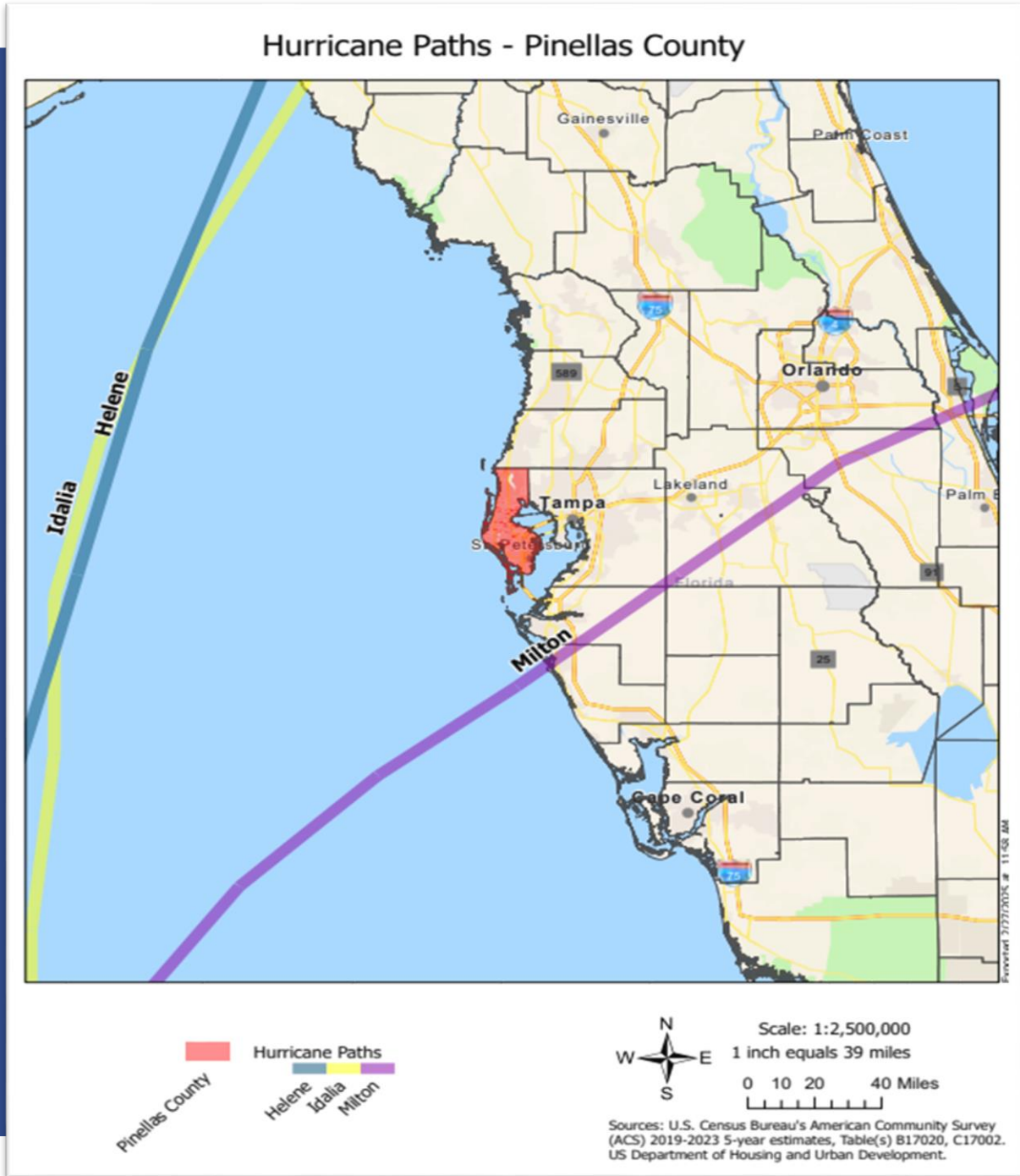
Overview

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).

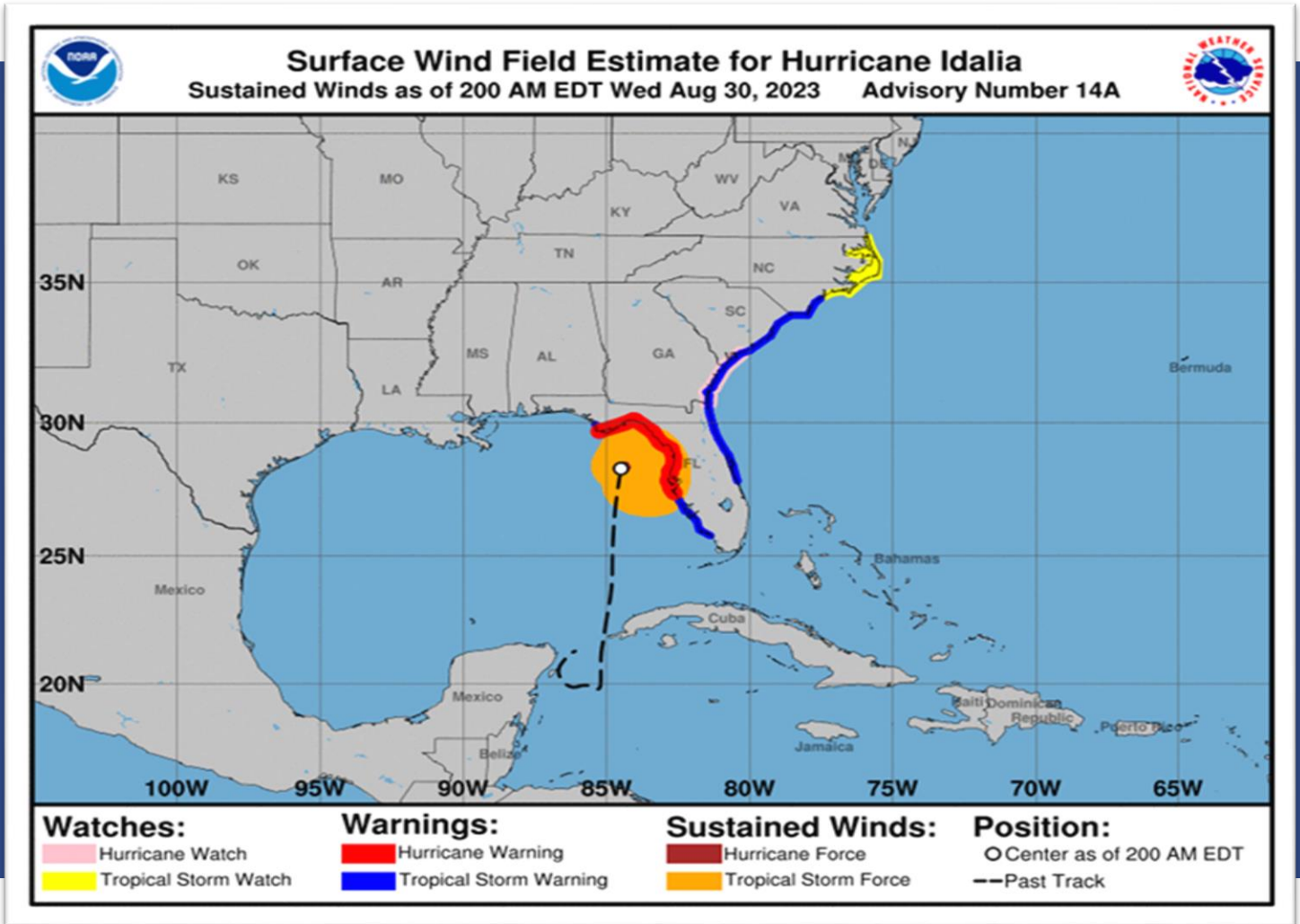
Disaster-Specific Overview

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.

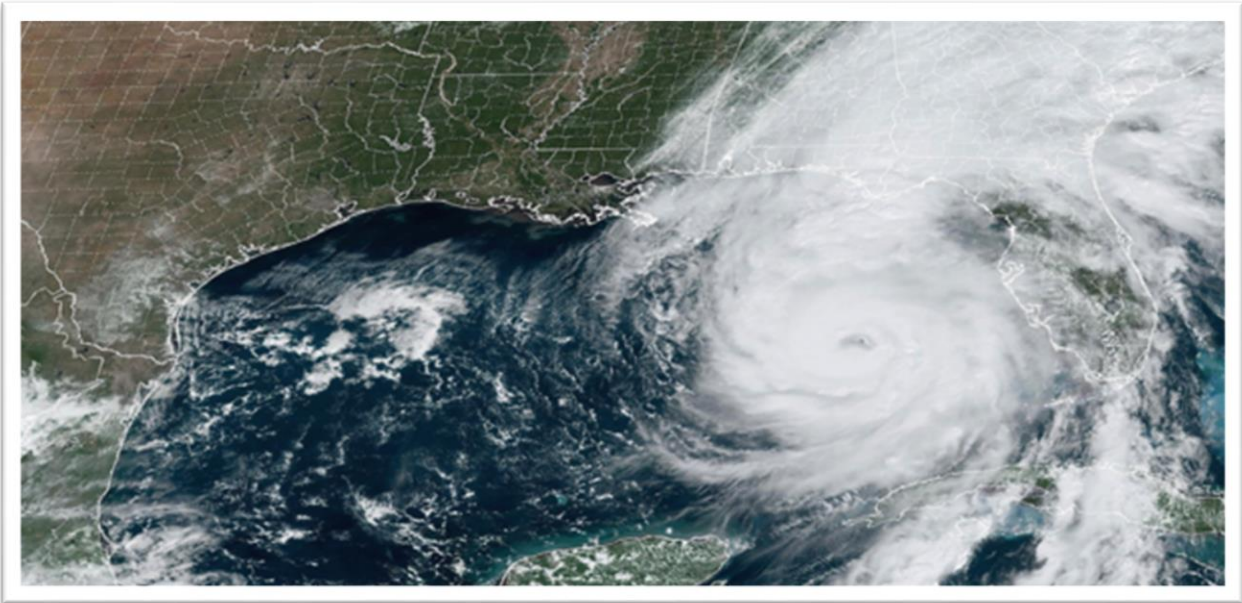


Figure 3: Satellite imagery Hurricane Helene (September 26, 2024)- Image courtesy of NOAA

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

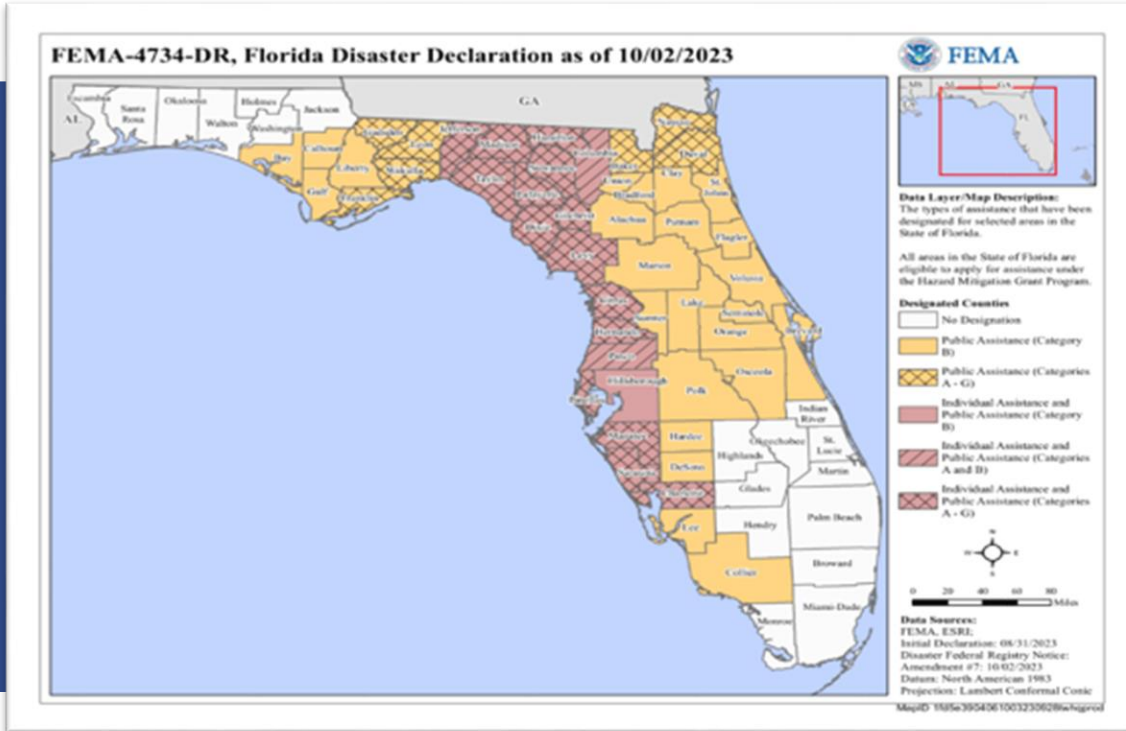
In the aftermath of the hurricane, 75% of Pinellas County experienced power outages. Damage to over 140 pump stations limited access to clean water. Additionally, areas such as St. Petersburg and Gulfport were placed under a boil water notice due to infrastructure damage, further complicating recovery 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

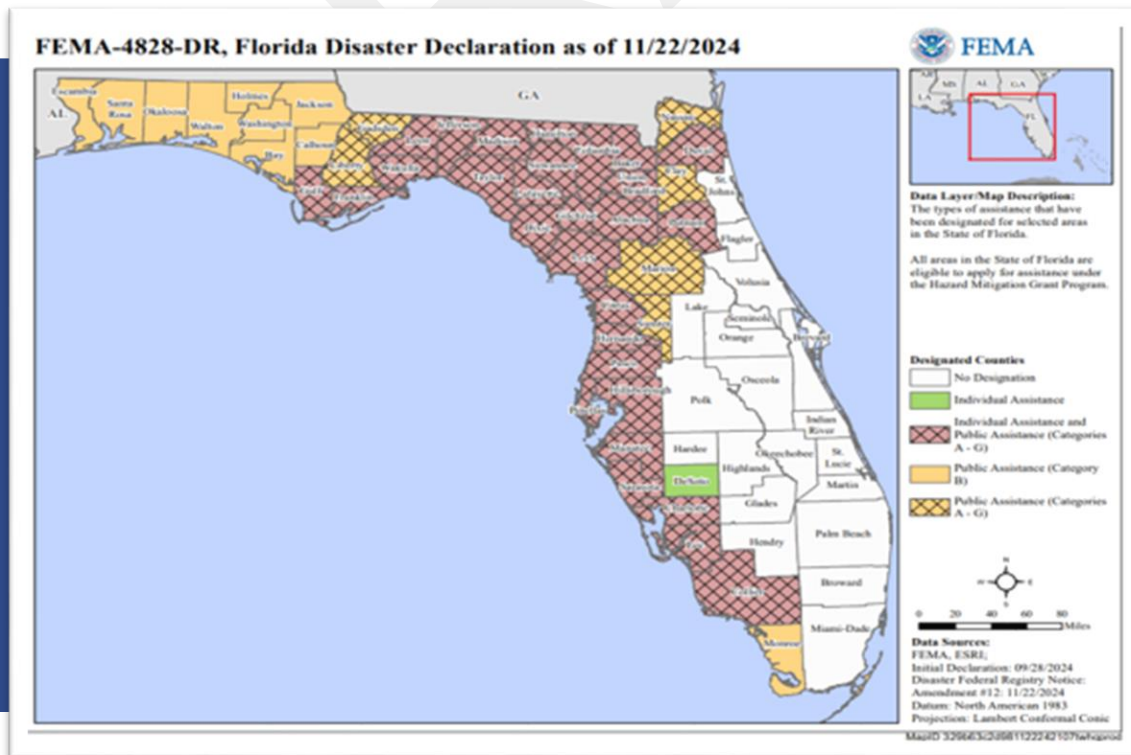
As required by the Federal Register notice, Pinellas County will spend 100% of its allocation in the HUD identified MID area, which includes all of Pinellas County except St. Petersburg, since the city received its own CDBG-DR allocation. Additionally, no less than 70% of the total allocation will be 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.

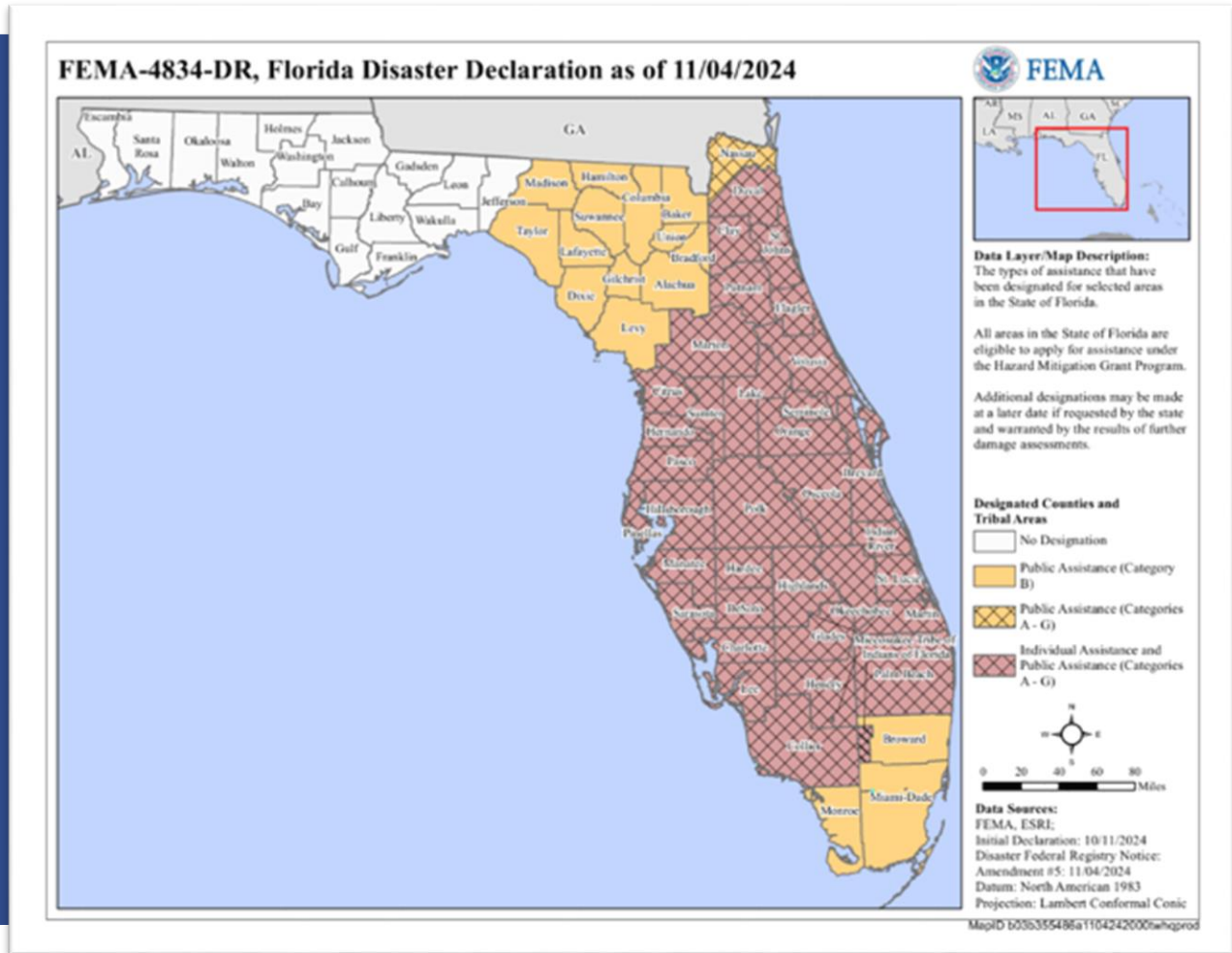
Each storm mapped below includes Pinellas County as a part of the Federal Disaster Declaration. HUD has therefore determined Pinellas County as one of the MID areas for the qualifying disasters, Hurricane Idalia (DR-4734-FL), Hurricane Helene (DR-4828-FL), and Hurricane Milton (DR-4834-FL).



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.



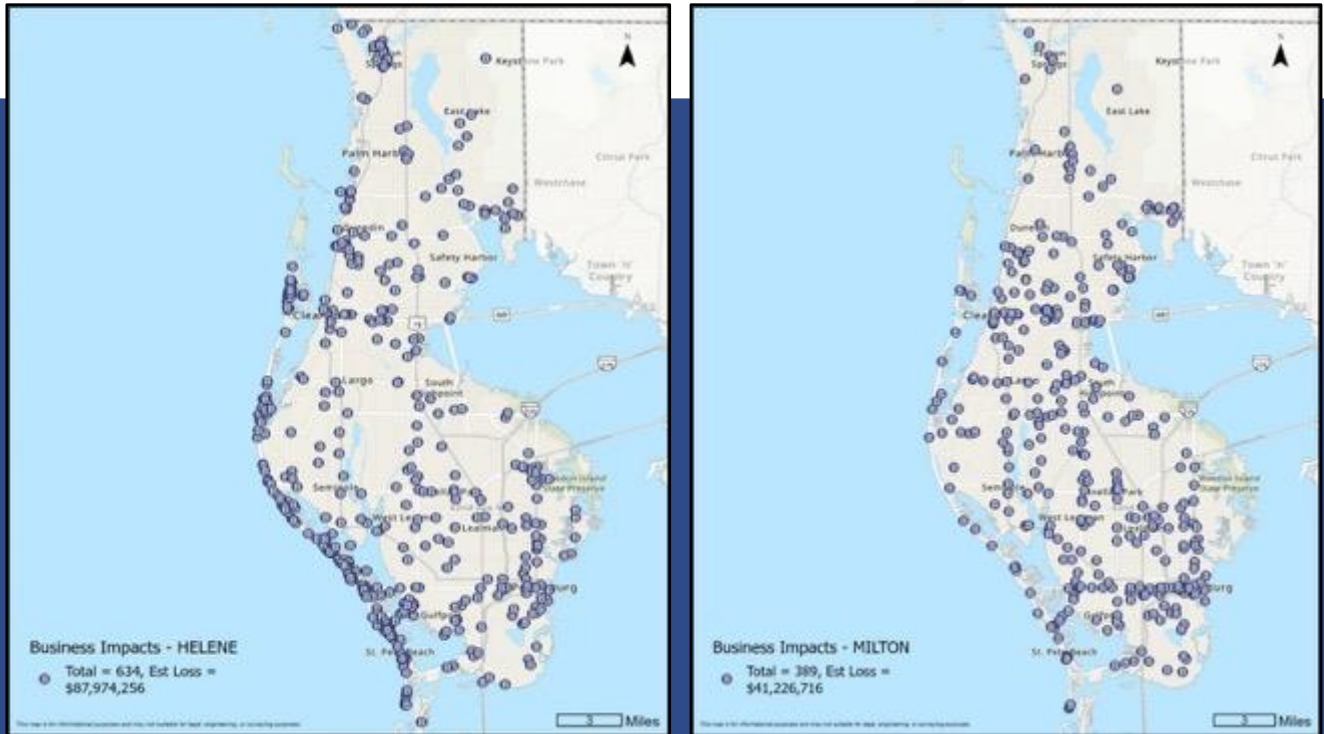
*Figure 7: Extensive beach erosion Pinellas County -
Photo Credit (Florida Department of Transportation (FDOT))*

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, only excluding the City of St. Petersburg. 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.

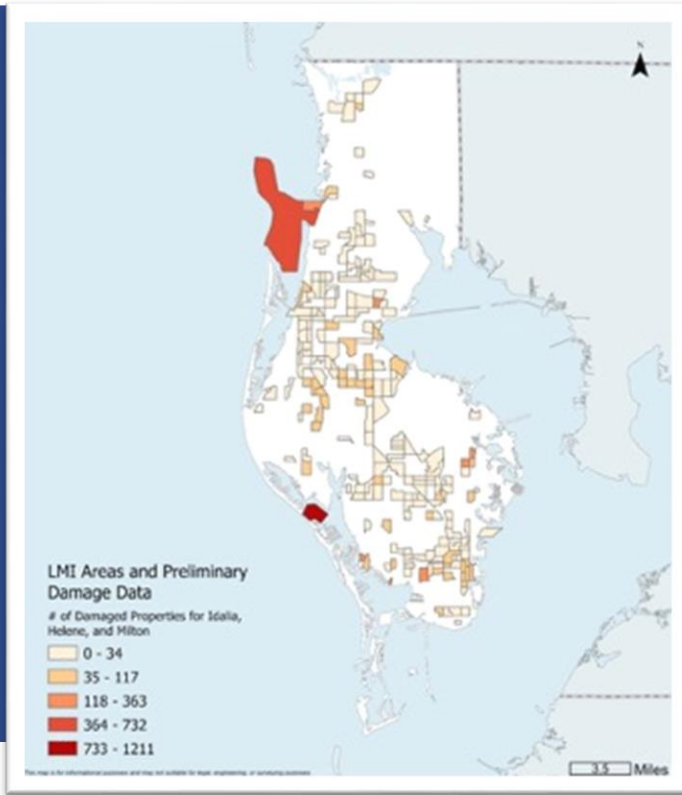
At this point in the recovery, housing is the dominant sector requiring recovery funding, with significant unmet needs concentrated on housing rehabilitation, reconstruction, and replacement efforts. However, the economy and public services support for LMI residents of Pinellas County is also representative.

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

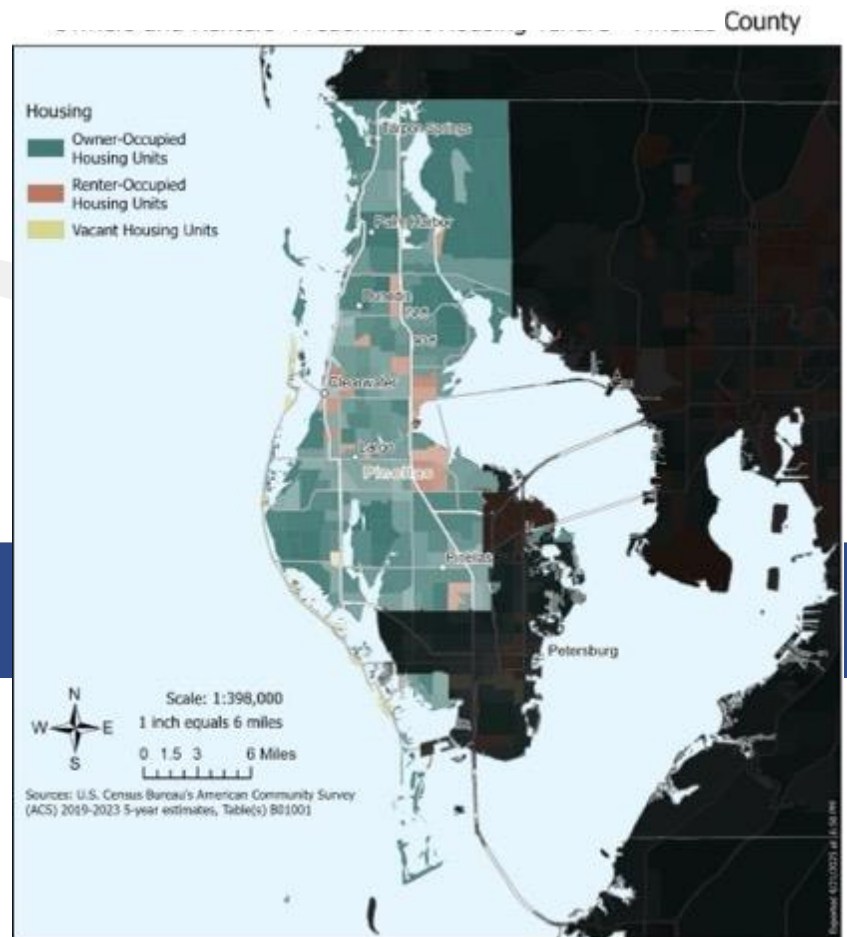
In Pinellas County, the affordable housing crisis has been further exacerbated by rising rents, stagnant wages, and increasing cost burdens. Over the past decade, the number of affordable rental units has declined sharply, placing greater pressure on existing housing stock. At the same time, median home 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, excluding St. Petersburg, 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

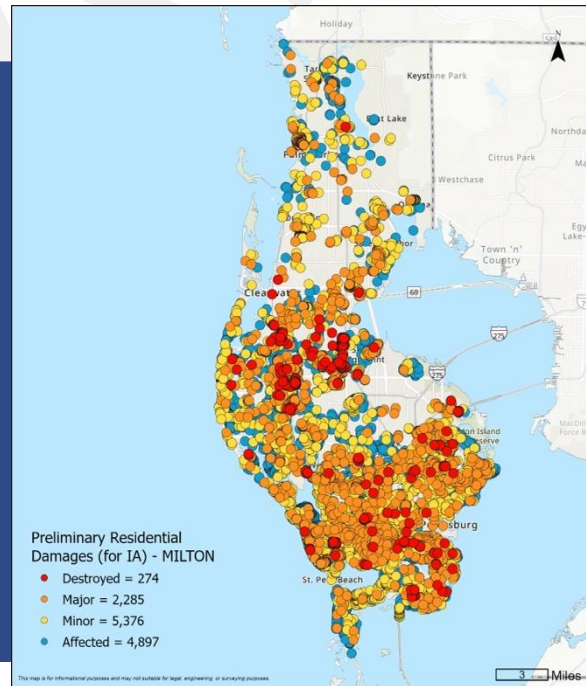
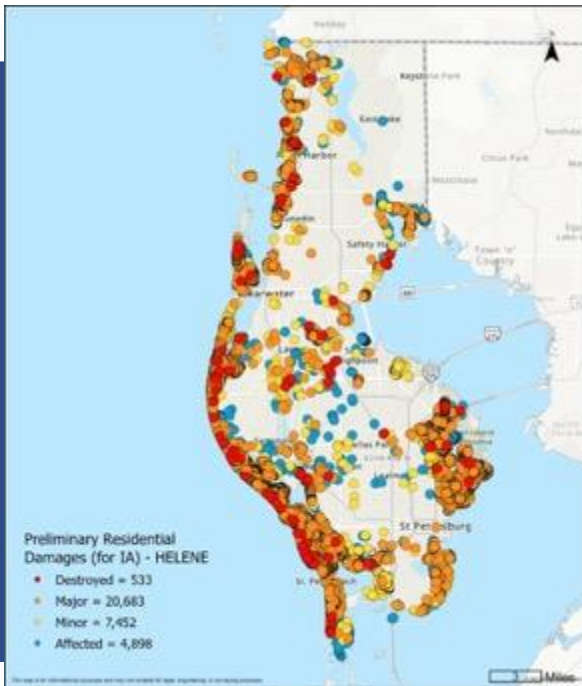
Housing Unmet Needs

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		
Major-Low to Minor-Low	\$ 131,711	14,504	\$ 1,910,329,474	\$ 435,466,952	\$ 3,088,394,522
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%

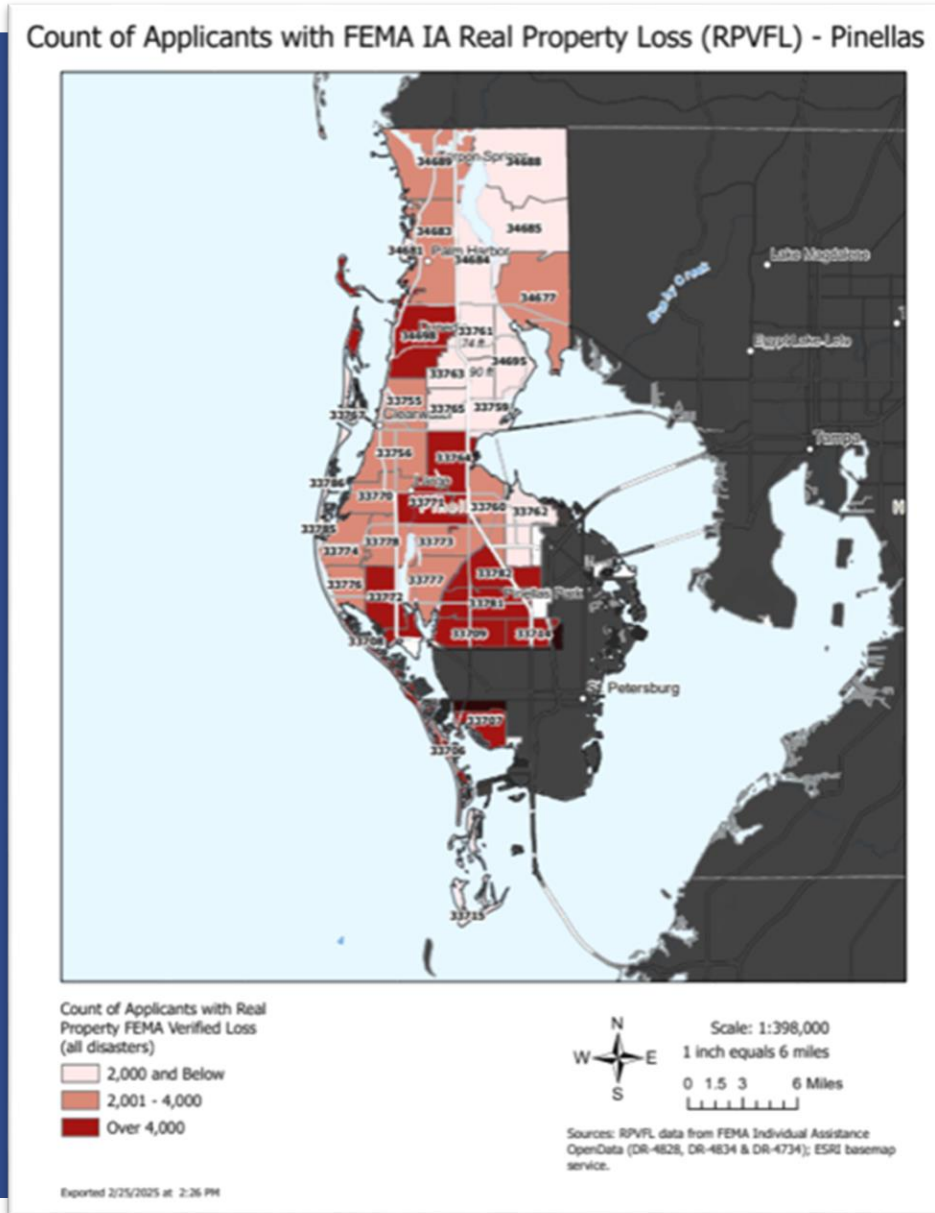
Table 10: Total Renter and Owner FEMA IA Applications for Pinellas County

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 mobile 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

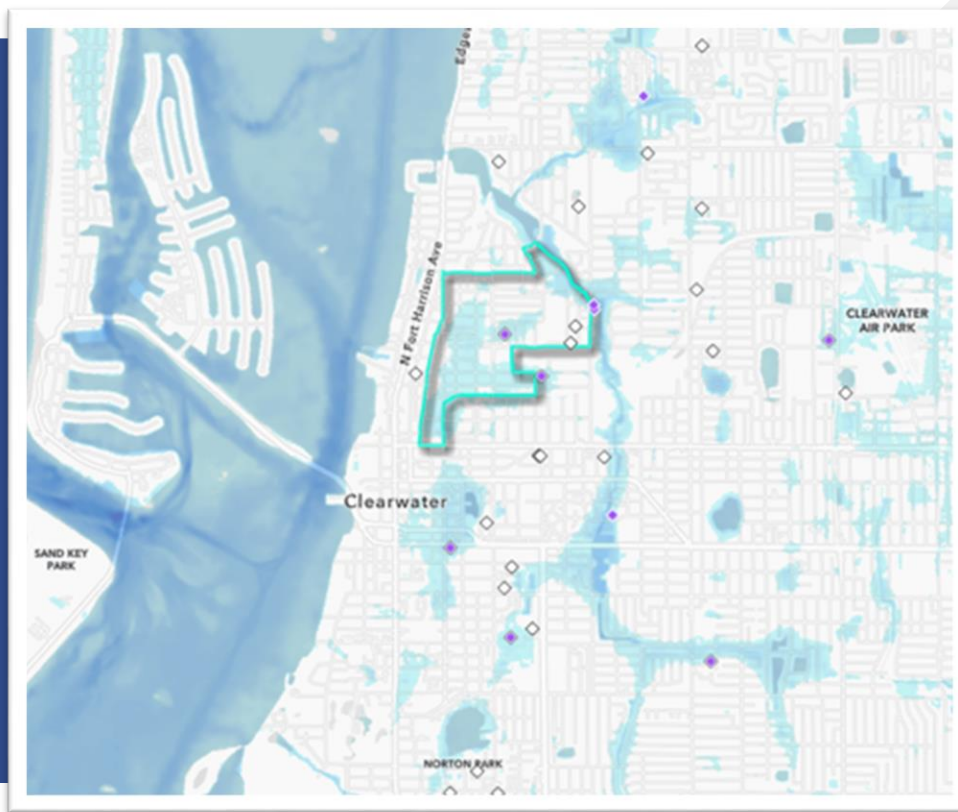
In Pinellas County, a significant number of disaster-affected households experienced flood damage without having flood insurance. A total of 164,594 applicants reported flood damage but did not have flood insurance coverage. Of these, 10,546 applicants had FEMA-verified losses for real or personal property, 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.

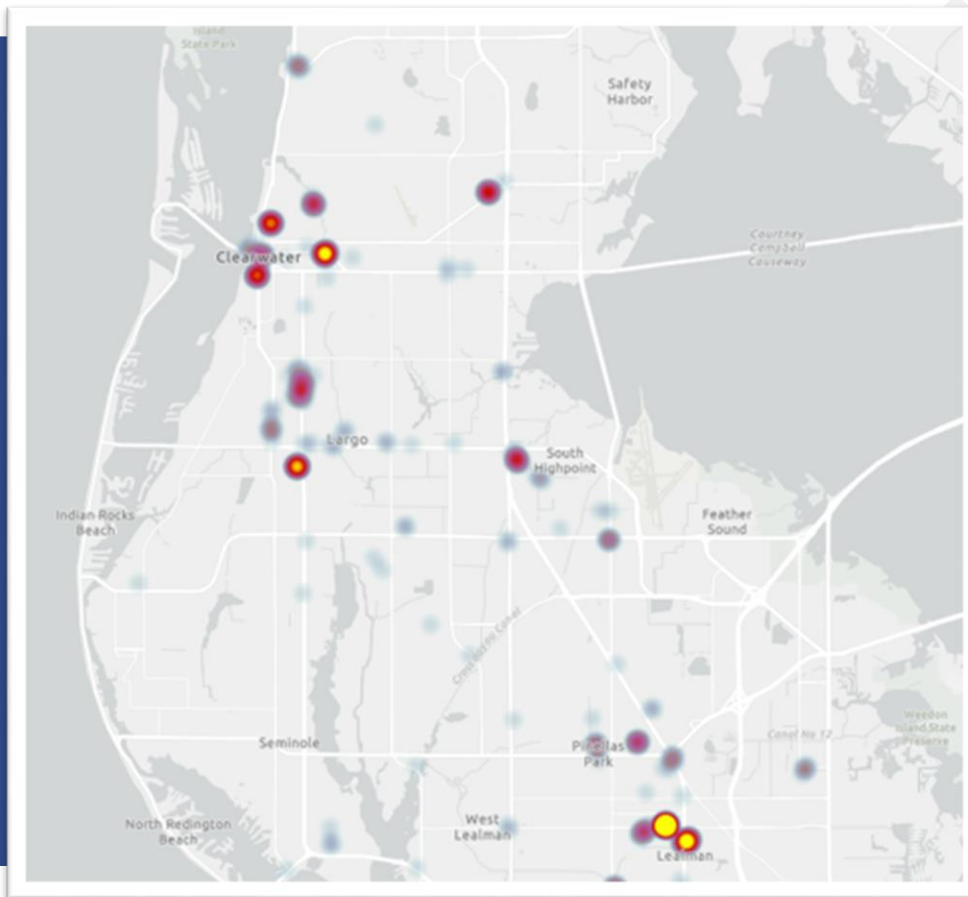


Map 12: Multifamily Assisted Properties located in the Army Corp of Engineers Flood Inundation Model, Source: USACE, National Housing Preservation Database (NHPD)

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.

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.

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

- **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) - 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.

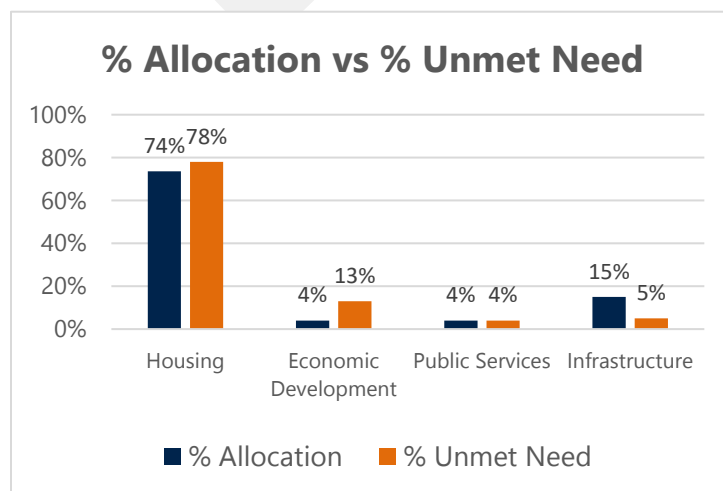
In summary, FEMA IA/ONA and unemployment benefits are capped and time-limited, and do not account for the full duration or cost of recovery-related hardship. Further, while FEMA and ONA assistance totaled \$163 million, the County estimates a remaining hardship-related unmet need

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.

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.

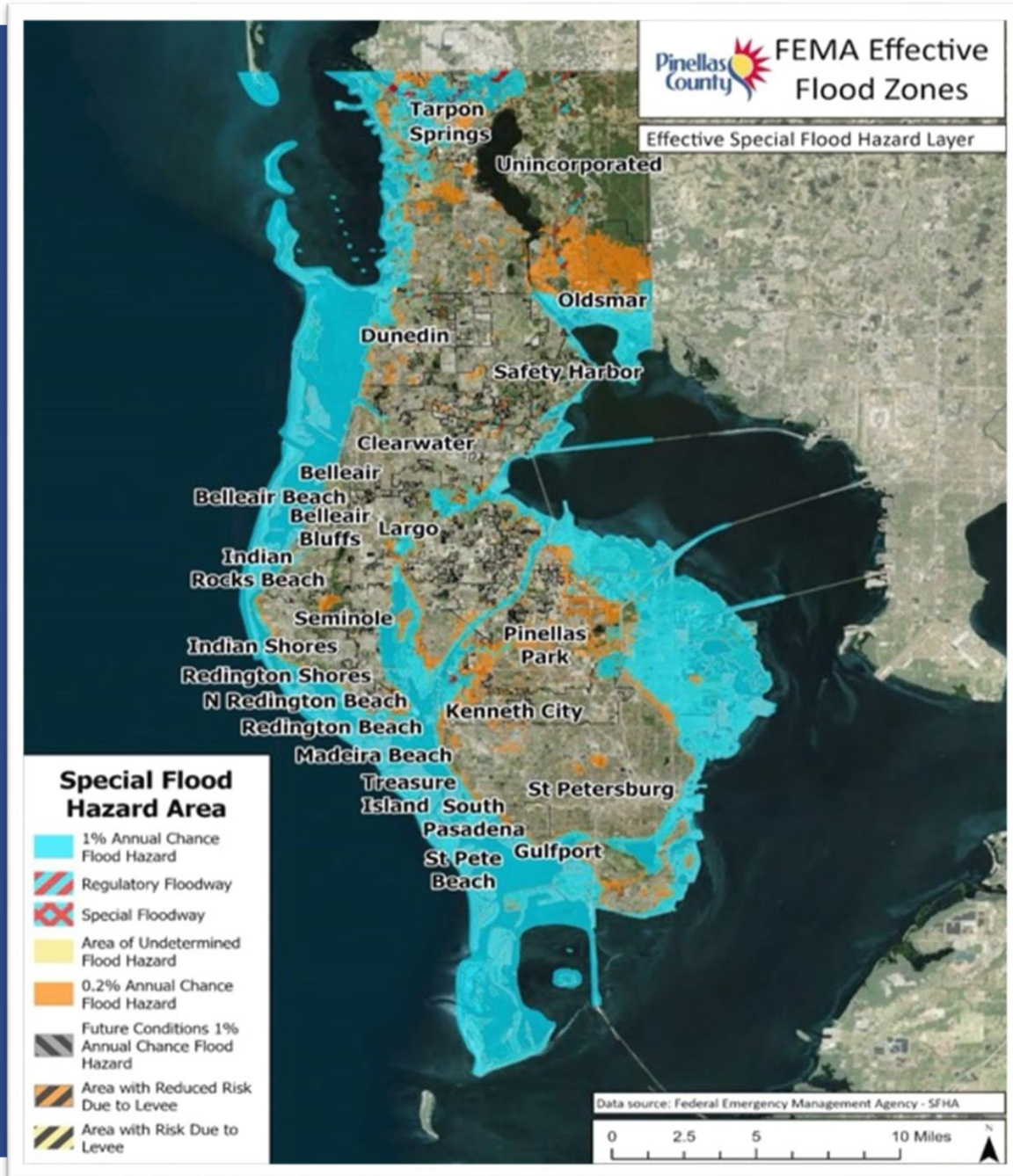
Pinellas County has 10 dams identified within the National Dam Inventory, with two of them being identified as "high," three as "significant," and the remaining five as "low".

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.

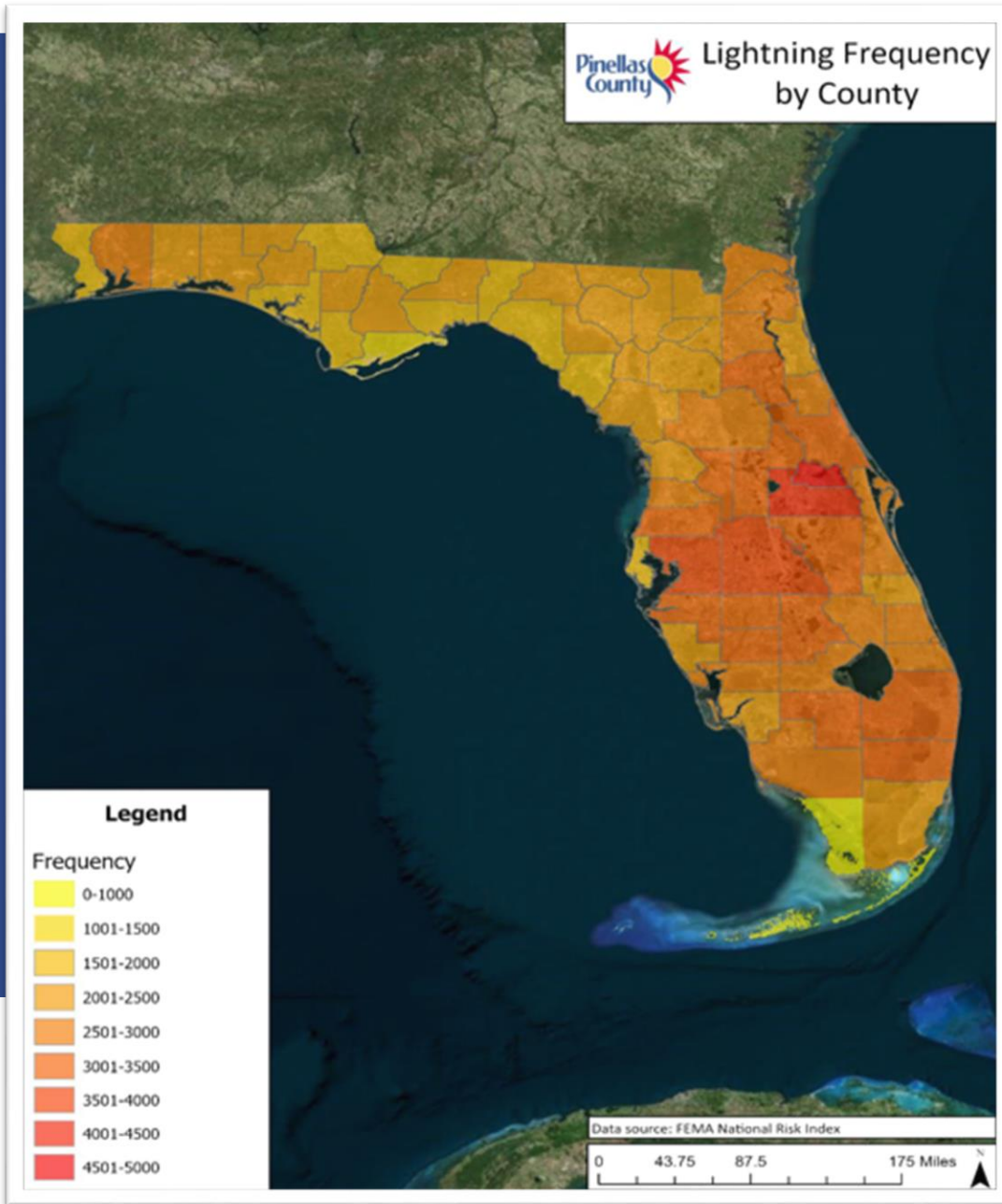
Straight Line Winds: Severe Storms often include strong winds that are called “straight-line” winds and are different than the winds in tornadoes. These damaging winds exceed 50–60 mph and can reach up to 100 mph. Damage from these winds is more common than damage from tornadoes in the continental United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

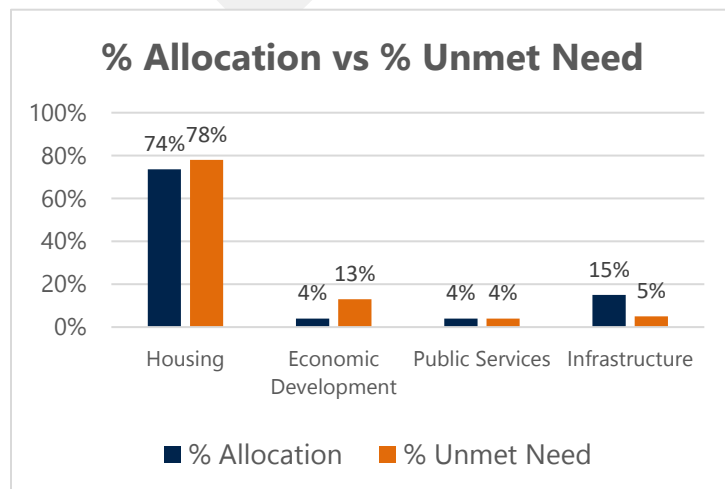
Table 31: CDBG-DR Mitigation Set-Aside Needs Assessment

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 9: 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%
Infrastructure (CDBG-DR Mitigation Set-aside)	\$ 106,146,000	0%	100%	100%	50%
Economic Revitalization	\$ 32,147,393	5%	0%	100%	80%
Public Services	\$ 32,147,392	5%	0%	100%	100%
TOTAL	\$ 813,783,000	100%	15%	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

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), 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 United States 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

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 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, and outside the geographic boundaries of the City of St. Petersburg.

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.

Reducing Impediments for Assistance: The Homeowner Rehabilitation and Reconstruction Program is available to all Pinellas County homeowners (excluding St. Petersburg) 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 (excluding St. Petersburg) 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, Pinellas 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.

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.

Reducing Impediments for Assistance: The Local Landlord Program is available to owners of eligible properties in Pinellas County (excluding St. Petersburg) 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.

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—excluding those within the City of St. Petersburg—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—excluding those residing within the City of St. Petersburg—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 (excluding St. Petersburg) 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.

Reducing Impediments for Assistance: The Small Business Community Recovery Program is available to all eligible small businesses in Pinellas County (excluding the City of St. Petersburg) 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.

Reducing Impediments for Assistance: The People First Nonprofit Recovery Program is available to all eligible nonprofit organizations in Pinellas County (excluding the City of St. Petersburg) 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.

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.

Local Mitigation Planning Program

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR 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, engage 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 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 (excluding the city of St. Petersburg). 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

DRAFT

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 country'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.	<p>Disaster Impacts:</p> <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.	<p>Assistance Received:</p> <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.	<p>Remaining Unmet Needs:</p> <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.	<p>Resiliency, Mitigation and Infrastructure:</p> <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.	<p>Additional Feedback:</p> <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.

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

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

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
Hearing #5	5/15/2025	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 and program costs, as applicable. 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
- CDBG-DR Eligible Program Costs

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.

- o **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

Consideration of Public Comments (Place Holder)

DRAFT

Appendix D:

Standard Form 424

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

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